

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL

WESTERN ZONE BENCH AT PUNE

APPEAL NO. 19 OF 2025

**IN THE MATTER OF:**

VIJAYKUMAR KARSANBHAI GADHAVI AND ORS.

....APPELLANTS

VERSUS

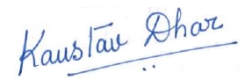
UNION OF INDIA AND ORS.

....RESPONDENTS

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**THROUGH**



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**PLACE: PUNE / NEW DELHI**

**DATE: 13.05.2026**

**MOST RESPECTFULLY SHOWETH:**

The Appellants have challenged the Environmental Clearance dated 12.12.2024 granted by the MoEF&CC to M/s Greenfield Chemical Complex Ltd (GHCL) for the proposed production of 11,00,000 TPA capacity of Light Soda Ash 5,00,000 TPA capacity of Dense Soda Ash and 2,00,000 TPA capacity of Sodium Bicarbonate. This note is only in Rejoinder to the Submissions made by R4 in its Written Submission dated 14.04.2026.

The Project Proponent has correctly stated in its Written Submission that the manner of obtaining EC is “**Unique and Peculiar**” [Para B(x) Pg.5391]. It is clearly ‘unique’ in the manner in which the edifice of the Project rests on not one but a bundle of lies, false statement and concealment which clearly attracts Para 8 (vi) of the EIA Notification, 2006 making not only the EC to be quashed but also action should be taken against all those involved in the process including the EIA Consultant, the Members of the EAC and officials of the MoEF&CC. The casual and lackadaisical manner in which the Project Proponent has interpreted the EIA Notification, 2006 to suit itself makes a mockery of the process and can be termed not as ‘Rule of Law’ but ‘Rule of Men’ to use the expression applied by the Hon’ble Supreme Court in **Rojer Mathew vs. South Indian Bank Ltd., (2020) 6 SCC 1** [Para 359, Pg. 5374]. The members of the EAC, who were supposed to be custodians of public interest and environment, instead of being watchdogs behaved like meek lambs being taken for slaughter as laid down by the Hon’ble High Court of Himachal Pradesh in **Him Parivesh vs. Union of India (2012) SCC OnLine HP 2690** [Para 100 (i) Pg. 5264].

The Project Proponent has strangely prayed for dismissal of the Appeal *in limine* at the stage of final hearing after multiple hearings on the Appeal. It has stated that they have ‘a legitimate expectation’ [Para 3 (5) Pg. 5396 of the Written Submission] for grant of EC despite not following the legitimate process. It further contends that the EC is valid despite the fact that there has been only ‘substantial compliance’ [Para B (1) (xvii) Pg.5393] and not full and complete compliance with the law. To make it worse, the Project Proponent has admitted that they have not followed the Siting Criteria since it came into effect in 2022 only and that they would have followed the same if the same was in force before [Para 7(ii) Pg. 5401 of the Submissions] However, the fact is that prior to 2022, the Siting Criteria was very much in existence (since 2006) and had the same restriction as the 2022 Notification.

The Project has been approved based on an EIA that was prepared by CSIR-NEERI, a Non Accredited EIA Consultant and the Public Hearing took place based on the illegal EIA Report. Project Proponent blatantly lied at the Public Hearing by stating that they had valid Accreditation. [Para A(1) of Note on Public Hearing Pg. 5307]. The ZSI Report on Turtle was used for seeking Environmental Clearance despite the disclaimer of the ZSI Report itself says that their findings are not legally binding to issue any statutory clearances. [Pg. 399 of Appeal Para 3]; the EAC on its part ‘revalidated’ the illegal CSIR NEERI report by allowing an accredited EIA Consultant to ‘own’ the report; something which is impermissible under the EIA Notification, 2006. The following are the Response to the main issues highlighted in the reply of the Project Proponent:

**1. Admission by the Project Proponent that some of the Appellants are Aggrieved Persons:**

The Project Proponent even though has raised legally untenable objections to the fact that Appellant Nos. 1, 3 and 4 are not residents of Bada Village and hence are not “Aggrieved Parties”, but has not raised any objections with respect to Appellant Nos. 2 and 5. Even with respect to Appellant No.3 Bharat Gala, the Project Proponent has admitted that he is an owner of land at Bada Village in which the impugned project is located. Thus, even as per the own statement of the Project

Proponent both Appellant No. 2 and Appellant No. 3 are connected to Bada Village. Irrespective of the above facts, the question as to who is an aggrieved person for the purposes of Section 16 of the NGT Act has been well settled by the Hon'ble Supreme Court and the Hon'ble Tribunal in a catena of cases.

- [See Para 164 of **Hanuman Laxman Aroskar vs. UOI** @Pg 4992 of the Compilation of Judgments by Appellants].
- [See Para 18 of Judgment in **Save Mon Region Federation vs. UOI (M.A. 104/2012)** also reiterated in **Medha Patkar vs. MoEF (2013 SCC OnLine NGT 63)**]
- [See Para 27, 28, 29 of **Samata vs. UOI 2013 SCC OnLine NGT 101**]
- [See Para (a) **Vimal Bhai vs. MoEF Appeal No. 5 of 2011**]

**2. Admission by the Project Proponent that NEERI does not have accreditation to conduct EIA studies for Soda Ash**

The Project Proponent in its submission has admitted that the NEERI does not have accreditation for Soda Ash [Para 4A (viii), Page 5384]. It has stated that 'NEERI has accreditation for Chlor Alkali'. The Project Proponent has not shown any Law, Notification, Office Memorandum which considers Soda Ash and Chlor Alkali as the same sector for purposes of EIA. The only reason given by the Project proponent is that NEERI did studies for other major players such as Tata Chemicals, Nirma and RSPL. The Project Proponent has overlooked the fact that a wrong and illegal action by 'a major player' does not create a legal precedent in the absence of statutory provision.

**3. Violation of OM dated 18.3.2010 of MoEF&CC which confines Accredited EIA Consultants to undertake EIA Studies for only those sectors they are accredited**

The Project proponent has violated the Office Memorandum dated 18.03.2010 issued by MoEF&CC which clearly states that an EIA Consultant "would be confined" only to the Accredited Sector for undertaking EIA studies. Therefore, an EIA Consultant accredited for Chlor Alkali Industry undertaking EIA studies for Soda Ash is in direct contravention of the Office Memorandum dated 18.3.2010 issued by the MOEF&CC. The relevant part is hereby reproduced:

*"3(i). A Consultant would be confined in the consultancy only to the accredited sectors and parameters for bringing in more specificity in the EIA document".*

Copy of the Office Memorandum dated 18.03.2010 of MoEF&CC is annexed as **Annexure A/1.**

**4. Consultants are barred from undertaking EIA Studies for which they are not Accredited and are liable to be penalised**

It is also pertinent to note that the QCI-NABET document of July 2015 titled Scheme for accreditation of EIA Consultant Organizations Version 3 in Para 7.5 categorically states that if a consultant conducts EIA in Sectors for which no accreditation has been granted, strict action may be taken, including cancellation of accreditation in other sectors:

*"Taking up EIAs in sectors and/or category for which the consultant organization has not been accredited will attract a non-conformance. Repeat Non-Conformance on the same issue may invite strict action including cancellation of accreditation/approval against the Accredited Consultant Organizations (ACO) as well as the expert concerned".*

Copy of the July, 2015 Document titled Scheme for accreditation of EIA Consultant Organizations Version 3 is annexed herein as **Annexure A/2.**

**5. Soda Ash and Chlor Alkali are distinct Sectors under QCI -NABET Scheme**

It is pertinent to note that the Annexure II of the QCI-NABET document dated July 2015 titled "Scheme for Accreditation of EIA Consultant Organizations, Version 3" distinctly classifies sector-specific projects requiring separate NABET accreditation. Under Serial No. 13, "Chlor Alkali Industry" is identified as Category 4(d) whereas under Serial No. 14, "Soda Ash Industry" is separately

identified as Category 4(e). The distinct classification of “Chlor Alkali” and “Soda Ash” industries demonstrates that each sector requires independent and specific NABET accreditation. Therefore, the contention by Respondent No. 4 that NEERI’s accreditation for the Chlor Alkali sector is sufficient for undertaking EIA studies relating to the Soda Ash industry is wholly untenable and contrary to the accreditation framework of 2015 itself. Further, it is pertinent to note that the MoEF&CC has come up with a Sector Specific EIA Manuals for Chlor Alkali (Aug, 2010) and Soda Ash (Sep, 2010) which are distinct in nature. For Sector Specific EIA Manual for Chlor Alkali and Soda Ash please see visit ([https://environmentclearance.nic.in/report/User\\_eia\\_manuals.aspx](https://environmentclearance.nic.in/report/User_eia_manuals.aspx)) Copy of the Cover page of Sector Specific Manual for EIA for Chlor Alkali and Soda Ash by MoEF&CC is annexed herewith as **Annexure A/3.**

6. **Admission by the Project proponent that they have violated EIA Amendment dated 3.3.2016 with respect to Accredited EIA Consultant since NEERI is not notified by MOEF&CC nor accredited by NABET:** The Project Proponent has referred [Para B1, Page 5386] to the Notification stating that EIA report can be prepared either by QCI - NABET Accredited Agency or ‘any agency notified by the MoEF&CC’. Thus, to be a valid EIA report it must either be through an Agency that is NABET Accredited or Notified by MoEF&CC. While admitting that NEERI is not accredited by NABET for Soda Ash, the Project Proponent has not shown any document showing that NEERI has been notified by the MoEF&CC for undertaking EIA studies for Soda Ash. The Project Proponent has also admitted in [Para B II Page 5387] that NEERI is not specifically mandated soda ash accredited consultant and that only TR Associates is.
7. **False Submission that there was no Sector Specific EIA Consultant at the time of Scoping:** The Project proponent has stated that ‘at the stage of application for the Terms of Reference, they have duly clarified to MoEF&CC the engagement of CSIR NEERI, as there was no sector specific soda ash accredited or notified consultant’ [Para iv, Page 5388 of the Written Submission by the R-4/ PP]. However, the Application for seeking Terms of Reference under Scoping exercise was submitted on 6.8.2021. The Terms of Reference was granted on 10.8.2021 [MoEF&CC Reply, Page 2505]. However, two other EIA Consultants namely, M/s Kadam Environmental Consultants, Vadodara and M/s Aqua Air Environmental Engineers Pvt. Ltd. Suart both in the State of Gujarat itself were accredited for conducting EIA Studies for Soda Ash by QCI - NABET in December, 2019 i.e. two years prior to scoping itself as per the reply filed by the Project Proponent itself. [See @Pg.2051 @ Annex R/36 of Counter Affidavit by R4]. It is therefore completely false that ‘there was no sector specific soda ash accredited or notified consultant’ in 2021 where scoping was undertaken. Even when the baseline Data was collected i.e., December, 2019, there were these three EIA Consultants in Gujarat itself that had valid Accreditation for Soda Ash and despite being fully aware, they went ahead with a non-accredited consultant. The Project Proponent is silent on this.
8. **Project proponents Reliance on Work Order issued in 2018 overlooks the fact that the same has been declared as illegal on the ground that NEERI could not have accepted the work order for a Sector they were not accredited:** It is precisely on this ground - accepting work order despite not having valid accreditation - that CSIR NEERI was disqualified from seeking accreditation for soda ash for six months. (See @Annexure A/5, @Pg. 127). The Project proponent is in fact seeking to legitimize a process that has already been declared as illegal by QCI -NABET.
9. **OM dated 8.6.2022 allows Revalidation only of outdated Baseline Data and not of EIA Report prepared by Unaccredited EIA Consultant:** It is also to be noted that the MoEF&CC OM dated 08.06.2022 permits only revalidation of outdated baseline data through one season of fresh non-monsoon data. It does not authorize revalidation of an entire EIA report originally prepared by a

non-accredited consultant by subsequently engaging an accredited one. (See @Annexure A/12 @ Pg. 236 of Appeal) (See Para No. G of Pg. 15 of the Note on Accreditation filed by Appellants).

**10. The Project Proponent has implicitly accepted the fact that the Judgment of the Hon'ble Tribunal in Akhil Bhartiya Jeev Raksha Bishnoi Sabha & Ors. vs. Union of India and Ors. so far as accreditation of EIA Consultant is concerned is per incurium:**

The Project Proponent in its submissions has stated that 'The said Judgment cannot be considered as *per incurium* as the same has been delivered on 24-09-2018 by a five Judgment (sic) bench of the NGT and duly notes compliance with the procedure in the EIA Notification, 2006' [Para B (1) (xv) Page 5392]. However, the fact that the Judgment makes no reference to the EIA Amendment Notification of 03.03.2016 which made accreditation of EIA consultants mandatory has been overlooked by the Respondent No. 4. Mere reference to EIA Notification, 2006 will not suffice when the relevant amendment took place on 3.3.2016. Akhil Bharaitiya Jeev Rakasha makes no mention of the 3.3.2016 Amendment even though the Judgment was delivered in 2018. The Supreme Court Judgment in **BDA vs. Sudhakar Hedge 2020 15 SCC 63** which emphasises on the mandatory requirement of Accredited EIA Consultant overrides NGT Judgment in Akhil Bharitiya Jeev Raksha Bishnoi Sabha. It need not be highlighted that judgment of the Hon'ble Supreme Court will be binding as opposed to the Judgment of the NGT which is *per incurium*.

- **BDA vs. Sudhakar Hegde, (2020) 15 SCC 63** - (See Relevant Para 62-65 & 99 @Pg. 4695, 4696, 4709)
- **Sreeranganathan K.P vs. Union of India & Ors. 2014 SCC OnLine NGT 5631** which is also upheld by the Hon'ble Supreme Court – (See Para 151(i) (vi), 152 @ Pg. 4613, 4618, 4619 of Compilation of Judgments by Appellants).

**11. CSRI-NIO had no NABET ACCREDITATION to conduct Marine EIA for a Non Accredited EIA Consultant:**

The Project Proponent stated that they engaged CSIR NIO for "Additional Studies" to "Supplement CSIR NEERI Report" [Para 2 (ii) Page 5394]. However, in a self-contradictory statement which amount to admission of illegality, the Project Proponent has stated as follows:

*"No Restriction as per May, 2012 Letter of NABET.....on NIO to undertake specialised studies with accredited agencies. In the present case, a specialised study was undertaken along with CSIR -NEERI, who has a valid accreditation for Chlor Alkali projects"*.

Thus even the project proponent has admitted that specialised study can be done with only an accredited agency. In the present case, CSIR NEERI did not have accreditation for Soda Ash (while other agencies had accreditation). Therefore CSIR NIO could have done specialised studies in association with Soda Ash accredited Agencies. [See Para A (1)(2)(3)(4) of Note on NIO Pg. 5272]

**12. EC is granted in violation of Siting Criteria Guidelines of GPCB:**

The Project Proponent has admitted that the Siting Criteria of 2022 has not been followed since "site selection was carried out between 2018-2021 and that reliance on Circular dated 05-06-2022 is misplaced as the same came into being much after the site selection, grant of Terms of Reference and cannot be retrospectively applied" [Para 7 (ii) Page 5401]. However, the Project proponent has overlooked the wording of the Circular on Siting Criteria dated 5.6.2022 which it is stated that it is in cancellation/ suppression of the earlier Siting Criteria of 12.04.2006. The Siting Criteria of 2006 also had a similar restriction i.e., **a minimum distance of 500 metres from the River**. The relevant part of the 2022 Notification reads:

*"After due consideration of the representations received, by this office from time to time regarding the siting criteria for establishment of industrial units, circulars of various government departments and orders of eminent courts etc. the Board's earlier Circular No. G.P.N. Board / Circular / N.A./R.J./1/06/10253 dated 12.04.2006 is hereby cancelled.*

*Henceforth, the following siting criteria will be applicable in case of setting up of new industrial units / expansion of units”*

It is submitted that the Siting Criteria Guidelines dated 12.04.2006 issued by the Gujarat Pollution Control Board, which were in force during which the site selection as carried out. Notably, the said Guidelines also provide that: “The site must be at least 500 meters away from water bodies such as rivers, streams, lakes, reservoirs, canals, etc.”

Copy of the Siting Criteria of GPCB dated 12.04.2006 is annexed herewith as Annexure A/4.

- 13. Project Proponent’s false submissions regarding distance from Vengani River:** The Project Proponent has nowhere denied that the Project Site is Adjacent to the Vengani River in violation of the Siting Criteria and that it had not made a false declaration that the nearest river is at a distance of 500 metres. [Detailed Note on the Siting Criteria is given in Note Page 5286 Para C and E] (See Satellite Imageries @Annexure A/23 @Pg. 349 and 351 marked in “BLUE”. Also see Pg. 5377 & 5378).
- 14. Project Proponent’s wrongful reliance on studies of NIO & ZSI which are non est in the eyes of law:** The Project proponent has wrongly cited studies which are ‘non est’ in the eyes of the law by CSIR NIO and ZSI to justify the absence of Turtle nesting sites in the project site and within a distance of 1 km (the EIA Notification requires 15 km radius). However, reliance on both the Reports is contrary to the law for the following reasons:
- CSIR NIO Study: CSIR NIO was not competent to undertake studies for non-accredited Consultants CSIR NEERI. Two wrongs do not make a right. The Study by CSIR NIO is non est in the eyes of the law. [See Para A (1)(2)(3)(4) of Note on NIO Pg. 5272]
  - ZSI Study: No denial of the illegality of referring to the Report of ZSI for obtaining Environmental Clearance in view of a specific stipulation by ZSI that its report will not be used for securing Environmental Clearance. The study by ZSI is non est in the eyes of law, in so far as it is for the purpose of seeking environmental clearance. [See Para B Pg. 5278]
- 15. No deliberation at the EAC on Turtle Nesting and Siting Criteria:** The Project Proponent has failed to cite even a single portion of the EAC proceedings to demonstrate that the issues pertaining to Turtle nesting and violation of the siting criteria were ever considered or deliberated upon. Significantly, there is not even a whisper in the deliberations of the EAC or its Sub-Committee regarding Turtle nesting or the impact of the Project on the same.
- 16. No Denial of the Fact that the Project Proponent in Response to Multiple Queries during the Public Hearing had made a wrong/ false statement that they had valid accreditation for Soda Ash:** The project proponent did not at any point state that the CSIR NEERI did not have a valid Accreditation for soda ash. [See Para A(1) Pg. 5307 of Note on Public Hearing] In the submissions during the final hearing, the Project Proponent did not deny that the statement with respect to accreditation was a blatantly false statement.
- 17. The Project Proponent has been silent on the Judgments of the NGT which required revised EIA Report to be placed before the Public in a fresh public hearing has not been followed:** It is an undisputed fact that the Public Consultation took place based on a Report of an unaccredited consultant. The additional and special studies were also never shared with the public. The EIA process does not contemplate one set of documents before the Public and another set of documents before the EAC/MOEF&CC. This has been held as illegal by this Hon’ble Tribunal in **T. Mohana Rao vs. MoEF 2012 SCC OnLine NGT 40** [Para 36 Pg. 5023].

It is thus submitted that the Project Proponent cannot, at this belated stage, seek to improve upon or supplement its Written Submissions by introducing fresh pleas, explanations, or materials *dehors* the record. Thus, the Hon’be Tribunal may take the above points into consideration while deciding the Appeal.

F. No. J-11013/77/2004- IA II (I)  
Government of India  
Ministry of Environment and Forests  
(I.A. Division)

Paryavaran Bhawan  
CGO Complex, Lodhi Road  
New Delhi – 110 003

Dated 18<sup>th</sup> March, 2010

**OFFICE MEMORANDUM**

With reference to Ministry's O.M. of even number dated 4<sup>th</sup> December, 2009 available on Ministry's website <http://www.envfor@nic.in>, all the Project Proponents to whom Ministry of Environment and Forests has awarded 'Terms of References' under the EIA Notification, 2006 are hereby informed that final EIA/EMP will be entertained in the Ministry for consideration for the Environment Clearance, only if prepared by Consultants/s accredited by the National Accreditation Board of Education and Training/Quality Council of India (NABET/QCI). **No final EIA/EMP from any Project Proponent prepared by the Non-accredited Consultant will be entertained after 1<sup>st</sup> July, 2010.**

2. Therefore, all the individuals, firms and organizations, including Government Organizations, Universities and Public Sector Undertakings (PSUs) working in the area of Environmental Impact Assessment should apply and register under the scheme of Accreditation and Registration of the NABET/QCI well in time.

3. This is also to inform that:

- i) A Consultant would be confined in the consultancy only to the accredited sectors and parameters for bringing in more specificity in the EIA document.
- ii) Detailed procedure for registration of Consultants for taking up the assignments in Category 'A' and 'B' projects as detailed in EIA Notification, 2006 is available at the website of NABET/QCI ([www.cqin.org](http://www.cqin.org)). The QCI would maintain full transparency on accredited Consultants, procedure followed for accreditation, feed back and evaluation mechanism for Consultants for quality of EIA/EMP Reports.
- iii) After accreditation, the Consultants would need to include a Certificate in this regard in the EIA/EMP Reports prepared by them and also data provided by other Organizations/Laboratories including their status of approvals, etc.

- iv) The EIA Consultants can approach NABET/QCI for further clarification on the subject through the website of NABET/QCI ([www.qcin.org](http://www.qcin.org)).

This issues with the approval of the Competent Authority.

**(Dr. P.B. Rastogi)**  
**Director**

1. All the Officers of IA Division
2. Chairman/Secretaries of SEIAA/SEACs
3. Website of MoEF
4. Guard File



# **Scheme for Accreditation of EIA Consultant Organizations: Version 3**



**NATIONAL ACCREDITATION BOARD FOR EDUCATION AND TRAINING  
QUALITY COUNCIL OF INDIA**

June, 2015

in the 'incomplete applications' list. NABET intimates the AO of the deficiencies in the application. If it is an application for IA, the same is processed further once all requirements are fulfilled.

- e. **Cancelled/ Debarred/Suspended applications** – see Section 9.3 below.

## 7.5 Category of accredited consultants

EIA consultant organizations are granted accreditation in categories 'A' or 'B'. Experts are also approved in categories A or B under this Scheme. Specific conditions applicable for categorization of organization and experts in IA, SA and RA are detailed in **Appendix C**.

EIA consultant organizations accredited as category A can carry out EIAs for both, category A and category B projects as defined in the EIA Notification of the MoEFCC dated September 14, 2006 and its subsequent amendments. This accreditation would apply for sectors of which the consultant organizations have an approved category A EIA coordinator. If a category A consultant has only a category B EIA coordinator in a sector, it can take only category B projects in that Sector till the time it has an approved category A EC for the Sector. An ACO approved as Cat. B organization can only take up projects in Cat. B only. Taking up EIAs in sectors and/or category for which the consultant organization has not been accredited will attract a non-conformance. Repeat NC on the same issue may invite strict action including cancellation of accreditation/ approval against the ACO as well as the expert concerned.

Experience for EIAs carried out for sectors not accredited contravenes the requirements of the Scheme and is not given any weightage. In fact, an NC is issued to the ACO for such cases. EIAs in unaccredited sector/s initiated prior to receiving accreditation are not covered for raising NCs.

If an approved category A expert scores less than 50% marks in SA, s/he is issued an alert and her/his approval status may be changed to Cat. B. A category B expert is upgraded to category A if -

- a. S/he meets the experience requirements stated in the Scheme/has addressed the shortfalls of earlier assessment in the re-application
- b. Scores 60% or more in SA/RA/Supplementary assessment and
- c. Recommended for up-gradation by the assessors on fulfillment of point a, b above and final decision of Accreditation Committee.

## 8.0 ACCREDITATION FEES

QCI/NABET does not get any financial assistance from any agency for operation of this Scheme. Hence, to offset the costs involved in the implementation of the Scheme by NABET, fees are charged for organizing the assessment and accreditation processes and annual fees for updating and maintaining the Scheme. Details are given in **Appendix D**.

Timely payment of dues to NABET by the AO/ACO is crucial to the Scheme. Processes of IA, SA and RA can proceed to the next stage only if all pending bills to NABET are cleared by the AO/ACO. All invoices raised by NABET are to be paid within one month of date of dispatch/ mailing of the invoices.

## Annexure – II

## Project Sectors

Please tick the desired project sector/s for NABET accreditation

S. No.	Sectors	As per MoEFCC Notification	Tick
1	Mining of minerals including opencast / underground mining	1 (a) (i)	
2	Offshore and onshore oil and gas exploration, development & production	1 (b)	
3	River Valley projects	1 (c)	
4	Thermal power plants	1 (d)	
5	Nuclear power projects and processing of nuclear fuel	1 (e)	
6	Coal washeries	2 (a)	
7	Mineral beneficiation	2 (b)	
8	Metallurgical industries (ferrous & non-ferrous)	3 (a)	
9	Cement plants	3 (b)	
10	Petroleum refining industry	4 (a)	
11	Coke oven plants	4 (b)	
12	Asbestos milling and asbestos based products	4 (c)	
13	Chlor-alkali industry	4 (d)	
14	Soda ash Industry	4 (e)	
15	Leather/skin/hide processing industry	4 (f)	
16	Chemical fertilizers	5 (a)	
17	Pesticides industry and pesticide specific intermediates (excluding formulations)	5 (b)	
18	Petro-chemical complexes (industries based on processing of petroleum fractions & natural gas and/or reforming to aromatics)	5 (c)	
19	Manmade fibers manufacturing	5 (d)	
20	Petrochemical based processing (processes other than cracking & reformation and not covered under the complexes)	5 (e)	
21	Synthetic organic chemicals industry (dyes & dye intermediates; bulk drugs and intermediates <b>excluding</b> drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates)	5 (f)	
22	Distilleries	5 (g)	
23	Integrated paint industry	5 (h)	
24	Pulp & paper industry excluding manufacturing of paper from wastepaper and manufacture of paper from ready pulp without bleaching	5 (i)	



# TECHNICAL EIA GUIDANCE MANUAL FOR SODA ASH INDUSTRY

Prepared for  
The Ministry of Environment and Forests  
Government of India



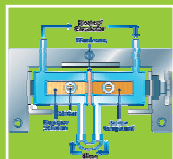
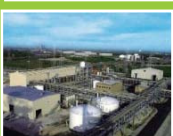
by  
IL&FS Ecosmart Limited  
Hyderabad

September 2010



# TECHNICAL EIA GUIDANCE MANUAL FOR CHLOR-ALKALI INDUSTRY

Prepared for  
The Ministry of Environment and Forests  
Government of India



by  
IL&FS Ecosmart Limited  
Hyderabad

August 2010

ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ  
ગાંધીનગર

પરિપત્ર

બંનેની જમીનોને અધિકૃતિત હેતુ માટે બંધ-બંધોતીપ વધારવા માટે તાલુકા વિભાગ અધિકારી/ પ્રમુખ  
વિભાગ અધિકારી/ પ્રમુખ કલેક્ટરશ્રી વગેરે પહેરુથી અધિકારીશ્રીને દાવા સુજ્ઞાન પ્રદૂષણ નિયંત્રણ બોર્ડની  
અધિભાગ વેલવલવનું અગાઉ સરકારની દાવા કરવાપાત બંધવવાનું અર્થેલ હેતુ. જે અન્વેષી પહેરુથી  
અધિકારીશ્રીને દાવા જમીનો બંધ-બંધોતીપ કરવાનું પહેલાં બોર્ડ-ને અધિભાગ વેલવવા માટે અરજી મોકલવાની  
આવશ્યક હતી.

ગુજરાત સરકાર-ના મહેસુલ વિભાગ-ના ડરાવબંધન/૧૦૯૫/ પુ.બી.૧૨/૩, તા.૩૦/૧૦/૯૮-ના પરિપત્રથી  
ઠેલોગ પ્રદૂષણ વેલ કરવા હોય કે ન હોય તેની પરા જમીનોને અધિકૃતિત હેતુ માટે બંધ-બંધોતીપ ઠેલોગ માટે  
પરવાનગી આપતી વખતે ગુજરાત પ્રદૂષણ નિયંત્રણ બોર્ડ-ના પરવાનગી જરૂર રહેતી ન હોઈ અગાઉ જે પરવાનગી  
કરવા માટેની કુચનાઓ આપવામાં આવેલ તે રદ કરવામાં આવેલ છે.

ઠેલોગ વિગતો ધ્યાને લઈ હવે આ બંનેની જમીનોને અધિકૃતિત હેતુ માટે બંધ-બંધોતીપ કરવા માટે  
આ બંનેના હોઈ અધિભાગ-ની જરૂર ન હોવાથી પરિપત્રનો ધ્યાને લેતા હોઈપણ જમીનોને ઠેલોગ બંધ  
બંધ-બંધોતીપ કરવાના કુચનો કરતી વેળા જે તે મહેસુલ વિભાગ-ના સ્ટામ્પીશ્રીને ઠેલોગ દર્શાવેલ જરૂરનું  
ધ્યાને લઈ જરૂરી અગાઉની કચી નીચેની રાસતી-ને બંધ-બંધોતીપ કુચનોમાં સ્પષ્ટ રાખવેલા કરવો જોઈએ.

- ૧) આવા ઠેલોગોનું સ્થળ રહેણાંક વિસ્તાર તેમજ સુકા/કોલેજ વિગેરેથી અંદાજેલ અંતર ૫૦૦ મીટર હોય જોઈએ.
- ૨) આવા ઠેલોગનું સ્થળ અનિદાક્ષિત ઈમારતો, ગાંધી ગણી, જંગલની હદ તેમજ દરિયા કિ-કરાથી અંદાજેલ અંતર ૫૦૦ મીટર દૂર હોય જોઈએ.
- ૩) આવા ઠેલોગનું સ્થળ એકસપેસ પોલીસઠા, રાષ્ટ્રીય પોલી માર્ગ, રાજ્ય પોલી માર્ગ અને વિભાગ-નું પુખ્ત માર્ગથી માર્ગ અને મુકાન વિભાગ દ્વારા જે નિયંત્રણરેખા નક્કી કરવામાં આવે તે મુજબ હોય જોઈએ.
- ૪) આવા ઠેલોગનું સ્થળ રેલવેલાઈનથી ભારતીય રેલવે દ્વારા જે નિયંત્રણરેખા નક્કી કરવામાં આવી ન હોય તે મુજબ હોય જોઈએ.
- ૫) આવા ઠેલોગનું સ્થળ નદી, નાના નાના, સરોવર, નહેર, વગેરે જેવા જલસંચયથી અંદાજેલ અંતર ૫૦૦ મીટર દૂર હોય જોઈએ.
- ૬) આવા ઠેલોગને માટે જમીન બંધ-બંધોતીપ માટેની મંજૂરીના કુચનોમાં ઠેલોગને ઠેલોગ-ના વિભાગ-ના વારંવારુ અંદાજેલ અંતર ૫૦૦ મીટર પહેલાંવેલોગની નીચેની વિકસાવવાની રાસતી સમાવેલ કરવો જોઈએ.

આ પરિપત્ર તાઈલ નં.એનએ-આરજે-૧/૦૬/ ઠેલોગ-અધિકારી-ની મંજૂરી હોય બાદ મુકાન આપે છે.

(સહ-અધિકારી)  
મહેસુલ વિભાગ

નં.ગુમનિબોર્ડ/પરિપત્ર/એન.એ./આરજે/૧/૦૬/ ૧૦૨૫

તારીખ: ૧૪/૦૬

સર્વે કલેક્ટરશ્રી,  
વિભાગ કલેક્ટરશ્રીની કચેરી  
નકલ રવાના:-

2 APR 2006

- ૧) સર્વે સચિવશ્રી, મહેસુલ વિભાગ, સચિવાલય, ગાંધીનગર
- ૨) અધી-સચિવશ્રી, વન અને પર્યાવરણ વિભાગ, સચિવાલય, ગાંધીનગર
- ૩) સર્વે મહેસુલ/ પ્રમુખ વિભાગ અધિકારીશ્રી,  
તાલુકા/ પ્રમુખ વિભાગ અધિકારીશ્રીની કચેરી  
તેમના હોઈ ઉકળના મહેસુલ અધિકારીને જરૂરી સુચના આપવા માટે.
- ૪) સર્વે પ્રાંતીક અધિકારીશ્રી, ગુમનિબોર્ડ, મલકચેરી
- ૫) સર્વે પુનિટ ઠેલોગ
- ૬) સર્વે નામન પર્યાવરણ ઈજનેર અને મદદ-નીત પર્યાવરણ ઈજનેર
- ૭) અધિકારી/સચિવશ્રી-ના અંગત મદદ-નીત.

(સહ-અધિકારી)

**Gujarat Pollution Control Board**  
Gandhinagar

Date: 12.04.2006

**Circular**

Previously, it was made mandatory by the Government that while converting agricultural land to non-agricultural use for industrial purposes, Taluka Development Officers / District Development Officers / District Collectors and other revenue authorities were required to obtain the opinion of the Gujarat Pollution Control Board. Accordingly, applications were being sent to the Board before granting such conversion.

However, as per the Resolution No. Bkhp/1098/U.O.12/6 dated 30/10/1998 issued by the Revenue Department of the Government of Gujarat, it has been decided that whether an industry generates pollution or not, permission from the Gujarat Pollution Control Board is not required at the time of granting non-agricultural use for industrial purposes. Therefore, the earlier instructions regarding consultation with the Board have been withdrawn.

In view of the above, henceforth no opinion from this Board is required for converting agricultural land to non-agricultural use for industrial purposes. However, while issuing such orders, the concerned revenue authorities must ensure compliance with the following conditions and include them in the non-agricultural permission orders:

1. The site of such industries must be at least **500 meters away** from residential areas, schools, colleges, etc.
2. The site must be at least **500 meters away** from historical monuments, religious places, forest boundaries, and the seashore.
3. The site must comply with control lines fixed by the Roads and Buildings Department from express highways, national highways, state highways, and major district roads.
4. The site must comply with control lines fixed by Indian Railways from railway lines.
5. The site must be at least **500 meters away** from water bodies such as rivers, streams, lakes, reservoirs, canals, etc.

6. The permission order for non-agricultural use must include a condition that a **green belt of at least 5 meters width** be developed around the industrial area.

This circular is issued after obtaining approval of the Chairman under File No. NA-RJ-1/06.

**No.: GPCB/Circular/NA/RJ/1/06/10253**

**Date:** /04/05

**To,**  
All District Collectors

**Copy to:**

1. Additional Chief Secretary, Revenue Department, Secretariat, Gandhinagar
2. Additional Chief Secretary, Forest & Environment Department, Secretariat, Gandhinagar
3. All Taluka / District Development Officers – for issuing necessary instructions to the revenue officers under their jurisdiction.
4. All Regional Officers, Gujarat Pollution Control Board – Regional Offices.
5. All Unit Heads.
6. All Deputy Environmental Engineers and Assistant Environmental Engineers.
7. Personal Assistants to the Chairman and Member Secretary.

True Translated Copy

*Kaustubh Dhor*