

BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL (N.G.T)

WESTERN ZONE BENCH PUNE

APPEAL NO. 148 OF 2025

IN THE MATTER OF

The Shakti Plastic Industries

.... Appellant

Versus

CPCB & Others

.... Respondent

**WRITTEN NOTES OF ARGUMENT ON BEHALF OF APPELLANT**

It is most humbly submitted before this Hon'ble Court as:

1. The Appellant who are in the business of Reprocessing Plastic Waste which is governed under the provisions of Section 26 of the Water (Prevention and Control of Pollution Act) 1974 read with Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Authorization under Rule 6 and Rule 18(7) of the Hazardous & Other Wastes(Management &Trans boundary Movement) Rules 2016 thereof. It is a registered MSME that complies with environmental regulations, including the Plastic Waste Management Rules, 2016 and Extended Producer Responsibility (EPR) guidelines governed under the Swachh Bharat Mission. The Appellant is having all the permission for the purpose of conducting the said business which is being carried at least since the year 1969.

2. It is a matter because that in order to control the Plastic waste, necessary rules have been framed from the Authorities in respect thereof, and as per the said rules, a person who utilises the Plastic for any other purposes is required to reprocess the Plastic to the extent of use made by him. For example: - if the company has used 100 kgs of Plastic for their manufacturing, they are required to lift the same quantity of the Plastic which is thrown after use and send it in the reprocessing to the units like the Appellant units.

3. In View of the said facts, apart from Collection from rag-pickers, scrap dealers, Segregation and recycling of plastic waste of their clients, the Appellant have been rendering services to all those companies for recycling the waste collected from them. The Recycling of the Plastic waste is being done in three different formats i.e. (i) Plastic Granules & Reprocess of Plastic Granules, (ii) Plastic Grinding and (iii) Agglomerates. It is to be further noted that, on such Recycling, Either the Appellant return the recycled plastic packaging i.e. Either of each in the above format to the party concerned and take service charges or in alternative if the party permits, the Appellant sells the same in the open market and transfer EPR credits of the amount so received by making Accounts on the EPR portal with the concerned Parties.

4. The whole idea of this scheme is floated by the Government, is to see that if a company utilises Plastic Materials, the same do not remain on the roads

or in the garbage and the same is recycled so that it does not cause any harm to the Public at large. It may be noted that Plastic is a product which cannot be destroyed by any means and even if it is burnt or any other matter is used it remains and recently the use of the same has also been started while manufacturing cement and also for constructing the roads, etc. With this background of the matter, we have been rendering our services to various parties and from time to time have raised our bills which require and are covered under the provisions of GST. And accordingly, we have been making payments of crores of rupees by way of GST. In order to consider the Genuineness of the said bills, what is required to be seen is as to whether the parties in whose favour such bills are raised have taken GST benefits in respect thereof and in our case all the parties have taken the benefits of the same.

5. This indicates that all the transactions have been genuine. The Appellant is a regular processing unit situated at Nandgaon, Palghar, Maharashtra, wherein following machinery are installed and depending upon the work, they engage the services of labours which notes between 100-600 persons on day to day basis. And accordingly, hereto annexed and marked as Exhibit - "A" copy of the same is enclosed with the present written submissions.

6. The records show that at the time of obtaining necessary permission, the present Appellant had given the details of the entire machinery including the power consumption of each and every machinery and the capacity of the

machinery to produce and/or recycle such plastic waste management and accordingly, hereto annexed and marked Exhibit-"B" is the copy of the same.

7. With the background of the matter, though we have not committed any default of whatsoever nature, despite the same the officers of CPCB Pune, they had visited to the premises of the present Appellant on the 31<sup>st</sup> day of August 2023 and 1<sup>st</sup> day of September, 2023. It is submitted that on both the days, two CPCB Officials by name Mr. Tapas and Nikhilesh had attended to the premises of the Appellants to inspect the Appellants Factory Unit. Their inspection was limited to observing only three machines that were operational within the shed. They evaluated the production capacity of these machines for approximately less than 1 hour to assess granule output. However, other critical machines such as washing lines, agglomeration machines and related equipment's was not inspected. And accordingly, the present Appellants have submitted all the documents vide their letter dated 1st November, 2023 and accordingly, copy of the said letter is enclosed herewith as Exhibit- hereto.

8. It is further submitted that during the audit, the officials did not obtain any signatures or acknowledgement from the present Appellants on any document, record, or paper of any kind, thereby leaving no authenticated proof of the observations purportedly made at the site.

9. It is submitted that there is still no Standard Operating Procedure (SOP), format, or proper training for any inspection or audit. No audit checklist has been issued, nor is there any documented guideline defining the methodology for inspecting or verifying the production capacity of polymers, despite the fact that multiple polymer types exist, including HDPE, LDPE, LLDPE, PP, PET, among others.

10. It is submitted that by virtue of the said documents, a complete compilation have been given to the same authority which has been acknowledged by them in all respect and Accordingly, the present Appellant are in possession of the copy of the said compilation of documents and Accordingly they shall crave, leave to refer and rely upon the copy of the same as and when produced, contents of which are self-explanatory.

11. It is submitted that the said letter by itself indicates that much prior to the said letter by virtue of various emails, the Appellant have forwarded all the documents and accordingly, the same was forwarded in the month of September 2023 itself and the same has duly been acknowledged by the said authorities and accordingly, hereto annexed and marked Exhibit-"C" are the copies of the said email Correspondence exchanged between the parties.

12. It is submitted that it is also matter of record that though, the alleged visit was made on 31st August as well as 1st September, 2023 however, the

fact remains that under the provisions of the State Government rules, 1st September, was Friday and accordingly, there is a compulsory off required to be kept every Friday and even the power supply is withdrawn on the said date and if any person keep the Factory or the workshop open, it amounts to an offence. It is submitted that in view of the said facts, otherwise also, the question of the said Mr. Tapas making any in respect of the capacity of the machines and/or the quantum of the reprocessed items on the said date, does not arise. It is submitted that despite the said facts, the present Appellants were served with a notice issued by CPCB being the notice dated 26th October, 2023 whereby, it was sought to be suggested that the Appellants have failed to provide any document though, the records shows that much prior thereto, all the documents have been submitted and this by itself shows the manner in which, the said notice has been issued without looking into the documents.

13. It is submitted that by virtue of the said notice, it was sought to be suggested that since, the present Appellants have failed to submit any such documents, Directions under Section 5 of the EPA, 1986 regarding compliance of various provisions under Schedule - II of Plastic Waste Management Rules, 2016, i.e., Guidelines on Extended Producer Responsibility (EPR) dated 26.10.2023 by CPCB to MPCB was issued under clause-11.4 of the Rules/EPR Guidelines whereby, it was sought to be suggested as to why the unit shall not be closed as contemplated under the provisions of the same. It is submitted that by virtue of the said notice, it was further sought to be suggested that the EPR

certificates generated are not in conformity of the requirement described in CPCB guidelines manual for operating Centralized EPR Portal which is again, contrary to the facts and contrary to the provisions of law. By virtue of the said notice, it was further sought to be suggested to take immediate action to improve the system of grant of registration with MPCB Monitoring and enforcement etc. The said directions were issued solely on the basis of the first audit, whereas the said audit was not conducted in accordance with any prescribed procedure, format, or guidelines. and hereto annexed and marked **Exhibit-"D"** is the copy of the said notice.

14. It is submitted that in response to the said notice, the present Appellants have immediately responded to the same by e-mail dated 2<sup>nd</sup> November, 2023 and thereafter, along with which, they have also forwarded the earlier letter forwarded by them being letter dated 1st November, 2023 along with all the necessary documents in the nature of all the necessary explanation in respect of the machinery etc.in their letter dated 3rd November, 2023 and accordingly, hereto annexed and marked **Exhibit-"E"** is the copy in respect thereof.

15. It is submitted that, due to the aforesaid Directions, more than 200 customers have ceased their business dealings with the Present Appellant on account of the alleged non-compliance. Consequently, the Appellant has suffered a financial loss exceeding ₹100 crores, in addition to severe damage to its brand image and goodwill built over 55 years, valued at over ₹100

crores. hereto annexed and marked Exhibit- "F" is the copies of client letters mails with respect to discontinuation of business transactions in respect thereof.

16. It is submitted that several clients have withheld clearance of outstanding payments owing to the alleged non-compliances referred to in the impugned orders, as a result of which the Present Appellant has suffered, and continues to suffer, severe financial hardship.

17. It is submitted that simultaneously, the present Appellants have also inquired about the person who alleged to have visited to the premises of the Appellant and upon inquiries being made, it has been learnt that, he is not even competent enough to decide the lapses if any, in the production unit of the Appellant, at the highest he is having necessary diplomas/degree which is related to Mines and has no knowledge about Polymers. And accordingly, the details of the said person are enclosed herewith for ready reference of the Hon'ble Court.

18. It is submitted that it is also a matter of record that a surprise inspection had been carried out by the MPCB Board on 08.11.2023, and accordingly, a complete report has been prepared by them, it is submitted that, though, the copy of the said report was not made available to the Appellants, however, from their own sources they had obtained the copy of the same and the said report shows that there was no irregularities being found in the functioning of

the present Appellant and accordingly, hereto annexed and marked as Exhibit "G" is the copy the said report in respect thereof.

19. It is submitted that a careful perusal of the said report further indicates that the same has been signed by one Mr. Kiran Hasabnis being the Regional Officer Thane of MPCB, who is the same person who had issued the necessary further notices contrary to his own findings, which is relevant for the purpose of consideration of this Hon'ble Court. It is submitted that, on the basis of Inspection conducted by MPCB, though the copy of the report was not made available to the Present Appellant, however, the contents of the same were made known to the present Appellant, the Appellant had also made a representation by their letter dated 11.01.2024, hereto annexed and marked as Exhibit -"H" is the copy in respect thereof.

20. It is further submitted that, the said letter was further followed up by an email correspondence being the email dated 10.01.2024, making necessary request to the office of the CPCB, contents of which are self-explanatory and Accordingly, hereto annexed and marked as Exhibit-"I" is the copy in respect thereof.

21. It is submitted that the said email was further followed up by another email being the email dated 23.01.2024 and, accordingly, hereto annexed and marked as Exhibit -"J" is the copy in respect thereof.

22. It is submitted that, on 30<sup>th</sup> January, 2024 and 31<sup>st</sup> January, 2024 a joint audit was conducted by CPCB and MPCB officials of the Appellant's facility. While MPCB had already considered all the additional machines purchased by us during the renewal of Consent to Operate, the corresponding machines were not considered at the time of Joint Audit by the officials. It is to be further submitted and noted that, the report of the Joint Audit was never provided to the Present Appellants.

23. It is respectfully submitted that the Respondents have falsely alleged that the GST bills submitted by the Appellant were certified by a Chartered Accountant. In reality, no CA-verified audit report was ever issued, and the allegation is therefore entirely baseless and misleading.

24. It is submitted that the said email dated 23.01.2024 was further followed up by another email being the email dated 01.06.2024 and, hereto annexed and marked as **Exhibit-"K"** is the copy in respect thereof. Along with the other emails being the emails dated 27.05.2024 as well as 29.05.2024.

25. It is further submitted that it was further followed up by email being the email dated 07.06.2024 and, hereto annexed and marked as **Exhibit-"L"** is the copy in respect of thereof.

26. It is submitted that the said email was further followed up by another email being the email dated 24.06.2024 and accordingly, hereto annexed and marked as Exhibit-“M” is the copy in respect thereof.

27. It is submitted that the said email was further followed up by another email being the email dated 01.07.2024 and, accordingly, hereto annexed and marked as Exhibit-“N” is the copy in respect thereof.

28. It is submitted that a further email was forwarded by the present appellant by being the email dated 22.07.2024 and accordingly, hereto annexed and marked as Exhibit –“O” is the copy in respect thereof.

29. It is submitted that, it is also a matter of record that since, the report of CPCB was allegedly against the Present Appellant, whereas, the report of the MPCB was in favour of the Present Appellant, the Appellant had also independently conducted their own audit through a reputed institute recognised by CPCB as well as MPCB, which is the Institute of Chemical Technology and Accordingly, even the said report has been submitted by the present Appellant contents of which are self-explanatory. The third-party audit had been undertaken solely because the CPCB was not considering any of the documents furnished by the Appellant. Furthermore, since neither CPCB nor MPCB had any prescribed format, guideline, or methodology for the manner in which such audits were to be conducted or how the production capacity of polymers was to

be calculated, the Appellant, in order to ensure transparency and compliance, had commissioned an audit through a government-owned, duly recognised institute. ICT had also stated that, in the event, if the said report is challenged, they would be in a position to file an appropriate and suitable reply to such claims before this Hon'ble Court. And accordingly, hereto annexed and marked as Exhibit-"P" is the copy of the Report obtained by the Present Appellant from the said Institute.

30. It is submitted that the said agency is well reputed agency and question of disputing the Authenticity of the said report does not arise which was also forwarded to the office of CPCB as well as MPCB.

31. It is submitted that, despite the aforesaid facts, MPCB authorities issued another Show Cause Notice dated 08.04.2024 wherein their earlier concerned raised pertained primarily to an alleged shortfall in the installed recycling capacity, the Show Cause Notice dated 08.04.2024 had broadened its scope to challenging the validity of EPR credits claims for Agglomeration and grinding activities. It is submitted that though the said notice is in the nature of a Show Cause Notice, however, it is an order passed by them under the provisions of Rule 14 (2) of the relevant rules, whereby, the Appellant has been directed for a closure of their unit for a period of one year and accordingly, hereto Annexed and Marked as Exhibit-"Q" is the copy in respect thereof.

32. It is submitted that, even, the said notice has been duly replied by the Appellant, by treating the same as the Show Cause Notice vide their letter dated 09.04.2024 along with the necessary documents bills, electricity bills, have been forwarded by the present Appellant and accordingly, hereto Annexed and Marked as Exhibit-“R” is the copy of the said letter along with the complete compilation in respect thereof.

33. It is submitted that; Accordingly, all those documents have been made available with the Respondent herein above. It is submitted that, in the said Compilation, the present Appellant had also forwarded necessary confirmations from their respective clients, for whom, the present Appellants have rendered necessary services and they had paid necessary amounts, etc. Accordingly, the Present Appellant shall crave, leave to refer and rely upon the copies of the same as and when produced.

34. It is submitted that at one stage, the Respondents have been claiming that they will only consider what is known as the Granted Bullets, Etc. However, as per their own rules of 2023, categorially provides as to what can be considered as a Recycled product to be calculated for the purpose of considering the total production of the Appellants. And Accordingly, Rules 5.2.2.3.2 is relevant for consideration and accordingly, hereto annexed and marked as Exhibit-“S” is the copy in respect thereof.

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35. It is submitted that by virtue of the further emails, the present Appellant was informed for a personal hearing in the matter being the email dated 14.05.2024. And, accordingly, hereto annexed and marked as Exhibit-“T” is the copy in respect thereof.

36. It is submitted that, at the time of personal hearing given by them, the Appellant had produced all the necessary documents vide their letter dated 18.05.2024 as a detailed reply along with the Annexures wherein the reply comprehensively addressed and substantiated all concerns raised by MPCB and CPCB regarding capacity, EPR credits Eligibility, power consumption and sales invoices. And, accordingly, hereto annexed and marked as Exhibit-“U” is the copy in respect thereof.

37. It is submitted that in Continuation thereto, the Appellant were served with the order dated 18<sup>th</sup> June 2024 passed by the Respondent by virtue of which, the Appellants have been directed to close their unit for a period of one year as mentioned therein and as per the rules, 14.2 of the relevant rules. And, accordingly, hereto annexed and marked as Exhibit –“V” is the copy in respect thereof.

38. The Appellant had again made necessary representations by their letter being the letter dated 21.06.2024 & 26.06.2024. And, accordingly, hereto

annexed and marked as Exhibit-“W”(Colly) are the copies of the said two letters in respect thereof.

39. It is submitted that in continuation, the Respondents had again issued an order being the order dated 21.09.2024, whereby it has been alleged by the Respondents that the Capacity of production of the Appellant's unit is much less thereof, and the Appellant are required to pay necessary compensation to the tune of Rs.137.42 Crores. And, accordingly, hereto annexed and marked as Exhibit-“X” is the copy in respect thereof.

40. It is to be submitted, thereafter also, the Present Appellant had made various representations Time and again to the Respondents vide their letters dated 08.11.2024, 12.03.2025, 18.06.2025, 16.11.2025, requesting resumption of the operations and revocation of the closure directions. Accordingly, hereto annexed and marked as Exhibit-“Y”(Colly) is the copy in respect thereof.

41. It is submitted that several mails and letters—approximately one hundred—had been sent to both CPCB and MPCB; however, neither authority had replied to a single communication nor considered any of the materials furnished by the Appellant.

42. It is submitted that a careful perusal of the said order indicates that, none of the documents, which has been forwarded by the Appellant has been taken into consideration while passing the orders.

43. It is respectfully submitted that the Appellant has been diligently working towards protecting the environment and promoting the well-being of the country. The issuance of the impugned notices and directions has not only disrupted its operations but has also directly hindered its meaningful contribution to national environmental conservation and sustainability efforts.



Advocate For Appellant







Sl. No.	Name	Emp. No.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21
1	Sunanda Kashyap Bhoir	ML002	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
2	Babu Shankar Ambat	ML038	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
3	Asha Damu Vayare	ML038	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
4	Shanta Vishnu Bhukade	ML040	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
5	Ashwini Ashok Shelar	ML041	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
6	Sundar Ramu Sabala	ML043	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
7	Swati Shriram Ghadge	ML044	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
8	Aika Ramu Dukale	ML045	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
9	Anti Jairam Lahange	ML046	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
10	Sukri Balu Baswat	ML047	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
11	Sangita Udaya Lahange	ML048	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
12	Vanita Vikas Chawhan	ML049	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
13	Jairam (Sweeper)		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
14	Jairam Bhikar Lahage	MG050	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
15	Hariram Yadav	MG051	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
16	Sunil Kashinath Bhoir	MG052	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
17	Ajay Damu Ambat	MG053	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
18	Nayan Nathu Dhola	MG054	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
19	Yogesh Suresh Sambre	MG055	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
20	Avinash Chintu Shelar	MG056	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
21	Deepak Bhoir	MG057	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

15.02









ABSENCE SHEET, MONTH OF October 2023

II Company

Sr.no	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	
16	Gotam Gaykwan	MG0116	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
17	Akshay Madav	MG0117	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
18	Mohamed Ismail	MG0118	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
19	Vishnu Jivan Ghatal	MG0119	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
20	Rajneet Vartha	MG0120	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
21	Pavan Amrut Tambadi	MG0121	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
22	Nitin Naresh Bhoir	MG0122	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
23	Prahlad Dandekar	MG0123	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
24	Abhishek Kadmoda	MG0124	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
25	Omprakash Pandit	MG0125	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
26	Namdev Mahadev Gimbhal (Pintoo)	MG0126	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
27	Ramdev Mahadu Gimbhal (Pintoo)	MG0127	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
28	Nilesh Rawal	MG0128	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
29	Vandesh Kache (Wadli)-Temporary	MG0129	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
30	Nitin Kurhada (Rajji)	MG0130	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
31	Shubham Pande	MG0131	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
32	Pranjal Patel	MG0132	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
33	Naeem Ahmad	MG0133	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
34	Nagendra Prasad	MG0134	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
35																																						



MONTH OF October-2023

Sr.No	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29
1	Rahul Bhor	MDT01	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
2	Vikas Rajgurunath Bhor	MDT02	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
3	Gautam Kambar Bhor	MDT03	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
4	Siddhant Lakshya Lakshar	MDT04	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
5	Rahul Sivar Purokar	MDT05	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
6	Amit Jayram Labarge	MDT06	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
7	Ramesh Gopal Shelar	MDT07	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
8	Rohit Sunil A. Tilak	MDT09	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
9	Tushar Vignau Ghatai	MDT010	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
10	Barakhu Anant Ghatai	MDT011	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
11	Rupesh Prakash Bhor	MDT013	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
12	Subham Sunil Bhor	MDT015	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
13	Raman Ladiak Harpake	MDT016	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
14	Babhan Kisan Kave	MDT018	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
15	Sajan Haya Shelar	MDT019	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
16	Rupam Srinoo	MDT021	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
17	Umesh Madhukar Paritae	MDT022	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
18	Kaltes Parshuram Madhavan	MDT024	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
19	Raju Bencya Sutar	MDT025	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
20	Sunil Bhor	MDT026	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
21	Suresh Lahu Tumbada	MDT027	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
22	Kisan Jhiya Kavi	MDT028	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
23	Vishal Devanand Madhavi	MDT030	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
24	Arun Lakman Ganeshkar	MDT031	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
25	Dipak Vijay Singh	MDT036	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
26	Ganesh Prakash More	MDT037	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
27	Amit Anant Tambadi	MDT040	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
28	Manojesh Varsha	MDT041	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
29	Anant Sakharam Tambadi	MDT042	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	

MUJIB 04 October 2022

Sl. No	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30
30	Aakash Kulkarni Ranjane	MD1067	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
31	Jayendra Patil	MD1068	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
32	Nay Chandra Bhow	MD1069	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
33	Sahil Sachin Bawale	MD1070	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
34	Ekshat Prady Kulkarni	MD1071	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
35	Ramanshu Vithal Patil	MD1072	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
36	Panku Bhow	MD1073	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
37	Manoj Dink Sambare	MD1074	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
38	Umesh Ramdas Sutar	MD1075	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
39	Mangya Navsh Verha	MD1076	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
40	Genesh Sutar	MD1077	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
41	Deepak Vijay Madhani	MD1078	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
42	Sagar Jadhav	MD1079	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
43	Aditya Shekhar Bawale	MD1080	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
44	Sujal Jadhav	MD1081	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
45	Vikas Prasad Kulkarni	MD1082	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
46	Mayur Suresh Tumbada	MD1083	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
47	Genesh Navsh Jadhav	MD1084	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
48	Sanodip Ramchandra Kamal	MD1085	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
49	Somnath Suresh Khachha	MD1086	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
50	Rohit Ravindra Khachha	MD1087	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
51	Akshay Kashanath Tambodi	MD1088	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
52	Vivek Kulkarni Ambale	MD1089	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
53	Utkam Sutar	MD1090	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
54	Nihar Anil Tumbada	MD1091	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
55	Rajesh Parashuram Homade	MD1092	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
56	Pravin Vijay Sing	MD1093	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
57	Pratul Bawale		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
58	Vikas Kauram Dagla		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
59	Rohit Madhav Marale		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P



Sr No	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total	
88	Deepak Labhane		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
89	Dattatraya Labhane		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31
90	Dinesh Suker		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
91	Parshuram Chitambar		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
92	Parshuram Chitambar		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
93	Ketan Kumbhar		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
94	Prashant Mali		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	
95	Pratik Kumbhar		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	31	

Supesh Sugar Contractors

MONTH OF October-2023

Sl. No.	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
1	Vaibhav Madhukar Shinkar	MKS03	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
2	Ankush Chandu Barai	MKS04	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
3	Rohit Vasant Junor	MKS05	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
4	Rahul Vilas Ghatal	MKS06	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
5	Vrushabh Ramu Pandhre	MKS08	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
6	Tushar Prakash Basyal	MKS09	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
7	Nilesh Hanochandra Bhovare	MKS010	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
8	Amit Madhav Hadai	MKS011	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
9	Atul Vilas Ghatal	MKS012	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
10	Ashok Shantaram Junor	MKS014	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
11	Rajesh Madi		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P



Age

Sl. No	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31			
31	Chandana Thirudal		P	P	P	P	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P			
32	Anitha Thirudal		P	P	P	P	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P		
33	Prathibha Mani		P	P	P	P	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
34	poornima kumar		P	P	P	P	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P





Sr. No.	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
1	Rohini Raghunath Madhavi	MCK04	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
2	Premilata Raghunath Madhavi	MCK07	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
3	Chandrabhaga Chandu Dawal	MCK08	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
4	Vijaya Devanand Madhavi	MCK09	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
5	Nikita Ramdas Kurhada	MCK010	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
6	Santia Madvi	MCK011	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
7	Aruna Sambire	MCK012	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
8	Roshni Ramesh More	MCK013	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
9	Premilata Dharma Singda	MCK015	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
10	Vandana Bharat Danane	MCK016	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
11	Samiksha Sandesh Ambat	MCK021	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
12	Parwati Anna Bujad	MCK022	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
13	Rasula Bhoir	MCK024	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
14	Divya Batu Bhoir	MCK028	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
15	Nisha Raghu Bhuyal	MCK029	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
16	Maishnavi Ghatal	MCK032	A	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
17	Mathura Chandrakant Sutar	MCK034	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
18	Sujata Baswat	MCK035	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
19	Shawika Bhalkhandra Bhoir	MCK039	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

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Sl. No.	Name	Employee ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
1	Vandana Vikas Chakrade	MCG001	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
2	Vandana Udaya Kulkarni	MCG002	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
3	Mahesh Joshi	MCG003	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
4	Pranali Ravindra Borade	MCG004	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
5	Arjunrao Ramraj Dhooje	MCG005	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
6	Shanali Prasad Ganshahi	MCG006	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
7	Nandana Vaghait	MCG007	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
8	Rajeshree Ramdev Gimbhai	MCG008	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
9	Bharti Vartha	MCG009	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
10	Sunanda Ramdash Kavali	MCG010	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
11	Nilam Vaghait	MCG011	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
12	Savita Vartha	MCG012	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
13	Vandana Ananta Dakhode	MCG013	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
14	Ladkay Tukaram Bhoir	MCG014	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
15	Darshana Dasherath Kulkhadi	MCG015	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
16	Lata Ganeskar	MCG016	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
17	Sunita Valvi	MCG017	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
18	Kamal Dilip Mookeshi	MCG018	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
19	Pramila Ramji Ringde	MCG019	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
20	Jaika Baburao Burodhde	MCG020	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
21	Bhavana Pravin Basvat	MCG021	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
22	Savita Ganeskar	MCG022	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
23	Ruchita Dabhadre	MCG023	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
24	Maheshwari Dule	MCG024	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
25	Anusaya Yashwanti	MCG025	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	
TOTAL:																												

THE SHAKTI PUSPATI MEMBERSHIP ORGANISATION  
ATTENDANCE SHEET, WEEK END OF October 2013  
Guedu Centre, Kozhikode

Sr.no	Name	Enrolment ID	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
1	Sudheer Suresh Manji	MGS006	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
2	Chandran Venkatesh Chaturvedi	MGS017	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
3	Karu Karun Manji	MGS018	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
4	Sonu Karu Manji	MGS014	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
5	Arvind Kamlesh Manji	MGS016	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
6	Kuldeep Ramjatan Mandal	MGS034	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
7	Rahul Rajendra Manji	MGS044	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
8	Ramdev Kuleshar Manji	MGS047	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
9	Kailash Rajkumar Manji	MGS054	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
10	Sita Rajkumar Manji	MGS055	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
11	Munna Ananth Manji	MGS059	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
12	Ranjit Ramjatan Mandal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
13	Anansi Sudeshar Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
14	Solar Sankar Mandal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
15	Babu Preethu Mandal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
16	Jitendra Suresh Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
17	Ranjit Basant Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
18	Nanthu Sohan Ravidas		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
19	Bhagwan Jagdish Das		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
20	Mukesh Suresh Mandal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
21	Mahadev Herman Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
22	Laxman Prameshwar Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
23	Saijun Karu Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
24	Sandip Kall Chaudhari		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
25	Aakash Ramchandra Saw		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
26	Sonu Jitendra Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
27	Suraj Sarfaj Manji		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P
28	Kurjan Shivalak Mandal		P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P

Total Days = 63  
Absence = 13

Sr.	Machine	Qty/Nos.	Production Capacity in KGS. Hour / Approx. Weight	Flow of Material
<b>(A) EXTRUDERS</b>				
1	Extruder No. 1	1 nos	1900	Finished Product
2	Extruder No. 2	1 nos	1800	Finished Product
3	Extruder No. 3 (Twin)	1 nos	4400	Finished Product
4	Extruder No. 4 (Mother- Baby)	1 nos	3800	Finished Product
5	Extruder No. 5	1 nos	1900	Finished Product
6	Extruder No. 6 (Die- Face)	1 nos	1500	Finished Product
<b>(B) AGLOW MACHINE</b>				
1	Aglow (Big)	1 nos	1600	Direct Sale
2	Aglow (Big)	1 nos	1800	Direct Sale
3	Aglow (Big)	1 nos	2200	Direct Sale
4	Aglow (Small)	1 nos	1000	Direct Sale
5	Aglow (Big)	1 nos	2000	Direct Sale
6	Aglow (Big)	1 nos	4000	For Production
7	Aglow (Big)	1 nos	4200	For Production
<b>(C) GRINDER MACHINE</b>				
1	Small Grinder	1 nos	1925	Direct Sale
2	Small Grinder	1 nos	1600	Direct Sale
3	Small Grinder	1 nos	1400	Direct Sale
4	Small Grinder	1 nos	1000	Direct Sale
5	Big Grinder	1 nos	2400	Direct Sale
6	Big Grinder	1 nos	2000	Direct Sale
7	Small Grinder	1 nos	1200	For Production
8	Small Grinder	1 nos	1000	For Production
<b>(D) SHREDDER MACHINE</b>				
1	Shredder	1 nos	3500	Direct Sale
2	Shredder	1 nos	4800	For Production
<b>(E) SQUEEZER MACHINE</b>				
1	Squeezer Machine	1 Nos	3100	Direct Sales / Grinding
<b>(F) WASHING MACHINE</b>				
1	Small Washing Line	1 Nos	2200	For Agglow
2	Big Washing Line	1 Nos	2500	For Agglow

Capacity	For Production
TPD	TPD
367.200	196.8
206.400	52.8
247.800	115.2
84.000	
28.200	
933.600	364.800
TPH	
38.900	

570

41

**TSPI - Manor Plant  
Workers Record**

<b>Month</b>	<b>No of Workers</b>
June' 23	393
July' 23	378
August' 23	396
Sept' 23	393
Oct' 23	402

571  
Exh. "C"

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 Outlook

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**Information required based on the visit carried out at M/s. Shakti Plastic Industries, Palghar on 31.08.2023-reg**

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**From** CPCB, RD Pune <rdpune.cpcb@gov.in>**Date** Tue 9/5/2023 10:57 AM**To** Yogesh Sharma <yogesh@shaktiplasticinds.com>; Bharati Shetty <info@shaktiplasticinds.com>**Cc** Pratik Bharné <pratik.cpcb@gov.in>; Tapas Ukil <tapas.cpcb@gov.in>; nikhileshg.cpcb@supportgov.in <nikhileshg.cpcb@supportgov.in> 2 attachments (384 KB)

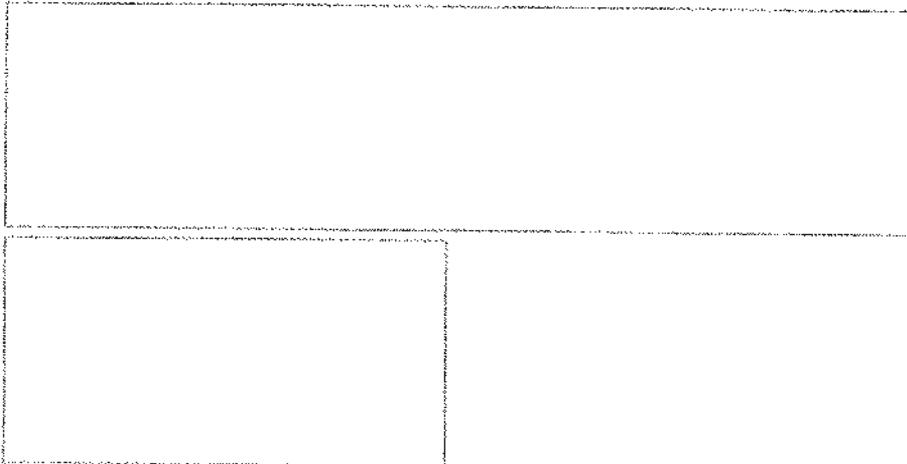
Mission-LiFE-Final Logo.png; G20 theme and logo.png;

Sir,

This has reference to the visit at your facility M/s. Shakti Plastic Industries, Palghar on 31.08.2023 & 01.09.2023 and subsequent telephonic communication with you.

In this regard, it is requested to send the required information as discussed with Sh. Nilesh Joshi and Sh. Pratik Saraf during the aforesaid visit.

धन्यवाद,  
केंद्रीय प्रदूषण नियंत्रण बोर्ड  
क्षेत्रीय निदेशालय, पुणे



**Shradha Singh**

**From:** CPCB, RD Pune <rdpune.cpcb@gov.in>  
**Sent:** Wednesday, September 6, 2023 12:42 PM  
**To:** Yogesh Sharma; Bharati Shetty  
**Cc:** Pratik Bharne; Tapas Ukil; nikhileshg.cpcb@supportgov.in  
**Subject:** Information required based on the visit carried out at M/s. Shakti Plastic Industries, Palghar on 31.08.2023-reg

Sir,

This has reference to the trailing mail and subsequent telephonic communications. In this regard, it is once again requested to send the following information as discussed with Sh. Nilesh Joshi and Sh. Pratik Saraf during the visit.

1. Total Plot Area of the facility i.e. for both Gut No. 158 & 159 with relevant document proofs (Lease Document/Rent Agreement).
2. Purchase orders/invoices of the installed equipment/machinery mentioning power rating and production capacity.
3. Production capacity of the installed equipment/machinery with respect to different materials viz. HDPE, LDPE, PP, PET etc.
4. Electricity bills (Jan, 2023 to Aug, 2023).
5. Details of disposal of ETP sludge (i.e. Hazardous waste manifest, FORM 4 etc.)
6. Processing capacity of plastic waste in terms of Cat I, Cat II, Cat III with supporting documents.
7. Brief details of the type of waste received and its sources.
8. Procurement details of added additives proportion to production.
9. GST Statement for the period April-2022 to August-23.
10. Details of Month Wise Sales, Production & Procurement (April-2022 to August- 2023). (along with the excel sheets of the same)
11. Actual Sales invoices of the products (i.e. granules/pellets etc.) produced by the facility for the period April-2022 to August-23.
12. Actual Invoices with respect to procurement of raw materials (i.e. plastic waste) for the period April-2022 to August-23. (as uploaded on the EPR Portal)
13. Procurement & Sales Invoices as uploaded on the EPR Portal.
14. Names and contact no. of any 05 entities from which the facility has procured its raw materials (i.e. plastic waste) during FY 2022-23, along with relevant invoices.
15. Names and contact no. of any 05 entities to which the facility has sold its finished products (i.e. pellets/granules etc.) during FY 2022-23, along with relevant invoices.
16. Monthly Summary details of EPR credits accumulated and used.

धन्यवाद,

केंद्रीय प्रदूषण नियंत्रण बोर्ड

क्षेत्रीय निदेशालय, पुणे



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केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT FOREST & CLIMATE CHANGE GOVT OF INDIA

F.No. CP-20/80/2021-UPC-II-HO-CPCB-HO Part(1)

26.10.2023

To,

**The Chairman**  
Maharashtra Pollution Control Board,  
Kalpataru Point, 3rd and 4th floor,  
Opp. PVR Theatre, Sion (E),  
Mumbai - 400 022

**Sub: Directions under Section 5 of the EPA, 1986 regarding compliance of various provisions under Schedule – II of Plastic Waste Management Rules, 2016, i.e., Guidelines on Extended Producer Responsibility (EPR)**

**WHEREAS**, the Ministry of Environment, Forest & Climate Change (MoEF&CC) has notified Plastic Waste Management Rules, 2016, in exercise of the powers conferred under sections 3, 6 & 25 of the Environment (Protection) Act, 1986 vide Notification No. G.S.R 320 (E) dated March 18, 2016; and

**WHEREAS**, Plastic Waste Management Rules, 2016 was amended and notified by Ministry of Environment, Forest & Climate Change (MoEF&CC) on 16 February, 2022 to insert Schedule – II, i.e., Guidelines on Extended Producer Responsibility for Plastic Packaging (hereinafter referred as "EPR Guidelines"); and

**WHEREAS**, as per Section 6.1(a) of the EPR Guidelines, "The following entities shall register on the centralized portal developed by Central Pollution Control Board namely: - (i) Producer (P); (ii) Importer (I); (iii) Brand owner (BO), (iv) Plastic Waste Processor engaged in (a) recycling, (b) waste to energy, (c) waste to oil, and (iv) industrial composting; and

**WHEREAS**, as per Section 11.1 of the EPR Guidelines, "All plastic waste processors shall have to register with concerned State Pollution Control Board or Pollution Control Committee in accordance with provisions of 13(3) of Plastic Waste Management Rules, 2016 on the centralized portal developed by Central Pollution Control Board. Central Pollution Control Board shall lay down uniform procedure for registration within three months of the publication of these guidelines" and

**WHEREAS**, CPCB developed the Standard Operating Procedure (SOP) for registration of PWPs on March 15, 2023 and uploaded the same on CPCB website in accordance with EPR guidelines; and

**WHEREAS**, as per Section 11.2 of EPR Guidelines, "The Plastic waste processors shall submit annual returns after end of every financial year by 30th April of the next financial year on the quantity of plastic waste processed category-wise as per prescribed pro forma on the centralized portal developed by Central Pollution Control Board; and.

**WHEREAS**, as per Section 11.5 of the EPR Guidelines, "Only plastic waste processors registered under Plastic Waste Management Rules, 2016, as amended, shall provide certificates for plastic waste processing, except in case of use of plastic waste in road

**'परिवेश भवन' पर्वी अर्जुन नगर, दिल्ली-110032**

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

construction. In case where plastic waste is used in road construction the Producers, Importers & Brand-Owners shall provide a self-declaration certificate in pro forma developed by Central Pollution Control Board. The certificate provided by only registered plastic waste processors shall be considered for fulfilment of Extended Producer Responsibility obligations by Producers, Importers & Brand-Owners; and

**WHEREAS**, as per Section 11.7 of the EPR Guidelines, "The certificate for plastic packaging waste provided by registered plastic waste processors shall be in the name of registered Producers, Importers & Brand-Owners or Local authorities, as applicable, based upon agreed modalities. Central Pollution Control Board will develop mechanism for issuance of such certificate on the centralized portal "; and

**WHEREAS**, as per the EPR Guidelines, CPCB has developed the Centralized portal for registration of Producers, Importers and Brand-owners (PIBOs) & Plastic Waste Processors (PWPs) that has been formally launched on April 05, 2022; and

**WHEREAS**, CPCB has developed the mechanism for Generation & Transfer of EPR Certificates by PWPs (as given in the Guidance Manual developed by CPCB) on the EPR Portal and the corresponding online module of the EPR Portal was launched on November 19, 2022; and

**WHEREAS**, Registration of PWPs by SPCBs/PCCs is on the basis of information provided online by PWPs on the EPR Portal which includes details of plant and machinery (processing capacity, production capacity, power rating, etc.), geotagged photograph of the plant & machinery, raw material, production and sales section of the Units, short video of the Unit etc.; and

**WHEREAS**, as per clause 4(iv) of SOP "Physical Audit of the PWP to be completed by SPCB/PCC within 30 days of grant of Registration. The PWP shall be able to issue certificates to PIBOs post conduction of Audit and validation of its facilities by the SPCB/PCC"; and

**WHEREAS**, in accordance with aforesaid clause of SOP, upon grant of registration to PWP, SPCB/PCC are required to physically verify details of plant and machinery (processing capacity, production capacity, power rating etc.), geotagged photograph of the plant & machinery, raw material, production and sales section of the Units, short video of the Unit etc. as per the checklist provided on EPR portal for the purpose; and

**WHEREAS**, CPCB has developed the Guidance manual for operating Centralized EPR Portal which includes details of procedure for Registration of PIBOs/PWPs, Generation & Transfer of EPR certificates etc., which was made available on EPR portal. Several training sessions/meetings were also conducted with SPCBs/PCCs/Industrial Associations/PWPs and other stakeholders in which inspection requirements/procedures for grant of approval of physical verification of PWPs to be followed by SPCBs/PCCs were covered. SPCBs/PCCs were required to upload approval status of Physical verification of PWPs on the EPR portal following these procedures; and

**WHEREAS**, CPCB vide directions dated 10.03.2023 and 04.07.2023 reiterated that all SPCBs/PCCs to complete physical verification of all registered PWPs in their jurisdiction within the stipulated time frame to enable the PWPs to generate EPR certificates within the timelines stipulated in EPR guidelines; and

**WHEREAS**, CPCB vide directions dated 21.12.2022 had directed all PWPs to upload GST E-invoice of all transactions (sales/ purchase) related to processing of plastic packaging & plastic waste on the EPR Portal; and

**WHEREAS**, viewing rights of the PWP dashboard have been provided to the officials of SPCBs/PCCs to monitor the PWP operations including procurement, production, sale and Certificate generation & transfer by PWP Units registered in their jurisdiction and the same was communicated during the training sessions for SPCBs/PCCs conducted by CPCB for the purpose; and

**WHEREAS**, Section 12.4 of the EPR Guidelines provides that "*Central Pollution Control Board by itself or through a designated agency shall verify compliance of Producers, Importers & Brand-Owners through inspection and periodic audit, as deemed appropriate. Central Pollution Control Board, as required, can also verify compliance of Plastic Waste Processors through inspection and periodic audit. In case of plastic waste processors and Producers, Importers & Brand-Owners operating in a State or Union Territory, Central Pollution Control Board may, if required, direct State Pollution Control Board or Pollution Control Committee to take action*"; and

**WHEREAS**, random sample audit of (i) M/s Shakti Plastics Industries, Palghar, Maharashtra, and (ii) Technova Recycling India Pvt. Ltd, Thane, Maharashtra (plastic waste recyclers); was conducted by CPCB on August 31, 2023 and September 01, 2023 respectively in accordance with Clause 12.4 of the EPR Guidelines; and

**WHEREAS**, M/s Technova Recycling India Pvt. Ltd, Thane, Maharashtra, was registered with Maharashtra Pollution Control Board (MPCB) on 20.6.2023 followed by physical verification of the Unit and uploading approval thereto by MPCB on 07.07.2023 and M/s Shakti Plastics Industries, Palghar, Maharashtra, was registered on 21.7.23 followed by physical verification of the Unit and uploading approval thereto by MPCB on 17.8.23 on the EPR portal; and

**WHEREAS** the following observations were made by the CPCB officials during the aforesaid audit:

i. **M/s Shakti Plastics Industries, Palghar, Maharashtra**

- a. The plastic waste processing capacity of the Unit is 2,88,000 (Tonne per annum) TPA, as registered by Maharashtra Pollution Control Board (MPCB) and CTE/CTO issued. The plant processing capacity as per the plant machinery and process flow diagram given in the application form is 17,760 TPA. The audit team found plant machinery corresponding to 17,760 TPA installed and commissioned in the Unit. The plant machinery corresponding to the registered capacity of 2,88,000 TPA was neither declared on the EPR portal nor found to be installed and commissioned in the Unit by the Audit team.
- b. The Unit has generated EPR Certificates of the order of 2,74,000 Tonnes and transferred EPR Certificates of 2,68,000 Tonnes values to Producers/Importers/Brand Owners (PIBOs). Quantities mentioned in the invoices uploaded on EPR Portal by the Unit are fallacious & very high as compared to the declared production capacity since the plant operations had not yet commenced. As per the information on the EPR Portal, invoices were randomly verified and it has been observed that all verified invoices have been

- generated for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic.
- c. No relevant information as stated below were made available to verify processing of 2,15,000 Tonnes of plastic waste and sale of corresponding quantity of finished product, by the Unit to the audit team:
    - i. Procurement of Plastic waste (Procurement invoices, Supplier details, etc.)
    - ii. Electricity consumption (Electricity bill)
    - iii. Procurement of additives required for processing plastic waste
    - iv. Sale of recycled plastic (GST Statement, Sales invoices, etc.)
  - d. Only 40 workers were available in the Unit as against 125 reported in the application form.

In view of the above, it is observed that EPR Certificates of the value of 2,56,240 tonnes have been generated by the Unit in excess of its actual processing capacity (17760 TPA) and the Unit neither has processing capacity for the said quantity nor relevant prescribed supporting documents/information for the same. The Unit has obtained registration and generated the said EPR certificates of 2,56,240 Tonnes without any actual processing of plastic waste at the Unit and by submitting false documents/information, which is in gross violation of provisions of EPR Guidelines notified as Schedule II of PWM Rules by MoEFCC and CPCB's. Guidance manual for operating Centralized EPR Portal and other directions/communications issued by CPCB from time to time in this regard. The process of generation of EPR Certificates by the Unit was also not monitored by MPCB, despite being the prescribed authority for enforcement as notified under the PWM Rules and having provision of viewing the PWP dashboard on the EPR portal.

ii. **Technova Recycling India Pvt. Ltd, Thane Maharashtra**

- a. The plastic waste processing capacity of the Unit is 97200 Tonnes Per Annum, as registered by MPCB and CTO/CTE issued. The audit team found plant machinery corresponding to 4700 TPA (Cat I 2000 TPA and Cat II/III: 2700 TPA (considering the plant is operated for 24 hrs for 300 days) instead of 97200 TPA as per the trial run conducted by the Unit during which the plant was run at full capacity. Further the processing capacity of Grinder was found to be 400 TPA as against the reported value of 18500 TPA in the application. Also the processing capacity of agglomerator was found to be 2700 TPA as against 60000 TPA reported in the application. The plant machinery corresponding to the registered capacity 97200TPA was not found to be installed and commissioned in the Unit by the Audit team.
- b. The Unit has generated EPR Certificates of the order of 97200 Tonnes and transferred EPR Certificates of 95200 tonnes value to Producer/Importer/ Brand Owners. Quantities mentioned in the invoices uploaded on EPR Portal by the Unit are fallacious & very high as compared to the declared production capacity since the plant operations had not yet commenced. As per the information on the EPR Portal, invoices were randomly verified and it has been observed that such verified invoices have been generated for actual sales of plastic for only 82 Tonnes and the balance quantity has been generated for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic.
- c. No relevant information as stated below were made available to verify processing of 97200 Tonnes of plastic waste and sale of corresponding quantity of finished product, by the Unit to the audit team:

- i. Procurement of Plastic waste (Procurement invoices, Supplier details, etc.)
  - ii. Electricity consumption (Electricity bill)
  - iii. Procurement of additives required for processing plastic waste
  - iv. Sale of recycled plastic (GST Statement, Sales invoices, etc.)
- d. Only 6 workers were available in the Unit as against 30 reported in the application form.
- e. Also, the plant area was found to be 270 sqm as against the 1226 Sqm area reported in the application. Also, The GPS location of the Facility, as submitted in the EPR Portal, was found inaccurate. The actual GPS co-ordinates of the Facility are: Latitude-19.288865 (19°17'19.9"N) Longitude-73.097299 (73°05'50.3"E). The distance between the GPS location as submitted by the facility in the EPR Portal and the actual GPS location of the facility is about 2.2 kms.
- f. The facility has provided 3 godowns (each with an area of about 90 m<sup>2</sup>). The plant machinery, raw material and finished products are placed in these godowns. The total raw material storage area provided by the facility, which is about 170 m<sup>2</sup> area, is observed to be inadequate considering the raw material required for the production of recycled products of 97,200 MTA as per the Registration granted by Maharashtra SPCB.
- g. The Unit has not installed Extruder to produce plastic pellets/granules (products). The facility produces semi-finished products of Grindings & Agglomerates (plastics chips), in its Agglomerator & Grinders. However, MPCB has granted consent to the Unit for production of 86400 TPA pellets/grinding/ agglomerates.

In view of the above, it is observed that EPR Certificates of the value of 92500 T have been generated by the Unit in excess of its actual processing capacity (4700 TPA) and the Unit neither has processing capacity for the said quantity nor relevant prescribed supporting documents/information for the same. The Unit has obtained registration and generated the said EPR certificates of 92500 Tonnes without any actual processing of plastic waste at the Unit and by submitting false documents/information, which is in gross violation of provisions of EPR Guidelines as notified under Schedule II of the PWM Rules by MoEFCC, CPCB's Guidance manual for operating Centralized EPR Portal and other directions/communications issued by CPCB from time to time in this regards. The process of generation of EPR Certificates by the Unit was also not monitored by MPCB, despite being the enforcing agency notified under the PWM Rules and having provision of viewing the PWP dashboard on the EPR portal.

**WHEREAS**, as per Section 11.4 of the EPR Guidelines "*In case, at any stage it is found that the information provided by the plastic waste processor is false, the plastic waste processor shall be debarred by State Pollution Control Board, as per procedure laid down by Central Pollution Control Board, from operating under the Extended Producer Responsibility framework for a period of one year*"; and

**WHEREAS**, as per Section 11.6 of the EPR Guidelines "*The pro forma for the certificate shall be developed by Central Pollution Control Board. In no case, the amount of plastic packaging waste recycled by the enterprise shall be more than installed capacity of the enterprise. The certificates will be for plastic packaging category-wise and shall include GST data of the enterprise*"; and

**WHEREAS**, as per Section 13.1 of the EPR Guidelines "The concerned State Pollution Control Board or Pollution Control Committee shall register Producers, Importers & Brand-Owners (operating in one or two states) and plastic waste processors, through the online portal developed by Central Pollution Control Board. Provision for registration shall be made on the Extended Producer Responsibility portal. State Pollution Control Board or Pollution Control Committee by itself or through a designated agency shall verify compliance of Producers, Importers & Brand-Owners through inspection and periodic audit, as deemed appropriate, of Producers, Importers & Brand-Owners as well as plastic waste processors in their jurisdiction as per the Plastic Waste Management Rule, 2016"; and

**WHEREAS**, as per Rule 18 of PWM Rules " The Environmental Compensation shall be levied based upon polluter pays principle, on persons who are not complying with the provisions of these rules, as per guidelines notified by the Central Pollution Control Board"; and

**WHEREAS**, as per the EC Regime framed by CPCB in 2022, Environmental Compensation is to be levied on PWP @ Rs. 5000/- per ton of plastic waste misreported for quantity of plastic procured and EPR certificate generated after following due legal procedure"; and

**NOW, THEREFORE**, in view of above and in exercise of the powers vested to Chairman, Central Pollution Control Board (CPCB) vide Notification No. S.O.730 (E) dated July 10, 2002 notified as per provisions of Section 5 of the Environment (Protection) Act, 1986, following directions are issued for compliance:

1. To conduct detailed enquiry as to how physical verification of the units namely M/s The Shakti Plastics Industries and M/s. Technova Recycling India Pvt. Ltd (Reg No. PR-20-MAH-06-AAHCT3188J-23) was approved by MSPCB on the EPR portal, in view of the gross violations observed by the Audit team, as above, and also as to why the process of generation of EPR Certificates was not monitored by MSPCB.
2. To fix the liability on erring official/s and take disciplinary action against erring officials, if any, as per the findings of the enquiry set up, as at (1) above.
3. To immediately take the following actions against the afore-mentioned PWP Units namely M/s The Shakti Plastics Industries (Reg No. PR-31-MAH-07-AAMFS7839M-23) and M/s. Technova Recycling India Pvt. Ltd (Reg No. PR-20-MAH-06-AAHCT3188J-23)
  - i. To suspend the consent/authorization/registration issued to the Units with immediate effect and issue show cause notice for debarring the Unit from operating under the Extended Producer Responsibility framework for a period of one year as per Clause 11.4 of the EPR Guidelines or/ and for the revocation of the consent/authorization/registration issued to the Unit;
  - ii. To levy Environmental Compensation (EC), corresponding to the quantum of EPR certificates generated not in conformity with requirement prescribed in CPCB Guidance manual for operating Centralized EPR Portal. The EC is to be levied as per "Guidelines for Assessment of Environmental Compensation to be levied for violation of PWP Rules"

([https://cpcb.nic.in/uploads/plasticwaste/EC\\_Regime\\_PWM.pdf](https://cpcb.nic.in/uploads/plasticwaste/EC_Regime_PWM.pdf))

and Unit be directed to deposit the same in the designated Escrow Account, created by the MPCB for the purpose.

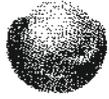
- iii. To take necessary action against every Unit as per applicable law as the Units have submitted false documents for obtaining registration as well as for generating EPR certificates. It may further be ensured that action taken by MPCB regarding these units should act as a deterrent for other Units in committing such violations.
4. To take immediate necessary actions to improve upon the system of grant of registration within MSPCB, monitoring and enforcement thereto ensuring compliance of the Plastic Waste Management Rules, EPR guidelines and directions/guidelines issued by CPCB, including the following:
    - i. Inspection of all processing facilities of Registered PWPs in your jurisdiction within a fortnight from the issue of these Directions and to confirm that the Processing capacity as per the Registration granted to units is in conformity with the actual facilities provided in each Unit. All other information provided in the online application form are also to be revalidated by MPCB.
    - ii. Regular monitoring of EPR Certificate generation process of the Registered PWPs to ensure that EPR Certificates generated by PWPs are in accordance with requirements prescribed in the CPCB guidance manual including uploading of GST E-invoice corresponding to the sales of finished products on the EPR Portal.
  5. To take all necessary steps to ensure that every Unit henceforth complies with all conditions including generating GST E-invoice for all sales of finished products and uploads the same on the EPR Portal, failing which necessary action be immediately taken including levying of EC against each non-complying Unit.

You are, hereby, directed to take necessary action immediately for ensuring compliance of the aforesaid directions and submit action taken report to this office within 10 days from the date of issuance of this direction.

H  
26/10  
(Tanmay Kumar)  
Chairman

580

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**THE SHAKTI**  
**PLASTIC INDUSTRIES**  
Turning waste into value

info@shaktiplasticinds.com  
www.shaktiplasticinds.com

Central Pollution Control Board  
Regional Office  
Pune

1<sup>st</sup> November 2023

Sub: Information required based on the visit carried out by your officials at our factory Palghar, Maharashtra.

Dear Sir

We are in receipt of your e-mail dated 6<sup>th</sup> September 2023 and our subsequent visit to your office on 11<sup>th</sup> September & 4<sup>th</sup> October 2023 on the subject matter. In this regard, kindly note the following:

1. With regard to total plot area of the facility, we have already submitted the documents to you during our visit.
2. Concerning production capacity, a declaration for machine capacity on CPCB Portal is attached herewith, as there was an incorrect insertion, which could not be rectified in the portal.
3. Concerning Purchase Orders/Invoices of the installed machinery, we are submitting herewith a declaration of Equivalence between Sales Invoices & Service Invoices along with a list of machinery. (Invoices w.r.t 11 nos. machinery)
4. With regard to Electricity Bills, we have already submitted a detailed statement in excel format on 11<sup>th</sup> September 2023
5. With regard to details on disposal of ETP sludge, as already informed, we have not carried out the same.
6. As regards to processing capacity of plastic waste and the related Sr. No. 6 & 7, we have already provided you the required documents on 11<sup>th</sup> September, 2023.
7. With regard to GST Statement for the period April 2022, to August 2023, we are attaching herewith the same.
8. Details of month wise sales, production & procurement along with Sr.No.11 & 12, we have already provided you the same on 11<sup>th</sup> September 2023.
9. With regard to procurement & sales invoices as uploaded in the EPR Portal, we have already provided you the same on 11<sup>th</sup> September 2023.
10. With regard to contact number of 5 entities, we have already provided the same to you along with Sr. No. 15 on 11<sup>th</sup> September 2023.
11. Concerning monthly summary details of EPR Credits, we regularly update the same on the portal.

In case you require any clarifications/details on our operational system, kindly do not hesitate to contact us.

For THE SHAKTI PLASTIC INDUSTRIES

Rahul Podaar

(AUTHORISED SIGNATORY)



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
क्षेत्रीय निदेशालय, पुणे  
आम दिनांक  
दिनांक- 2-11-23

Rahul Podaar



THE SHAKTI PLASTIC INDUSTRIES  
202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malad (W), Mumbai 400 064.  
MH-INDIA PH: 022 49671500/01/02

**Shradha Singh**

---

**From:** Yogesh Sharma  
**Sent:** Thursday, November 2, 2023 4:48 PM  
**To:** 'pratik.cpcb@gov.in'  
**Cc:** 'tapas.cpcb@gov.in'; 'ccb.cpcb@nic.in'; 'mscb.cpcb@nic.in'  
**Subject:** Audit - The Shakti Plastic Industries  
**Attachments:** Letter - CPCB Acknowledged copy.pdf

Respected Sir,

We are writing in reference to the surprise audit conducted at our Manor plant in Palghar on August 31st and September 1st, 2023.

We promptly submitted all the necessary documents as per your email dated September 6th, 2023.

Additionally, we made a visit to CPCB Western Regional, Pune office for further clarification and discussion on September 11th and October 4th, 2023.

Due to the extensive nature of the required documents, we submitted hard copies on September 11th, 2023, and November 1st, 2023.

Furthermore, we had a detailed discussion with your good-self and Tapas Sir with explanations for each document submitted.

Attached herewith is an acknowledged copy of the document submission letter for your convenience.

Thank you for your attention to this matter.

Sincerely,

Yogesh



S.S.B

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3<sup>rd</sup> November 2023

The Chairman  
Maharashtra Pollution Control Board  
Sion (E)  
Mumbai 400 022

Sub: EPR Compliance  
Ref: CPCB Chairman's letter addressed to your good self bearing Ref No CP-  
20/80/2021-CPCB-HO dated 26<sup>th</sup> October 2023 pertaining to our Organization  
namely The Shakti Plastic Industries.

Respected Sir

As can be seen from the letter under reference, it was exclusively meant for your attention about our alleged non-compliance on the subject matter and the same was neither tagged to anyone. However, since the letter in question was leaked to all around especially in the comparable industry, as an alert, diligent & accountable Plastic Waste Management Agency in the Country operating out of Mumbai for more than five decades, we take the liberty to reply point by point to the queries being raised by the Hon'ble Chairman, as an abundant caution. In this regard, kindly note the following:

1. At the outset, we are really surprised about the purported EPR non-compliance in our factory at Palghar, Maharashtra, which was pointed out by the officials of Regional Office CPCB, Pune during their visit over there.

2. **The Shakti Plastic Industries**

a) Query: Plastic Processing Capacity of the Unit - CTO was issued for 288,000 TPA whereas the plant processing capacity given in the application was 17,760 TPA?

Ans: As a matter of fact, when the RO Pune, CPCB Officials visited our Palghar Factory on Thursday 31<sup>st</sup> August, 2023 in the afternoon, without any advance intimation, there were not adequate staff members present and





SS

the next day i.e. Friday, was the weekly off. What we intend to convey to you is that in order to explain the technical queries, it is imperative that skilled technical employees' presence in the factory is a must. However, due to lack of such technical experts, the queries could not be explained properly and we can assure you that the disparity indicated in your query is definitely a lack of communication and we are confident that we can erase any doubts about the alleged aberration in the capacity in case you could depute your officials once again to our factory.

- b) Query: Unit generated EPR Certificates to the tune of 274,000 MT and transferred credit for 268,000 MT. The documentation in this regard such as invoices, etc. is fallacious so much so that even the operation in the plant has not yet commenced. As a matter of fact, the invoices are meant for collection & recycling and not for actual sales of recycled plastic?

Ans: We normally issue two types of invoices namely Sales & Service. In this regard, we attach herewith a detailed declaration thereby showing the Equivalence between Sales Invoices & Service Invoices. With the above clarification, we trust that there will be no ambiguity between generation of EPR Certificates and the Transferred Ones.

Regarding the Plant operations was not yet commenced, we would like to point out the following:

- i) We had applied for the consent on 16<sup>th</sup> January, 2023 and we received the Consent to Establish on 24<sup>th</sup> March 2023 - Copies of both the Application and CTE are attached hereto for your reference.
- ii) We also received Amalgamation of Consent to operate along with the existing consent on 15<sup>th</sup> June, 2023, copy of which is also attached hereto for your perusal.
- iii) Two/Three machines were under maintenance





Therefore, question of not commencing the plant operations does not arise at all as the Plant was fully operational when the R O officials visited our factory on 31<sup>st</sup> August 2023 & 1<sup>st</sup> September 2023.

- c) Query: No details i.e. procurement of plastic waste, electricity consumption, GST Statement, etc. are available for processing of 215,000 MT and sale of corresponding quantity of finished product?

Ans: We had already submitted the electricity consumption statement in excel format when our officials visited Regional office, CPCB, Pune on 11<sup>th</sup> September, 2023 as also the GST Statement had also been given. We are also attaching herewith a detailed machinery list which speaks for itself.

With regard to procurement of additives required for processing plastic waste, please note:

- i) We do use only a negligible quantity of pigment i.e 0.1 grams for 100 kgs of plastic waste
- ii) Pigments are coming in the natural form.
- iii) For manufacturing and sale of granules, we have the relevant Purchase Orders and commercial invoices and the required details are regularly being updated on the portal.

- d) Query: 40 workers were present as against 125 reported in the application form?

Ans: When the Officials visited our factory on 31<sup>st</sup> August, 2023 at about 14.30 hrs. most of our workmen had been doing various types of jobs in different locations in the factory premises itself. Without having false modesty, we may state here that we do have a factory plot admeasuring about 20 acres where our workmen are deployed in different locations in the premises itself as also in various departments. Therefore, the R O officials could not notice their presence due to massive topography. As a matter of fact, we have contractual workmen as well as the permanent





employees, which would be to the extent of 350. We are paying labour wages of almost Rs 30 lacs per month and electricity bill to the extent of Rs 25 lacs per month. Apart from this, there are other related expenses to the extent of Rs 10 lacs per month. We are ready and willing to provide the requisite roaster in order to authenticate the exact manpower in our factory and there is, therefore, no anomalies to that extent.

In the light of the above, we trust that we have clarified the exact situation on each point and in case you need further details/clarifications on the same, we are ready and willing to provide it as and when the need arises.

Thanking you in anticipation and oblige,

For THE SHAKTI PLASTIC INDUSTRIES

*Rahul V Podaar*

Rahul V Podaar

Partner

Encl: a/a

✓ CC: Member - Secretary, MPCB Mumbai



*S. S. S. / 03/11/2023*  
Maharashtra Pollution Control Board  
Kalpataru Point, 2nd Floor, Sion Circle,  
Opp. Cine Planet, Sion (East),  
Mumbai - 400 022.  
Tel. 24010437 / 24020781.  
Website : www.mpcb.gov.in

*Submitted 2 copies.*

587 "F"

58

**Shradha Singh**

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:14 AM  
**To:** Shradha Singh  
**Subject:** FW: Confirmation about the Cancellation of Purchase order - 1200004194 The Shakti Plastic Industries  
**Attachments:** Purchase Order 1200004194.PDF

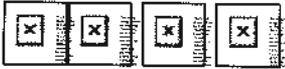
FYI - GRB Dairy Foods Pvt.Ltd.

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

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**From:** Markandeya Sarma <markandeya.s@grbdairyfood.com>  
**Sent:** Tuesday, January 30, 2024 5:00 PM  
**To:** Poonam Poddar <poonam@shaktiplasticinds.com>; Yogesh Sharma <yogesh@shaktiplasticinds.com>; Prateek Saraf <psaraf@shaktiplasticinds.com>  
**Cc:** Kasturi Raj P <kasturiraj@grbdairyfood.com>; Purchase Executive <purchase-exe@grbdairyfood.com>; Subbareddy A <subbareddy.a@grbdairyfood.com>; Sargurunathan.GR <sargurunathan.gr@grbdairyfood.com>; Krishnan A <krishnan.a@grbdairyfood.com>; Arutselvam <maintenance-u5@grbdairyfood.com>; stores-ghee <stores-ghee@grbdairyfood.com>  
**Subject:** Confirmation about the Cancellation of Purchase order - 1200004194 The Shakti Plastic Industries

**Kind attention: Madam Poonam Poddar,**

We herewith confirming you that the attached PO is cancelled & we are not going to execute any further activities related to this PO .

Pl. do not have any further discussion on this subject as far as this PO concerned .

Regards,

K. Markandeya Sarma ,  
Deputy General Manager – Purchase

**GRB DAIRY FOODS PVT. LTD.,**

Plot No.45,SIPCOT Industrial Estate

Phase 1, Hosur – 635126 India

Landline: +91 4344 297 434 /534 /634 Mobile: 8056666435



Ghee • Masalas • Instant Mixes • Sweets • Snacks



**From:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Sent:** Monday, September 4, 2023 2:41 PM  
**To:** Kasturi Raj P . <[kasturiraj@grbdairyfood.com](mailto:kasturiraj@grbdairyfood.com)>; Akhil V S <[akhil.vs@grbdairyfood.com](mailto:akhil.vs@grbdairyfood.com)>  
**Cc:** Markandeya Sarma <[markandeya.s@grbdairyfood.com](mailto:markandeya.s@grbdairyfood.com)>; Prabhakaran G <[prabhakaran.g@grbdairyfood.com](mailto:prabhakaran.g@grbdairyfood.com)>;  
 Purchase Executive <[purchase-exe@grbdairyfood.com](mailto:purchase-exe@grbdairyfood.com)>; stores-ghee <[stores-ghee@grbdairyfood.com](mailto:stores-ghee@grbdairyfood.com)>; Engineering  
 Stores <[enggstores.ghee@grbdairyfood.com](mailto:enggstores.ghee@grbdairyfood.com)>; Sargurunathan.GR <[sargurunathan.gr@grbdairyfood.com](mailto:sargurunathan.gr@grbdairyfood.com)>;  
 Arutselvam <[maintenance-u5@grbdairyfood.com](mailto:maintenance-u5@grbdairyfood.com)>; Kiruthika P <[Kiruthika.P@grbdairyfood.com](mailto:Kiruthika.P@grbdairyfood.com)>; Yogesh Sharma  
 <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>  
**Subject:** RE: Purchase order - 1200004194 The Shakti Plastic Industries

Thank you very much for the confirmation.

Regards,  
 Poonam Poddar



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



**From:** Kasturi Raj P . <[kasturiraj@grbdairyfood.com](mailto:kasturiraj@grbdairyfood.com)>  
**Sent:** Monday, September 4, 2023 2:38 PM  
**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>; Akhil V S <[akhil.vs@grbdairyfood.com](mailto:akhil.vs@grbdairyfood.com)>  
**Cc:** Markandeya Sarma <[markandeya.s@grbdairyfood.com](mailto:markandeya.s@grbdairyfood.com)>; Prabhakaran G <[prabhakaran.g@grbdairyfood.com](mailto:prabhakaran.g@grbdairyfood.com)>;  
 Purchase Executive <[purchase-exe@grbdairyfood.com](mailto:purchase-exe@grbdairyfood.com)>; stores-ghee <[stores-ghee@grbdairyfood.com](mailto:stores-ghee@grbdairyfood.com)>; Engineering  
 Stores <[enggstores.ghee@grbdairyfood.com](mailto:enggstores.ghee@grbdairyfood.com)>; Sargurunathan.GR <[sargurunathan.gr@grbdairyfood.com](mailto:sargurunathan.gr@grbdairyfood.com)>;  
 Arutselvam <[maintenance-u5@grbdairyfood.com](mailto:maintenance-u5@grbdairyfood.com)>; Kiruthika P <[Kiruthika.P@grbdairyfood.com](mailto:Kiruthika.P@grbdairyfood.com)>; Yogesh Sharma  
 <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>  
**Subject:** RE: Purchase order - 1200004194 The Shakti Plastic Industries

Please proceed to round off numbers

Regards

Kasturi Raj P

**GRB DAIRY FOODS PVT. LTD.,**

Plot No.45,SIPCOT Industrial Estate,

Phase 1, Hosur – 635126 India

Landline: +91 4344 297 434 /534 /634 Mobile: +91 984 008 8790



**From:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>

**Sent:** Monday, September 4, 2023 12:06 PM

**To:** Akhil V S <[akhil.vs@grbdairyfood.com](mailto:akhil.vs@grbdairyfood.com)>

**Cc:** Kasturi Raj P . <kasturiraj@grbdairyfood.com>; Markandeya Sarma <markandeya.s@grbdairyfood.com>; Prabhakaran G <prabhakaran.g@grbdairyfood.com>; Purchase Executive <purchase-exe@grbdairyfood.com>; stores-ghee <stores-ghee@grbdairyfood.com>; Engineering Stores <enggstores.ghee@grbdairyfood.com>; Sargurunathan.GR <sargurunathan.gr@grbdairyfood.com>; Arutselvam <maintenance-u5@grbdairyfood.com>; Kiruthika P <Kiruthika.P@grbdairyfood.com>; Yogesh Sharma <yogesh@shaktiplasticinds.com>; Prateek Saraf <psaraf@shaktiplasticinds.com>

**Subject:** RE: Purchase order - 1200004194 The Shakti Plastic Industries

Dear Mr. Akhil,

Thank you for the PO.

We will start the plastic waste collection accordingly.

Also note that we cannot transfer the credit in decimal points on the CPCB portal.

Request you to kindly issue the PO in round figures only as below:

PO No.	Date	Brand	State	Category	Price	Target Qty(MT)
1200004194	25.08.2023	GRB Dairy Foods	Geo Neutral	Rigid	1.25	560
1200004194	25.08.2023	GRB Dairy Foods	Geo Neutral	Flexible	1.25	127
1200004194	25.08.2023	GRB Dairy Foods	Geo Neutral	MLP	2.5	68

Awaiting your reply.

Regards,  
Poonam Poddar



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



**From:** Akhil V S <akhil.vs@grbdairyfood.com>

**Sent:** Saturday, September 2, 2023 10:47 AM

**To:** Poonam Poddar <poonam@shaktiplasticinds.com>

**Cc:** Kasturi Raj P . <kasturiraj@grbdairyfood.com>; Markandeya Sarma <markandeya.s@grbdairyfood.com>; Prabhakaran G <prabhakaran.g@grbdairyfood.com>; Purchase Executive <purchase-exe@grbdairyfood.com>; stores-ghee <stores-ghee@grbdairyfood.com>; Engineering Stores <enggstores.ghee@grbdairyfood.com>; Sargurunathan.GR <sargurunathan.gr@grbdairyfood.com>; Arutselvam <maintenance-u5@grbdairyfood.com>; Kiruthika P <Kiruthika.P@grbdairyfood.com>

**Subject:** Purchase order - 1200004194 The Shakti Plastic Industries

Dear sir/madam,

590

61

Please find here with the attached Purchase Order.

**Note: Invoice address & price must be as per our Purchase order only & PO NUMBER Should be mentioned in all your Invoices - else Goods will not be unloaded.**

**(PLEASE DON'T SEND THE EXCESS QTY. MORE THAN THE P.O QUANTITY)**

Thanks & Regards,

Akhil vs

Purchase Officer

**GRB DAIRY FOODS PVT. LTD.,**

Plot No. 45, Phase-1, SIPCOT Industrial Complex,  
Hosur, Tamilnadu, India. – 635 126.

Mobile: +91 8925839202



**Shradha Singh**

---

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:13 AM  
**To:** Shradha Singh  
**Subject:** FW: Request for proposal of EPR services in PWM

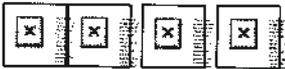
FYI - Glenmark Pharmaceuticals Limited

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



**From:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>  
**Sent:** Monday, June 17, 2024 10:53 AM  
**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>; Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>  
**Subject:** RE: Request for proposal of EPR services in PWM

Hi Poonam,  
It is decided that we will not proceed.

Regards,  
**Siddhesh Desai**

**From:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Sent:** 17 June 2024 10:36  
**To:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>  
**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>; Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>  
**Subject:** RE: Request for proposal of EPR services in PWM

Dear Siddhesh,

Please clarify to proceed accordingly.

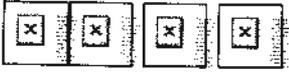
Thank you.

Regards,  
Poonam Poddar



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



---

**From:** Poonam Poddar

**Sent:** Wednesday, June 12, 2024 12:43 PM

**To:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>

**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>;

Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>

**Subject:** RE: Request for proposal of EPR services in PWM

Dear Siddhesh,

So, should we consider the PO as cancelled ?

Kindly confirm by today.

Thank you.

Regards,  
Poonam Poddar



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



---

**From:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>

**Sent:** Wednesday, June 12, 2024 12:32 PM

**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>

**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>;

Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>

**Subject:** RE: Request for proposal of EPR services in PWM

Hi Poonam,

It is still on hold & will not be considered.

Regards,

**Siddhesh Desai**  
Senior Manager

Glenmark Pharmaceuticals Limited

Glenmark House, B D Sawant Marg, Andheri (E), Mumbai 400099

(Office) 91 22 4018 9999 | (Extn) 11768 | (Mobile) +91 9920333032 /+91 9869209563 | (Web)



**From:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>

**Sent:** 12 June 2024 12:09

**To:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>

**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>;

Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>

**Subject:** RE: Request for proposal of EPR services in PWM

Dear Siddhesh,

Kindly update us further on below email.

Thank you.

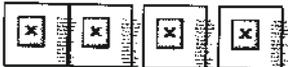
Regards,

Poonam Poddar



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



**From:** Poonam Poddar

**Sent:** Wednesday, December 6, 2023 3:28 PM

**To:** Siddhesh Desai <[Siddhesh.Desai@glenmarkpharma.com](mailto:Siddhesh.Desai@glenmarkpharma.com)>

**Cc:** Dr.Rajan Sharma <[Rajan.Sharma@glenmarkpharma.com](mailto:Rajan.Sharma@glenmarkpharma.com)>; Prateek Saraf <[psaraf@shaktiplasticinds.com](mailto:psaraf@shaktiplasticinds.com)>;

Yogesh Sharma <[yogesh@shaktiplasticinds.com](mailto:yogesh@shaktiplasticinds.com)>; Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>

**Subject:** RE: Request for proposal of EPR services in PWM

Dear Siddhesh,

Noted your below email.

We have kept the order / PO on hold as of now.

Thank you.

Regards,

Poonam Poddar

594



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**CHAMBAL FERTILISERS AND CHEMICALS LIMITED**

CFCL/PUR/45012467/SUS/01  
December 29, 2023

**THE SHAKTI PLASTIC INDUSTRIES**  
202-205, BUSINESS CLASSIC,  
MALAD WEST,  
MUMBAI-400064

KIND ATTN: MR. RAHUL PODDAR

Sub: - Suspension of contract for "PLASTIC WASTE MANAGEMENT".

Ref: - Our contract CFCL/PUR/260/45020078 dated 07.08.2023,

SWO No. 55116574 dated 09.08.2023 & 55117280 dated 29.08.2023.

Dear Sir

This has reference to the letter F No. CP-20/80/2021-UPC-11-HO-CPCB-HO Part (1) dated 26.10.2023 (Attached for ready reference) issued by CPCB to MPCB, wherein M/s. The Shakti Plastic Industries" have been debarred from "State pollution Control Board" (SPCB) as per procedure laid down by CPCB under section 11.4 of the EPR guideline.

The referred contract was issued for the fulfillment of EPR responsibility as per guideline issued by CPCB. As CFCL is operating within the same framework, we are forced to suspend the referred orders till receipt of further notice from CPCB in this regard, hence our SWO 55116574 dated 09.08.2023 & 55117280 dated 29.08.2023 shall be considered as cancelled.

Thanking you for your services and hoping to establish business relations again for our future requirements.

Yours faithfully,  
For CHAMBAL FERTILISERS & CHEMICALS LIMITED.

S K Saxena  
GM- Materials

8-Jan-25

To,

M/s. Shakti Plastics Industries,  
Office 202-205, 2<sup>nd</sup> Floor,  
Business Classic,  
Chincholi Bunder Roaf,  
Malad (West), Mumbai – 400064.  
Represented by its Director,  
Rahul V Podar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>

Sub: Notice for termination of Master Services (EPR) Agreement dated 11<sup>th</sup> August 2023

Ref:

1. Master Services (EPR) Agreement dated 11<sup>th</sup> August 2023 between Hindustan Coca-Cola Beverages Private Limited and Shakti Plastics Industries & EPR Allocation Letter dated 11<sup>th</sup> August 2023
2. Email correspondence resting with the last email dated 3<sup>rd</sup> February 2024
3. Letter from HCCBPL to Shakti Plastics dated 22<sup>nd</sup> November 2024
4. Reply dated 28<sup>th</sup> November 2024 from Shakti Plastics to HCCBPL's Letter dated 22<sup>nd</sup> November 2024
5. Continued reply dated 29<sup>th</sup> November 2024 from Shakti Plastics to HCCBPL's Letter dated 22<sup>nd</sup> November 2024.

We, Hindustan Coca-Cola Beverages Private Limited (HCCBPL), are in receipt of your replies as mentioned above. We have reviewed the contents of your replies and find that you have failed to provide us with the clearance confirmation letter from the Central Pollution Control Board that we have demanded for almost a year now.

In your Replies referred above, you had given a point wise response to the contents of our Letter. For which, we respond as follows:

- a. We have not accepted the 31,002 EPR credits that you had transferred to our wallet on the CPCB website since you had failed to follow the SOP mentioned in the Allocation Letter dated 11<sup>th</sup> August 2023. As a first step, your company / Enviro Recyclean were required to provide the documentation to verify traceability prior to making any transfer of EPR credits. You have not provided any proper documentation nor fulfilled the requirements of providing end to end traceability. Further, we learn through the notices issued to your organization by the CPCB and the respective State PCB's (listed in our Letter) that your organization has provided fake documents to multiple companies. For these reasons, we clearly excluded these 31,002 EPR credits transferred by Enviro Recyclean from our annual returns filed with the CPCB. Hence, we have not received any benefit whatsoever from this alleged transaction.



Classified - CONFIDENTIAL

- b. We reiterate that your organization failed to fulfil any of the obligations listed in the EPR agreement. The transfer of EPR credits was not as per the agreed terms and we had clearly rejected the said transfer of EPR credits and invoices raised in respect of the EPR credits promptly. Your company had acknowledged the said rejection of invoices. Since we have made clear that we have no use for nor have we derived any benefit from the EPR credits, **we insist that your company takes back the EPR credits from our CPCB wallet at the earliest.**
- c. To reiterate our stand, your claim that your company was updating the progress in collection of plastic waste to our procurement employee cannot be considered a fulfillment of your obligations under the Agreement. The attachment that you have referred to is merely an Excel spreadsheet with bald numbers. We have good reasons as stated above to refuse to rely on these numbers of plastic waste collection efforts of your company.
- d. Also, our demand for the confirmation of clearance of your company with its associated WMA's from the proceedings initiated against your company by the CPCB through a letter still stands. While the CPCB and State PCB's have cancelled your consents to operate, your company remains incapable of fulfilling the contractual obligations listed in the EPR Agreement. By your own admission, the matter continues to be sub-judice with respect to these entities. Hence, the EPR Agreement becomes voidable at the option of HCCBPL.
- e. We rejected the transfer of 31002 EPR credits to our wallet on the CPCB website. We have also informed the CPCB along with our annual return, to not consider the 31002 EPR credits transferred by Enviro Recycleclean as part of our allocated quantity. We reiterate that your company is requested to take back this quantity of 31002 EPR credits. Since we have not accepted the transfer of 31002 EPR credits and rejected the invoices amounting Rs.2,48,01,600/-, there is no basis for your company to demand any payment from HCCBPL.

Hence, we are under no obligation to make any payments to your company Shakti Plastics, much less the payment of Rs.2,48,01,600/-. All statements made in your replies not specifically traversed above, are disputed by HCCBPL. Kindly note that in view of your company's continued failure to fulfil contractual obligations, and unsatisfactory replies, the EPR Agreement along with the Allocation letter and Purchase Orders numbered as 4500382468, 4500382471 and 4500382472 issued thereunder shall stand terminated with immediate effect.

Issued for and on behalf of Hindustan Coca Cola Beverages Private Limited



(THIAGU MATHAN)

Classified - CONFIDENTIAL



castrol.co.in

**Confidential & Without Prejudice****Date:** 15 Jan 2024**To,**

**Shakti Plastic Industries,**  
2nd Floor, 202-205, Business Classic,  
Chincholi Bunder Road,  
Malad – West, Mumbai – 400 064, Maharashtra, India

**Sub:** Cancellation of the purchase order no. 21135475 - 001 OP issued by Castrol India Limited ("Purchase Order")

**Re:** Direction no - F.No. CP-20/80/2021-UPC-II-HO-CPCB-HO Part (1), issued by Central Pollution Control Board ("CPCB") to Maharashtra State Pollution Control Board ("MSPCB").

**Attn:** Mr. Rahul V. Poddar, Partner

Dear Mr. Poddar,

We are writing in continuance to our earlier communications with you in reference to the above referred directions issued by CPCB alleging irregularities by Shakti Plastic Industries ("Shakti Plastics").

While we have noted your assurances stating compliance with the applicable laws, the above captioned directions have not been revoked or clarified by CPCB till date. In the circumstances, and in the interim Castrol India Limited ("Castrol"), is compelled to cancel the Purchase Order no. 21135475 - 001 OP issued for collection and recycling of plastic waste on behalf of Castrol for the fiscal year 2023-24.

Please note that Castrol may elect to terminate the Master Services Agreement dated 8<sup>th</sup> August 2022 ("Agreement") in case the said directions are not recalled/clarified/closed in due course.

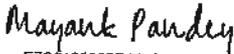
We note that Shakti Plastics has passed on the credits for the plastic waste that has been processed by it for Castrol. In case of a cancellation/revocation of the said credits and/or their benefit not being available to Castrol, Castrol will require Shakti Plastics to provide us undertaking of compliance with the Agreement and support Castrol's defense before the appropriate forums, if requested. Castrol expects Shakti Plastics to continue its stated compliance with the said Agreement.

This letter is being sent without prejudice to any rights that Castrol may have under the Agreement or under the applicable law, all of which rights shall stand reserved by Castrol.

We request you keep us updated on any further developments on the matter.

Best Regards

DocuSigned by:

  
E7C818659081410  
Mayank Pandey

Supply Chain Manager

**Registered office:**

Castrol India Limited  
CIN L23200MH1979PLC021359  
Technopolis Knowledge Park,  
Mahakali Caves Road, Andheri East, Mumbai - 400 093.  
Tel: +9122-66984100 / Fax: +9122-66984101  
Customer Service Toll Free No. : 1800222100 / 18002098100

**NOTICE OF TERMINATION****Date: 09<sup>th</sup> November 2023**

**The Shakti Plastic Industries**  
Office at 2<sup>nd</sup> Floor 202/203/204/205,  
Business Classic Chincholi Bunder Road,  
Malad (West) Mumbai 400 064.

Dear Sir,

**Sub: - Termination of Service Agreement dated 21<sup>st</sup> October 2021 and Addendum dated 31<sup>st</sup> October 2022 and 25<sup>th</sup> August 2023.**

-----  
This Notice of Termination is with reference to the Agreement dated 21<sup>st</sup> October 2021, Addendum dated 31<sup>st</sup> October 2022 and 25<sup>th</sup> August 2023. executed between **Bisleri International Private Limited and The Shakti Plastic Industries** (hereinafter referred to as the "Said Agreement"). In accordance with **Clause 7.4** of the said Agreement, we hereby issue this notice for termination of the said Agreement. Accordingly, the Agreement shall stand terminated with effect from **8<sup>th</sup> December 2023**.

On termination of the said Agreement, the Company stands fully discharged against any claim or liability on any account/transactions pertaining to the said Agreement.

We thank you for all the cooperation extended to us during the tenure of the arrangement.

Thanking you,

Agreed and accepted,  
**Bisleri International Private Limited**



(Authorised Signatory)





Recd  
11/9/25

70

Date : 05-09-2025

To:  
**The Shakti Plastics industries**  
2nd Floor, 202-205, Business Classic,  
Chincholi Bunder, Malad (W),  
Mumbai - 400064.

**Subject:** Termination of Agreement - 60 Days' Notice Under Clause 7.4

Dear Sir/Madam,

This Agreement executed date : 25-02-2025 between **Amar Tea Pvt. Ltd.**, having its registered office at **61, Dr. S. S. Rao Road, Parel, Mumbai - 400012**, and **The Shakti Plastics industries, EPR Compliance, Plastics & Waste Management**.

As per **Clause 7.4** of the Agreement, which permits either party to terminate the contract by providing a **60 (sixty) days' written notice**, we hereby formally notify you of our intention to **terminate the Agreement, effective 60 days from the date of this letter**.

Accordingly, the Agreement shall stand terminated with effect from **03-11-2025**.

We request your cooperation during the notice period to ensure a smooth transition and closure of all ongoing matters. Kindly ensure the following within the notice period:

- Completion and handover of any pending documentation and compliance reports
- Settlement of any outstanding invoices or obligations
- Cessation of all services post the termination date

We appreciate the services rendered by your organization during the course of our engagement and wish you all the best in your future endeavours.

For any clarification, you may contact the undersigned.

Thank you for your cooperation.

Sincerely,

For Amar Tea Pvt. Ltd.

  
ATMAN ATUL SHAH  
Director



CIN No. U15490MH1990PTC054836

ADMIN. OFFICE : 61, DR. S. S. RAO ROAD, NEAR M. G. HOSPITAL, PAREL, MUMBAI - 400 012  
TEL : 91-22-4040 0900 • Website : www.societytea.com • Email : info@societytea.com



600

71

## FDC Limited

MANUFACTURERS & EXPORTERS OF FOODS, DRUGS & CHEMICALS

March 03, 2025.

**The Shakti Plastic Industries**  
202/203/204/205, 2<sup>nd</sup> Floor,  
Business Classic,  
Chincholi Bunder Road,  
Malad West,  
Mumbai - 400 064

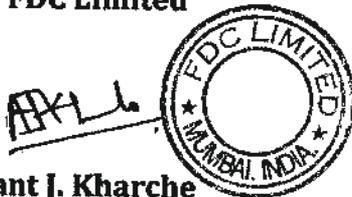
Dear Sir/ Madam,

Sub: **Termination of Service Provider Agreement**

This letter is to inform you that pursuant to clause 7.2 (a) of the Service Provider Agreement for collection and disposal of plastic waste executed with you on 1<sup>st</sup> June, 2022 and the further Addendum dated 28<sup>th</sup> June, 2023, we would like to terminate the Agreement and your Services with no monetary cost payable by us.

Please treat this letter as an official intimation of termination of the agreement with immediate effect.

Thanking you.  
For FDC Limited



**Anant J. Kharche**  
**Associate Vice President**  
**Engineering Services & Projects**

---

CORPORATE OFFICE : 142-48, S. V. Road, Jogeshwari (W), Mumbai - 400 102, INDIA  
Tel.: +91-22-6291 7900 / 950 / 2678 0652 / 2653 / 2656 • Fax : +91-22-2677 3462  
E-mail : fdc@fdcindia.com • Website : www.fdcindia.com

REGISTERED OFFICE : B-8, M.I.D.C. Industrial Area, Waluj - 431 136, Dist. Aurangabad, INDIA  
Tel.: 0240-255 4407 / 255 4299 / 255 4967 • Fax : 0240-255 4299  
E-mail : waluj@fdcindia.com • CIN : L24239MH1940PLC003176

## Yogesh Sharma

---

**From:** info@davatbeverages.com  
**Sent:** 22 June 2024 15:59  
**To:** Anand Padhya; jayesh@shaktiplastic.com  
**Cc:** account@davatbeverages.com; Aniket Gavas; sugandha@shaktiplastic.com; Yogesh Sharma  
**Subject:** Termination of Agreement

Good afternoon, we got the notification from the market against your company regarding non-compliance things but still, we have not received any clarification from Mr Anand Padhya and your company, so our Management has decided to terminate all legal contracts with you from now, so kindly send us back our TDs amount as early as possible.

Should you have any query, please do inform us.

Best Regards,  
Savan Khanpara  
(General Manager)  
DAVAT BEVERAGES PVT. LTD.

**Important Disclosure:** The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of us. In case you share or leaked any part of this email to third party than you liable to compensate any kind of financial or nonfinancial loss arise out of it.

---

**From:** sugandha@shaktiplastic.com <sugandha@shaktiplastic.com>  
**Sent:** Monday, June 26, 2023 3:49 PM  
**To:** info@davatbeverages.com  
**Cc:** account@davatbeverages.com; Anand <anand@shaktiplasticinds.com>; Aniket <aniket@shaktiplasticinds.com>; Jayesh <jayesh@shaktiplastic.com>  
**Subject:** Scope of Work for 1 Lakh consultation for EPR services

Respected Sir,

Please find attachment of the Scope of work for End To End consultation. As per the discussion we have mailed you the Quotation. Thank you in anticipation.

Thanks & Regards,  
Anand Padhya  
Advisor  
Mobile No. +91-8169727341  
The Shakti Plastic Industries



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)  
Follow us:



# PONNI SUGARS (ERODE) LIMITED

Odapalli, Cauvery R.S P.O., ERODE - 638 007.  
Tamilnadu. India.

CIN : L15422 TN1996 PLC037200

Phones : 04288 - 247351 - 55

E.mail : gen@ponnisugars.com | website : www.ponnisugars.com

Regd. Office : Esvin House, No.13, Rajiv Gandhi Salai, (OMR), Perungudi, CHENNAI - 600 096.



PUR / 2221

17.06.2024

## THE SHAKTI PLASTIC INDUSTRIES

2<sup>nd</sup> Floor, 202-205,  
Business Classic,  
Chincholi Bunder Road,  
Malad – West,  
Mumbai – 400 064,  
Maharashtra

Dear Sir,

Sub: Termination of the contract – Due to Non-Receipt of EPR Credit - Reg.

Please note that, we are forced to terminate the EPR agreement entered with you as service provider for managing EPR plastic credits for disposal of plastic waste and assistance in annual filing and other services mentioned in the agreement in annexure - A of the agreement dated 4<sup>th</sup> September 2023 due to lack of cooperation from your end and non-receipt of EPR credits in time causing non-compliance by our company which may lead to penal action for us.

We have submitted all the necessary details related to EPR filing on 30<sup>th</sup> May 2023 and same was also filed in CPCB portal. On 26<sup>th</sup> July 2023 you have replied through E - mail regarding our EPR target is 265MT and requested for the Purchase Order. Subsequently, the agreement was entered into on 04<sup>th</sup> September 2023.

Based on the agreement till now we have not received the EPR credit in our CPCB EPR portal in spite of frequent reminders made by us via phone and E-mail for the Financial Year 2023-24 to Mr. Abhinay Lakhmapure service provider staff assigned to us.

In view of the above issues, we are issuing notice for the termination of the Agreement entered between us on 04<sup>th</sup> September 2023, with reference to clause 7.4 **“Notwithstanding the above, the company shall have the right to terminate this agreement, by giving a written notice of 60days to the service provider, without assigning any reason thereof”** in full and final with no obligations from our side.

We request you to kindly acknowledge receipt of this termination notice.

Thanking you,

Yours faithfully,  
For PONNI SUGARS (ERODE) LIMITED

PRESIDENT (OPERATIONS)



## UNIPATCH Rubber Limited

REGD. OFFICE :  
10, COMMUNITY CENTRE  
SAKET, NEW DELHI-110017  
INDIA  
CIN NO. : U25199DL1982PLC014879

Date : 11.03.2024

To  
Mr. Yogesh Sharma  
GM (EPR)  
M/s Shakti Plastic Industries  
2<sup>nd</sup> Floor, 202-205, Business Classic,  
Chincholi Bunder Road, Malad- West, Mumbai -400064

Sub. : Termination of ADDENDUM NO. 1.

Dear Sir,

This has reference to the agreement dt. 01.06.2022 between M/s Unipatch Rubber Limited and M/s Shakti Plastic Industries, in respect of EPR services. This agreement expired on 31<sup>st</sup> May'2023. There after we received your request / quotation dt. 17.05.2023 for end to end EPR services and the same was accepted by our management. We executed ADDENDUM NO. 1 on 02.08.2023 between M/s Unipatch Rubber Limited and M/s Shakti Plastic Industries which is to expire on 13.06.2024.

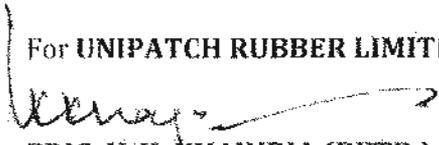
It has come to our knowledge that your company operation has been banned by the CPCB for EPR services, therefore we cannot continue suffering due to your own short comings raised by CPCB. Further we have not received any response from you regarding your eligibility in spite of repeated communication and personal visit by our Senior Executive to your office in Mumbai.

Therefore the management of M/s Unipatch Rubber Limited hereby terminates the ADDENDUM NO. 1 dated 02.08.2023 (Ref. clauses No. 7.2 (a & b) of the agreement dated 01.06.2022) with immediate effect.

This is for your information and necessary action please.

Regards,

For UNIPATCH RUBBER LIMITED

  
BRIG. V. K. KHAJURIA (RETD.)  
PRESIDENT & WHOLETIME DIRECTOR

PHONES : +91-11-46222222 (30 Lines) FAX : +91-11-26867192  
E-mail : corporate@unipatchrubber.com Website : www.unipatch.com

CHENNAI  
PH. : 26590896

DELHI  
PH. : 46222299

KOLKATA  
PH. : 22268364

MUMBAI  
PH. : 27657535



A joint venture with Tech, USA.



**Yogesh Sharma**

**From:** Rahul Podaar  
**Sent:** 12 March 2024 15:10  
**To:** Yogesh Sharma  
**Subject:** FW: Termination of Service Order no 85004057 dt 18.09.2023

**From:** srpaikray@kfl.net.in <srpaikray@kfl.net.in>  
**Sent:** 12 March 2024 14:17  
**To:** Sahil Ghai <sahil@shaktiplasticinds.com>  
**Cc:** sghosh@kfl.net.in; Rahul Podaar <rahul@shaktiplasticinds.com>; Pradeep Kumar Singh <pksingh@kfl.net.in>; KK Rai <kkrai@kfl.net.in>; Adesh Kumar Singh <aksingh@kfl.net.in>  
**Subject:** Termination of Service Order no 85004057 dt 18.09.2023

**M/s. Shakti Plastic**  
Dear sir,

This is with reference to below mail dated 31.01.24 & 17.02.24, we hereby terminate the service order no-85004057 dt 18.09.2023 issued for EPR activity for Plastic Waste Management.

Regards,  
Soumya Ranjan Paikray  
KRIBHCO FERTILIZER LIMITED  
SHAHJAHANPUR, UP-242001  
Mob: 7008145934

----- Message from Sahil Ghai <sahil@shaktiplasticinds.com> -----  
Date: Tue, 20 Feb 2024 06:08:12 +0000  
From: Sahil Ghai <sahil@shaktiplasticinds.com>  
Subject: RE: Suspension of SO no 85004057 dt 18.09.2023  
To: sghosh@kfl.net.in, Rahul Podaar <rahul@shaktiplasticinds.com>  
Cc: srpaikray@kfl.net.in, "mailto:kfl.net.in" <"@kfl.net.in" <"@kfl.net.in">, Pradeep Kumar Singh <pksingh@kfl.net.in>, KK Rai <kkrai@kfl.net.in>, Adesh Kumar Singh <aksingh@kfl.net.in>

Dear Sanjib Ghosh

605

75

## Yogesh Sharma

**From:** Sachin Brahmankar <sachin.brahmankar@caprihansindia.com>  
**Sent:** 13 March 2024 11:27  
**To:** jayesh@shaktiplastic.com; Aniket Gavas; Yogesh Sharma; Aniket Gavas  
**Cc:** anand.bhoite@bilcare.com; Ankush.shitole@caprihansindia.com; 'Suhas Nemmaniwar'  
**Subject:** Shakti Plastic-Contract termination  
**Attachments:** Directions to Maharashtra PCB.pdf

Dear Team,

Please find enclosed herewith the letter which we have received from market and we have discussed with your representative in October-23 in this regard. But we haven't received any kind of response from your side and from PCB. Hence our Management has decided to terminate all legal contracts with you including PO on urgent basis.

Thanks & Regards,

**Sachin Brahmankar**  
Dy.General Manager-HR & Admin

**caprihans** **Bilcare**  
INDIA LIMITED *Research*

Plot No. 76/77, Satpur MIDC, Nashik-422007  
Phone: (+91) 253 2225 700 / 711  
[www.caprihansindia.com](http://www.caprihansindia.com)

606

76

## Yogesh Sharma

**From:** Vinayak Polymers <[info.vinayakpolymers@gmail.com](mailto:info.vinayakpolymers@gmail.com)>  
**Sent:** 15 March 2024 12:54  
**To:** [jayesh@shaktiplastic.com](mailto:jayesh@shaktiplastic.com); Anand Padhya; Yogesh Sharma; Aniket Gavas  
**Subject:** Regarding Termination Of Our Contract  
**Attachments:** Directions to Maharashtra PCB.pdf

Dear Sir,

We have received this notice from Market and we had a word with Mr Anand Padhya regarding this notice in November 2023. At that time he said nothing was wrong with us. Everything is cleared and you will get clarification letter in two months time but March has been started but still we have not received any kind of clarification letter from the CPCB or your team. So our management has decided to Kindly terminate all our legal contracts and agreements from today.

**Thanks & Regards,**

**Jaimin Panchal**  
+91 997 941 4057

**Rohit Sidpara**  
+91 997 879 6664



16, Kanjibhai Estate, Opp. Ramwadi Weigh Bridge,

Vinzol Patia, Vatva-Mahemdabad Road,

Vatva, Ahmedabad, Gujarat - 382 445.

**Mobile:** +91 987 941 4057

**Email:** [info.vinayakpolymers@gmail.com](mailto:info.vinayakpolymers@gmail.com)

**Website:** [Vinayak Polymers & Air bubble Roll & Air bubble Rolls](#)



Please don't print this e-mail unless you need it.

**Yogesh Sharma**

---

**From:** accounts kutchbrine.in <accounts@kutchbrine.in>  
**Sent:** 31 January 2024 16:30  
**To:** jayesh@shaktiplastic.com; Anand Padhya; Yogesh Sharma; Aniket Gavas  
**Cc:** Jasmit Ahir  
**Subject:** Termination of Agreement.  
**Attachments:** Directions to Maharashtra PCB.pdf

We are terminating the Agreement because 3 months ago we got an Agreement, And till 3 Months we haven't got a satisfied response.  
PFA Press release note.

--

Regards,

**Kutch** Brine Chem Industries  
Manufacturer & Exporters of: Refined Iodised & Highly Purified Industrial Salt  
Ground Floor, "Shree Ram House"  
TCX-South-20, Ward-12-A  
Behind Oriental Bank Of Commerce,  
Gandhidham - 370 201 (Kutch)-Gujarat-India.

608

78

**Yogesh Sharma**

**From:** Accounts Flexibond <accounts@flexibondtapes.com>  
**Sent:** 20 January 2024 13:28  
**To:** jayesh@shaktiplastic.com; Anand Padhya; Yogesh Sharma; Aniket Gavas  
**Subject:** Termination Purchase Order & Agreement

Dear Sir,

This is to inform you sending notice to Shakti Plastic Industries but we Have not received any reply from since last two month we give many time reminder to Mr. Anandbhai to give us phone & msg But he didn't Any reply, So we are here with canceling our purchase Order & Agreement From today Onwards

This is Our Management Decision terminate Purchase order & Agreement.

Thanks & Regards,

**MEHUL PATEL 9904300133**

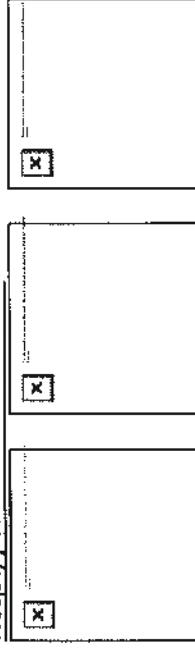
## **Flexibond Industries Pvt.Ltd.**

**Plot No.810/1,Kothari Cross Road, Village : Santej, Ta : Kalol,**

**Dist : Gandhinagar-382 722(Gujarat)**

**Office : 02764-286631**

**<http://www.flexibond.in>**



### **OUR BANK DETAIL**

**Flexibond Industries Pvt.Ltd. (Kotak Mahindra Bank Ltd.)**

**A/C No : 5645514240** Branch & IFSC Code :- Bopal(A`bad) & KKBK0003019

**Yogesh Sharma**

---

**From:** JK POLYMERS <jk\_polymers@yahoo.in>  
**Sent:** 13 January 2024 16:29  
**To:** Anand Padhya; jayesh@shaktiplastic.com; Yogesh Sharma; Aniket Gavas  
**Subject:** Regarding Termination of Agreement & P.O.

Dear Sir

Refer to above subject and reference to CPCB has issued the Notice against your organisation, so that we received from the market. After that we spoke to Mr. Anand Padhya regarding the same matter , but we have not received any kind of clarification. So our company has decided for Termination.

Kindly update your system & Cancel our P.O. and Agreement on urgent basis.

Regards,

Bhavesh Patel  
Partner

**J K POLYMERS**  
**PLOT No.: 8, GIDC,**  
**PHASE-II, DEDIYASANA,**  
**MEHSANA - 384 002**  
**PH.: +91-90990-06290**  
**MOB : +91-99256-80093**  
**e-mail : [jk\\_polymers@yahoo.in](mailto:jk_polymers@yahoo.in)**  
**URL: [www.jkpolymer.co.in](http://www.jkpolymer.co.in)**  
**[www.indiamart.com/j-k-polymer](http://www.indiamart.com/j-k-polymer)**

610

80

**Yogesh Sharma**

**From:** MAHARSHI PACKAGING <maharshipackaging11@gmail.com>  
**Sent:** 11 January 2024 09:56  
**To:** jayesh@shaktiplastic.com  
**Cc:** Anand Padhya; sugandha@shaktiplastic.com  
**Subject:** Termination of agreement for EPR compliance  
**Attachments:** Press\_Release\_-\_The\_Shakti\_Plastic\_Industries\_-\_31\_Oct\_2023\_1\_.pdf; Directions\_to\_Maharashtra\_PCB\_1\_.pdf

Sir,  
As per the CPCB notification and audit , you firm shakti plastic Industries found fraud for giving EPR credits. So, We are terminating our agreement with you from now onwards.  
Also if any Problem found due to credit given by you to us , then shakti plastic is liable for that and you have to clear that .



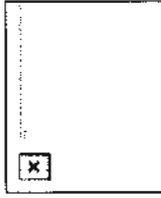
PLOT NO :- 3508/B, PHASE - 4, GIDC, CHHATRAL,  
TA - KALOL, DIST - GANDHINAGAR, GUJARAT  
CONTACTS NO :- 9879163613 / 9427039878

611

81

**From:** Ambica Polysacks kadi <[ambicapolysackskadi1@gmail.com](mailto:ambicapolysackskadi1@gmail.com)>  
**Sent:** 10 January 2024 11:09  
**To:** [jayesh@shaktiplastic.com](mailto:jayesh@shaktiplastic.com)  
**Cc:** [sugandha@shaktiplastic.com](mailto:sugandha@shaktiplastic.com); Anand Padhya; Aniket Gavas; Rahul Podaar; Yogesh Sharma  
**Subject:** Termination of agreement for EPR compliance  
**Attachments:** Press\_Release\_-\_The\_Shakti\_Plastic\_Industries\_-\_31\_Oct\_2023\_1\_.pdf; Directions\_to\_Maharashtra\_PCB\_1\_.pdf

Sir,  
As per the CPCB notification and audit , you firm shakti plastic Industries found fraud for giving EPR credits. So, We are terminating our agreement with you from now onwards.  
Also if any Problem found due to credit given by you to us , then shakti plastic is liable for that and you have to clear that .



\*AMBICA POLY SACKS\*  
\*SR.NO.138/8, NR. RAILWAY STATION,  
VILLAGE: KARANAGAR PIN-382727  
TA: KADI , DIST :- MEHSANA  
STATE :- GUJARAT (INDIA)  
PHONE NO. : +91-2764 277335\*

\*E-MAIL : [ambicapolysackskadi1@gmail.com](mailto:ambicapolysackskadi1@gmail.com)\*  
\*WEB : [www.ambicapolysacks.com](http://www.ambicapolysacks.com)\*

**Yogesh Sharma**

**From:** stretchnwrap@rediffmail.com on behalf of Stretch N Wrap International <stretchnwrap@rediffmail.com>  
**Sent:** 10 January 2024 09:45  
**To:** jayesh@shaktiplastic.com  
**Cc:** sugandha; Anand Padhya; Aniket Gavas; Rahul Podaar; Yogesh Sharma  
**Subject:** Termination of agreement for EPR compliance  
**Attachments:** Press\_Release\_-\_The\_Shakti\_Plastic\_Industries\_-\_31\_Oct\_2023; Directions\_to\_Maharashtra\_PCB\_1\_.pdf

**Sir,** As per the CPCB notification and audit , you firm shakti plastic Industries found fraud for giving EPR credits. So, We are terminating our agreement with you from now onwards.  
Also if any Problem found due to credit given by you to us , then shakti plastic is liable for that and you have to clear that .

Regards,

Hiren Patel / Urvi Patel

Mob : 9722370334 / 9726387568

Note - We have Started to supply the BOPP adhesive Tapes Also. Please send your inquiry.

M/s Stretch N Wrap International  
Plot No.117, Phase-1,GIDC  
Chhatral - 382729.  
Ta: Kalol , Dist- Ghandhinagar  
E-mail: stretchnwrap@rediffmail.com  
Website: www.stretchnwrap.com  
AN ISO 9001:2015 Certified Company

613

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**Yogesh Sharma**

---

**From:** devdatt.joshi <sumi7@gmail.com>  
**Sent:** 07 January 2024 09:19  
**To:** jayesh@shaktiplastic.com; Anand Padhya; Yogesh Sharma; Aniket Gavas  
**Subject:** termination of Agreement for EPR

Dear Mr Jayesh ,

In view of the recent notice by CPCB to your company and inadequate explanation by Mr Anand Padhya on the subject matter, we would like to terminate the Agreement between our company and your firm .  
Please make a note and put it in action.

Thanking you.  
Yours sincerely

For Surni Labs  
Devdatt Joshi  
CEO  
M 9824011379

614

84



WITHOUT PREJUDICE

4<sup>th</sup> January 2024

BY HAND DELIVERY / COURIER / EMAIL

To:

The Shakti Plastic Industries,  
2<sup>nd</sup> Floor, 202-205,  
Business Classic, Chincholi Bunder Rd.,  
Malad (W), Mumbai - 400064

Re: Notice of Termination under Clause 7.4 of Agreement dated 21 September 2023 ("the Agreement") executed by Hershey India Private Limited ("HIPL"), and The Shakti Plastic Industries ("Service Provider")

We refer to the Agreement.

In terms of Clause 7.4 of the Agreement, HIPL has the right to terminate the Agreement with 60 days' prior notice ("Right of Termination").

We hereby give notice to the Service Provider in exercise of our Right of Termination, as follows:

1. Service Provider is hereby notified that we wish to terminate the Agreement on and with effect from 4<sup>th</sup> March 2024, i.e., after the expiry of 60 days from the date of this notice of termination.

Nothing in this notice shall be regarded as impairing, diminishing, affecting, or operating as a waiver in whole or in part of, the rights of HIPL under the Agreement or otherwise, in any manner whatsoever.

This notice is issued to the Service Provider without prejudice to any other rights of HIPL whether under the or otherwise.

All the relevant provisions of the Agreement including (without limitation) in relation to governing law and dispute resolution shall *mutatis mutandis* apply to this notice.

Signed and delivered for and on behalf of HERSHEY INDIA PRIVATE LIMITED

By : Kanishka Das

Title : Director – Supply Chain



PRIVILEGED AND CONFIDENTIAL

1 | 1

**Hershey India Private Limited**

CIN U24240MH1997PTC105714

Regd. office - Schindler House • Hiranandani Gardens • Powai • Mumbai 400076, India  
Phone : +91- 22- 2572 7800 • Fax : +91-22- 2572 7801 • Website – www. hersheyindia.com

**Shradha Singh**

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:20 AM  
**To:** Shradha Singh  
**Subject:** FW: Service Ageement for EPR Services  
**Attachments:** Shakti Plastics Service Agreement.pdf

FYI - Kansai Nerolac Paints Ltd

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



---

**From:** Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>  
**Sent:** Monday, November 6, 2023 12:57 PM  
**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Subject:** FW: Service Ageement for EPR Services

Please check

---

**From:** VED RAJIV (MUMBAI - HO) <[rajived@nerolac.com](mailto:rajived@nerolac.com)>  
**Sent:** Monday, November 6, 2023 10:46 AM  
**To:** Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>  
**Cc:** CHATTERJEE INDRANATH (HO) <[indranathc@nerolac.com](mailto:indranathc@nerolac.com)>; SAWANT VARADA (MUMBAI - HO) <[varadasawant@nerolac.com](mailto:varadasawant@nerolac.com)>; TODKAR ONKAR (MUMBAI - HO) <[onkartodkar@nerolac.com](mailto:onkartodkar@nerolac.com)>; SHINDE MAHESH (MUMBAI - HO) <[maheshshinde@nerolac.com](mailto:maheshshinde@nerolac.com)>  
**Subject:** Service Ageement for EPR Services

Dear Mr., Podar,

I am Rajiv Ved, part of the Indirect procurement team at KNPL. This is with reference to the service agreement signed with Shakti Plastic Industries for Fulfilment of EPR requirements of the company, dated 18<sup>th</sup> May 2023.

In relation to the aforementioned agreement, we are in receipt of the notification from Central Pollution Control Board (CPCB), dated 26<sup>th</sup> Oct 2023 wherein "Shakti Plastic Industries" has been issued a show cause notice, debarring the unit from operating under the Extended Producer Responsibility framework for a period of one year. In lieu of this, Shakti Plastic Industries is in default of its Compliance obligations (clause 7.1) and performance clauses related to clauses 2.7 and 2.8. We thus, wish inform you of our decision to terminate this agreement in lieu of our rights of termination as per clause 10.2, with immediate effect.

Regards

=====  
Please do not print this e-mail unless you really need to.  
To know more about us visit: [www.nerolac.com](http://www.nerolac.com)  
=====

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Nerolac House, Ganpatrao Kadam Marg,  
Lower Parel, Mumbai 400013  
Phone: +91 22 2499 2500  
[www.nerolac.com](http://www.nerolac.com)

**Shradha Singh**

---

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:22 AM  
**To:** Shradha Singh  
**Subject:** FW: SERVICE ORDER  
**Attachments:** SHAKTI SERVICE ORDER 6900062234.pdf

FYI - Mahyco Private Ltd

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



---

**From:** Ratnesh Singh <[ratnesh.singh@mahyco.com](mailto:ratnesh.singh@mahyco.com)>  
**Sent:** Friday, January 31, 2025 6:15 PM  
**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Cc:** Mustafa Mulla <[mustafa.mulla@mahyco.com](mailto:mustafa.mulla@mahyco.com)>  
**Subject:** Fw: SERVICE ORDER

Dear Madam,  
This purchase order stands cancelled as you were unable to do the work at scheduled time.

Regards

Ratnesh Singh

Associate Manager (Materials)

MM Deptt.

**Mahyco Private Limited,**

Jalna – Aurangabad Road,

At. Dawalwadi, Tq. Badnapur,

Jalna – 431203. Maharashtra.

Email : [ratnesh.singh@mahyco.com](mailto:ratnesh.singh@mahyco.com)



---

**From:** Ratnesh Singh <[ratnesh.singh@mahyco.com](mailto:ratnesh.singh@mahyco.com)>  
**Sent:** 01 October 2024 14:32  
**To:** Poonam Poddar <[poonam@shaktiplasticinds.com](mailto:poonam@shaktiplasticinds.com)>  
**Cc:** Mustafa Mulla <[mustafa.mulla@mahyco.com](mailto:mustafa.mulla@mahyco.com)>  
**Subject:** SERVICE ORDER

Dear Madam,  
Please find the attachment regarding service order 6900062234 of EPR compliance charges.

Regards

Ratnesh Singh

Associate Manager (Materials)

MM Deptt.

**Mahyco Private Limited,**

Jalna – Aurangabad Road,

At. Dawalwadi, Tq. Badnapur,

Jalna – 431203. Maharashtra.

Email : [ratnesh.singh@mahyco.com](mailto:ratnesh.singh@mahyco.com)

Phone : +91-9996975614

[www.mahyco.com](http://www.mahyco.com)

*Vision: Feed the world by empowering smallholder farmers*

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**Shradha Singh**

---

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:23 AM  
**To:** Shradha Singh  
**Subject:** FW: [EXTERNAL] Procurement of EPR certificates for fulfilling the EPR obligations for Financial year 2022-23.

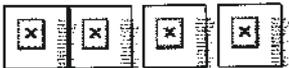
FYI - Marks & Spencer

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



---

**From:** Mishra, Ashish <Ashish.x.Mishra@marks-and-spencer.com>  
**Sent:** Tuesday, December 5, 2023 6:09 PM  
**To:** Poonam Poddar <poonam@shaktiplasticinds.com>  
**Cc:** Yogesh Sharma <yogesh@shaktiplasticinds.com>; Prateek Saraf <psaraf@shaktiplasticinds.com>; Batra, Rohan <Rohan.Batra@marks-and-spencer.com>  
**Subject:** RE: [EXTERNAL] Procurement of EPR certificates for fulfilling the EPR obligations for Financial year 2022-23.

Dear Poonam,

As per management decision, We have to cancel this PO.  
We shall update you later if we would require any support on this.

Thanks.

Kind Regards  
Ashish Mishra

---

**From:** Poonam Poddar <poonam@shaktiplasticinds.com>  
**Sent:** Tuesday, December 5, 2023 10:54 AM  
**To:** Mishra, Ashish <Ashish.x.Mishra@marks-and-spencer.com>  
**Cc:** Yogesh Sharma <yogesh@shaktiplasticinds.com>; Prateek Saraf <psaraf@shaktiplasticinds.com>; Batra, Rohan <Rohan.Batra@marks-and-spencer.com>  
**Subject:** RE: [EXTERNAL] Procurement of EPR certificates for fulfilling the EPR obligations for Financial year 2022-23.

Dear Mr. Ashish,

Kindly update us further on the trail mail by today.

**Shradha Singh**

**From:** Poonam Poddar  
**Sent:** Thursday, December 18, 2025 11:25 AM  
**To:** Shradha Singh  
**Subject:** FW: Kindly hold the PO of Swasth Aahar Private Limited due to non clarity of CPCB Clearance Authority Letter

FYI - Patanjali Peya Ltd

Regards,  
Poonam Poddar  
+91-9820480180



Website : [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

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**From:** legal@patanjalipeya.com <legal@patanjalipeya.com>  
**Sent:** Wednesday, April 24, 2024 3:25 PM  
**To:** Poonam Poddar <poonam@shaktiplasticinds.com>  
**Cc:** Prateek Saraf <psaraf@shaktiplasticinds.com>; Yogesh Sharma <yogesh@shaktiplasticinds.com>  
**Subject:** Re: Kindly hold the PO of Swasth Aahar Private Limited due to non clarity of CPCB Clearance Authority Letter

Dear Team,

We really felt good by using your services but really apprehend and wish to say in heavy note that we no longer be associated to take your services for EPR filing from this financial year with immediated effect as no communication has been recieved that your Company is eligible for the same under CPCB notice clearance letter.

Thanks for your services in all that matters any of the documents of PPPL records shall be shared to us in either pdf format attchements for the previous filing if any.

Thanks & Regards  
CS Yashvee  
Mob: +91-9610671163  
Legal & Compliance Department  
Email id: [legal@patanjalipeya.com](mailto:legal@patanjalipeya.com)

**Patanjali Peya Private Limited**

WITHOUT PREJUDICE

4<sup>th</sup> January 2024

BY HAND DELIVERY / COURIER / EMAIL

To:

The Shakti Plastic Industries,  
2<sup>nd</sup> Floor, 202-205,  
Business Classic, Chincholi Bunder Rd.,  
Malad (W), Mumbai - 400064

Re: Notice of Termination under Clause 7.4 of Agreement dated 21 September 2023 ("the Agreement") executed by Hershey India Private Limited ("HIPL"), and The Shakti Plastic Industries ("Service Provider")

We refer to the Agreement.

In terms of Clause 7.4 of the Agreement, HIPL has the right to terminate the Agreement with 60 days' prior notice ("Right of Termination").

We hereby give notice to the Service Provider in exercise of our Right of Termination, as follows:

1. Service Provider is hereby notified that we wish to terminate the Agreement on and with effect from 4<sup>th</sup> March 2024, i.e., after the expiry of 60 days from the date of this notice of termination.

Nothing in this notice shall be regarded as impairing, diminishing, affecting, or operating as a waiver in whole or in part of, the rights of HIPL under the Agreement or otherwise, in any manner whatsoever.

This notice is issued to the Service Provider without prejudice to any other rights of HIPL whether under the or otherwise.

All the relevant provisions of the Agreement including (without limitation) in relation to governing law and dispute resolution shall *mutatis mutandis* apply to this notice.

Signed and delivered for and on behalf of HERSHEY INDIA PRIVATE LIMITED

*Kanishka*



By : Kanishka Das

Title : Director – Supply Chain

PRIVILEGED AND CONFIDENTIAL

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**Hershey India Private Limited**

CIN U24240MH1997PTC105714

Regd. office - Schindler House • Hiranandani Gardens • Powai • Mumbai 400076, India  
Phone : +91- 22- 2572 7800 • Fax : +91-22- 2572 7801 • Website – www.hersheyindia.com

**Report with respect to CPCB directions issued u/s 5 of EP Act, 1986 to Maharashtra Pollution Control Board regarding non-compliance of M/s Shakti Plastic Industries**

**1 Introduction**

**1.1 Chronology of Consent Management**

M/s Shakti Plastics Industries, Palghar is engaged in recycling of plastic waste, having plant at Gat No.158, 159, Nandgaon, Manor, Tal-Palghar. The unit was commenced in the year 2000 as per Udyog Adhar certificate submitted by the industry.

The industry was having Consent to Operate (CTO) dated 28.07.2020, granted by Regional Officer (Thane) for capacity of 1,20,000 TPA.

Thereafter, the industry applied for Consent to Establish (Expansion) i.e. CTE(Expansion) on 16.01.2023 for capacity of 14,000 MT/month i.e. 1,68,000 TPA. The application for CTE (Expansion) was duly processed and recommended for approval, by Sub-Regional officer, Tarapur II, MPCB and it was granted on 24.03.2023.

Thereafter, the industry applied for Consent to Operate (expansion) on 22.05.2023 for aforesaid expansion. The application was duly processed and recommended for approval, by Sub-Regional officer, Tarapur II, MPCB and accordingly, Regional Officer (BMW), MPCB has granted the application on 15.06.2023 (copy enclosed as Annexure 1) for total plastic waste processing capacity of 2,88,000 Tonnes per Annum (TPA) (earlier CTO capacity of 1,20,000 TPA + expansion of 1,68,000 TPA), for following products:

- i. Plastic granules & reprocess plastic granules (without washing activity)- 7500 MT/Month
- ii. Plastic grinding & agglomerate (without washing activity) 2500 - MT/Month
- iii. Plastic granules & reprocess plastic granules (with washing activity) 10000 - MT/Month
- iv. Plastic grinding & agglomerate (with washing activity) - 4000 MT/Month

**1.2 Plastic EPR registration & physical verification- CPCB guidelines**

As per PWM Rules 2016, the Extended Producer Responsibility (EPR) guidelines were published in February 2022, according to which, plastic waste processors (PWPs) are mandated to obtain EPR registration from CPCB/ SPCB/ PCC as per their location. CPCB has published Standard Operating Procedure (SOP) for Registration of Plastic Waste Processor (PWP) through Plastic EPR Portal as per PWM Rules 2016 on 15<sup>th</sup> March, 2022.

As per the aforesaid SOP, Physical Audit of the PWP is required to be completed by SPCB/PCC within 30 days of grant of Registration. The PWP shall be able to issue certificates to PIBOs post conduction of Audit and validation of its facilities by the

SPCB/PCC.

Accordingly, login credentials have been created by MPCB and given to all the 12 Regional Officers of MPCB for physical verification of the installed machineries for processing of plastic waste.

#### **Chronology of EPR Registration approval to M/s Shakti Plastic Industries**

1. The industry had applied for plastic EPR registration on CPCB portal on 27.05.2022.
2. As per the CPCB guidelines, as the industry is having Consent to Operate for the capacity of 1,20,000 TPA, the EPR registration application was approved and registration was granted on 18.07.2022 for the said capacity.
3. After that, as per the CPCB guidelines, the checklist prepared by CPCB for physical verification was marked online to RO Thane.
4. Accordingly, RO Thane has conducted physical verification w.r.t. installed capacity of plant and machinery as per format of CPCB and submitted the verification report along with recommendation for approval of the installed capacity of 1,20,000 TPA.
5. After receipt of physical verification report from RO Thane, the final approval was given from MPCB head office. After that only, the waste processor is able to generate the EPR certificates.
6. The industry re-applied for EPR registration on 18.07.2023 for expanded quantity i.e. 2,88,000 TPA.
7. The abovesaid procedure was followed for the expanded capacity.
8. As per the CPCB guidelines, as the industry is having Consent to Operate for the capacity of 2,88,000 TPA, the EPR registration application was approved and registration was granted on 31.07.2023 for the said capacity.
9. After that, as per the CPCB guidelines, the checklist prepared by CPCB for physical verification was marked online to RO Thane.
10. Accordingly, RO Thane has conducted physical verification w.r.t. installed capacity of plant and machinery as per format of CPCB and submitted the verification report along with recommendation on 08.08.2023 for approval of the installed capacity of 2,88,000 TPA (Annexure 3).
11. After receipt of physical verification report from RO Thane, the final approval was given from MPCB head office.

#### **2 Directions by CPCB to MPCB under section 5 of EP Act, 1986, regarding M/s Shakti Plastics Industries, Palghar, Maharashtra on 26.10.2023**

CPCB taken random sample audit of M/s Shakti Plastics Industries, Palghar, Maharashtra, and (ii) Technova Recycling India Pvt. Ltd, Thane, Maharashtra (plastic waste recyclers); was conducted by CPCB on August 31, 2023 and September 01, 2023 respectively in accordance with Clause 12.4 of the EPR Guidelines.

In view of the observations made by the audit team, CPCB issued directions to Maharashtra Pollution Control Board on 26.10.2023 under Section 5 of the EPA, 1986 regarding compliance of various provisions under Schedule —II of Plastic Waste Management Rules, 2016, Guidelines on Extended Producer Responsibility (EPR). CPCB directed to take necessary action immediately with submission of action taken report within 10 days from the date of issuance of the aforesaid direction.

### **3 Visit to Shakti Plastic Industries on 08.11.2023**

Accordingly, a team for investigation of the matter has been constituted comprising of Regional Officer, Thane, Sub-Regional Officer (ROBMW) and Field Officer (ROBMW). The team conducted surprise visit on 08.11.2023 to the Shakti Plastic Industries, Gat No.158, 159, Nandgaon, Manor, Tal-Palghar.

During the inspection the following observation were made:

- 298 workers attendance on 08.11.2023 was shown to the team.
- Inward register (raw material) and outward register (product) for the month of November 2023 was shown.
- 27 plastic recycling/ processing machineries were present.
- Capacity of observed machinery not available on machines (only kW, RPM, Ampere etc.)
- 2 Washing lines along with grinder (capacity of 2300 T/A)
- Inward and Outward registers copy submitted.
- Light bill – hard copies submitted (After expansion, not much variation)
- GST bills- at corporate office
- OEM receipts called from company.

Due to above incomplete information, industry representatives were called with aforesaid information to compile all the relevant information at MPCB Office. Industry representative provided following documents on 20.11.2023.

### **4 Key observations regarding Details of Industry process and documentation**

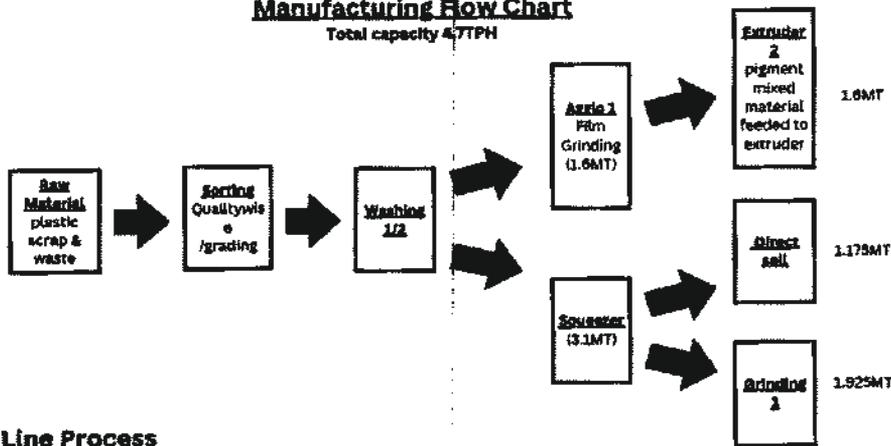
#### **4.1 Process description**

During visit, the following process was observed at the plant.

- a. Washing line process

**Manufacturing Flow Chart**

Total capacity 4.7TPH

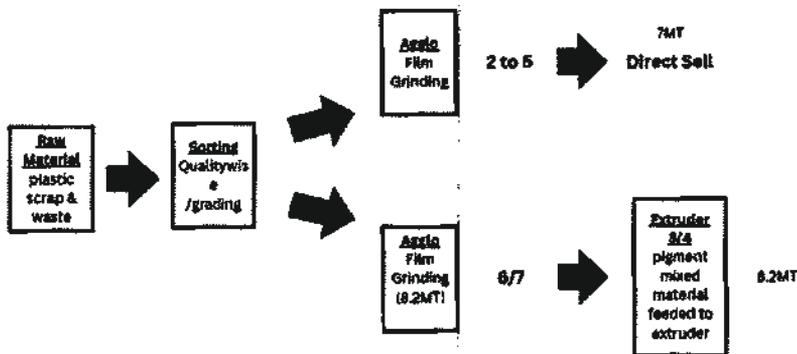


**Washing Line Process**

b. Agglo process

**Manufacturing Flow Chart**

Total capacity 15.2TPH

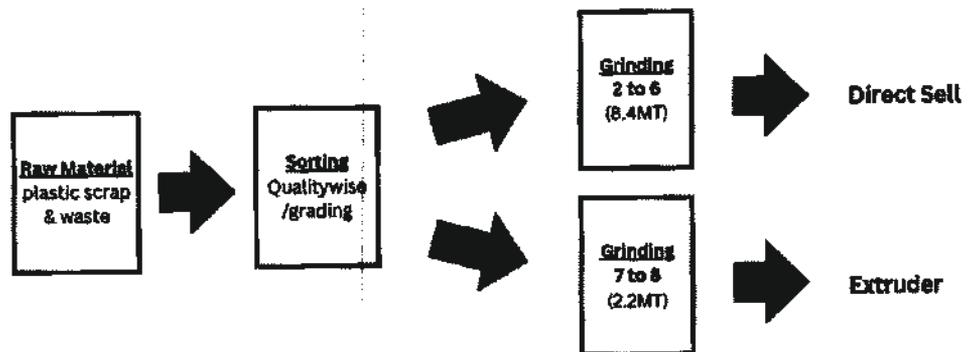


**Agglo Process**

c. Grinding process

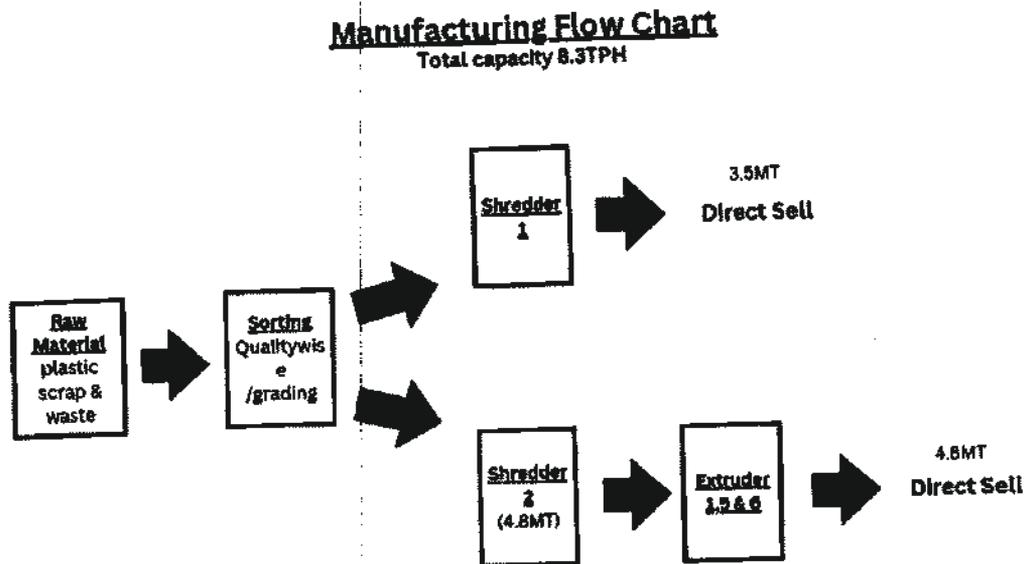
**Manufacturing Flow Chart**

Total capacity 10.6TPH



**Grinding process**

## d. Shredding process

**Shredding Process****4.2 Plant layout/storage**

Plant layout is enclosed as annexure.

**4.3 Machinery details with capacity**

During visit, it was noted that the industry has total of 26 machineries for plastic waste processing, out of which 23 are used for direct sale of finished product:

Sr No	Type	Total No. of machineries	No. of machineries for direct sale
1	extruders (granule making)	06	06
2	agglomerators	07	05
3	grinder machine	08	06
4	shredder machine	02	01
5	squeezer machine	01	01
6	washing line	02	--
	<b>Total</b>	<b>26</b>	<b>19</b>

Total estimated capacity of the Machines is 2,32,872 to 4,51,140 TPA as per purchase bills submitted by industry, used for direct sale (Annexure 6).

**Table 1 Estimated Capacity\* of plastic processing machines for direct sale/ finished product as per invoice/ bills**

Details of machine	No. of machines	Total capacity (kg/hour) (as submitted by industry)	Capacity as per invoice/ bills (kg/hr)		Capacity as per invoice/ bills (Tonnes/day)		Capacity as per invoice/ bills (Tonnes/Annum)		
			Min	Max	Min	Max	Min (working days= 313 in year)	Max capacity for working days = 313	Max (working days= 365 in year)
EXTRUDERS	6	15,300	10,800	17,000	240	408	75,120	1,27,704	1,48,920
AGLOW MACHINE	5	16,800	7,500	12,500	180	300	56,340	93,900	1,09,500
GRINDER MACHINE	6	12,525	9,500	14,000	228	336	71,364	1,05,168	1,22,640
SHREDDER MACHINE	1	8,300	3,000	3,000	72	72	22,536	22,536	26,280
SQUIZER MACHINE	1	3,100	2,000	5,000	48	120	15,024	37,500	43,800
<b>Total</b>	<b>19</b>	<b>58,025</b>	<b>32,000</b>	<b>51,500</b>	<b>768</b>	<b>1,236</b>	<b>2,40,384</b>	<b>3,66,668</b>	<b>4,51,140</b>

*\*Some invoices/ bills have given range of capacity (Kg/ hour) depending on the material recycled, which is also considered for calculation of minimum and maximum capacity.*

Details of all machineries are enclosed as Annexure.

Therefore, it is observed that Shakti plastic industries has 27 machineries for plastic waste processing with production capacity (as per invoices/ data sheets provided by industry for the machinery) of minimum of 2.32 lakh ton per annum to maximum of 4.51 lakh ton per annum of production, which is in line with the consented capacity and plastic EPR registration quantity of 2,88,000 ton per annum.

#### 4.4 Workers details

Attendance roaster of workers for period of March 2022 to September 2023 has been submitted by industry. Individual workers attendance sheet was submitted for April 2022, May 2022, August 2022, April 2023 and September 2023. It was noted that on 30<sup>th</sup> April 2022, 248 workers worked at the plant, whereas 30<sup>th</sup> September 2023, 398 workers worked in the plant. Details enclosed as Annexure 5.

#### 4.5 Electricity bills

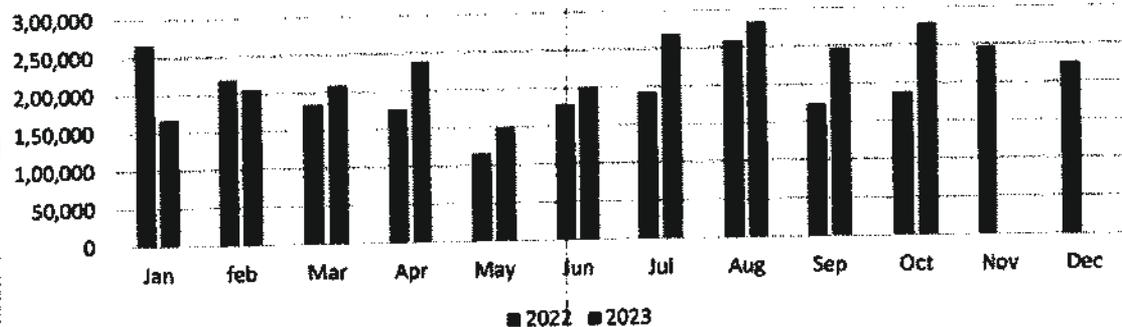
Electricity bills for January -2022 to October-2023 have been submitted by industry ( as follows:

**Table 2 Electricity bills for January -2022 to October-2023**

Month	Electricity Consumption (kWh/month)	Electricity bill demand (KVA)	Electricity Bill Amount (Rs.)
Jan-22	2,66,850	849	25,11,173
Feb-22	2,18,385	848	21,29,751
Mar-22	1,84,170	791	18,55,672
Apr-22	1,75,568	674	17,27,752
May-22	1,14,953	674	12,55,868
Jun-22	1,78,635	686	19,79,235
Jul-22	1,92,690	679	21,08,895
Aug-22	2,58,158	896	28,63,727
Sep-22	1,72,935	881	20,67,145

Oct-22	1,87,853	746	21,00,001
Nov-22	2,46,480	757	26,46,377
Dec-22	2,24,655	847	25,12,685
Jan-23	1,66,553	867	20,10,529
Feb-23	2,05,328	769	22,86,244
Mar-23	2,08,890	897	24,36,382
Apr-23	2,37,870	767	26,06,033
May-23	1,50,180	760	17,92,550
Jun-23	2,00,145	925	24,12,570
Jul-23	2,68,485	920	30,46,219
Aug-23	2,83,065	911	31,53,268
Sep-23	2,46,660	960	29,58,448
Oct-23	2,79,083	985	32,00,148

Comparison of Electricity consumption (kWh/month) (FY 2022 and FY 2023)



As per literature review, electricity of around 0.4 to 0.6 kWh electricity/ kg of plastic waste recycling (extrusion/ granule making) is required<sup>1</sup>. Therefore, electricity consumption of the shakti plant for FY 2022-23 i.e. 23.33 lakh kWh corresponds to 11.66 lakh tonnes of plastic recycling. Some of the electricity consumption may be for other purposes such as lighting, fans, water pumping, ETP operation etc.

#### 4.6 Raw Material/final product In out details

Industry has submitted material in-out register's copies for last 3 months (August, Sept, Oct 2023)

#### 4.7 Raw material purchase details

Industry has submitted soft copies of GST invoices for raw material procurement for FY 2022-23 by procurer's name.

<sup>1</sup> Source: [https://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2Fb\)%20of%20plastic%20processed.](https://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2Fb)%20of%20plastic%20processed.)

#### **4.8 EPR certificate generation and Sales details with GST for FY 2022-23**

As per the CPCB audit team observation reported in the Directions issued to MPCB on 26.10.2023, the unit has generated EPR Certificates of the order of 2,74,000 Tonnes and transferred EPR Certificates of 2,68,000 Tonnes values to Producers/Importers/Brand Owners (PIBOs). It was also reported that the quantities mentioned in the invoices uploaded on EPR Portal by the Unit are fallacious & very high as compared to the declared production capacity.

As annual report 2022-23 of Shakti Plastic Industries available on the EPR Portal, the industry has EPR certificates generated (as on date of filing of annual report) for quantity of 2,94,582 tonnes as on date 01.12.2023 (copy enclosed as Annexure).

It was noted that industry has made 533 entries under "Sales" tab. It has uploaded invoices with 240 attachments on the portal. Some of the attachments are having multiple invoices. The uploaded invoices were randomly checked and it was observed that the attached invoices have been generated for "Services provided towards collection and recycling" and not for the requisite actual sales of recycled plastic/granules.

Industry has provided sales data in the excel sheet consisting of total 431 invoices generated for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules having total quantity of 1,00,187 Tons for FY 2022-23. whereas total quantity of sales of EPR certificate was 2,68,000 Tonnes for FY 2022-23. Therefore, it is noted that the industry has also generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules.

**Shakti plastic industries has submitted soft copies of around 17,800 invoices for both sales and procurement of plastic waste. In view of the voluminous data, it is recommended that Chartered Accountant may be appointed for verification of the invoices.**

#### **4.9 Land documents- Land documents submitted by industry (Annexure 7).**

The documents are found to be as per industry address and area mentioned in Consent to Operate granted by Board.

#### **5 Conclusions-**

- i. Shakti plastic industries has 26 machineries for plastic waste processing with production capacity (as per invoices/ data sheets provided by industry for the machinery) of minimum of 2.32 lakh ton per annum to maximum of 4.51 lakh ton per annum of production, which is in line with the consented capacity and plastic EPR registration quantity of 2,88,000 ton per annum.

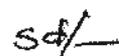
- ii. Electricity bills submitted by industry are in line with consented capacity of industry.
- iii. Physical verification of the industry was conducted as per SOP formulated by CPCB.
- iv. It is noted that the industry has generated some of the EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules.
- v. Shakti plastic industries has submitted soft copies of around 17,800 GST invoices for the plastic waste for plastic EPR portal of CPCB website. In view of the voluminous data, and also it was not possible to come out with opinion w.r.t. quantity of actual plastic waste processing carried out by the industry. Therefore, it is recommended that Chartered Accountant may be appointed for verification of the invoices.

#### List of Annexures

1. Annexure 1: Consent to Operate granted to Shakti Plastic Industries on 15.06.2023
2. Annexure 2: physical verification of the plant conducted on 08.11.2023.
3. Annexure 3: plastic EPR Registration certificate to the plant on 31.07.2023 for capacity of 2,88,000 MT/annum
4. Annexure 4: Details of workers attendance at the plant
5. Annexure 5: Copies of Electricity bills for January 2022 to October 2023
6. Annexure 6: Copies of purchase bills/ invoices for plastic recycling machines
7. Annexure 7: Land Documents provided by the industry

  
(Sandeep Shinde)  
Field Officer,  
RO(BMW) section

  
(Rutuja Bhalerao)  
Sub-Regional Officer,  
RO(BMW) section

  
(Kiran Hasabnis)  
Regional Officer, (Thane)

The Shakti Plastic Industries

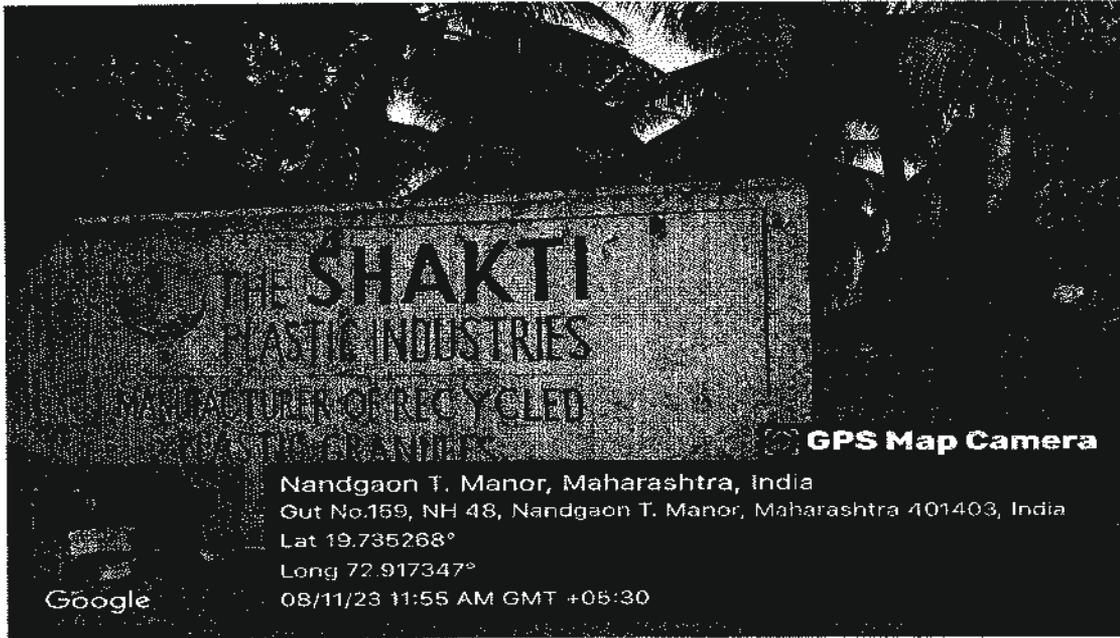


Photo No.1 Plant Main Gate

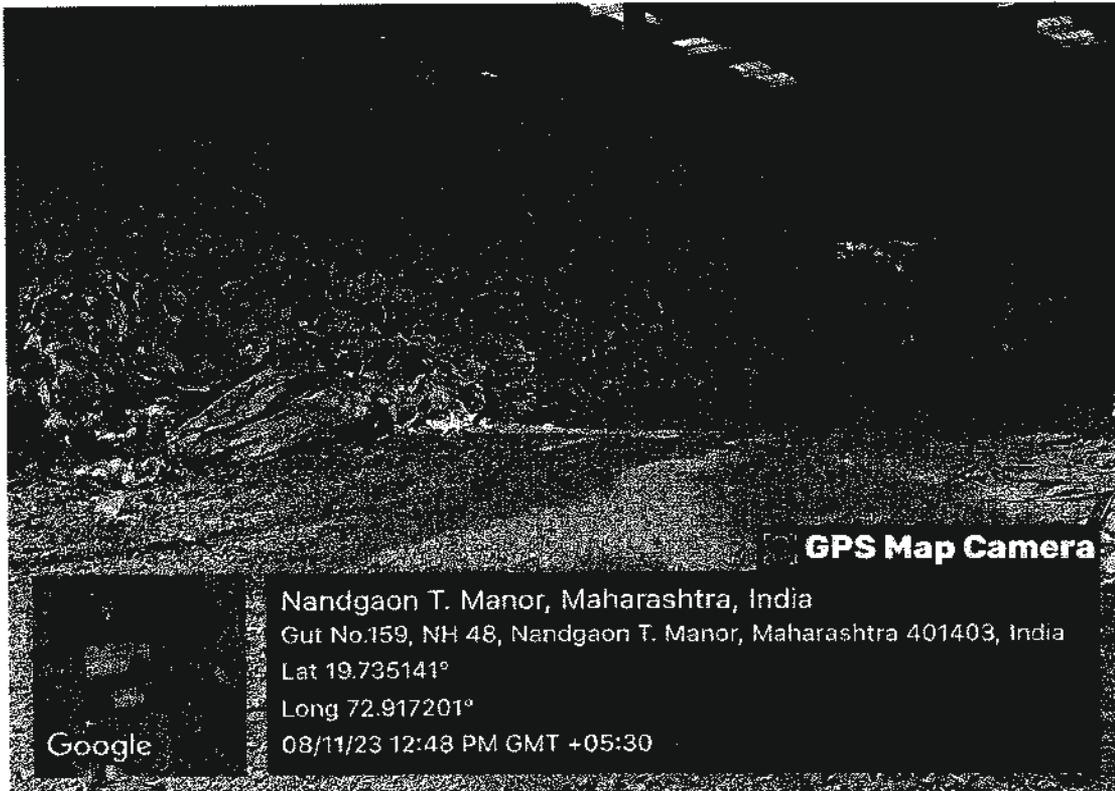


Photo No.2 Storage Area

103

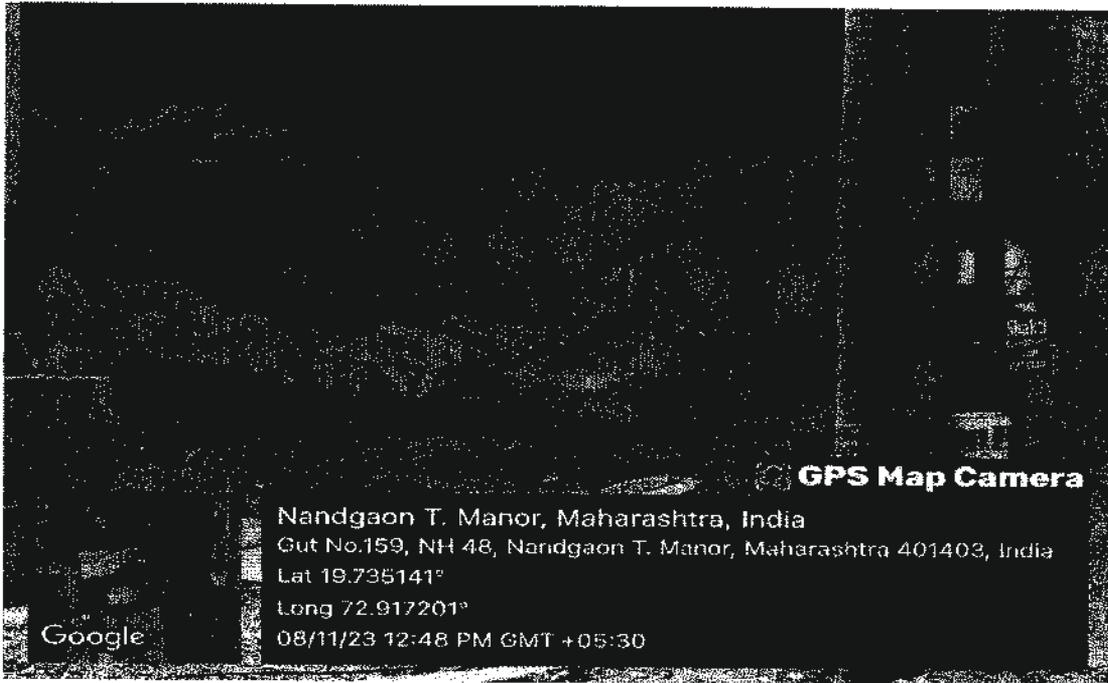


Photo No.3 Storage Area

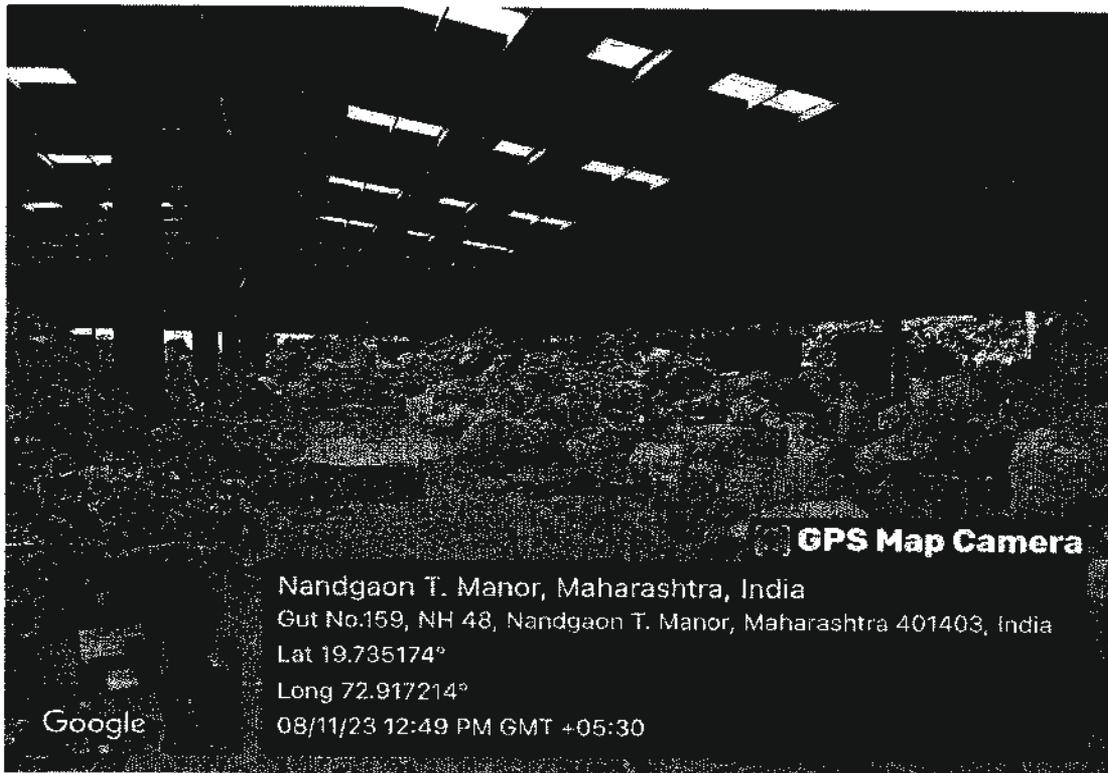


Photo No.4 Storage area



Photo No.5 Extruder No.1

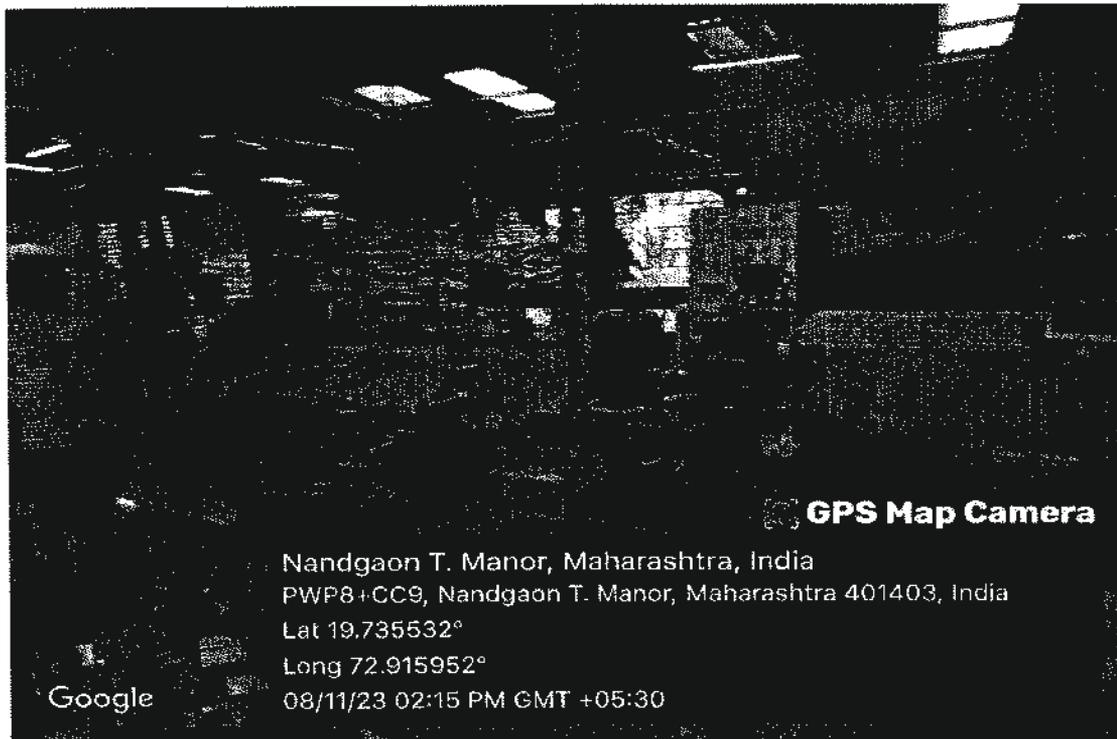


Photo No.6 Extruder No.2

705

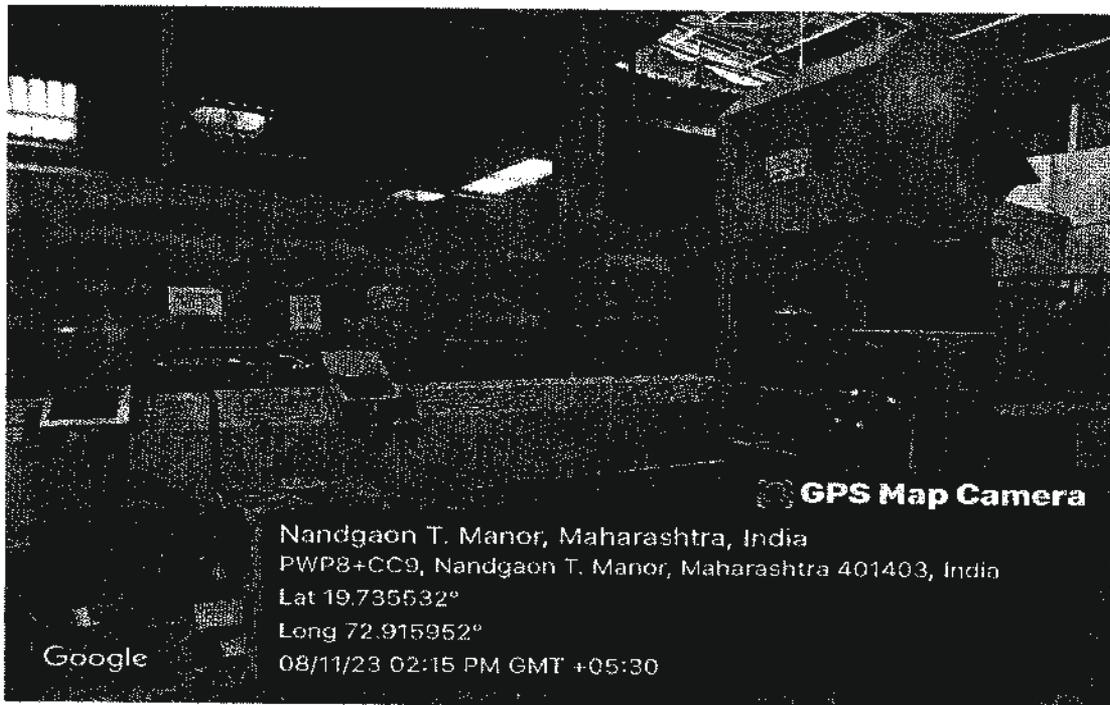


Photo No.7 Extruder no.3

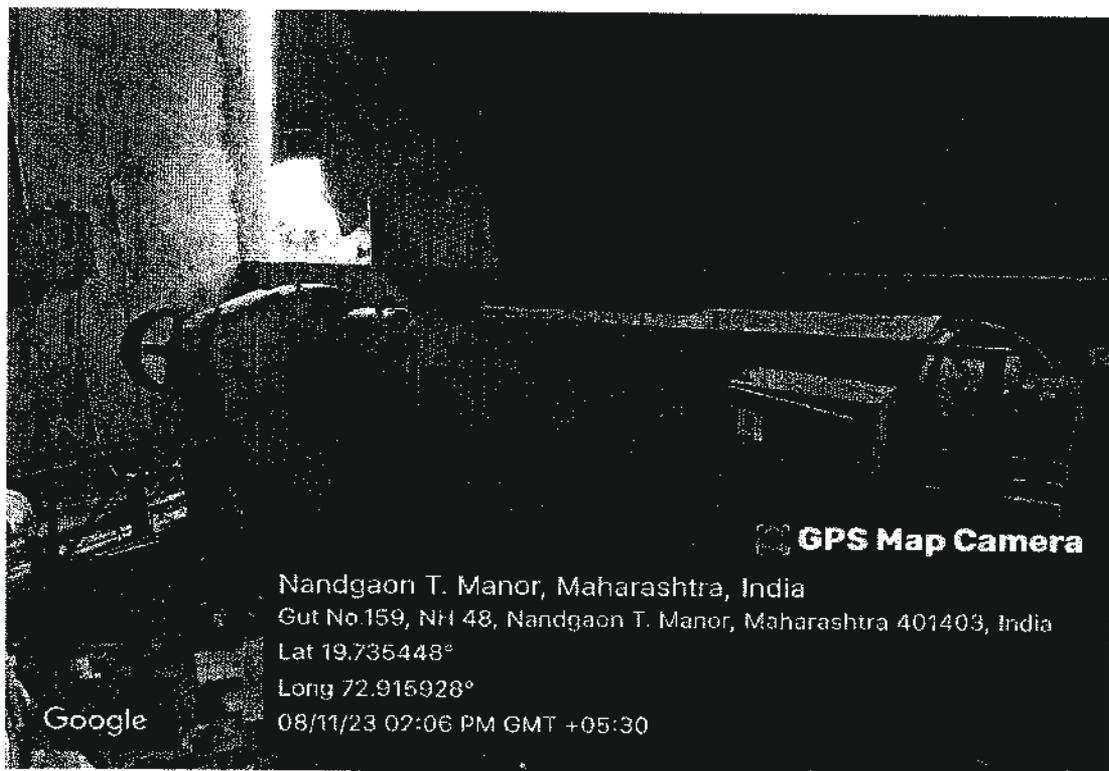


Photo No.8 Extruder not working No.4

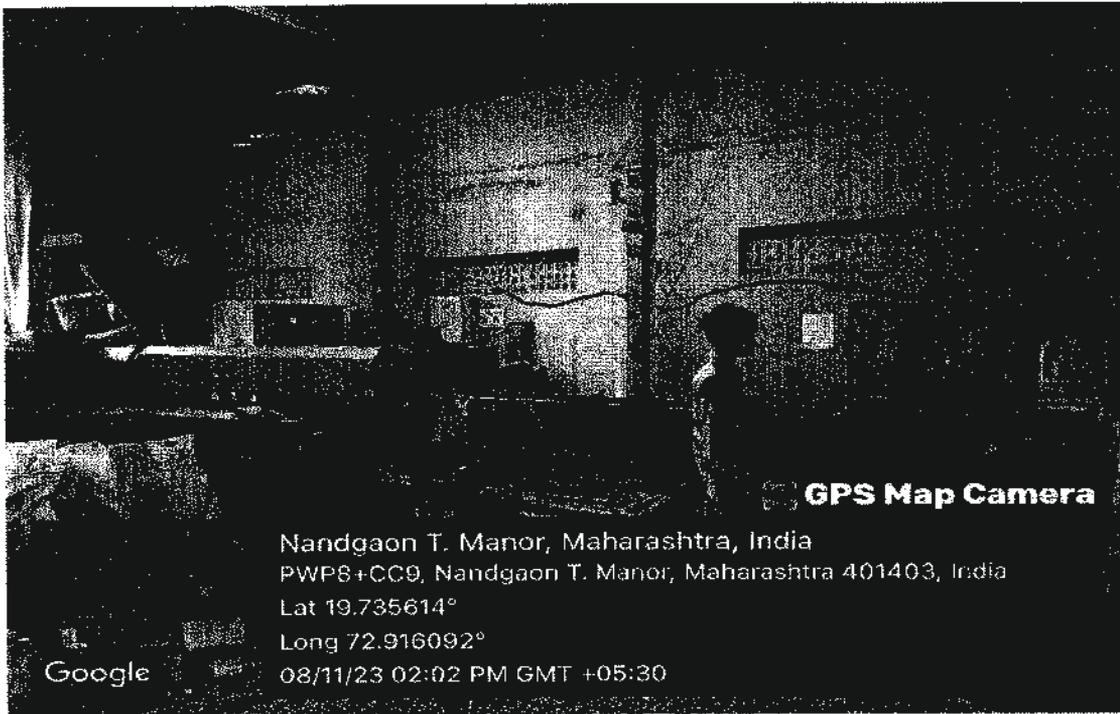


Photo No.9 Extruder no.5

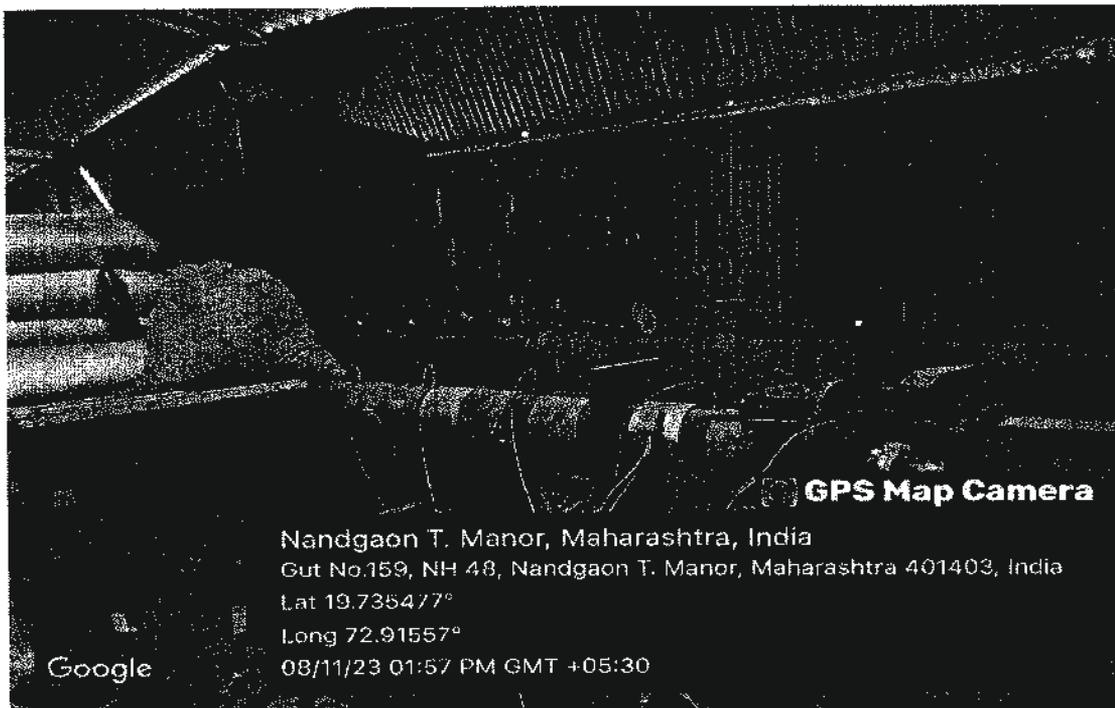


Photo No.10 Extruder not working No.06

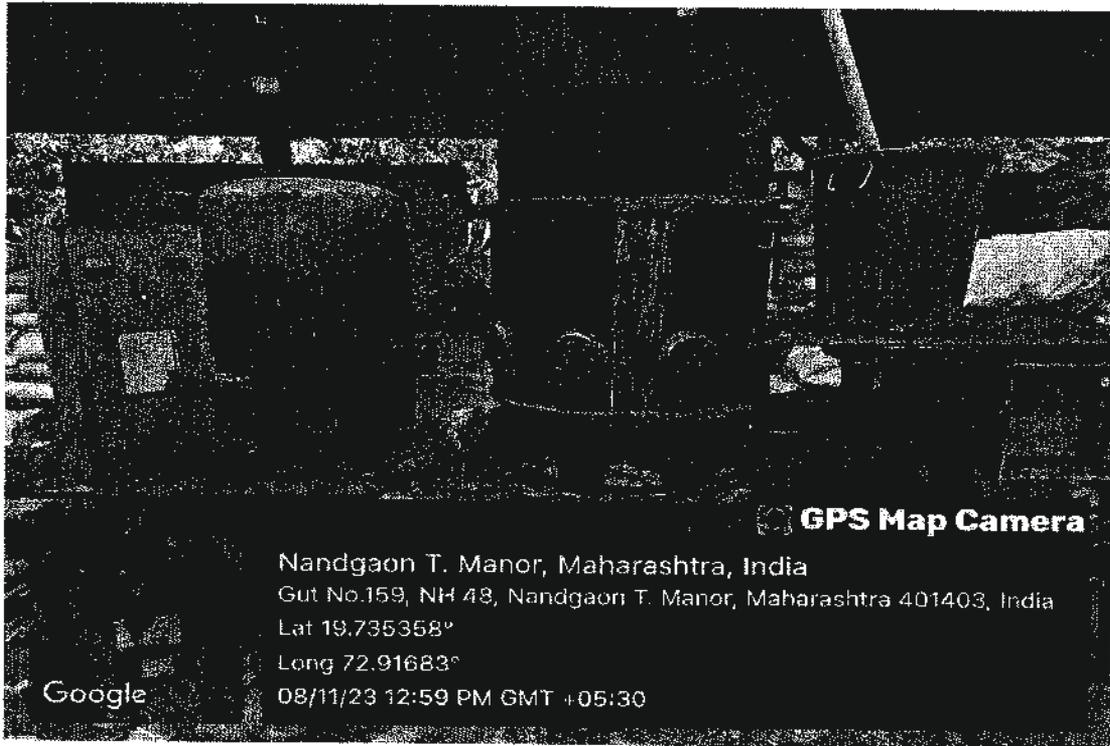


Photo No.11 Agglomeration machine 1

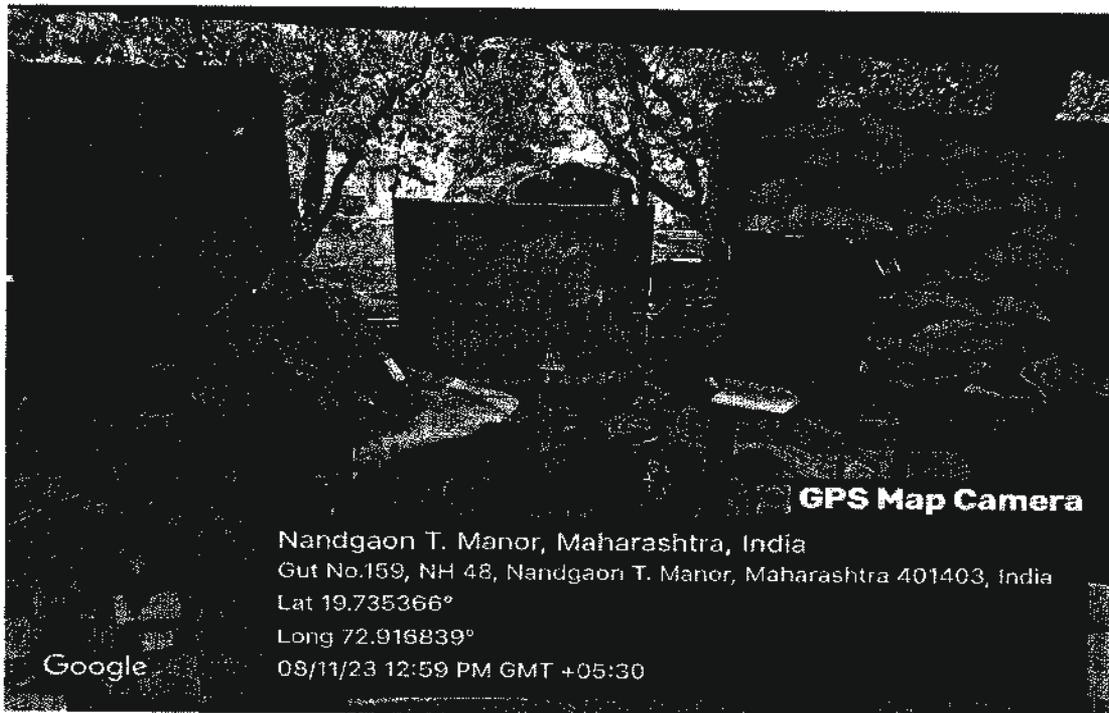


Photo No.12 Agglomeration machine 2

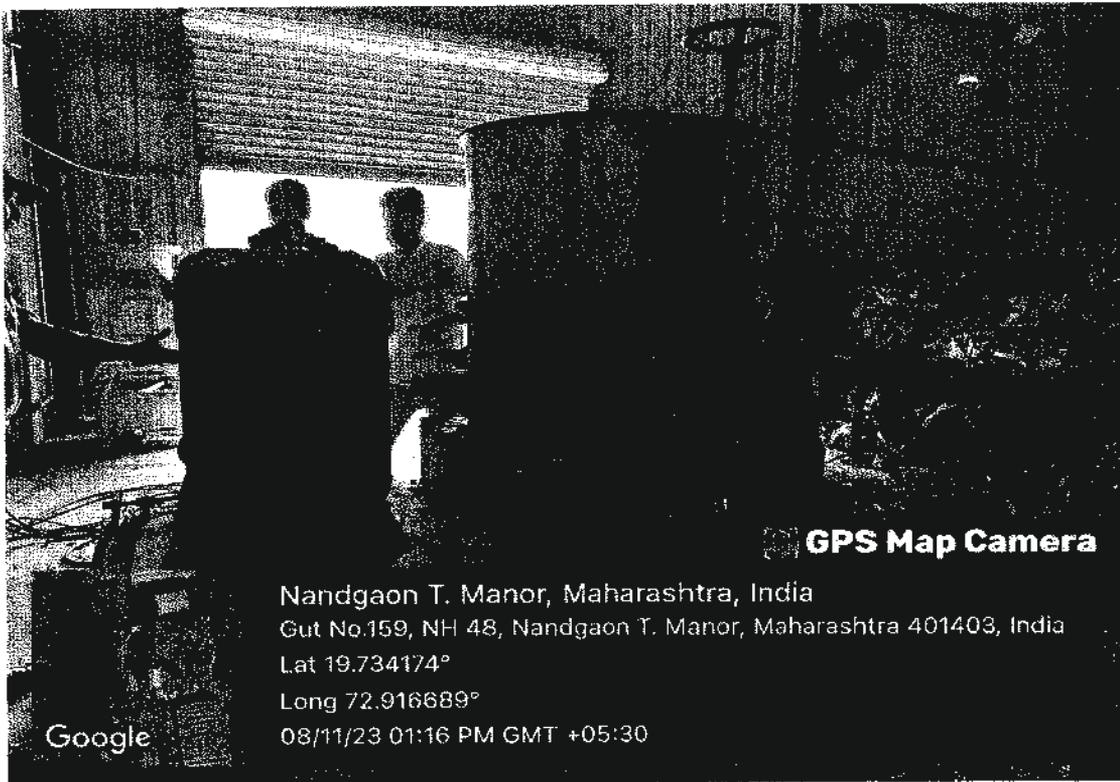


Photo No.13 Agglomeration machine No.3

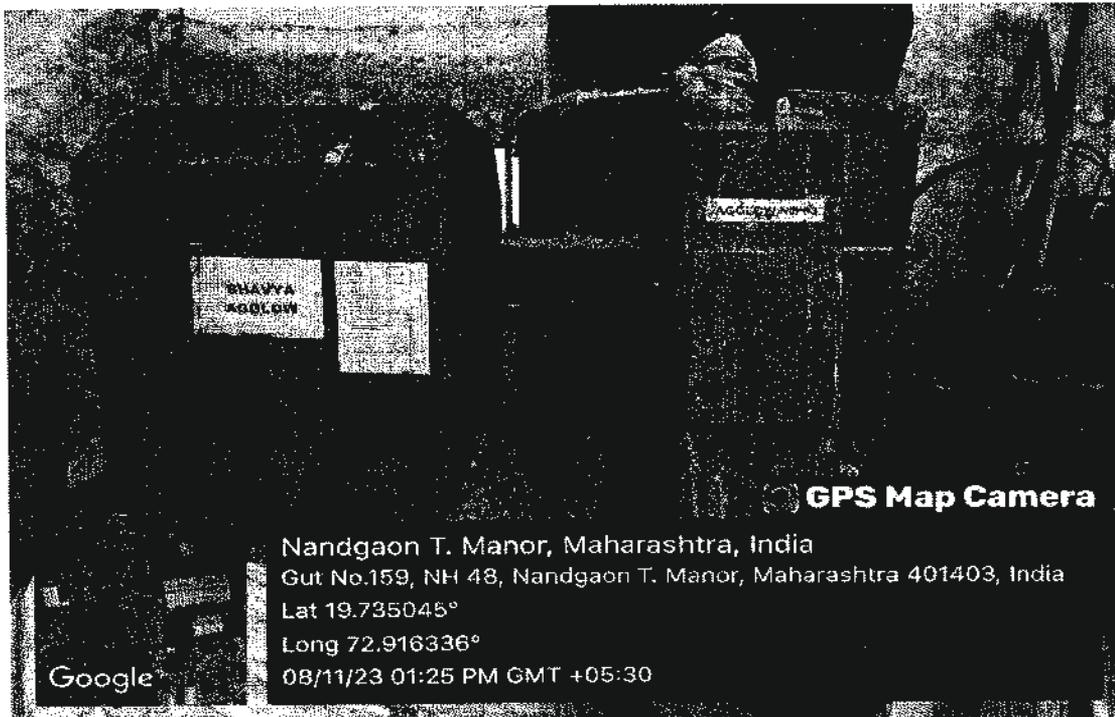


Photo No.14 Agglomeration machine No.4

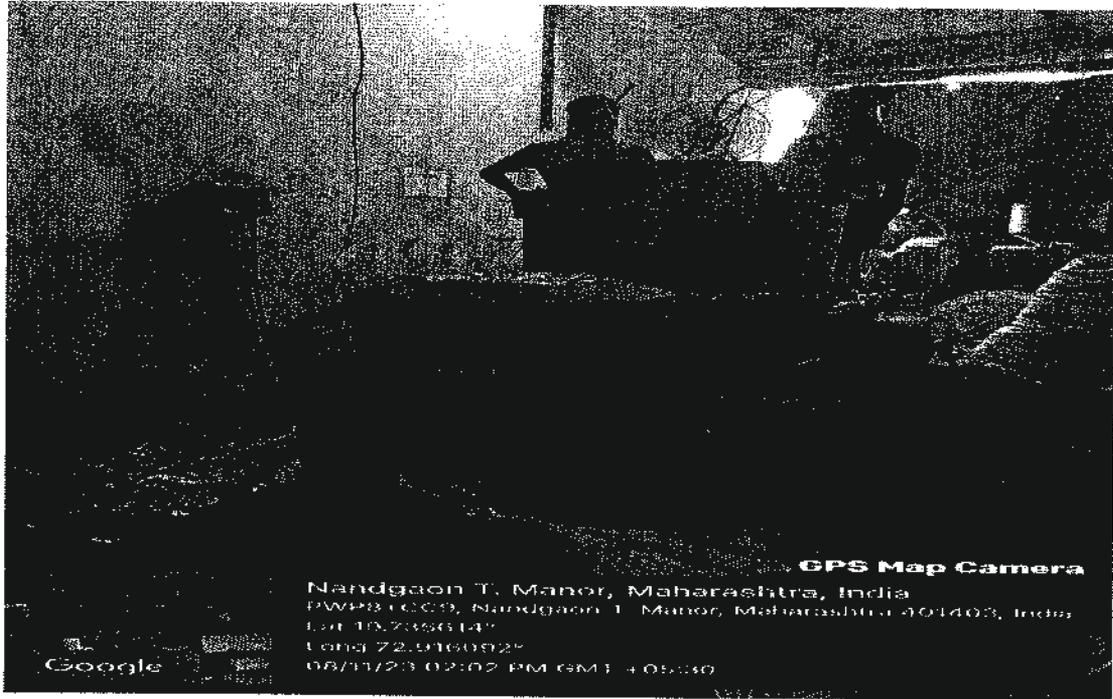


Photo No.15 Agglomeration machine No.5

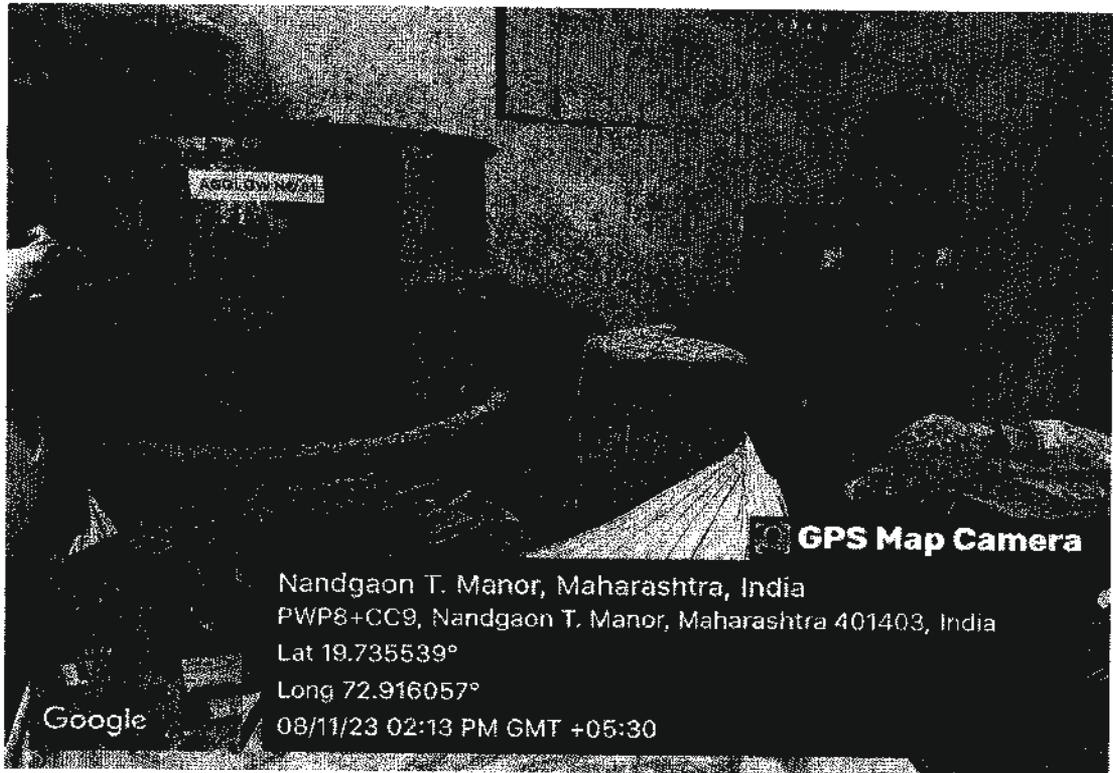


Photo No.16 Agglomeration machine no.6

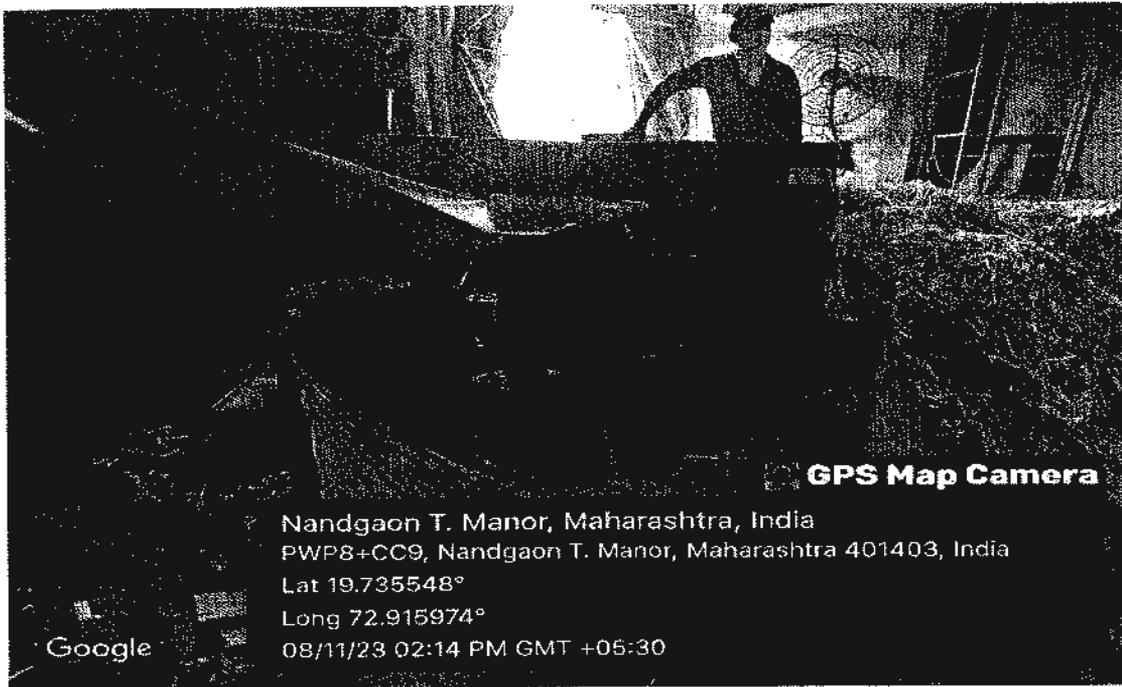


Photo No.17 Agglomeration machine no.7

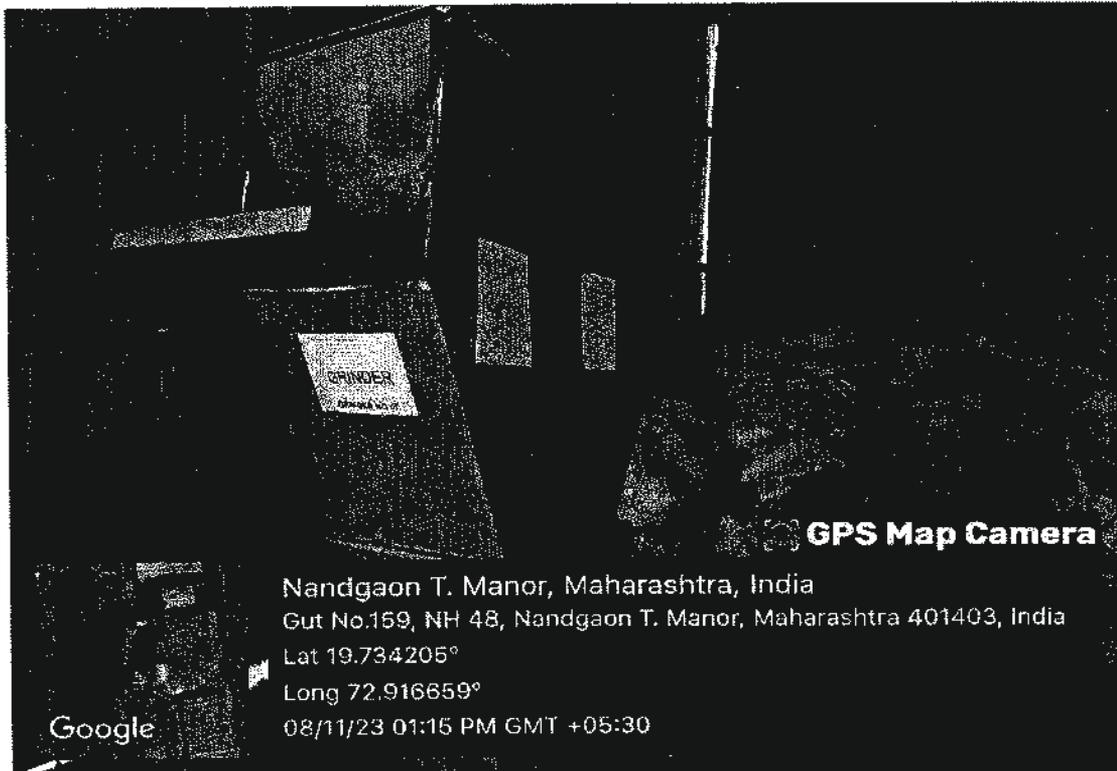


Photo No.18 Grinder No.1

77

641

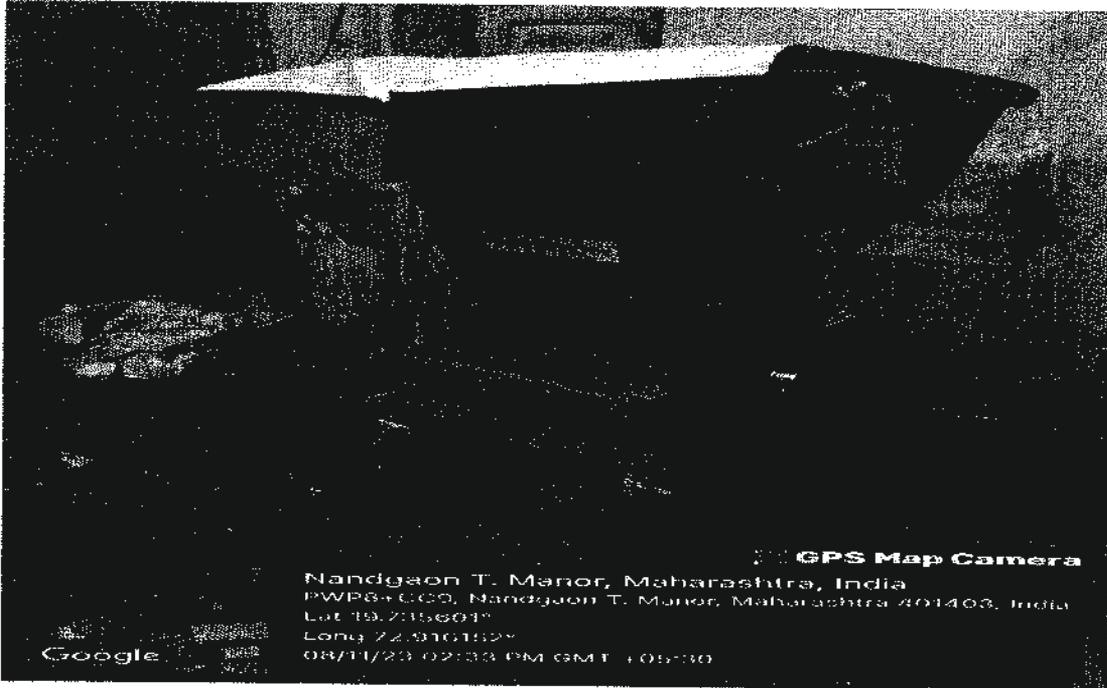


Photo No.19 Grinder No.2

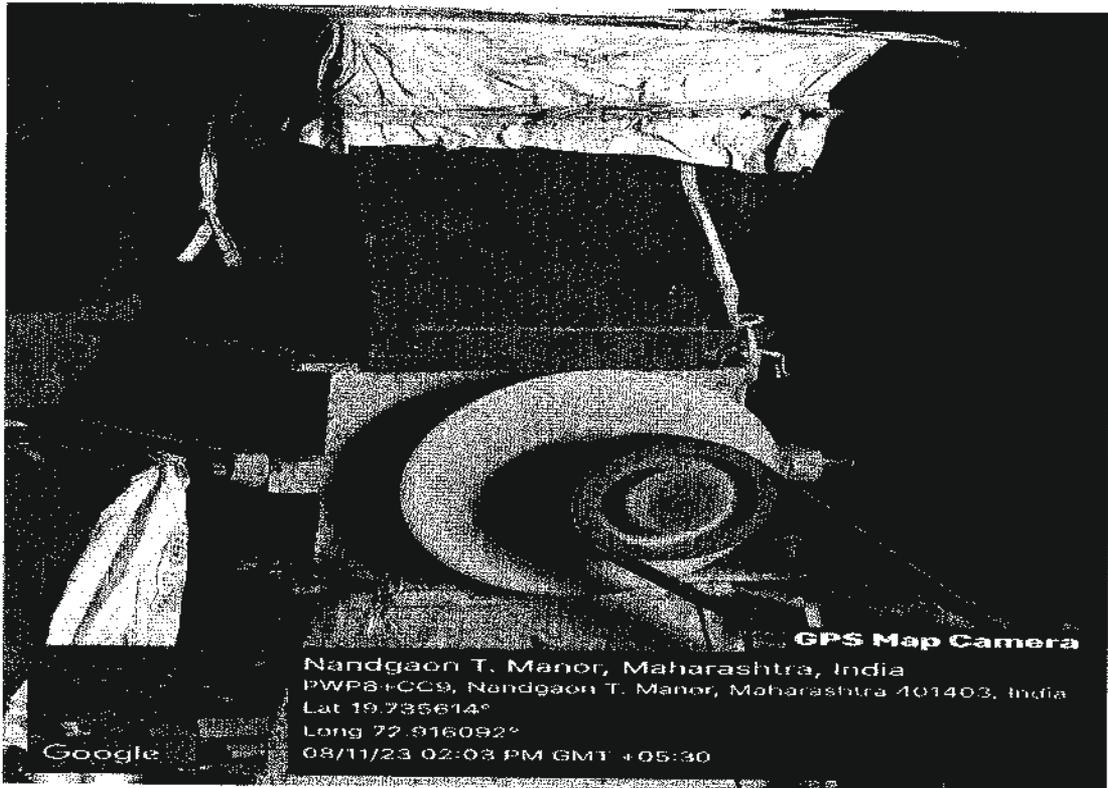


Photo No.20 Grinder No.3



Photo No.21 Grinder No.4,5 (02) Nos.

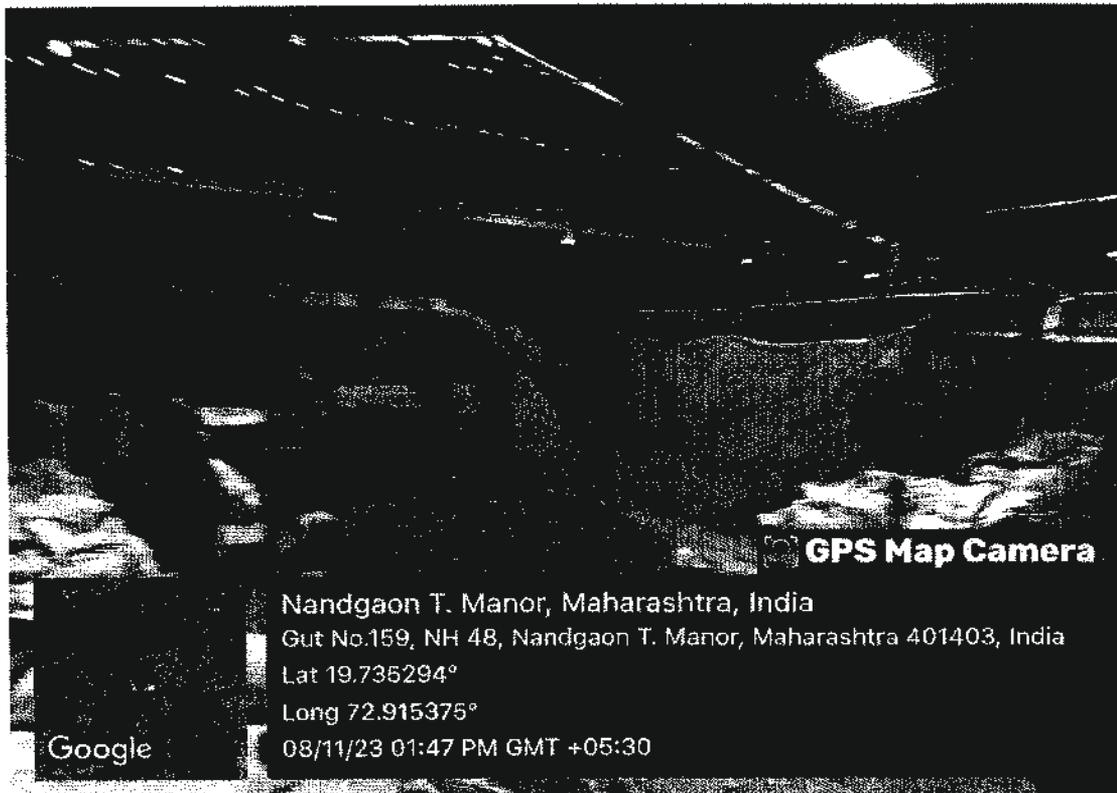


Photo No.22 Grinder No.6

113

643

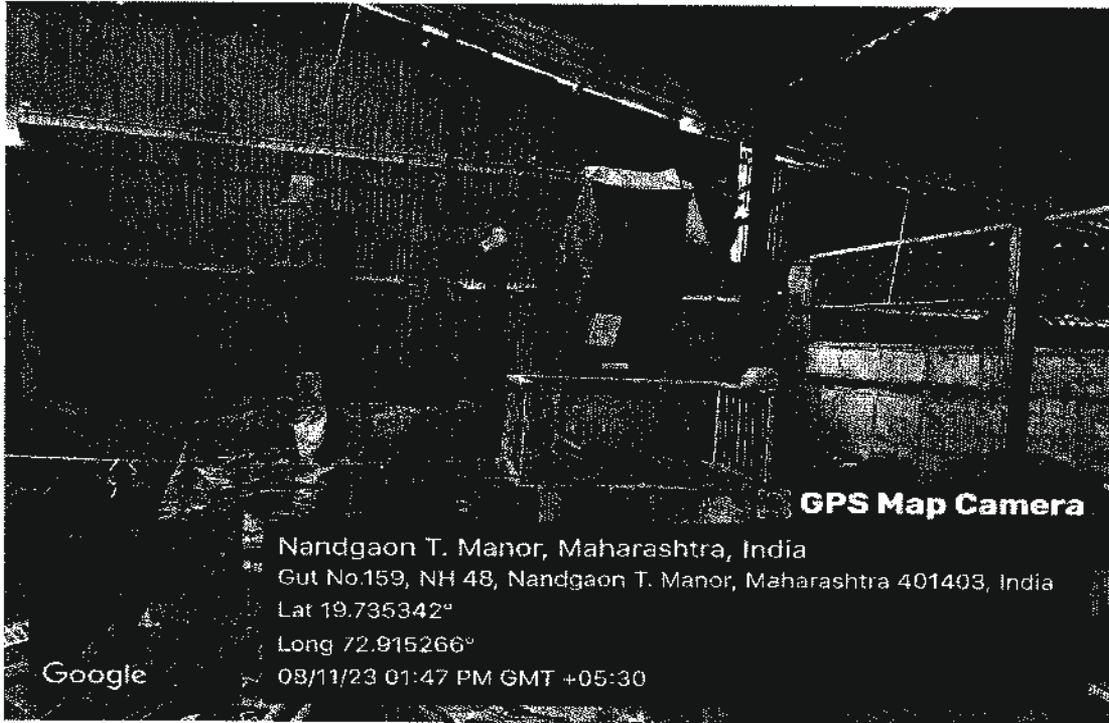


Photo No.23 Grinder No.7

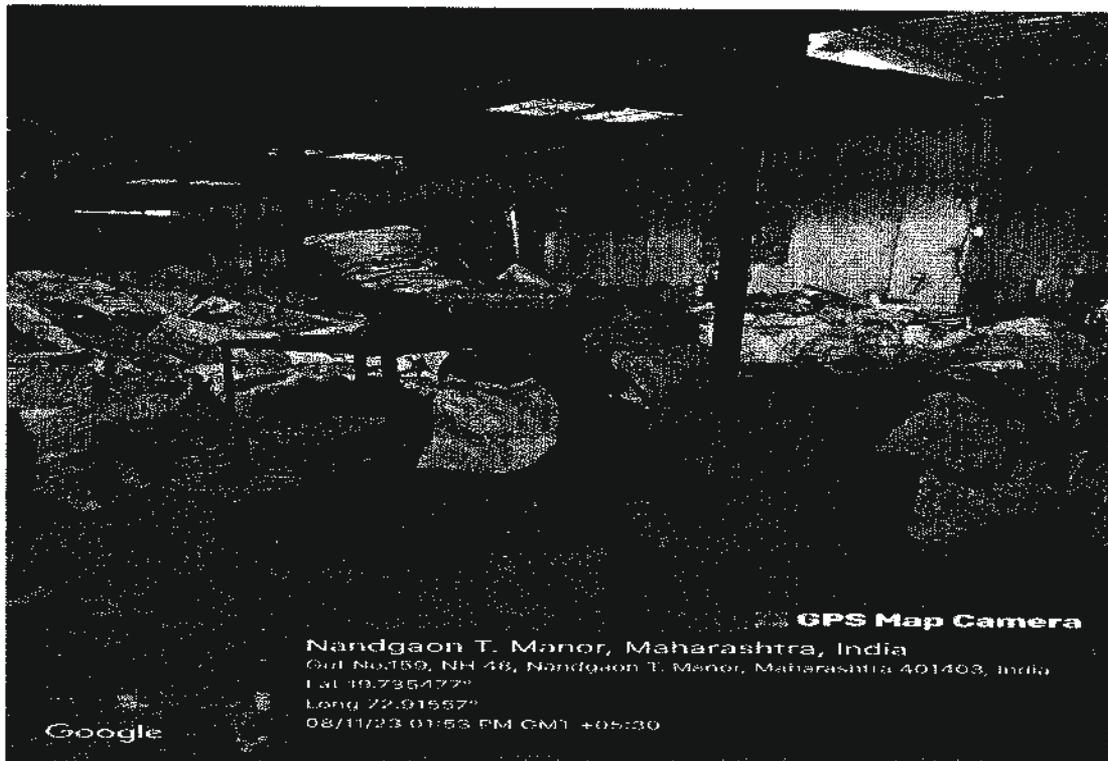


Photo No.24 Grinder No.08

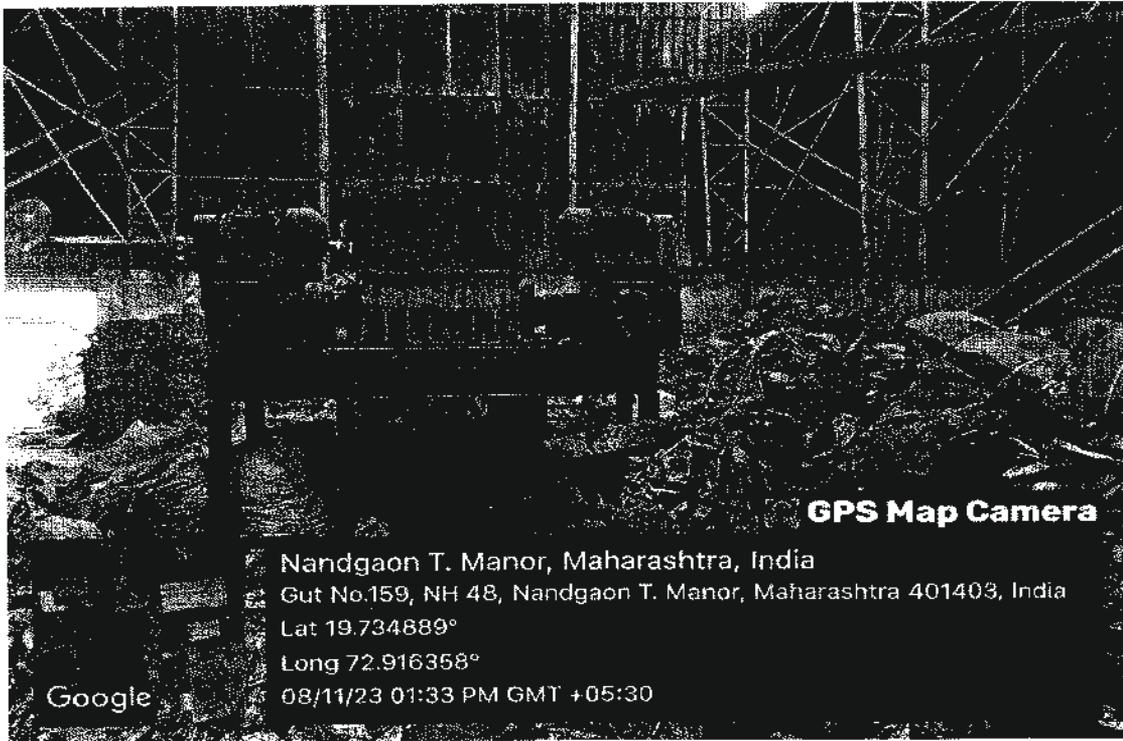


Photo No.25 Shredder No.1

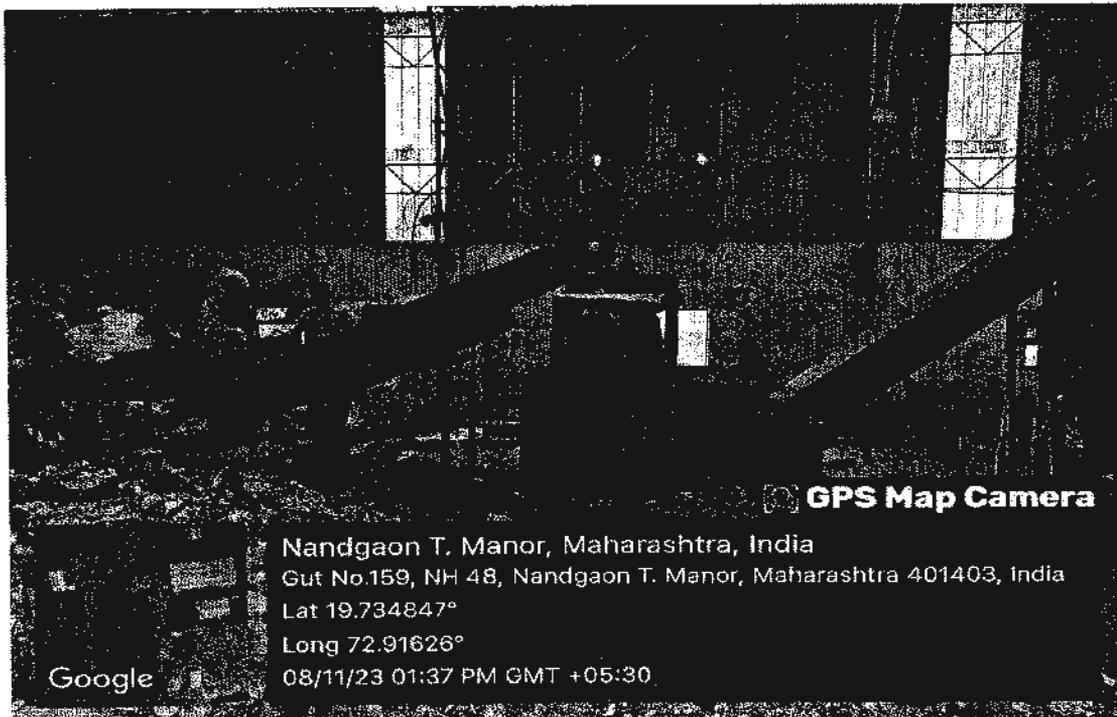


Photo No.26 Shredder no.2

115

645

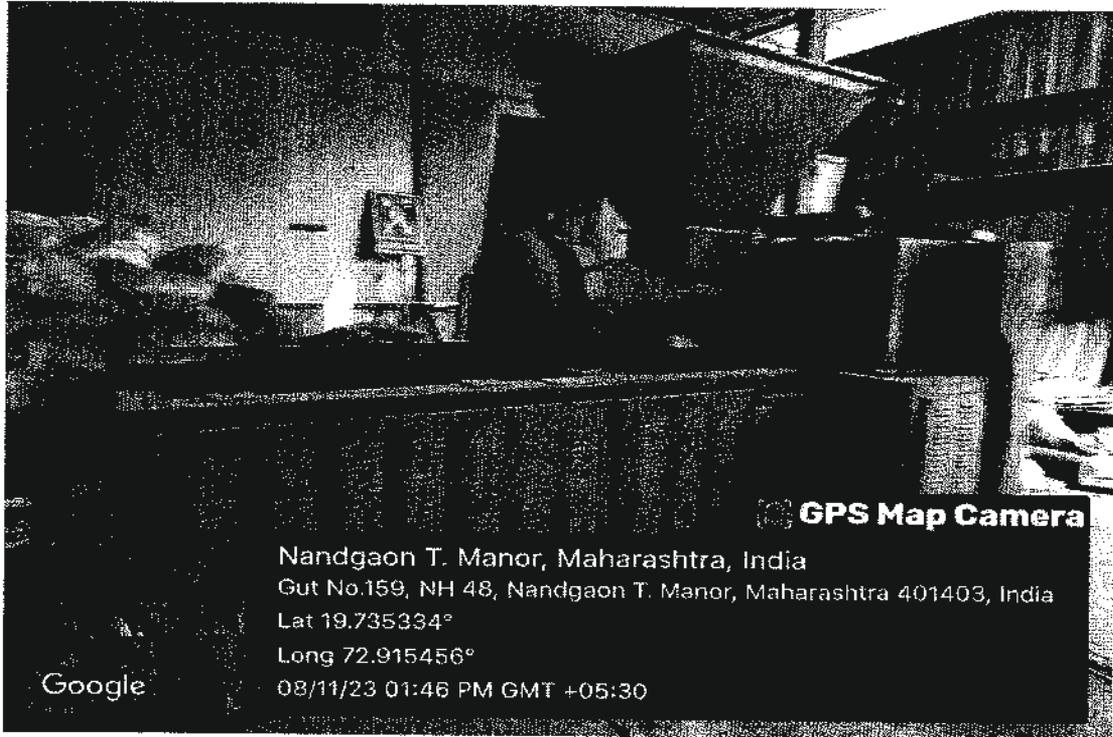


Photo No.27 Squeezing Machine No.1

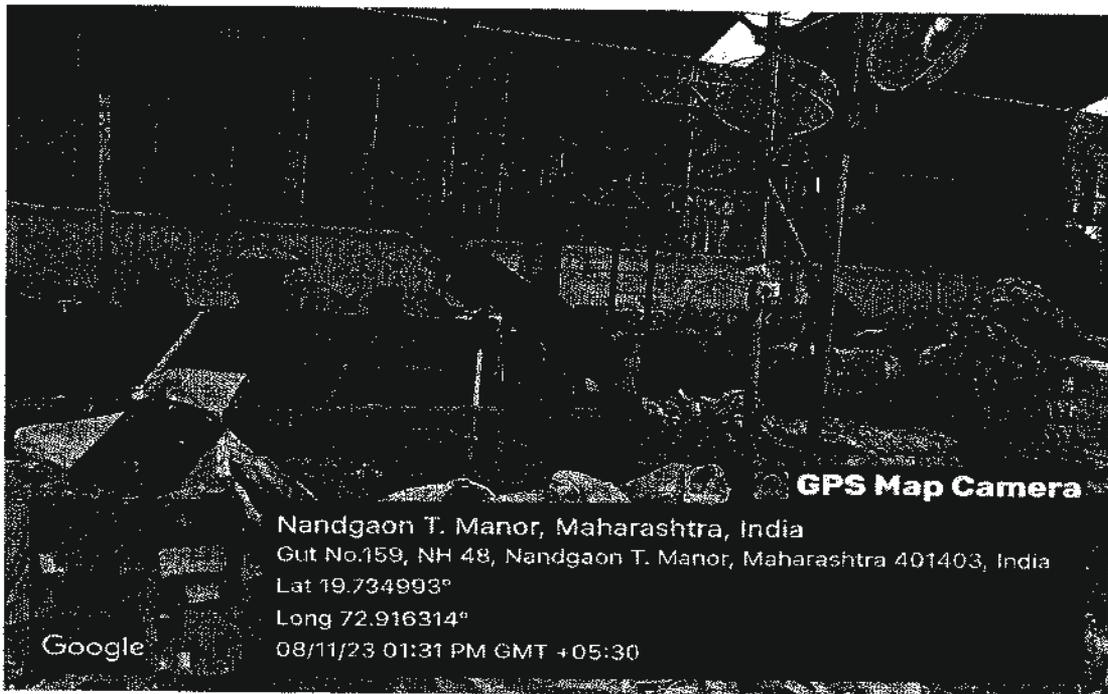


Photo No.28 Washing Line1

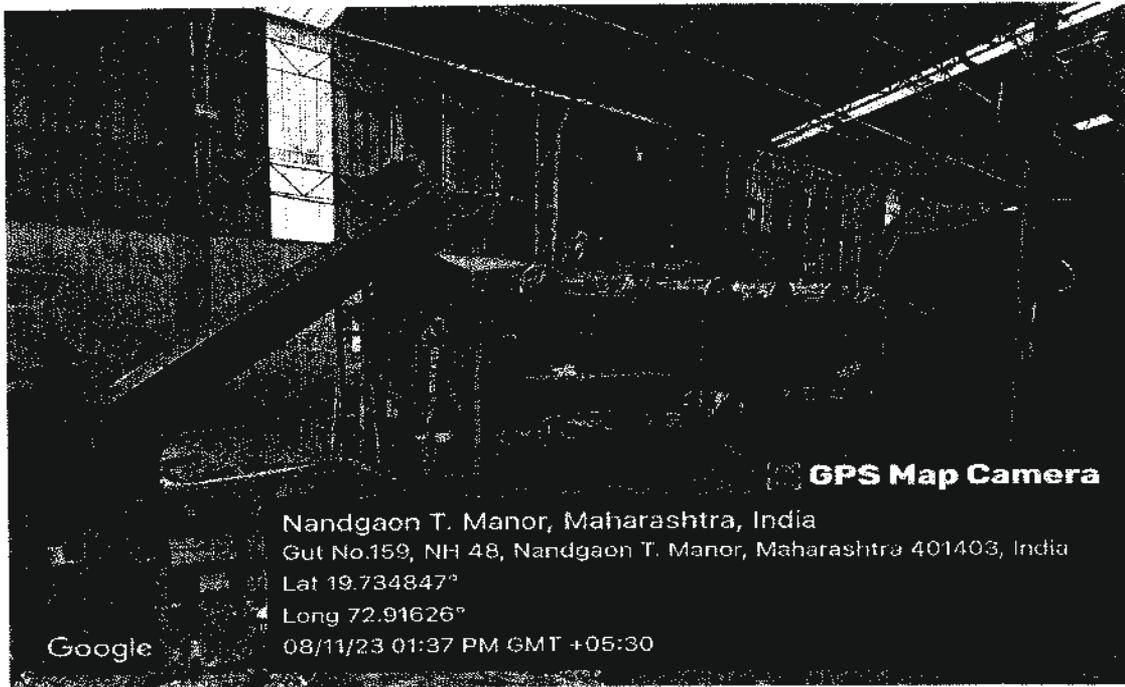


Photo No.29 Washing Line 2

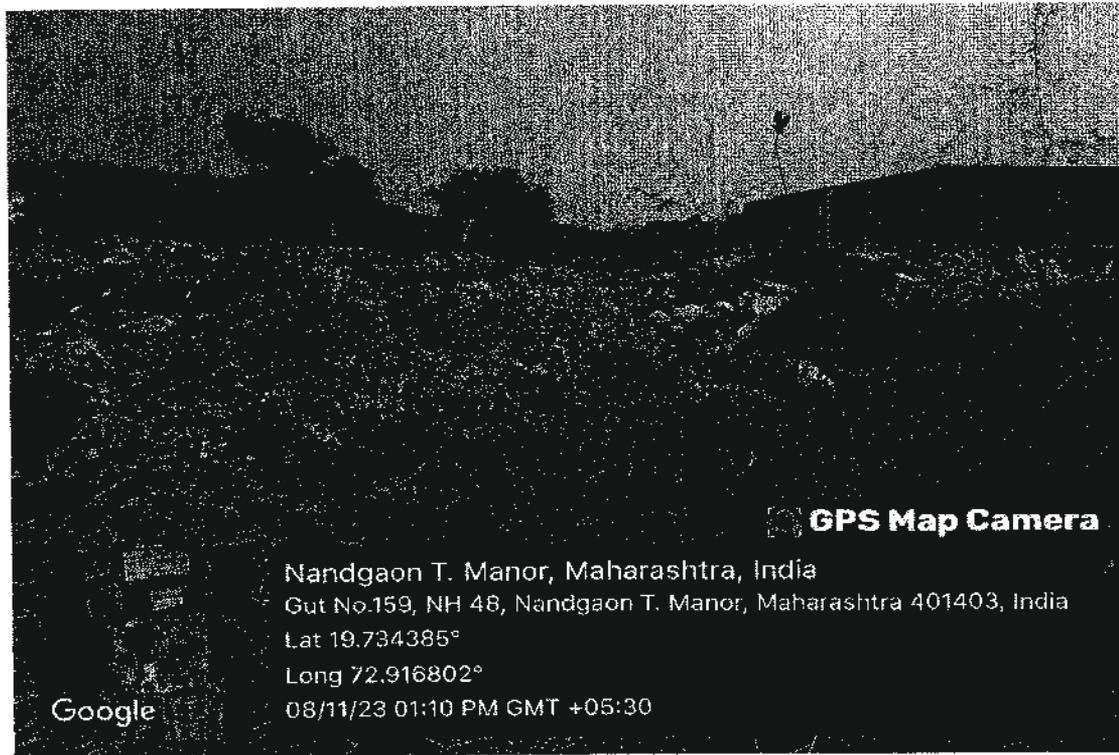


Photo No.30 Open Land

117

647

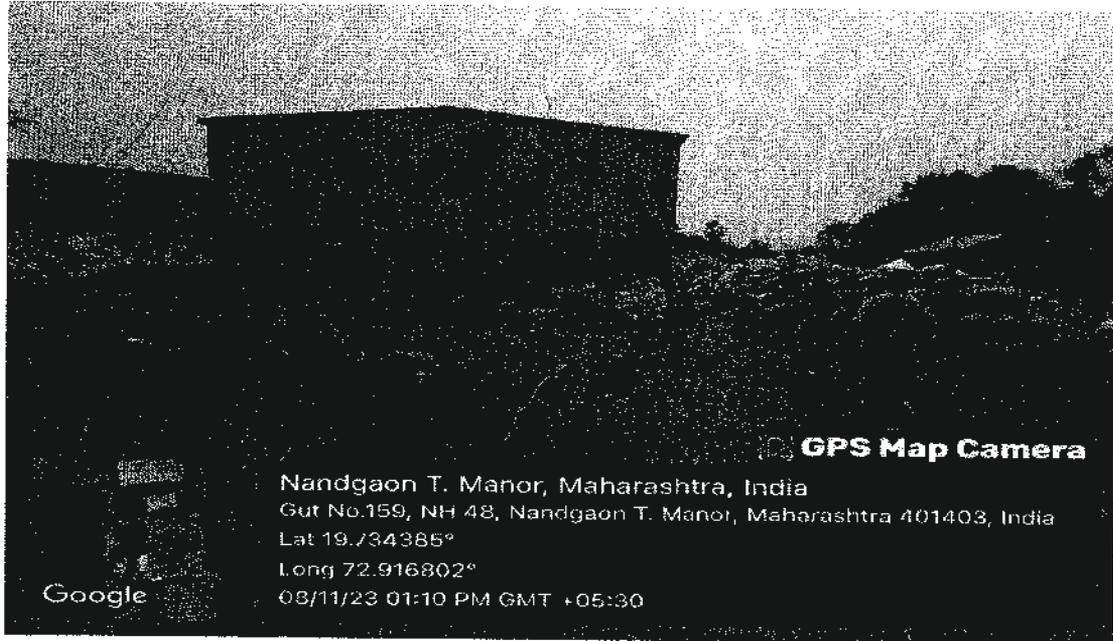


Photo No.31 Shed near open land

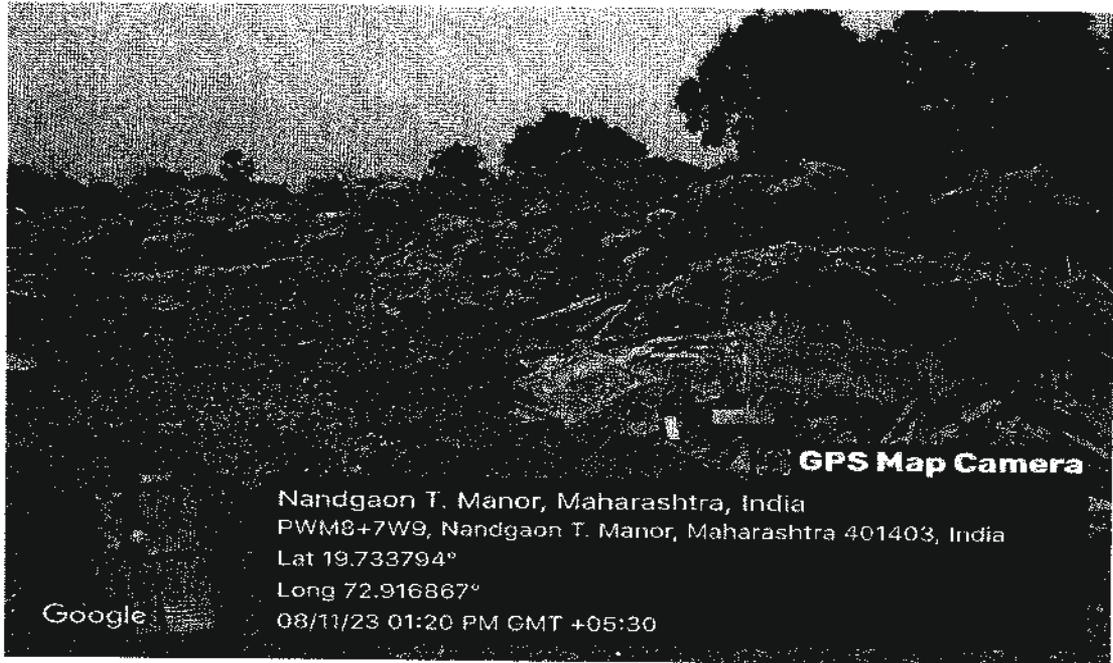


Photo No.32 Open land

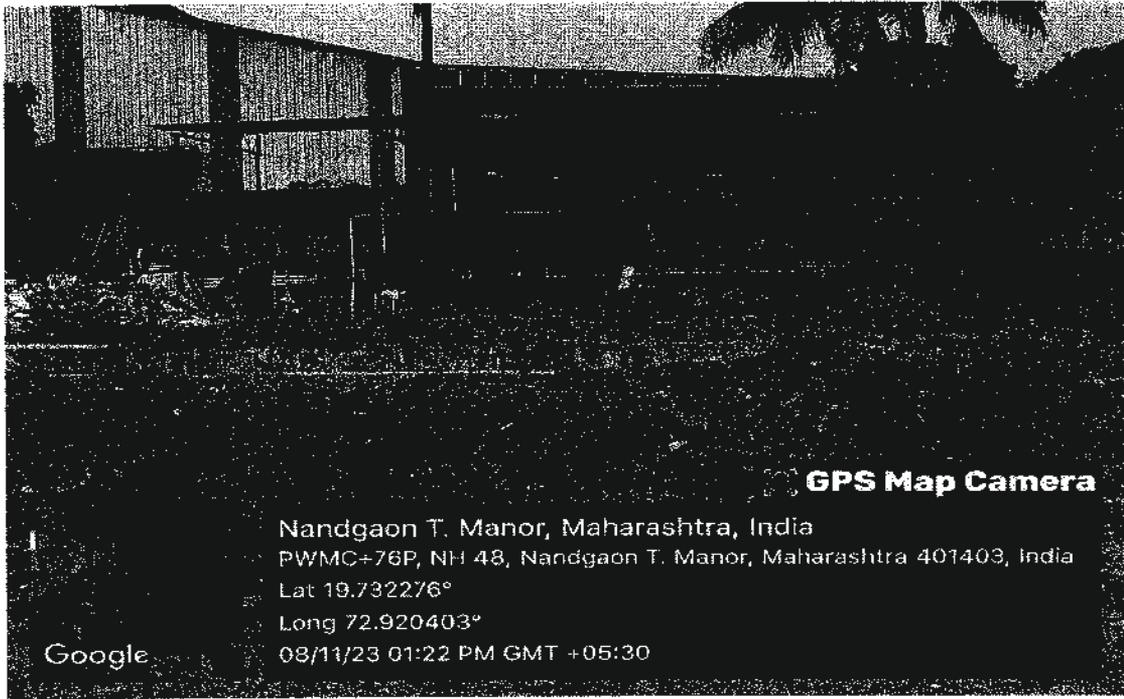


Photo No.33 ETP Plant

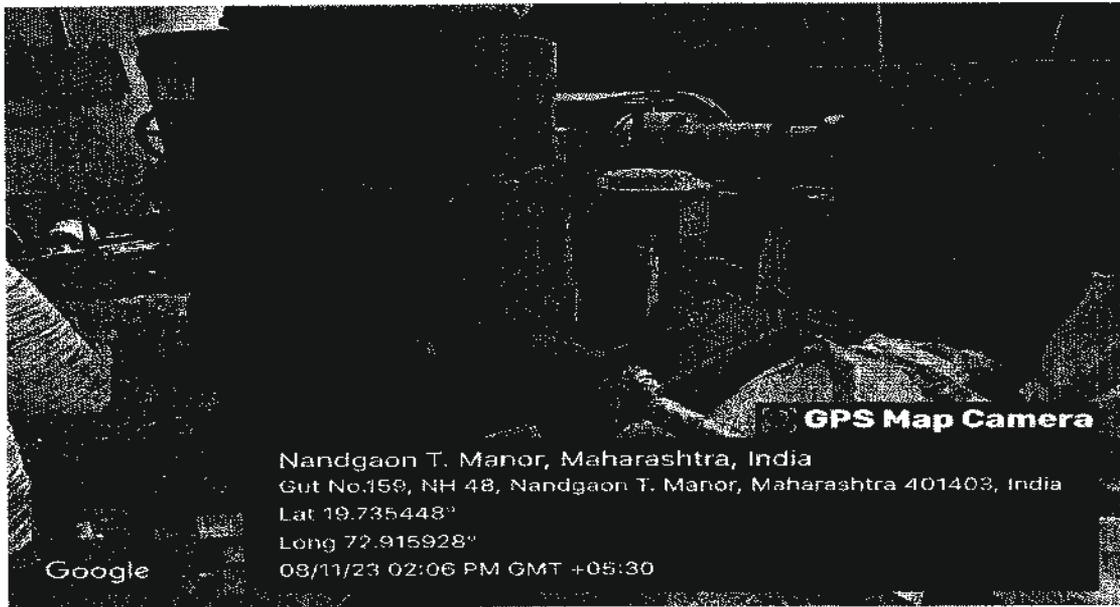


Photo No.34 Mixer not in working

119

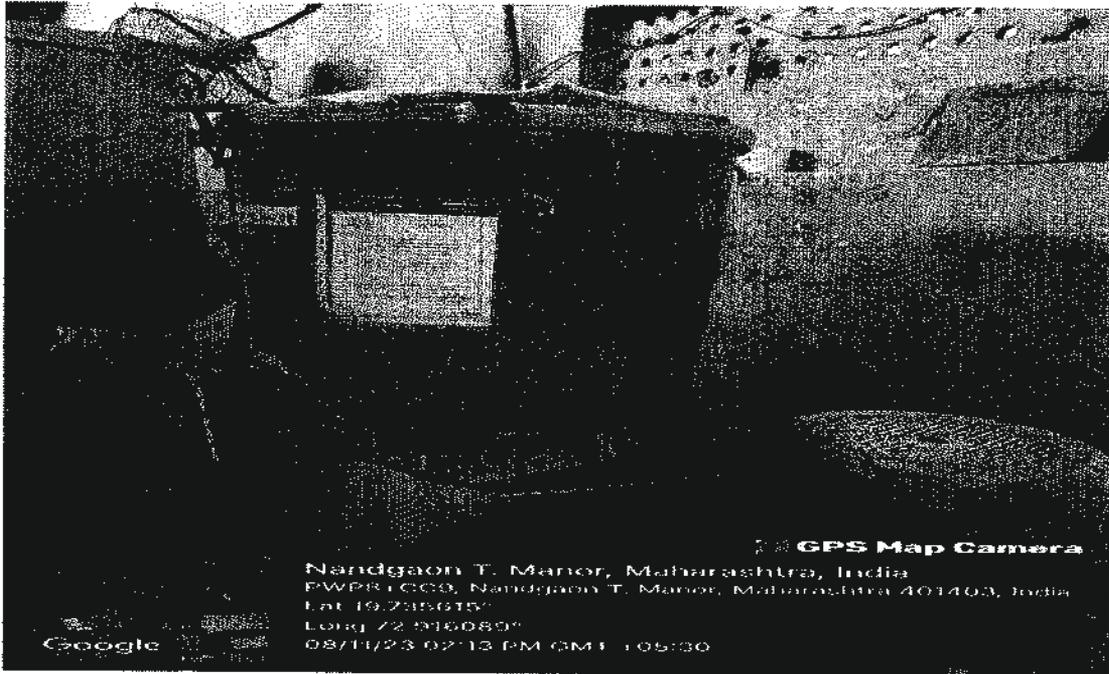


Photo No.35 Mixer

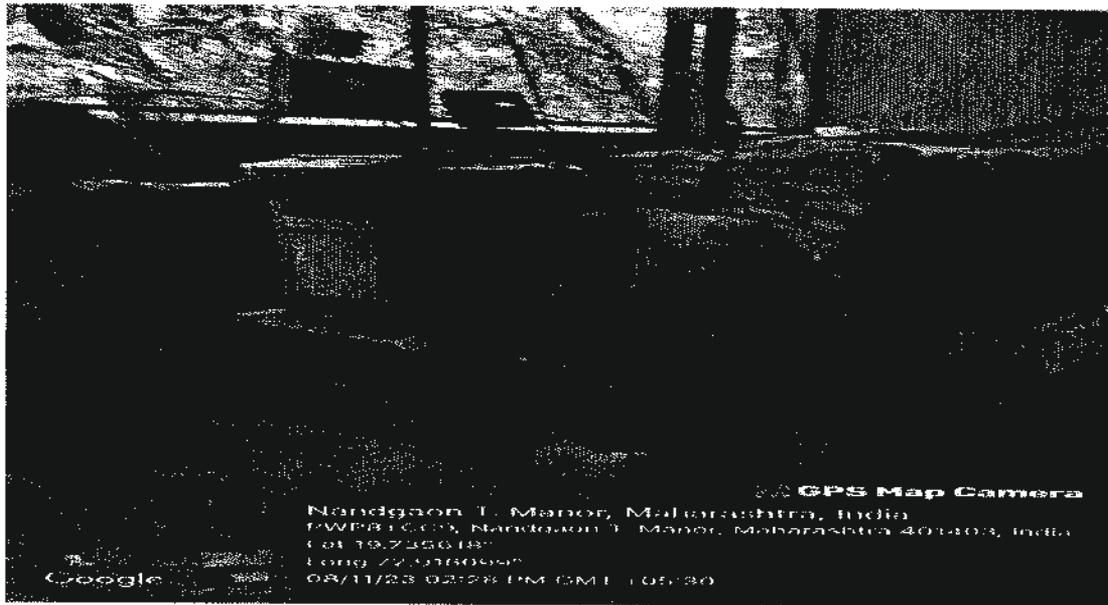


Photo No.36 Mixer

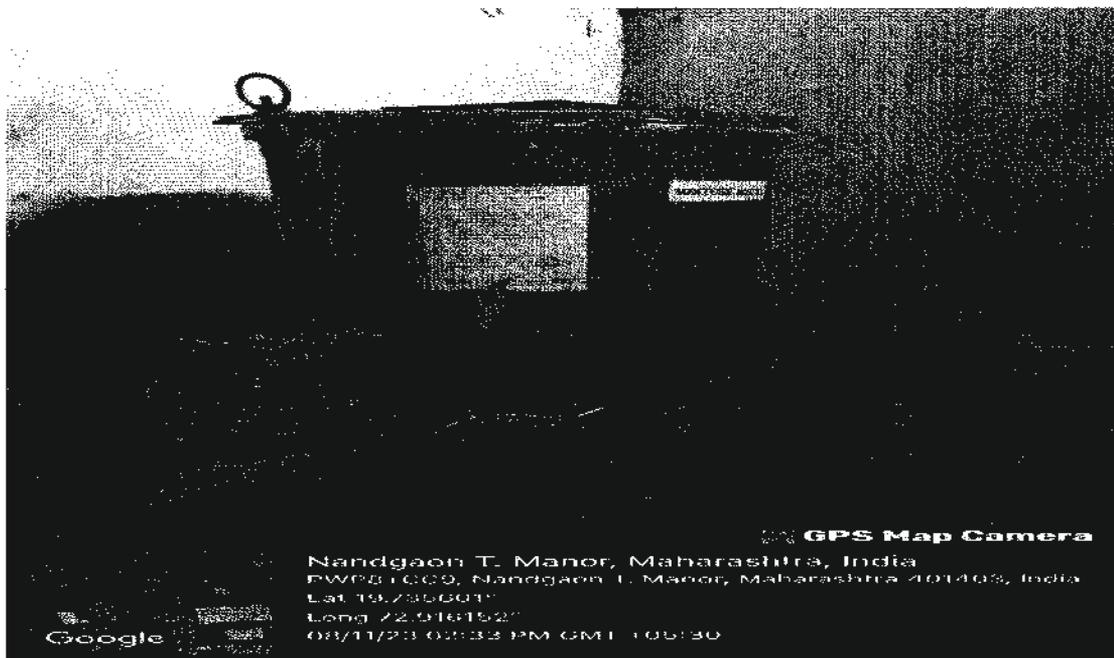


Photo No.37 Mixer

**Shradha Singh**

---

**From:** Yogesh Sharma  
**Sent:** Thursday, January 11, 2024 6:30 PM  
**To:** Siddhi Jambusariya  
**Subject:** Request for assessment of the report submitted of PWPF  
**Attachments:** SKM\_306i24011114140.pdf

Please mail to Shri Tanmay Kumar Ji – Chairman (CPCB) from Rahul Sir mail Id.

Mail Id: [tanmay.kumar-rj@gov.in](mailto:tanmay.kumar-rj@gov.in); [ccb.cpcb@nic.in](mailto:ccb.cpcb@nic.in)

Respected Sir,

I am writing to you on behalf of my company The Shakti Plastic Industries (**Reg NO PR-31-MAH-07-AAMFS7839M-23**) with reference to the directions issued on **26th October 2023**, ref letter no **CP-20-80-2021-UPC-II-HO-CPCB-HO Part (1)** under Section 5 of the EPA 1986, by the Central Pollution Control Board (CPCB) to the chairman Maharashtra Pollution Control Board (MPCB) regarding the detailed inquiry of our Plastic Waste Processing Facility (PWPF) at Palghar Maharashtra.

The MPCB has successfully conducted the audit of our facility and the comprehensive report has been submitted to your good office.

In light of the above, we kindly request the CPCB office to review the MPCB report and provide a clean chit to our company. We believe that the positive findings in the audit report warrant the clearance of any concerns raised earlier, and we are eager to receive your confirmation on the matter so that our esteemed customers would be at ease.

We are grateful to your attention to this matter and look forward to a swift resolution.

Thank you for your cooperation and understanding.

For The Shakti Plastic Industries  
Rahul V. Podaar



Date: 11-01-2024

To,  
The Chairman,  
Central Pollution Control Board,  
Parivesh Bhawan, East Arjun Nagar,  
Delhi-110032

**Subject: Request for assessment of the report submitted following MPCB Audit of PWPF-  
The Shakti Plastic Industries.**

Respected Sir,

I am writing to you on behalf of my company The Shakti Plastic Industries (Reg NO PR-31-MAH-07-AAMFS7839M-23 ) with reference to the directions issued on 26<sup>th</sup> October 2023, ref letter no CP-20-80-2021-UPC-II-HO-CPCB-HO Part (1) under Section 5 of the EPA 1986, by the Central Pollution Control Board (CPCB) to the chairman Maharashtra Pollution Control Board (MPCB) regarding the detailed inquiry of our Plastic Waste Processing Facility (PWPF) at Palghar Maharashtra .

In this regards we would like to state as under :

1. The MPCB has successfully conducted the audit of our facility and the comprehensive report has been submitted to your good office. In this regard we are pleased to convey that the audit revealed no contravening findings and our operations were found to be in compliance with the EPR Guidelines notified as schedule II of PWM Rules set forth by the CPCB.
2. We sincerely appreciate the efforts taken by the MPCB for the detailed audit and submitting the true and fair picture to your good office.
3. The surprise physical audit and verification of the plant was conducted by the MPCB team on 8<sup>th</sup> November 2023. We have provided the below details to the MPCB audit team to their full satisfaction and also explained to them the working of our plant:
  - a. We have justified our plastic waste processing capacity of 2,88,000 as registered in MPCB consent. We have shown to the audit team 27 plastic recycling /processing machineries corresponding to the registered quantity with their purchase bills . Copy of plant and machinery bills given to the MPCB audit team.
  - b. It was mentioned in CPCB random audit that plant operation has not commenced. However, we have shown the electric bills and labour register for past years to the MPCB audit team which clearly shows that our facility is running since many years.



123

c. Procurement of Plastic waste (Procurement invoices supplier details etc.) were produced and copy given to the audit team.

d. Electric Consumption (Electricity bills) copy given.

e. Procurement bills of additives copy given.

f. Sales bill copy of Recycled plastic given.

g. Labour register copy given and attendance for 298 workers physically present was shown to the team.

l. Plant lay out copy showing the area of the plant was given to the audit team.

f. We have paid all the GST dues till November 23.

g. We have installed power saving equipment's to our machines which reduces the power consumption resulting in less units consumed post the capacity expansion of facility

4. In light of the above, we kindly request the CPCB office to review the MPCB report and provide a clean hit to our company. We believe that the positive findings in the audit report warrant the clearance of any concerns raised earlier, and we are eager to receive your confirmation on the matter so that our esteemed customers would be at ease.

We are grateful to your attention to this matter and look forward to a swift resolution. If you require any additional information or clarification, please do not hesitate to contact us.

Thank you for your cooperation and understanding.

Your Sincerely

For The Shakti Plastic Industries

Vinod V. Podaar



Vinod V. Podaar

Partner

**Yogesh Sharma**

---

**From:** Yogesh Sharma  
**Sent:** 15 January 2024 12:14  
**To:** pwm.cpcb@gov.in  
**Cc:** divyasinha.cpcb@nic.in; atanudey.cpcb@supportgov.in; purbey.cpcb@gov.in  
**Subject:** RE: Regarding generation of EPR credits for 2023 - 2024

Respected Madam / Sir,

Please guide the way further.

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 10 January 2024 11:35  
**To:** pwm.cpcb@gov.in  
**Cc:** divyasinha.cpcb@nic.in; atanudey.cpcb@supportgov.in; purbey.cpcb@gov.in  
**Subject:** Regarding generation of EPR credits for 2023 - 2024

Respected Madam / Sir,

It's been mid of January 2024 and the EPR credit generation for period 2023 - 2024 has not yet been started.

Request you to please let know from when it will be started as our clients are insisting for EPR credits.

Attaching herewith screenshot of the portal for your kind reference.

Google Chrome on 1 year 15GB Browser

### Certificate Tracking

Financial Year: 2022-23

View on the dashboard for more details and reports

Category	Current Capacity	Category	Current Capacity	Category	Current Capacity
Processing Capacity (MT)	10000	Recovery Capacity (MT)	10000	Processing Capacity (MT)	10000
Chemical Recovery Potential (MT)	25000.00	Chemical Recovery Potential (MT)	10000.00	Chemical Recovery Potential (MT)	10000.00
Residue Potential (MT)	5.00	Residue Potential (MT)	5.00	Residue Potential (MT)	5.00
Waste Potential (MT)	10000	Waste Potential (MT)	10000	Waste Potential (MT)	10000
Total Certificate Value (MT)	12	Total Certificate Value (MT)	5	Total Certificate Value (MT)	0

[View on the dashboard](#)  
 [Debit Transactions](#)  
 [Certificates Generation](#)

Filter: None

Sl. No.	Date	Transaction ID	Certificate Category	Quantity/Value	Status	Action
No data available						

Thanks & Regards

Yogesh

**Yogesh Sharma**

---

**From:** Yogesh Sharma  
**Sent:** 23 January 2024 14:34  
**To:** divyasinha.cpcb@nic.in  
**Cc:** atanudey.cpcb@supportgov.in; purbey.cpcb@gov.in; eprplastic.cpcb@gov.in  
**Subject:** Account login issue  
**Attachments:** EPR OTP

Respected Madam / Sir,

We hereby inform you that our CPCB login account password is getting changed without our knowledge.

This is the second time that our password is been changed without bringing to our knowledge.

We hereby request you kindly help us by checking from where our CPCB login has been done on 22.01.2024 @ 05.18 am.

As on regular basis we are not receiving any OTP mail, but, on 22.01.2024 @ 5.18 am we received OTP mail.

Attaching herewith the OTP mail for your reference.

Please help us and do needful at earliest.

Thanks & Regards

Yogesh

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 01 June 2024 12:39  
**To:** 'divyag9.cpcb@gov.in' <divyag9.cpcb@gov.in>  
**Cc:** 'eprplastic.cpcb@gov.in' <eprplastic.cpcb@gov.in>; 'pwm.cpcb@gov.in' <pwm.cpcb@gov.in>  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 29 May 2024 10:50  
**To:** divyag9.cpcb@gov.in  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 27 May 2024 11:41  
**To:** divyag9.cpcb@gov.in  
**Cc:** eprplastic.cpcb@gov.in  
**Subject:** RE: Account Locked

Respected Madam / Sir,

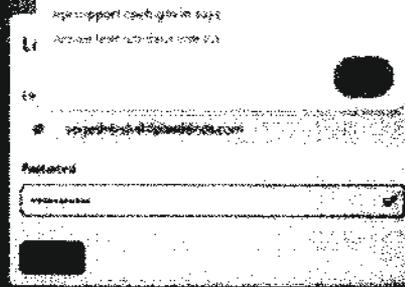
Still waiting account to be unlocked.

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 24 May 2024 11:20  
**To:** 'divyag9.cpcb@gov.in' <divyag9.cpcb@gov.in>  
**Cc:** 'eprplastic.cpcb@gov.in' <eprplastic.cpcb@gov.in>  
**Subject:** RE: Account Locked



Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 07 June 2024 11:39  
**To:** [divyag9.cpcb@gov.in](mailto:divyag9.cpcb@gov.in); DIVYA SINHA <[divyasinha.cpcb@nic.in](mailto:divyasinha.cpcb@nic.in)>  
**Cc:** [eprplastic.cpcb@gov.in](mailto:eprplastic.cpcb@gov.in); [pwm.cpcb@gov.in](mailto:pwm.cpcb@gov.in)  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 05 June 2024 14:08  
**To:** [divyag9.cpcb@gov.in](mailto:divyag9.cpcb@gov.in)  
**Cc:** [eprplastic.cpcb@gov.in](mailto:eprplastic.cpcb@gov.in); [pwm.cpcb@gov.in](mailto:pwm.cpcb@gov.in)  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma

**Sent:** 01 June 2024 12:39

**To:** 'divyag9.cpcb@gov.in' <divyag9.cpcb@gov.in>

**Cc:** 'eprplastic.cpcb@gov.in' <eprplastic.cpcb@gov.in>; 'pwm.cpcb@gov.in' <pwm.cpcb@gov.in>

**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma

**Sent:** 29 May 2024 10:50

**To:** [divyag9.cpcb@gov.in](mailto:divyag9.cpcb@gov.in)

**Cc:** [eprplastic.cpcb@gov.in](mailto:eprplastic.cpcb@gov.in); [pwm.cpcb@gov.in](mailto:pwm.cpcb@gov.in)

**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma

**Sent:** 27 May 2024 11:41

**To:** [divyag9.cpcb@gov.in](mailto:divyag9.cpcb@gov.in)

**Cc:** [eprplastic.cpcb@gov.in](mailto:eprplastic.cpcb@gov.in)

**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting account to be unlocked.

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma

**Sent:** 24 May 2024 11:20

**To:** 'divyag9.cpcb@gov.in' <divyag9.cpcb@gov.in>

**Cc:** 'eprplastic.cpcb@gov.in' <eprplastic.cpcb@gov.in>

**Subject:** RE: Account Locked

**Yogesh Sharma**

---

**From:** Yogesh Sharma  
**Sent:** 17 June 2024 10:41  
**To:** divyag9.cpcb@gov.in; DIVYA SINHA  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in; Rahul Podaar  
**Subject:** RE: Account Locked

Respected Madam / Sir,

We are following since last more than 15 days.

Still our PWP account is locked.

Requesting you kindly look in matter and do needful.

Thanks & Regards

Yogesh

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 12 June 2024 12:05  
**To:** divyag9.cpcb@gov.in; DIVYA SINHA <divyasinha.cpcb@nic.in>  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in; Rahul Podaar <rahul@shaktiplasticinds.com>  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still waiting our PWP account to be unlocked

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 07 June 2024 16:20 |  
**To:** divyag9.cpcb@gov.in; DIVYA SINHA <divyasinha.cpcb@nic.in>  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Also we are not able to generate ticket. Error is showing "Request failed with status code 401"

Kindly look into the matter and do needful.

**Yogesh Sharma**

**From:** Yogesh Sharma  
**Sent:** 01 July 2024 11:19  
**To:** divyag9.cpcb@gov.in; DIVYA SINHA  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in; Rahul Podaar  
**Subject:** RE: Account Locked

Respected Madam / Sir,

Still our account is locked.

Request you to kindly look into the same and do needful at earliest.

Thanks & Regards

Yogesh

---

**From:** Yogesh Sharma  
**Sent:** 25 June 2024 12:12  
**To:** divyag9.cpcb@gov.in; DIVYA SINHA <divyasinha.cpcb@nic.in>  
**Cc:** eprplastic.cpcb@gov.in; pwm.cpcb@gov.in; Rahul Podaar <rahul@shaktiplasticinds.com>  
**Subject:** RE: Account Locked

Respected Madam / Sir,

We are following since last one month, but our account has not been opened yet.

← → 📄 📧 eprplastic.cpcb@gov.in/epriplastic/epriplastic



Ministry of Environment, Forest and Climate  
Change Government of India

Centralized Extended Producers Responsibility For



Central Pollution Control Board  
Ministry of Environment, Forest and Climate Change  
Government of India



EPR Portal for Plastic Packaging

Requesting you to kindly check and do needful.

As we are unable to upload documents also EPR credit generation has not been started for 2023-24. All our clients (PIBOs) are chasing us for EPR credits as Annual Return date of 30.06.2024 is nearby.

Request you to please look into matter and do needful.

Thanks & Regards

**Yogesh Sharma**

---

**From:** Yogesh Sharma  
**Sent:** 02 July 2024 12:03  
**To:** Rahul Podaar  
**Subject:** RE: TSPI - Account Locked  
**Attachments:** RE: Account Locked ; TSPI - Account Locked

Mailed CPCB regularly. Attached the copy of mail with trails.

Mailed again today.

Thanks & Regards

Yogesh

---

**From:** Rahul Podaar <rahul@shaktiplasticinds.com>  
**Sent:** 02 July 2024 12:00  
**To:** Yogesh Sharma <yogesh@shaktiplasticinds.com>  
**Subject:** FW: TSPI - Account Locked

---

**From:** Divya Gupta <divyag9.cpcb@gov.in>  
**Sent:** 02 July 2024 11:33  
**To:** Rahul Podaar <rahul@shaktiplasticinds.com>  
**Cc:** DIVYA SINHA <divyasinha.cpcb@nic.in>; EPR Plastic <eprplastic.cpcb@gov.in>  
**Subject:** Re: TSPI - Account Locked

Please send email from your registered email ID.

सादर/Regards

डॉ. दिव्या गुप्ता / Dr. Divya Gupta

वैज्ञानिक 'ख' / Scientist 'B'

शहरी प्रदूषण नियंत्रण - II / Urban Pollution Control Board - II,

केंद्रीय प्रदूषण नियंत्रण बोर्ड / Central Pollution Control Board (CPCB)

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय, भारत सरकार / Ministry of Environment, Forest & Climate Change, Govt. of India

---

**From:** rahul@shaktiplasticinds.com  
**To:** "DIVYA SINHA" <divyasinha.cpcb@nic.in>, "Divya Gupta" <divyag9.cpcb@gov.in>, "EPR Plastic" <eprplastic.cpcb@gov.in>  
**Sent:** Thursday, June 20, 2024 1:48:30 PM  
**Subject:** TSPI - Account Locked

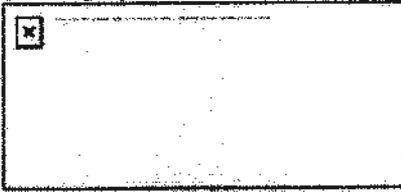
Respected Madam / Sir,

We have been following since last more than 15 days.

Still, our PWP account is locked.

Requesting you kindly look into the matter and do needful.

Best Regards,  
Rahul V Podaar  
(Managing Director)



Office: 202 - 205, 2nd Floor, Business Classic, Chincholi Bunder  
Road, Malad (W), Mumbai 400 064 MH-India  
M: +91 9820300446 T: 91 22 4967 1500/01/02  
W: [www.shaktiplasticinds.com](http://www.shaktiplasticinds.com)

Follow us:



**Yogesh Sharma**

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**From:** Yogesh Sharma  
**Sent:** 02 July 2024 12:02  
**To:** DIVYA SINHA  
**Cc:** divyag9.cpcb@gov.in; Rahul Podaar; eprplastic.cpcb@gov.in  
**Subject:** TSPI - Account Locked

Respected Madam / Sir,

We are following since last one month, but our account has not been opened yet.

[epplastic.cpcb@gov.in](mailto:epplastic.cpcb@gov.in)



Ministry of Environment, Forest and Climate  
Change Government of India

Centralized Extended Producers Responsibility Por



Central Pollution Control Board  
Ministry of Environment, Forest and Climate Change  
Government of India



EPR Portal for Plastic Packaging

Requesting you to kindly check and do needful.

As we are unable to upload documents also EPR credit generation has not been started for 2023-24. All our clients (PIBOs) are chasing us for EPR credits as Annual Return date of 30.06.2024 is nearby.

Request you to please look into matter and do needful.

Thanks & Regards

Yogesh



**Yogesh Sharma**

**From:** Yogesh Sharma  
**Sent:** 22 July 2024 15:05  
**To:** DIVYA SINHA  
**Cc:** epplastic.cpcb@gov.in; Rahul Podaar; divyag9.cpcb@gov.in; atanudsey.cpcb@supportgov.in; purhey cpcb@gov.in  
**Subject:** RE: Error during transfer of EPR credits.

Respected Madam / Sir,

Kindly check and do needful at earliest.

Thanks & Regards

Yogesh

**From:** Yogesh Sharma  
**Sent:** 19 July 2024 11:31  
**To:** DIVYA SINHA  
**Cc:** epplastic.cpcb@gov.in; Rahul Podaar; divyag9.cpcb@gov.in  
**Subject:** RE: Error during transfer of EPR credits.

Respected Madam / Sir,

We have requested for change in mobile no. The request is pending.

Exh "0"  
666

135

136

667

THE MULTIPLASTIC ADVANTAGE

Home - Changeover

Change Email And Mobile Number

Current Email Address

Current Mobile Number

Current Email Address

Current Mobile Number



Now as we have to transfer credits we are getting error as "Error in sending OTP"

Transfer Certificate

Company Name: ...  
Address: ...

Total Credits: ...

Demerit Points: ...

Demerit Points	Credits	Points	Availability	Project Status
1	X	5	40	20
10	X	5	1	21
20	X	5	0	22
30	X	5	0	23
40	X	5	0	24
50	X	5	0	25
60	X	5	0	26
70	X	5	0	27
80	X	5	0	28
90	X	5	0	29
100	X	5	0	30

Total: 5

Request you to kindly look into the matter and do needful at earliest.

Thanks & Regards

Yogesh

From: Yogesh Sharma  
 Sent: 18 July 2024 15:33  
 To: DIVYA SINHA <divyasinha.cpcb@nic.in>  
 Cc: eprplastic.cpcb@gov.in; Rahul Poddar <rahul@shaktiplasticsindia.com>; divya@nic.in  
 Subject: RE: Error during transfer of EPR credits

Respected Madam / Sir,

138

669

We have requested for change in mobile no.

Now as we have to transfer credits we are getting error as "Error in sending OTP"

Request you to kindly look into the matter and do needful at earliest.

Thanks & Regards

Yogesh

From: Yogesh Sharma

Sent: 17 July 2024 16:01

To: DIVYA SINHA <[divyasinha.cpcb@nic.in](mailto:divyasinha.cpcb@nic.in)>

Cc: [epiplastic.cpcb@gov.in](mailto:epiplastic.cpcb@gov.in); Rahul Podaar <[rahul@shaktiplasticinds.com](mailto:rahul@shaktiplasticinds.com)>; [divyag9.cpcb@gov.in](mailto:divyag9.cpcb@gov.in)

Subject: Error during transfer of EPR credits.

Respected Madam / Sir,

We have requested for change in mobile no.

Now as we have to transfer credits we are getting error as "Error in sending OTP"




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# Report on Machinery Capacity Audit for Manufacturing and Feasibility of Effluent Treatment Plant

## For

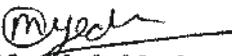
The Shakti Plastic Industries,

 Gut No. 159, Manor Palghar Road, Village Nandgoan, Palghar  
Maharashtra - 401403

Prepared by  
**Dr Manish Yadav**  
Assistant Professor,  
Department of Chemical Engineering,  
Institute of Chemical Technology,  
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Mumbai 400019



February 15, 2024

  
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Page 1 of 9

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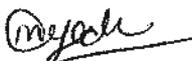
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3	Capacity of processing of the equipment's	06-07
4	Effluent treatment plant audit	08-09
5	Annexure 1	10

  
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## Introduction

M/s. The Shakti Plastic Industries is a Manor, Palghar Maharashtra based one of its own kind of company that specializes exclusively in upcycling Multilayered Plastic (MLP), high density polyethylene (HDPE), Low density polyethylene (LDPE), Polypropylene (PP) and other plastic material. MLPs in India, are primarily phased out of the system by either burning them in cement kilns and converting them into alternate fuel, dumping them in landfills or littering in the oceans. M/s. The Shakti Plastic Industries have recycling facility which is incorporated with the latest technologies for plastic recycling and an in-built quality testing lab for the re-processed products. In addition, effluent treatment plant to treat the wastewater generated during the existing manufacturing activities. Plant layout is depicted in Annexure 1. It can be observed that the total area in which the plant is situated is approximately 270000 sq.ft. The plant site is well equipped with electrical connections with safety features along with a regular supply of water from the in-house ETP. The total number of man power working in the plant is around 350 (including security personnel, cleaning staff, etc).

M/s. The Shakti Plastic Industries has appointed Dr Manish Yadav, Assistant Professor in the Department of Chemical Engineering at the Institute of Chemical Technology, Nathalal Parekh Marg, Matunga East Mumbai – 400019 as consultant to understand the capacity of the existing facility along with detailed audit of effluent treatment plant. The entire report is divided into three sections.

**Section 1:** Process flow sheet of major unit operations

**Section 2:** Capacity of processing of the equipment's

**Section 3:** Effluent treatment plant audit

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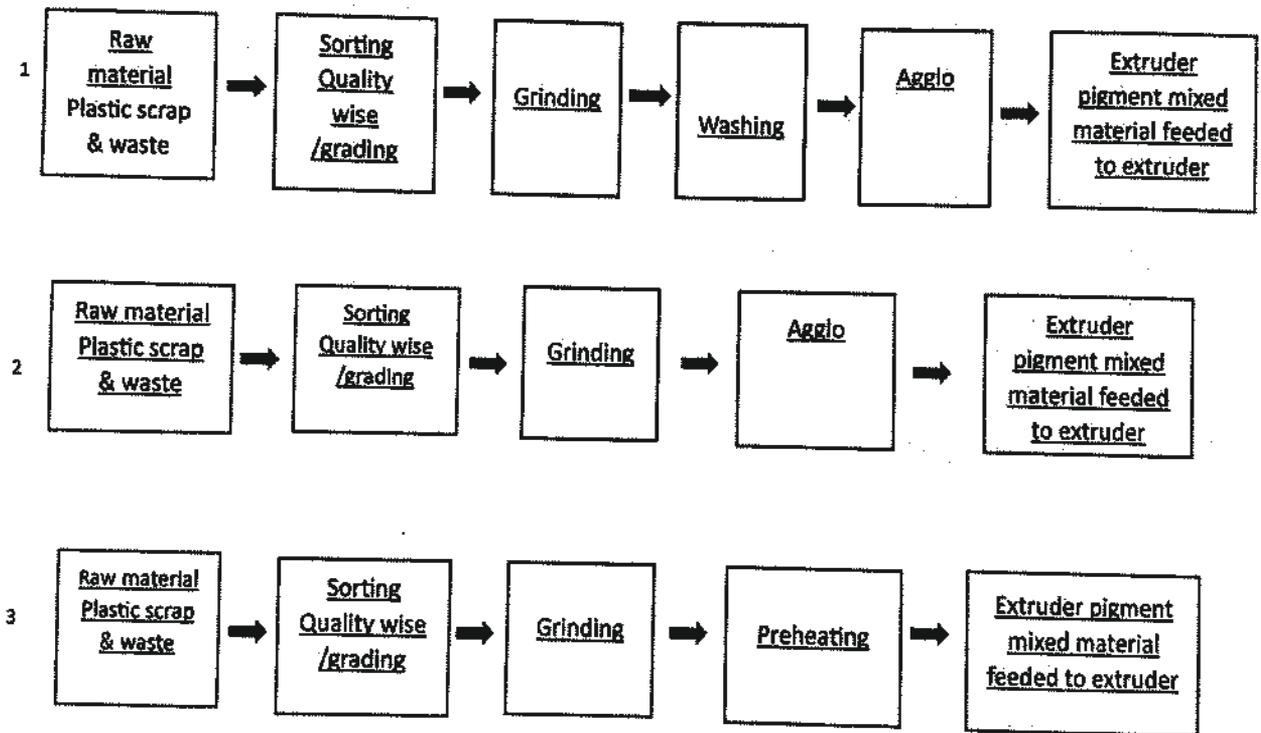
**Section 1**

**Process flow sheet of major unit operations**

Major unit operations existing in the plant are washing the waste MLP/HDPE/LDPE/PP, agglomeration, grinding and extrusion. Depending upon the type of MLP/HDPE/LDPE/PP obtained as raw material, the processing conditions are changed. However, the flow sheet remains same as reproduced below.

**Manufacturing Flow Chart**

**Manufacturing Flow Chart of Extrusion Process**



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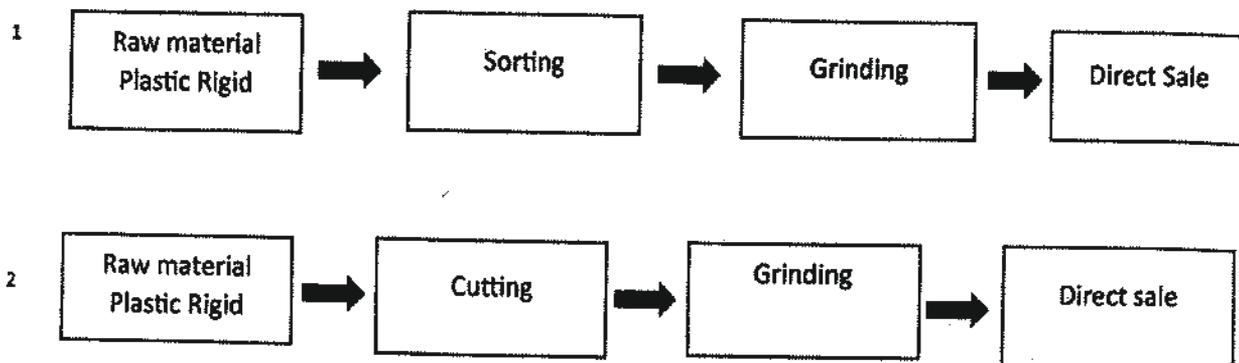
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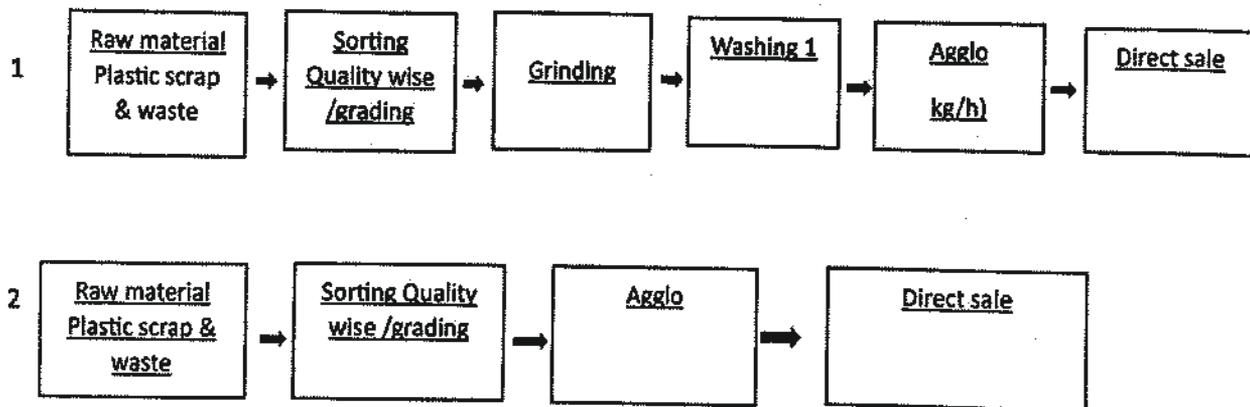
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**Manufacturing Flow Chart of Grinding Process**



**Manufacturing Flow Chart of Agglomeration Process**



  
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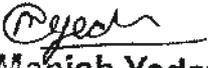
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**Section 2:**

Capacity of processing of the equipment's

Herewith I am stating the capacity of the equipment's used in the premises.

<u>Sr.</u>	<u>Machine</u>	<u>Qty/Nos.</u>	<u>Production Capacity in Kg Hour / Approx. Weight</u>
(A)	<b>EXTRUDERS</b>		
1	Extruder No. 1	1 no	1900
2	Extruder No. 2	1 no	1800
3	Extruder No. 3 (Twin)	1 no	4400
4	Extruder No. 4 (Mother-Baby)	1 no	3800
5	Extruder No. 5	1 no	1900
6	Extruder No. 6 (Die-Face)	1 no	1500
(B)	<b>AGLOW MACHINE</b>		
1	Aglow (Big)	1 no	1600
2	Aglow (Big)	1 no	1800
3	Aglow (Big)	1 no	2200
4	Aglow (Small)	1 no	1000
5	Aglow (Big)	1 no	2000
6	Aglow (Big)	1 no	4000
7	Aglow (Big)	1 no	4200
(C)	<b>GRINDER MACHINE</b>		
1	Small Grinder	1 no	1925
2	Small Grinder	1 no	1600
3	Small Grinder	1 no	1400
4	Small Grinder	1 no	1000
5	Big Grinder	1 no	2400
6	Big Grinder	1 no	2000
7	Small Grinder	1 no	1200
8	Small Grinder	1 no	1000

  
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(D)	SHREDDER MACHINE		
1	Shredder	1 no	3500
2	Shredder	1 no	4800
(E)	SOUZER MACHINE		
1	Squeezer Machine	1 no	3100
(F)	WASHING MACHINE		
1	Small Washing Line	1 no	2200
2	Big Washing Line	1 no	2500

As per my knowledge the total capacity of the plant

Sr.No.	Process	Capacity (TPD)
1	Extruder	367.2
2	Agglomeration	403.2
3	Grinding	300.6
4	Shredding	206.4
5	Squeezer	28.2
6	Washing	112.8
	<b>Total Capacity</b>	<b>1418.4</b>

**Total Capacity of the Plant :: 1420 TPD**

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**Section 3:**

Effluent treatment plant audit.

The treatability of the effluent collectively and study the suitability of the existing treatment process to meet the standards prescribed by MPCB of the existing ETP individually including the adequacy of existing units and equipment, mainly for controlling the pH, COD, BOD3 days, TDS & TSS values below the prescribed standard. Based on the characteristics of raw wastewater, the following treatment processes were considered for the treatability: Since no chemical conversion is involved in the processing no biological treatment facility is installed in the existing facility.

- Primary treatment comprises neutralization and coagulation.
- Tertiary treatment with Activated carbon bed

**3.1 Primary Treatment****3.1.1 Coagulation:**

Determination of optimum pH and determination of optimum dose. Coagulation is always highly effective only at particular pH with particular Alum dosage. Hence, studies were carried out to determine optimum pH and dose. Methodology observed was as follows.

- Determination of Optimum pH:

100 ml volume of wastewater samples were taken in 4 cylinders. Alum dose of 100 mg/lit was given to all the samples. The pH was adjusted to 7.0, 7.5, 8.0 and 8.5 respectively, by using 6N NaOH. After allowing for reaction time and settling, the supernatant COD was checked. Satisfactory settling with best COD reduction was observed at 7.5 pH.

- Determination of Optimum Alum dose:

100 ml volume of wastewater samples were taken in 4 cylinders. Alum dose of 250, 500, 750 and 1000 mg/liter were given to respective wastewater samples. The pH was adjusted to 7.5 (optimum pH). After allowing for reaction time and settling, supernatant COD was checked. Satisfactory settling with good COD reduction was observed for 500 mg/L alum dose i.e. optimum dose.

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### 3.2 Tertiary Treatment

The purpose of tertiary treatment is to provide a final treatment stage to raise the effluent quality before it is discharged to the receiving environment (sea, river, lake, ground, etc.). More than one tertiary treatment process may be used at any treatment plant. In the existing facility activated carbon based tertiary treatment is installed.

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# ANNEXURE

## I

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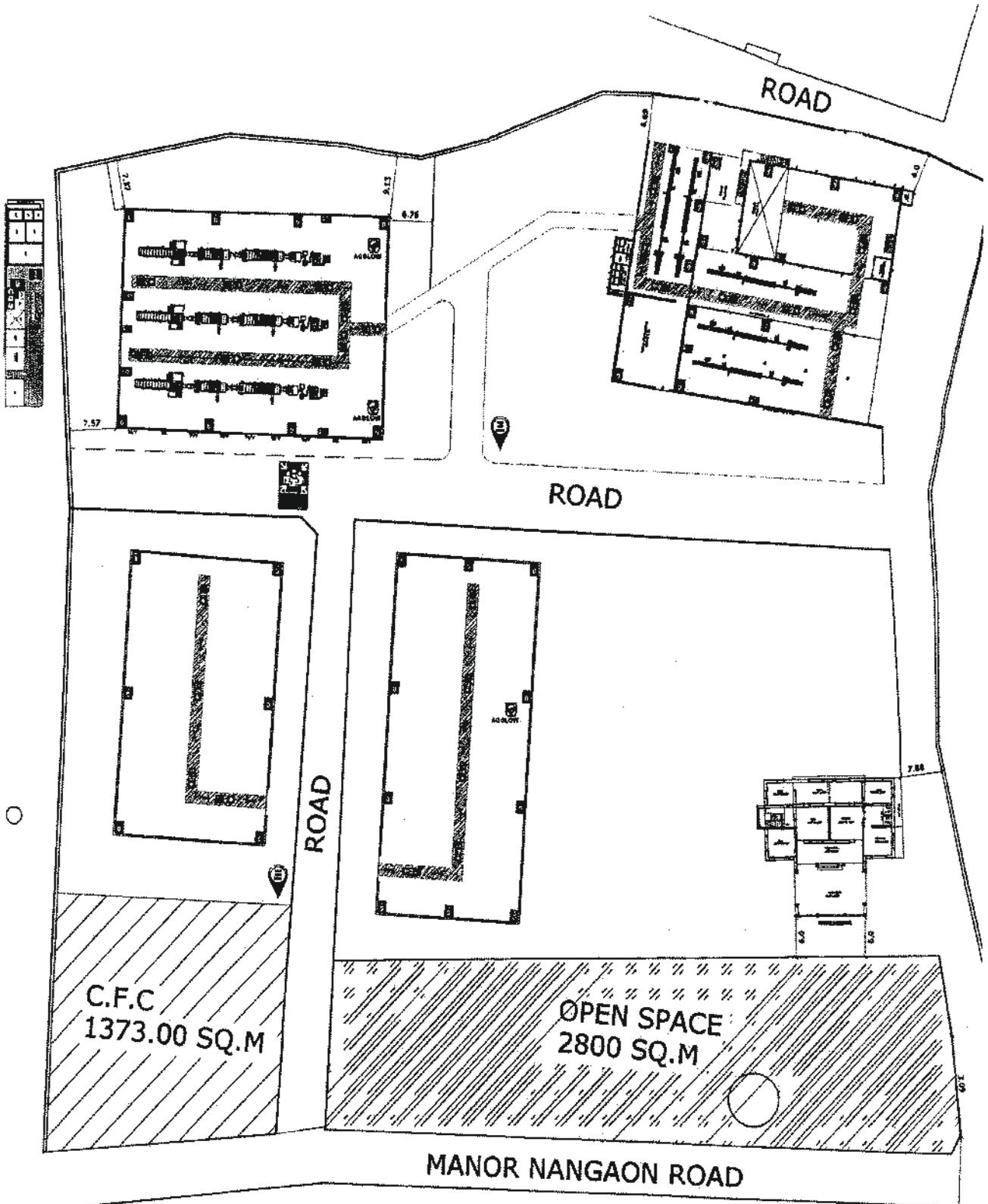
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	Fire Alarm
	Fire Extinguisher
	Fire Exit
	Assembly Point

In case of Emergency	
Follow Code, Do not panic.	
Avoid persons with Disabilities as necessary.	
Do not re-occupy or immediate.	
Proceed to the designated area or assembly point.	
Wait for further instructions.	

MAHARASHTRA POLLUTION CONTROL BOARD

Phone No.: 022-2410437,  
24020781

Email: robmw@mpcb.gov.in

Website: www.mpcb.gov.in



Kalpataru Point, Third Floor,  
Sion Matunga Scheme Road No. 8,  
Sion Circle, Sion (E),  
Mumbai - 400022

No. MPCB/RO(BMW)/B-237

Date: 08/04/2024

To  
M/s. Shakti Plastic Industries.,  
Gut No.158 & 159, Vill-Nandgaon,  
Manor, Dist-Palghar.

**Sub: Show Cause Notice for Closure under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981 and r/w Plastic Waste Management Rules, 2016**

- Ref:**
- 1) CPCB Direction u/s 5 F. No. CP-20/80/2021-UPC-II-HO-CPCB-HO Part (1) dt. 26.10.2023.
  - 2) Consent to Operate granted dt. 15.06.2023 valid up to 31.08.2026
  - 3) Plastic EPR registration granted by the M P C Board vide no.PR-31-MAH-07-AAMFS7839M-23 dt.31.07.2023.
  - 4) Joint inspection of your industry on 30 & 31 January 2024.

**WHEREAS**, you are operating industry located in the "Pollution Prevention Area" under the Water Act, 1974; under the Air Act, 1981 and Authorization under the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 followed by further amendments made therein from time to time.

**AND WHEREAS**, it is obligatory on your part to obtain Consent to Operate of the Board under section 26 of the Water (Prevention & Control of Pollution) Act, 1974; under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 and to comply the same.

**AND WHEREAS**, it is an obligatory on your part to provide pollution control systems as it warranted and to operate and maintain the same continuously and effectively so as to achieve the standards prescribed in the consent.

**AND WHEREAS**, as per clause 11.4 of Guidelines on Extended Producer Responsibility published by MoEF & CC dated 16.02.2022, 'In case, at any stage it is found that the information provided by the plastic waste processor is false, the plastic waste processor shall be debarred by State Pollution Control Board, as per procedure laid down by Central Pollution Control Board from operating under the Extended Producer Responsibility framework for a period of one year'.

**AND WHEREAS**, the Board has granted Consent to Operate on 15.06.2023 for plastic Granules & Plastic Grinding and agglomerates 24000 MT/M valid till 31.08.2026.

**AND WHEREAS**, the EPR registration application was approved and registration was granted on 31.07.2023 to your industry.

**AND WHEREAS**, CPCB has issued directions u/s vide above ref. no.1 wherein it was directed to conduct detail enquiry with respect to your industry.

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**AND WHEREAS**, As per the clause 3.0 of EPR guidelines 'Recycling' means the process of transforming segregated plastic waste into a new product or raw material for producing new products. Accordingly, the PWP (recyclers) can be registered on the EPR portal for production of pellets/chips/products (process code R1 to R6) and EPR certificates can be generated for the sale of the same. Grindings & agglomerates of plastic waste does not amount to transforming of plastic waste and hence cannot be considered as product from "Recycling process". Also, as per clause 5 (a) of the Plastic Waste Management Rules, 2016, "plastic waste, which can be recycled, shall be channelized to registered plastic waste recycler and recycling of plastic shall conform to the Indian Standard: IS 14534:1998 titled as Guidelines for Recycling of Plastics, as amended from time to time". And as per the Indian standard IS 14534:1998 titled Guidelines for Recycling of plastics, the process of recycling of plastic waste includes "the cleaned and washed material as obtained in 7.3.1 may be blended with additives, processing aids, pigments etc., as the case may be, and finally granulated by using appropriate screen mesh for filtration of contaminants and impurities".

**AND WHEREAS**, in connection with the CPCB Direction, a joint inspection of the CPCB & MPCB Officials have visited to your industry on 30 & 31 January 2024 to assess the plant production capacity, machinery details, Manpower deployed, GST invoice uploaded on the EPR portal etc and observed following non-compliances

- i. Assessed production capacity as per the trial run conducted by the inspection team was found to be much less than the Registered processing capacity of the unit. The assessed production capacity of the unit is 10,141.2 TPA as per the trial run conducted by the inspection team, wherein the Registered Processing capacity is 2,88,000 TPA. The trial run was conducted as per the details (Plant machinery and Process Flow Diagram) provided in the application form.
- ii. Assessed Average Monthly power consumption for production of 10,141.2 TPA recycled product was found to be less than the actual power consumption as per the electricity bills. Assessed Average Monthly power consumption as per the trial run is 27,456 KWh for production of 842 TPM i.e. 10,141.2 TPA. However, average Monthly power consumption as per electricity bills of 3 months (i.e. September'23 to November'23) is 17,455 KWH which is 64% of the assessed power consumption required for production. Based on the electricity consumption, the actual production for a year is assessed as 6447 TPA.
- iii. Appropriate sales invoices of recycled products were not found uploaded on the EPR Portal by the unit. The industry has made 698 sale entries on EPR portal till date. Out of which, only 2 invoices, correspond to sale of grinded plastic waste of quantity 11.6 Tons uploaded on the EPR Portal. No invoice has been uploaded for the sale of recycled plastic on the EPR Portal. 468 no. of the invoices have been issued for services provided by the unit. For the remaining 228 sale entries, invoices have not been uploaded.
- iv. The sale of recycled plastic was not confirmed by the buyers as claimed by the unit. None of the five units contacted by the inspection team, to whom the unit claimed that it had sold recycled plastic on the EPR Portal, confirmed that they had procured recycled Plastic from M/s Shakti Plastics. It was Informed

by these five units that they had only procured EPR certificates from M/s. Shakti Plastics India.

- v. As per your ETP logbook, you are treating 27 m<sup>3</sup>/day of effluent, but as per consent to operate ETP having capacity 3.0 m<sup>3</sup>/day.
- vi. You have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules.

**NOW THEREFORE**, you are hereby called upon to show cause as to:

- 1) Why consent to operate shall not be revoked and Closure Directions shall not be issued against your industry under the Water (P & CP) Act, 1974, Air (P & CP) Act, 1981 and r/w Plastic Waste Management Rules, 2016 and amendment thereto.
- 2) Why penalty or environmental compensation per ton of plastic waste misreported for quantity of plastic procured and EPR certificate generated shall not be levied upon you as per Rule 18 of Plastic Waste Management Rules, 2016 and Rule 9 of Plastic Waste Management (amendments) Rules, 2022 as per Environmental Compensation regime framed by CPCB in 2022.

You are hereby directed to submit your reply to this Show Cause Notice within 07 days from the date of issuance of this notice, failing which, Consent to Operate will be revoked and final Closure Directions will be issued without any intimation to you as per the provision of various environmental enactments mentioned above, which may please be noted.

This is issued with the approval of the competent authority.

For and behalf of M.P.C. Board,

  
(S L Waghmare)  
Regional Officer, (BMW)

**Copy to:- Regional Officer, M.P.C. Board, Thane/Sub-Regional Tarapur-II :- You are directed to ensure the receipt of this Show Cause Notice for closure to the industry.**

To,  
The Regional Officer (BMW)  
Maharashtra Pollution Control Board,  
Kalpataru Point, Third Floor,  
Sion Matunga Scheme Road No. 8,  
Sion Circle, Sion (East),  
Mumbai – 400022

Date: 09.04.2024

Subject: Response to Show Cause Notice

Reference: MPCB/RO(BMW)/8-237 dated 08.04.2024

Respected Sir,

I am writing in response to the Show Cause Notice referenced above, regarding the observations made during the recent inspection conducted by MPCB and CPCB at our recycling facility on 30th and 31st January 2024.

Firstly, I would like to highlight that all necessary approvals, including Consent to Establish (CTE) and Consent to Operate (CTO), were diligently obtained from MPCB after thorough compliance verification. Additionally, the Recycler Certificate issued under PWM rules has been duly acquired, which further solidifies our commitment to Extended Producer Responsibility (EPR) compliance.

Regarding the observations raised in the notice, I would like to provide clarifications as follows:

A comprehensive third-party audit conducted by the Institute of Chemical Technology (ICT), a reputable institution, has confirmed that our reprocessing capacity exceeds the registered capacity stated in the CTO. Copy of Audit Report of ICE is attached herewith for your kind reference. Furthermore, MPCB officials conducted an



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audit post-registration on the CPCB portal, affirming our capability and subsequently allowing us to generate EPR credits.

The audit team's assessment appears to have focused solely on granule production. However, alongside granules, we also manufacture and sell agglomerates and grinding products. Similar to PET manufacturers who produce flakes and grinding products, we request consideration for our agglomerate and grinding production. Our CTO explicitly mentions our capability to produce agglomerates and grinding (copy of CTO attached for your reference).

We are puzzled by the audit team's conclusion regarding the "Assessed Average Monthly Power Consumption" of 27456 KWH, which they correlate with processing capacity. We believe this calculation requires further explanation and clarification. We are attaching copies of Electricity Bills for period September'23 to November'23 for your ready reference and kind consideration.

The details of our customers, including EPR clients, were duly provided to CPCB as requested. We have attached the same information for your reference. Additionally, the visit conducted by Mr. Purbey to one of our clients in Vasai reaffirmed our commitment to supplying Recycled Post-Consumer Plastics (RPG) to our clients. Attaching copies of Invoices of customers for your ready and kind consideration.

We have addressed the concern raised regarding the classification of "Services" in our industry jargon. We have provided a declaration to CPCB clarifying that it should be considered as sales, which is consistent with our reporting on the GST Portal.

In conclusion, we firmly believe that the reasons outlined above substantiate our position that our consent should not be revoked, and environmental compensation should not be imposed. It is essential to recognize that the recycling industry is undergoing a



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transition towards organization, and we are dedicated stakeholders in this process.

We kindly request your cooperation and understanding as regulators to facilitate a constructive dialogue and resolution of these matters. We remain committed to upholding environmental standards and contributing positively to the recycling ecosystem.

We request your prompt attention to this issue to enable the smooth operation of our plant.

Thank you for considering this matter.

Sincerely,

For The Shakti Plastic Industries

A handwritten signature in black ink, appearing to read 'Rahul V. Podaar', is written over a circular stamp. The stamp contains the text 'THE SHAKTI PLASTIC INDUSTRIES' around the perimeter and 'MUMBAI' in the center, with a small star symbol at the bottom.

Rahul V. Podaar  
Partner

the identification of specific types of plastic and associated additives, thus permitting their efficient downstream separation and segregation.

NOTE -- In case of unknown or new source material, polymer characterization of waste should be carried out for identification of input waste by Differential Scanning Calorimetry (DSC), Fourier Transform Infrared (FTIR) or Chemical analysis in laboratory.

#### 5.2.2.2.2 Separation and sorting

Plastics separation and sorting operations, which are generally required in all material recovery processes, may be carried out manually or automatically or combination of both systems using appropriate means of identification. The more accurate and efficient the means of identification, sorting and separation, the better is the quality of the recovered product obtained. Depending on specific circumstances, a compaction process such as crushing or baling to reduce size may be necessary to ensure easier handling. In manual sorting, risk of chemical, microbiological and ergonomic problems due to repetitive work can appear. Therefore, if manual sorting cannot be avoided, the workplace shall be designed to minimize such problems.

#### NOTES

1 Pre-consumer products can generally be sorted by type of plastic to permit their re-use in the production process. Re-use of post-consumer products is generally rendered more complex because of their contamination by adventitious heterogeneous plastics waste.

2 Some post-consumer materials may consist of plastics fractions with different material properties such as different melt flow rates, densities or colours. Separation of the waste according to their colour, flow rate is very important for achieving high quality recycle. In some cases, it may not be practically or commercially viable to achieve the desired levels of separation or cleanliness, in such cases these inputs should preferably be diverted for alternative recovery process like mixed waste recycling or feedstock/chemical recycling. If the input plastics waste is commingled, choice of recycling process should be carefully made.

3 Recycling of reinforced plastics may be carried out in some cases without separating the polymeric matrix from fibre reinforcements. When sufficiently efficient separation, as required for the desired property profile of the recycle, is not feasible at the preparatory process stage, appropriate preliminary operations should be conducted at the next regenerating step.

#### 5.2.2.3 Recyclates production process

5.2.2.3.1 The commercial production of plastics recyclates or granules or pellets through mechanical recycling comprises sequence of operations, including the separation of materials, efficient removal of contaminants by washing or other methods, drying where appropriate, handling, constitution of lots, storage, packaging and shipment. In addition, other processes, such as grinding, additional sorting, homogenizing, extruding, pelletizing, micronizing or dissolution in solvent, may be necessary in order to regenerate the plastics material.

5.2.2.3.2 Recyclates are usually conditioned as agglomerate or regrind in the form of fluff, flake, chips, pellets or powder. Addition of modifiers or stabilizers may also be carried out in order to enhance the value of recyclates for subsequent use.

NOTE -- All separated contaminants, such as those entrained in waste water, should be taken into account and handled properly during these preparatory steps.

#### 5.2.2.4 Use of plastics waste in partial substitution of bitumen for asphalt road construction

5.2.2.4.1 Use of plastics waste in partial replacement of bitumen for the construction of asphalt road has multiple benefits: improvement of the quality of the road, reduction of cost and scientific disposal of otherwise abandoned plastics waste -- especially flexible plastics waste.

5.2.2.4.2 Plastics waste blended bitumen road offer better binding property, higher softening point, ability to withstand higher temperature, lower penetration value, higher Marshal Stability value - resulting in increased strength of the road and better water resistance. All these benefits lead to longer life of the road and that too at reduced cost.

5.2.2.4.3 Types and size of plastics waste and the mixing process have been described in the guidelines published by Indian Roads Congress (IRC): IRC: SP: 98: 2020 "Guidelines for the use of waste plastic in hot bituminous mixes (dry process) in wearing courses (first revision)" based on laboratory as well as field performance studies/investigations carried out in India.

#### 5.2.3 Feedstock or Chemical Recycling

5.2.3.1 Using various processes, well-known within the petrochemical industry, plastics can be depolymerized by pyrolysis process and equivalent process and fed back into the cracking process to form into their basic monomeric chemical constituents or into hydrocarbon fractions. These chemicals can then be used either as polymerization feedstock or in other useful applications and chemical processes.

5.2.3.2 Waste generated out of mixed plastics, commingled plastics and plastics materials made out of a combination of different plastic materials are generally difficult for normal recycling (mechanical recycling).

5.2.3.3 Mixed plastics including thermosetting plastics can be converted in to Light Diesel Oil (LDO) range of oil having useful applications. Evolved methane gas can be trapped and be used to produce electricity or be used as gaseous fuel.



Rahul P. Das

and equipment and the relevant recovery targets in terms of material or energy content requirements. When the target is disposal of the waste, compliance of emissions and other relevant environmental norms specified by the regulatory authorities, is to be ensured. Relevant selection criteria include the relative costs, competitiveness and environmental performance of the available options (see Annex C). Access to markets for recovered materials or energy is also an important consideration.

NOTE — Concepts and definitions of recovery are continually evolving. The basic principle of recovery lies in the transformation of an input (waste) into an output (product). Recovery is complete when secondary materials, fuels or products have been manufactured, or energy has been generated, in accordance with consensus-standardized criteria. Plastics recyclates with specified properties (secondary raw material) is a product, and recovery is accomplished when this product has been produced and has become commercially available, or energy has been generated (see Annex C and Annex D).

## 5.2 Material Recovery

### 5.2.1 General

Material recovery of plastics waste encompasses three distinct recycling routes: Mechanical recycling, feedstock or chemical recycling and biological or organic recycling.

### 5.2.2 Mechanical Recycling

#### 5.2.2.1 Sequence of operations

5.2.2.1.1 The mechanical recycling option generally comprises of the following sequence of operations, some of which may occur simultaneously, that are carried out as part of the recyclate preparation and production process:

Collection → Identification → Sorting/Separating (Into types and forms of plastic) → Grinding/Shredding → Washing → Drying → Agglomerating/Mixing → Extruding/Compounding → Pelletizing

5.2.2.1.2 Over the years, technology and machinery for mechanical recycling have significantly improved with automation, process control, higher output to produce good quality of recyclates, which can be used in plastics processing or product manufacturing techniques.

#### NOTES

1 In practice, many plastics processors or recyclers use plastics recyclates in the form of flake, eliminating the need for a prior pelletization step.

2 Plastics waste of all categories of plastics packaging as defined in MoEF&CC notification for EPR need to be effectively sorted, washed and cleaned by utilizing appropriate machinery and equipment.

3 Plastics waste for mechanical recycling may be offered in the form of bulk waste as collected, or in a value-added grade such as sorted, cleaned, standardized for weight etc.

4 For testing and characterization of mechanically recycled polyethylene (PE) and polypropylene (PP), ISO 5677 shall be used.

5 For recycling of waste from engineering plastics (ABS, PC, Nylon variants), PVC, PET and all other plastics including mixed waste recycling, proven technology of machinery and processes from India or outside India shall be used to produce processable recycled material in conventional plastics processing, as applicable for products with desired specification.

### 5.2.2.2 Pre-treatment

Depending on the intended application of the recyclate and the characteristics of the waste stream, a preparatory step may be used to decontaminate the collected material, as far as practically possible and to optimize their handling characteristics for shipping, processing and other downstream operations.

In the absence of homogeneous plastics waste consisting of materials of similar grade or type, material identification, sorting and separation steps become critical, such as in specialized sorting, washing and cleaning for household packaging or end-of-life electrical and electronic equipment.

Wherever possible, these pre-selective operational steps should be carried out prior to any downstream mixing (commingling) with other waste streams. In some cases, particularly affecting post-consumer sources and at higher quantity operation level, attainment of this objective may require automated separation and sorting unit operations. In the absence of such automatic process control, precise identification of the sources of the components of the waste may be of crucial importance.

NOTE — In order to optimize the recovery efficiency of plastics products and component parts, it is desirable to design for ease of disassembly and material identification as well as for minimization of variety in the types of plastic used in their manufacture. Such criteria may evolve as a function of the future development and implementation of technical options for resource recovery.

#### 5.2.2.2.1 Identification

5.2.2.2.1.1 The implementation of product identification code on both rigid and flexible plastics products facilitate in mode of separating materials, by type of plastics, at any point in the process, including the post-consumer stage, during manual or automatic sorting at the collection facility, and during disassembly of durable goods. With known and regular source of waste and with the involvement of experienced manual operators, identification in local level / decentralized segregation systems achieve the desired level of efficiency.

5.2.2.2.1.2 For large scale operation, various in-line analytical methods using techniques such as infrared analysis and trace-element tracking are available for

Rohit Bhatia



Shradha Singh

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**From:** Rutuja Bhalerao <srohq2@mpcb.gov.in>  
**Sent:** Tuesday, May 14, 2024 10:54 AM  
**To:** RO (BMW); Rahul Podaar; Yogesh Sharma  
**Cc:** Vinay Waghmare; Technical Advisor Chairman; Nandkumar Gurav; RO Thane; SRO Tarapur 2; Sandeep B. Shinde  
**Subject:** Re: Personal hearing scheduled before Hon'ble Chairman, Maharashtra Pollution Control Board, at 12.30 PM on 14/05/2024

This is with reference to the earlier email sent on 07/05/2024 for personal hearing to M/s. Shakti Plastic Industries on 08/04/2024.

Gentle reminder regarding the personal hearing.

With Regards,  
Rutuja Bhalerao,  
Sub-Regional Officer,  
RO (HQ) section, MPCB

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**From:** RO (BMW) <robmw@mpcb.gov.in>  
**Sent:** 07 May 2024 18:42  
**To:** Rahul Potdar <rahul@shaktiplasticinds.com>; Yogesh Sharma <yogesh@shaktiplasticinds.com>  
**Cc:** Vinay Waghmare <pschairman@mpcb.gov.in>; Technical Advisor Chairman <ta.chairman@mpcb.gov.in>; RO Thane <rothane@mpcb.gov.in>; SRO Tarapur 2 <srotarapur2@mpcb.gov.in>; Rutuja Bhalerao <srohq2@mpcb.gov.in>; Sandeep B. Shinde <sandeep.shinde@mpcb.gov.in>  
**Subject:** Personal hearing scheduled before Hon'ble Chairman, Maharashtra Pollution Control Board, at 12.30 PM on 14/05/2024

This is with reference to the Show Cause Notice for closure issued to M/s. Shakti Plastic Industries on 08/04/2024.

In this regard, a personal hearing is scheduled before **Hon'ble Chairman, Maharashtra Pollution Control Board, at 12.30 PM on 14/05/2024 in-person.**

You are requested to attend the personal hearing along with relevant documents.

AS(T) is requested to kindly attend the meeting.

RO Thane and SRO Tarapur 2: You are requested to inform the industry and attend the hearing online along with relevant documents. Link for the hearing is as follow-

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## Microsoft Teams

### Join the meeting now

Meeting ID: 476 976 767 625

Passcode: tmBVnu

With Regards,

**Shankar Waghmare**

Regional Officer (BMW),  
M.P. C. Board, Mumbai.



<http://missionlife-moefcc.nic.in/>



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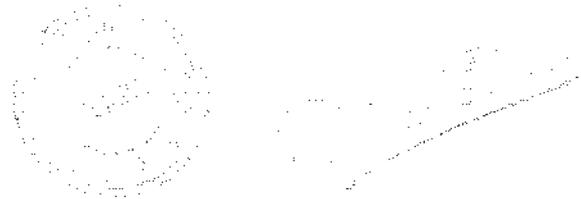
**MAHARASHTRA POLLUTION CONTROL BOARD**

**Date 18/05/2024**

**Show cause Notice for Closure under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981  
and r/w Plastic Waste Management Rules, 2016**

**No. MPCB/RO (BMW)/B-237**

**REPLY & DOCUMENTS FILED BY  
THE SHAKTI PLASTIC INDUSTRIES**





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Date :18/05/2024

To,  
The Chairman,  
Maharashtra Pollution Control Board,  
Sion Circle Sion East.

**Kind Attention: Mr. Siddhesh Ramdas Kadam, The Chairman, MPCB**

**Subject: Reply to the Show cause notice no. MPCB/RO/(BMW)/B-237 dated 8<sup>th</sup> April, 2024.**

Respected Sir,

We are writing in response to the Show Cause Notice No. MPCB/RO/(BMW)/B-237 dated 8<sup>th</sup> April, 2024 regarding our compliance with the Plastic Waste Management Rules, 2016 and Extended Producer Responsibility (EPR) guidelines. We take environmental responsibility seriously and are committed to operating in accordance with all regulations.

Below is the point wise reply to the concerns raised:

1. In response to the point made about clause 5(a) of the Plastic Waste Management Rules, 2016, Grinding and Agglomerate of plastic does not amount to transforming of plastic waste and hence cannot be considered as Recycling, we would like to address each point raised as:

THE SHAKTI PLASTIC INDUSTRIES  
202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malabar Hill, Sion Circle, Sion East,  
Mumbai - 400 022.  
MH-INDIA PH: 022 49671500/01/02

Maharashtra Pollution Control Board  
Kalpataru Point, 2nd Floor, Sion Circle,  
Sion East, Mumbai - 400 022.  
Tel. 24010437 / 24020781.  
Website : www.mpcb.gov.in

21/5/24  
Submit



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**1.1. Rules and Guidelines:** Clause 5(a) of the Plastic Waste Management Rules, 2016 *“Plastic waste, which can be recycled, shall be channelized to registered plastic waste recycler and recycling of plastic shall conform to the Indian Standard: IS 14534:1998 titled as Guidelines for Recycling of Plastics, as amended from time to time;”* which states that this clause should conform to the Indian Standard IS 14534:1998 and the amended BIS notification. As per the Indian Standard IS 14534:2016 titled **Plastics - Guidelines for the recovery and recycling of plastics waste (First Revision)**, the process of recyclate production process as mentioned in 5.2.2.3 *“Recyclates are usually conditioned as agglomerate or regrind in the form of fluff, flake, chips, pellets or powder. Addition of modifiers or stabilizers may also be carried out in order to enhance the value of recyclates for subsequent use.”* Also, as per the Indian Standard IS 14534:2023 titled **Plastics - Guidelines for the recovery and recycling of plastics waste (Second Revision)**, the process of recyclate production process as mentioned in 5.2.2.3.2 *“Recyclates are usually conditioned as agglomerate or regrind in the form of fluff, flake, chips, pellets or powder. Addition of modifiers or stabilizers may also be carried out in order to enhance the value of recyclates for subsequent use.”* The updated BIS Guidelines of 2016 and 2023 regarding agglomerates and regrinding being considered as process of recycling process aligns with the clarification provided in Clause 5(a) of the Plastic Waste Management Rules, 2016. The inclusion of agglomerates and regrinding as a part of the recycling process is in accordance with the guidelines set forth in IS 14534:2016 and IS 14534:2023. **The process of transforming segregated plastic waste into agglomerates and regrinding can be considered as recycling.** A copy of Guideline number IS 14534:2016 and IS 14534:2023 is attached for your reference as **Annexure-A**.

**1.2. CPCB Letter:** We have written a letter to CPCB dated 04<sup>th</sup> May, 2024 for considering the agglomeration and grinding as a recycling of plastic waste. A copy of Letter to CPCB is attached for your reference as **Annexure-B**.



**1.3.Consent to Operate by MPCB and PWP Registration:** The permission to engage in the production of agglomerate and grinding was granted by MPCB in Consent to Operate (CTO) dated 15<sup>th</sup> June, 2023. The approval granted for the manufacture of plastic grinding and agglomerate, as outlined in the CTO. This supporting document highlights our compliance with regulatory requirements and validates our actions in utilizing these materials for recycling process. During the PWP registration process, multiple inspections were conducted by the authorities. These inspections were carried out to ensure compliance with the regulations and to grant permission for generating EPR credits. **It is important to note that** during these inspections, there were no issues raised specifically regarding agglomerates and re-grind. Consequently, permission was granted by the authorities to generate EPR credits from agglomerates and re-grinds to us. A copy of Consent to Operate, and PWP certificate is attached for your reference as **Annexure-C**.

**1.4.Clients purchases agglomerate and grinding material:** To further support this point, we are providing information of the clients to whom we supply the agglomerate and grinding materials. This information highlights the manufacturing process carried out by these clients, demonstrating how they utilize these materials to produce new products. This evidence serves to confirm that the agglomerates and grinding are integral to the recycling process and contribute to the creation of sustainable plastic products. A copy of clients to whom we supply agglomerate and grinding materials is attached for your reference as **Annexure-D**.

**1.5. Industry Practice:** Additionally, it is worth mentioning that our industry is not alone in this practice. Along with **2000 other PWP registrations**, we have also been granted permission to generate EPR credits from agglomerates and re-grinds. This practice of generating EPR credits from agglomerate and re-grind is widely accepted and implemented within the industry.



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*Therefore, based on the clarification provided by the amended BIS Guidelines IS 14534:2016 and IS 14534:2023, and the compliance requirement of Clause 5(a) read with BIS guidelines, it can be concluded that agglomerates and re-grinding of plastic waste which are integral steps in the recycling process, which aim to transform post-consumer waste raw materials into usable raw materials for manufacturing and thus, can indeed be considered as products from recycling process and are allowed for EPR credit collection. The letter written to CPCB, advocating for recognition of agglomeration and re-grind as form of plastic waste recycling, further supports this conclusion. Additionally, approval granted by MPCB in CTO, for the production of agglomerates and grinding affirms compliance with the regulatory requirements in utilizing these materials for recycling process. Furthermore, the information provided regarding clients who use agglomerate and grinding materials reinforces the role of these materials in creating sustainable plastic products. The acceptance of EPR credits from agglomerates and re-grinding as evidenced by industry-wide practice highlights the widespread acknowledgment and implementation of this recycling approach within the industry.*

Further, in response to the other queries raised by MPCB, we would like to address each point raised as following:

- i. **Assessed Production capacity of the unit is 10141.2 TPA as per trail run conducted by inspection team against registered Processing capacity of 288000 TPA.**

Regarding the claim of discrepancy in the assessed production capacity, we would like to address each point raised and draw a conclusion:



- i.a. Capacity of Agglomerate and Grinding not taken into consideration:** The assessed production quantity by the inspection team does not account for the capacity of the agglomerate and grinding, resulting in lower output than the registered capacity.
- i.b. MPCB Report:** According to the MPCB Audit report with respect to CPCB directions issued u/s 5 of EP Act, 1986 issued after the physical visit to our plant on 08<sup>th</sup> November, 2023, our plant has 26 machineries for plastic waste processing with the production capacity of minimum of 2.32 lakhs tonnes per annum to maximum of 4.51 lakhs tonnes per annum of production. This production capacity aligns with our consented capacity and the EPR registration quantity of 2,88,000 tonnes. A copy of MPCB report is attached for your reference as **Annexure-E**.

MACHINERY DETAILS IN CAPACITY		
Type	Total No. of Machines	No. of Machineries for direct Sales
Extruders (Granule making)	6	6
Agglomerators	7	5
Grinder Machine	8	6
Shredder Machine	2	1
Squeezer Machine	1	1
Washing Line	2	
	<b>26</b>	<b>19</b>

- i.c. Third Party Report:** The Report on Machinery Capacity Audit for Manufacturing and Feasibility of Effluent Treatment Plant of *Institute of Chemical Technology (ICT)* dated 15<sup>th</sup> February, 2024 states that the capacity of the equipment in our plant is 1420 TPD (tonnes per day) which comes to 5,18,300 TPA. This further supports our claim



*Rohit Podar*

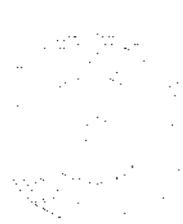


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that our registered processing capacity is in line with the actual capacity of our equipment. A copy of ICT Report is attached for your reference as **Annexure-F**.

- i.d. Machinery under Maintenance:** It should be noted that at the inspection, five of our machinery units were undergoing maintenance, which means the quantity mentioned in the assessment does not take into account the capacity of these unavailable machinery units.
- i.e. Trial Run Duration:** It is important to note that our machine capacity is based on 24-hour operation. However, during the trial run conducted by the inspection team, they assessed the capacity based on just one hour of operation that gives only 25% result. Once the machines are heated and run in full swing the production is more. The quantity mentioned in their assessment is specific to that one-hour timeframe, and it does not provide an accurate representation of our machine's maximum capacity.
- i.f. Varied Input:** As a recycling business, the input material we receive for processing is not standardized. The production capacity can vary based on the quality and composition of the input material. Therefore, it is important to consider the variability in input when assessing the input capacity.

*Based on the above points, we can conclude that our assessed production capacity aligns with our registered processing capacity of 2,88,000 TPA. The MPCB report, ICT Audit support this conclusion. However, it is vital to consider the operational context i.e. 5 machines were under maintenance, including 24-hour machine capacity and the variability in input material, to accurately determine our production capacity.*



*Rehman*



- ii. **Assessed Average monthly power consumption for production of 10141.2 TPA Recycled product found to 64 % be less than actual power consumption as per trial run.**

In response to the claim of discrepancy in the assessed average monthly power consumption for production of 10141.2 TPA, we would like to address the point raised and draw a conclusion:

- ii.a. **Electricity Bills:** Based on the electricity bills summary for the period ranging from June, 2022 to December, 2023, as mentioned below:

<b>Electricity Bill Details - TSPI</b>		
<b>Month</b>	<b>Units</b>	<b>Amount</b>
Jun-22	178635	1979235
July	192690	2108895
August	258158	2863727
Sept	172935	2067145
Oct	187853	2100001
Nov	246480	2646377
Dec	224655	2512685
Jan-23	166553	2010529
Feb	205328	2286244
March	208890	2436382
April	237870	2606033
May	150180	1792550
June	200145	2412570
Jul	268485	3046219
Aug	283065	3153268
Sept	246660	2958448
Oct	279083	3200148
Nov	189720	2402866
Dec	250800	2871381
	<b>Total</b>	<b>47454703</b>



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the average monthly power consumption for the production aligns with the actual consumption required for the production. Therefore, the assessed power consumption based on the electricity bills reflects the accurate power usage for the production process. The electricity bills for the above-mentioned period is attached for your reference as **Annexure-G**.

**ii.b. Literature Review:** As per the literature review, Source: [http://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2F1b\)%20of%20plastic%20processed.](http://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2F1b)%20of%20plastic%20processed.); electricity of around 0.4 to 0.6 kWh electricity/kg of plastic waste recycling (extrusion/granule making) is required. Therefore, electricity consumption of the industry for F.Y. 2022-23 i.e. 23.33 lakhs kWh corresponds to 11.66 lakh tonnes of plastic recycling.

**ii.c. MPCB Report:** As per the Report of MPCB, electricity bills submitted are in line with the consented capacity of industry.

**ii.d. Less power consumption:** The regrinds and agglomerate, we sale, require less energy to produce compared to granules which correlates to our production and electricity consumption.

*Based on the summary of the electricity bills, literature review and MPCB report we can conclude that it is evident that the average monthly power consumption aligns with the actual consumption required for the production. As per the literature review, industry standards suggest a consumption range of 0.4 to 0.6 kWh per kg of plastic waste recycled. Based on this, the electricity consumption for the given period aligns with the production of 2,88,000 TPA. Therefore, the assessed power consumption*



*[Handwritten signature]*



*based on the electricity bills accurately reflects the power usage for the production process.*

**iii. Appropriate Sale of Recycled Products were not found uploaded on the portal.**

Our responses to the points raised are as follows:

**iii.a. Uploading of sales invoices:** We have diligently uploaded all sales invoices on the portal, but unfortunately, not all of them are currently reflected due to a technical glitch. We have proactively communicated this issue to the authorities through multiple emails. A copy of emails to CPCB is attached for your reference as **Annexure-H**.

**iii.b. Sales invoice:** To ensure accuracy in reflecting the sales of recycled products, we are providing hard copies of all 698 sales entries as an alternative method. A copy of invoices is attached for your reference as **Annexure-I**.

**iii.c. Additives:** Additionally, we use some percentage of additives/pigments/masterbatch/processingaids/fillers/anti-oxidants/moisture powder/lime powder which justifies our actual production of granules. A copy of invoices is attached for your reference as **Annexure-J**.

**iii.d. GST Payments:** Our active sales operations are reflected in several key financial metrics. These include annual GST collection of Rs. 22 crores and GST payments of 10 crores, timely salary and labour wages payments, and consistent annual purchases of additives. This strong financial performance demonstrates our commitment to regulatory compliance and business operations.

**Total GST Liability Discharged**



1472

F.Y. 2022-2023	
Month	Total Tax
Apr-22	87,77,156
May-22	96,67,625
Jun-22	1,68,64,624
Jul-22	1,05,55,828
Aug-22	1,60,61,790
Sep-22	59,02,647
Oct-22	1,00,26,528
Nov-22	1,27,27,027
Dec-22	1,99,44,882
Jan-23	1,50,96,445
Feb-23	2,16,79,861
Mar-23	7,38,53,257
<b>Total</b>	<b>22,11,57,670</b>

Additives Purchased during 2022 - 2023			
Pigments / Master Batch / Titanium / Moisture Powder / Filler			
Sr. no	Description	Qty (Kgs)	Value
1	Titanium	1,200.00	4,93,000.00
2	Master Batch	2,500.00	3,82,000.00
3	Filler	36,369.00	15,84,033.00
4	Moisture Powder	9,000.00	1,53,000.00
5	Additives	150.00	83,650.00
6	Lime Powder	10,300.00	1,74,250.00
7	Carbon	2,200.00	45,000.00
		<b>61,719.00</b>	<b>29,14,933.00</b>

Details of Wages paid for period		Details of Salary for period	
01.06.22 - 31.10.23		01.06.22 - 31.10.23	

THE SHAKTI PLASTIC INDUSTRIES

202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Matad (W), Mumbai 400 064.  
MH-INDIA PH: 022 49671500/01/02



Month	Amount	Month	Amount
June	26,87,752.00	June	31,36,146.00
July	19,59,088.00	July	32,36,287.00
August	31,64,256.00	August	33,12,094.00
September	41,33,824.00	September	33,65,831.00
October	26,50,743.00	October	34,92,598.00
November	24,47,189.00	November	34,10,507.00
December	12,98,874.00	December	35,79,755.00
January'24	19,90,720.00	January'24	54,60,153.00
February	28,42,301.00	February	37,82,559.00
March	16,18,348.00	March	38,33,449.00
April	18,63,819.00	April	44,95,805.00
May	16,50,248.00	May	46,36,113.00
June	16,30,766.00	June	45,32,078.00
July	20,34,331.00	July	46,12,638.00
August	22,46,261.00	August	45,44,000.00
September	28,44,921.00	September	43,51,558.00
October	16,52,439.00	October	42,87,753.00
	<b>4,10,29,075.00</b>		<b>7,51,11,575.00</b>

A copy of GST payments is attached for your reference as **Annexure-K**.

- iii.e. **Technical glitches:** *We along with the industry, is facing a critical issue with recurring technical glitches on the portal, portal is under maintenance now and then.* These multiple failures over the past year are well-documented with the authorities and require an immediate action. Furthermore, we would like to raise concerns about a recent security incident where our portal password was changed without our prior knowledge. This incident highlights the need for robust security protocols on the EPR portal to ensure the data integrity and user confidence. The EPR portal unfortunately encountered recurring technical glitches. These issue cause frustration and hinder PWP's from efficiently utilizing the system for EPR compliance. We all, PWP are working towards the success of dream project "Swachh Bharat Abhiyaan" of our Prime Minister,



*[Handwritten signature]*



Mr. Narendra Modi, but because of technical glitches on the portal, it seems to be total failure.

*In conclusion, while we are committed to fulfilling our EPR compliances, recurring technical glitches (including portal maintenance) and a security incident involving unauthorized password changes hinder efficient utilization of the system. We echo industry concerns and urge immediate action to address these issues. We have faced technical challenges with the EPR portal but have uploaded all the invoices on the portal diligently. Despite diligently uploading all sales invoices, a technical glitch on the portal prevents them from being fully reflected. This delay, unfortunately, has impacted our ability to demonstrate compliance to clients in timely manner, which lead to reputational risk and potential business loss.*

iv. **The Sale of Recycles Product was not confirmed by the buyers as claimed by the unit.**

Our responses to the claims raised are as follows:

iv.a **Customer details:** We have provided the details of our customers, including EPR clients, as requested by the CPCB. The attachment of details of the customer and sales invoice is attached for your reference as **Annexure-L**.

iv.b **Confirmation from customers:** We have obtained the confirmation from the customers regarding their purchase of recycled plastic stating that they have purchased the agglomerates/regrinds/granules from us and they have replied back to the inspection team regarding the purchase of agglomerates/regrinds/granules from us. A copy of Confirmation letter is attached for your reference as **Annexure-M**.



*Rehman Khan*



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**iv.c Visit by CPCB Official:** The visit by Mr. Mayank Purbey, CPCB Delhi to our client M/S R.P. Industries in Vasai on 31st January, 2024 reaffirms our commitment to supplying recycled post-consumer plastic to our clients. A copy of the confirmation letter is attached for your reference as **Annexure-N**.

*In conclusion, we have provided the necessary information to the inspection team and obtained the confirmation of our customers regarding their purchase of recycled plastic from us. We reiterate our commitment to promoting sustainable practices and aim to contribute positively to the environment and society.*

**v. ETP Consent only for 3.0 m<sup>3</sup>/day against 27M<sup>3</sup>/day given in the log book.**

We would like to address the claim regarding the capacity of Effluent Treatment Plant. Our response is as follows:

**v.a Crown Chemical Report:** According to the report from Crown Chemicals, the capacity to operate our ETP is determined to be 30 KLD, which is appropriate for treating the amount of effluent mentioned in our ETP logbook. It is important to note that Crown Chemicals is our ETP vendor and is responsible for the deployment and commissioning of our ETP. A copy of report of Crown Chemicals is attached for your reference as **Annexure-O**.

**v.b ICT-ETP Report:** Furthermore, the ETP report from the Institute of Chemical Technology (ICT) confirms that the amount of effluent treatment per day is in line with the established capacity to operate the ETP. A copy of ICT report is attached for your reference as **Annexure-P**.

*Based on the assessments by both Crown Chemicals and ICT-ETP report, it is evident that the capacity to operate our ETP is suitable for treating the specified amount of*



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*effluent per day. In conclusion, the amount of effluent treated per day aligns with this established capacity.*

**vi. You have generated EPR Credits for Services Provided towards Collection and Recycling and not for requisite actual sales of Recycled Plastic Granules.**

We would like to address this claim by providing the following responses:

- vi.a. Sales Details:** We have raised the invoices of Services as general practices of the industry and as per the requirement of the clients but have generated the EPR credit as Sales. A copy of Sales Details is attached for your reference as **Annexure-Q**.
- vi.b. Declaration to CPCB, Pune:** We have duly provided a declaration to the CPCB, Pune dated 1<sup>st</sup> November, 2023, stating that these services should be considered as sales and accounted for as such. This declaration is consistent with our reporting on the GST portal, where these services are treated as sales. A copy of declaration to CPCB, Pune is attached for your reference as **Annexure-R**.
- vi.c.** Furthermore, we have maintained transparency and compliance by accurately reporting our revenue generated from these services. This includes proper taxation, invoicing, ensuring that all income from these services is appropriately recorded.

*In conclusion, generating EPR credits for the services provided towards collection and recycling is a widely accepted practice in the industry. We have diligently followed this practice and submitted a declaration to CPCB, Pune accordingly. Our reporting to the GST portal is also in line with treating these services as sales.*



Over past six months, our facility has undergone several audits by state, centre and other agencies. During these audits, we fully cooperated by providing all requested documentation related to our production capacity (2,88,000 TPA). These documents were submitted to CPCB Delhi, CPCB Pune, MPCB. We have also attended physically multiple meetings with state and centre to address concern regarding our production capacity and sales. We are confident that our production capacity of 2,88,000 TPA, production for F.Y. 2022-2023, and the associated EPR credits are all completely aligned.

Unfortunately, recent show-cause notices issued by CPCB and MPCB have caused unintended consequences. These notices have negatively impacted our business operations, including reputational damage with clients.

We understand the importance of responsible operations and appreciate the role of regulatory bodies in ensuring compliance. Our commitment to this is demonstrated by our well-established organization with over 600 employees (labour and staff), our support for over 1000 ragpickers, and a strong network of over 1000 suppliers and customers. We have consistently worked to maintain a highly organized and responsible business.

Our Company is classified as MSME and in case any penalty or closure of the at this time will lead to financial crisis to Company apart from severely affecting the livelihood of around 600 families who are directly and indirectly employed/connected with our unit.

In light of the above, we firmly believe that the reasons outlined above substantiate our position that our consent should not be revoked, and environmental compensation should not be levied. We are open to providing any additional information or



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participating in further discussions to address any concerns and ensure compliance with regulatory requirement.

Thanking you for your attention to this matter.

Your Sincerely,

**For The Shakti Plastic Industries**


**Rahul V. Podaar**

**Partner**

**Copy to: - Mr. SL Waghmare, Regional Officer, (BMW)**

**Mr. Kiran Hasabnis, Regional Officer, (Thane)**

## MAHARASHTRA POLLUTION CONTROL BOARD

Tel : 25802272		Regional Office, Thane
Fax : 25805398		5 <sup>th</sup> Floor, Office Complex Bldg.,
Website: <a href="http://mpcb.gov.in">http://mpcb.gov.in</a>		Near Mulund Check Naka,
E-mail Id: rothane@mpcb.gov.in		Wagle Estate, Thane-400 604.

Date : 18/06/2024

No. MPCB/ROT/CD/ 240618-FTS-0307

To,  
M/s. Shakti Plastic Industries.,  
Gut No.158 & 159, Vill-Nandgaon,  
Manor, Dist-Palghar.



Sub: Closure Directions under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981 and r/w Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 & Plastic Waste Management Rules, 2016 & amendment thereto.

- Ref: 1) CPCB Direction u/s 5 F.No. CP-20/80/2021-UPC-II-HO-CPCB-HO Part(1) dt. 26.10.2023.  
2) Consent to Operate granted dt. 15.06.2023 valid upto 31.08.2026  
3) Plastic EPR registration granted by the M P C Board vide no.PR-31-MAH-07-AAMFS7839M-23 dt.31.07.2023.  
4) Joint inspection of your industry on 30 & 31 January 2024.  
5) Show Cause Notice for Closure issued by the Board vide dtd.08.04.2024.  
6) Reply Submitted by the industry vide letter dtd.09.04.2024.  
7) Minutes of personal hearing extended on 14.05.2024.  
8) Reply (II) submitted by the industry dtd.18.05.2024.  
9) Approval of competent authority of the Board on dt.12.06.2024.

WHEREAS, you are operating industry located in the "Pollution Prevention Area" under the Water Act, 1974; under the Air Act, 1981 and Authorization under the Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016 followed by further amendments made therein from time to time.

AND WHEREAS, it is obligatory on your part to obtain Consent to Operate of the Board under section 26 of the Water (Prevention & Control of Pollution) Act, 1974; under Section 21 of the Air (Prevention & Control of Pollution) Act, 1981 and Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016 and to comply the same.

AND WHEREAS, it is an obligatory on your part to provide pollution control systems as it warranted and to operate and maintain the same continuously and effectively so as to achieve the standards prescribed in the consent.

AND WHEREAS, as per clause 11.4 of Guidelines on Extended Producer Responsibility published by MoEF & CC dated 16.02.2022, 'In case, at any stage it is found that the information provided by the plastic waste processor is false, the plastic waste processor shall be debarred by State Pollution Control Board, as per procedure laid down by Central Pollution Control Board from operating under the Extended Producer Responsibility framework for a period of one year'.

AND WHEREAS, the Board has granted Consent to Operate on 15.06.2023 for plastic Granules & Plastic Grinding and agglomerates 24000 MT/M valid till 31.08.2026.

AND WHEREAS, the plastic EPR registration application was approved and registration was granted on 31.07.2023 to your industry.

AND WHEREAS, CPCB has issued directions u/s vide above ref. no.1 wherein it was directed to conduct detailed enquiry with respect to your industry.

AND WHEREAS, as per the Environmental Compensation regime framed by CPCB in 2022, EC is to be levied on PWP @ Rs. 5000/- per ton of the Plastic Waste misreported for quantity of plastic procured and EPR certificate generated, and unit be directed to deposit same in the designated escrow account created by MPC Board.

AND WHEREAS, in connection with the CPCB Direction, a joint inspection team of the CPCB & MPCB Officials have visited your industry on 30 & 31 January 2024 to check the plant production capacity, machinery details, Manpower deployed, GST invoice uploaded on the EPR portal etc. and observed following non-compliances:

- i. Assessed production capacity as per the trial run conducted by the inspection team was found to be much less than the Registered processing capacity of the unit. The assessed production capacity of the unit is 10,141.2 TPA as per the trial run conducted by the inspection team, wherein the Registered Processing capacity is 2,88,000 TPA. The trial run was conducted as per the details (Plant machinery and Process Flow Diagram) provided in the application form.
- ii. Assessed Average Monthly power consumption for production of 10,141.2 TPA recycled product was found to be less than the actual power consumption as per the electricity bills. Assessed Average Monthly power consumption as per the trial run is 27,456 KWh for production of 842 TPM i.e. 10,141.2 TPA. However, average Monthly power consumption as per electricity bills of 3 months (i.e. September'23 to November'23) is 17,455 KWH which is 64% of the assessed power consumption required for production. Based on the electricity consumption, the actual production for a year is assessed as 6447 TPA.
- iii. Appropriate sales invoices of recycled products were not found uploaded on the EPR Portal by the unit. The industry has made 698 sale entries on EPR portal till date. Out of which, only 2 invoices correspond to sale of grinded plastic waste of quantity 11.6 Tons uploaded on the EPR Portal. No invoice has been uploaded for the sale of recycled plastic on the EPR Portal. 468 no. of the invoices have been issued for services provided by the unit. For the remaining 228 sale entries, invoices have not been uploaded.

- iv. The sale of recycled plastic was not confirmed by the buyers as claimed by you.
- v. As per your ETP logbook, you are treating 27 m<sup>3</sup>/day of effluent, but as per consent to operate ETP having capacity 3.0 m<sup>3</sup>/day.
- vi. Considering the BIS 14534:2023 the Grinding, Agglomeration & extruder activity the total capacity of the plant is 74519 TPA, which is also less than registered processing capacity of 2,88,000 TPA.
- vii. You have generated EPR certificates of the order of 2,74,000 Tonnes and transferred EPR certificates of 2,68,000 Tonnes which is very high considering actual processing capacity i.e 74519 TPA (considering the BIS 14534:2023).
- viii. You have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules for total 2,73,988.4 Tonnes.

**AND WHEREAS**, the Board had issued show cause notice for closure vide above reference cited at 5 for above non-compliances observed during joint inspection.

**AND WHEREAS**, your industry has submitted your reply to the show cause notice vide above reference cited at 6 without necessary documents and supplementary information.

**AND WHEREAS**, the personal hearing to your industry was extended before Hon'ble Chairman of the Board on 14.05.2024. **AND WHEREAS**, during the personal hearing it was understood that you have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules for total 2,73,988.4 Tonnes. **AND WHEREAS**, Considering the BIS 14534:2023 the Grinding, Agglomeration & extruder activity the total capacity of the plant is 74519 TPA, which is also less than registered processing capacity of 2,88,000 TPA.

**AND WHEREAS**, during the personal hearing, it was decided that industry shall again submit pointwise reply with supporting documents regarding non-compliances issued in the Show Cause Notice for Closure within 07 (seven) days period, or else further legal action shall be initiated as deem fit. **AND WHEREAS**, industry submitted reply (ii) vide above reference no. 8, which was also found to be not satisfactory.

**NOW THEREFORE**, in view of the above non-compliances, you are hereby directed to stop your manufacturing activities forthwith failing which the Board will have no option to initiate appropriate further legal action under the provisions of the various environmental enactments.

This is issued with the approval of the competent authority.

For and behalf of M.P.C. Board,



(Kiran Hasabnis)  
Regional Officer, Thane

**Copy submitted to:-**

- 1) Hon'ble Chairman, MPC Board, Mumbai.
- 2) Hon'ble Member Secretary, MPC Board, Mumbai

**Copy f.w.cs to:**

- 1) Regional Officer (BMW), M.P.C. Board, Mumbai.
- 2) Law Officer, MPC Board, Mumbai.

**Copy f.w.cs to:**

1) The Executive Engineer, Maharashtra State Electricity Distribution Co Ltd, Palghar.  
-He is directed to disconnect electricity supply to the aforesaid unit forthwith & inform this office accordingly.

2) Grampanchyat Nandgaon, Village Nandgaon, Tal. Palghar, Dist. Thane - It is directed to disconnect the water supply to the aforesaid unit forthwith & inform this office accordingly.

**Copy to:**

Sub Regional Officer, MPC Board, Tarapur II - It is directed to take follow up and ensure the compliance of the aforesaid directions. It is directed to ensure that these Directions to be served to the industry and competent authorities & submit the compliance verification report.



To,  
The Chairman,  
Maharashtra Pollution Control Board,  
Sion,  
Mumbai

**Date: 21.06.2024**

**Subject:** Closure Directions under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981, Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016, and Plastic Waste Management Rules, 2016 & Amendments Thereto.

**Reference:** Your Letter No. MPCB/ROT/CD/240618-FTS-0307 dated 18.06.2024

Respected Sir,

With reference to your closure directions dated 18.06.2024, we would like to inform you that we have complied with the directives issued by the Maharashtra Pollution Control Board (MPCB). Accordingly, we have halted our manufacturing activities immediately from 18.06.2024 and continued this cessation until today, 21.06.2024.

We have taken this time to address the issues mentioned in your letter and have implemented the necessary corrective measures to ensure full compliance with the relevant environmental regulations.

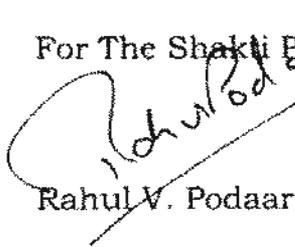
We respectfully request your permission to restart our manufacturing activities. Additionally, we request that you kindly depute an officer to our manufacturing plant to conduct a visit and verify the corrective actions taken.

We are confident that the measures implemented will meet the MPCB's standards and we are committed to maintaining compliance going forward.

Thank you for your attention to this matter. We look forward to your favorable response and continued cooperation.

Yours faithfully,

For The Shakti Plastic Industries

  
Rahul V. Podaar



Partner

**THE SHAKTI PLASTIC INDUSTRIES**

202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malad (W), Mumbai 400 064.

MH-INDIA PH: 022 49671500/01/02



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To,  
The Regional Officer (Thane)  
Maharashtra Pollution Control Board  
5<sup>th</sup> Floor, Office Complex Building,  
Near Mulund Check Naka,  
Wagle Estate, Thane - 400 604

Date: 26.06.2024

Subject: Closure Directions under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981, Hazardous & Other Wastes (Management & Transboundary Movement) Rules, 2016, and Plastic Waste Management Rules, 2016 & Amendments Thereto.

Reference: Your Letter No. MPCB/ROT/CD/240618-FTS-0307 dated 18.06.2024

Respected Sir,

Please find below herewith our pointwise reply to your Closure Directions vide your Letter No. MPCB/ROT/CD/240618-FTS-0307 dated 18.06.2024

**I. Assessed Production Capacity:**

The inspection team's assessment of our production capacity at 10,141.2 TPA was based solely on the trial run of the extruder and did not consider the Grinders, Agglomerates, and Squeezer capacity, which also generate recycalates as per BIS norms 14534:2023. The production capacities of the 8 to 9 machines, which were either not uploaded due to system glitch on EPR portal. We have 29 machines which includes extruder, grinders, agglomerates and squeezer. Only extruder capacity was considered. Additionally, the production varies depending on the material to material on time to time.

**II. Assessed Power Consumption.**

Consumption of power observed during the trial run, considering only the Extruder's power consumption. The power consumption of Grinder, Agglomerate, and Squeezer was not included.

**III. Sale Invoices on Portal.**

All sales invoices have been diligently uploaded on the portal, but only 698 invoices are visible. On the CPCB portal, we lack an edit or delete option if wrong invoices are uploaded. Due to a technical glitch, not all are currently visible. We have communicated this issue to CPCB through multiple emails (Copy attached) and will re-upload the invoices once the issue is resolved. If given the chance to change the invoices on the portal, we have around 400



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sales invoices in hand ready for upload which is having a capacity of around 2,50,000 Tonnes.

**IV. Sale Confirmation by Buyers.**

We confirm that we sell granules, grindings, and agglomerate materials to our clients, as confirmed by the buyers. We have obtained confirmation letters from the customers regarding their purchase of recycled plastic, stating they have purchased the agglomerates/regrinds/granules from us. A copy of the confirmation letter along with the acknowledge copy of their material receipt is attached for your reference.

**V. ETP Consent Discrepancy.**

The current ETP consent is for 3.0 m<sup>3</sup>/day, whereas our log book indicates 27 m<sup>3</sup>/day. The actual capacity of the ETP, as per the supplier, is 30 m<sup>3</sup>/day. Some of the plastic scrap, which is contaminated, requires washing. Not all material requires washing. We will add a flow meter to monitor the proper use of water intake and outward flow. We will correct this immediately.

**VI. Capacity Assessment Discrepancy.**

The inspection team's assessment was based on a one-hour operation trial, yielding only 25% of our actual capacity. They only considered the Extruder and not all machines, such as Grinders, Agglomerate, and Squeezer. Production also depends on the material. When all machines are running continuously for 24 hours with proper material input, we achieve our estimated capacity of around 2,50,000 TPA.

**VII. EPR Certificate Generation.**

As there is no edit or delete option on the portal, we were unable to correct the invoices uploaded. We were unable to upload sales invoices. If given a chance we can change the same on EPR portal.

**VIII. EPR Credits for Services Provided.**

Invoices were mistakenly uploaded, and since there is no option for deletion or editing, they appear on the portal. However, we have around 400 sales invoices in hand which we can replace/change if given the chance to do so.

We have complied with the directives issued by the Maharashtra Pollution Control Board (MPCB). Accordingly, we have halted our manufacturing activities immediately from 18.06.2024 and continued this cessation until today, 26.06.2024.



We respectfully request your permission to restart our manufacturing activities, as this affects our business and the livelihood of around 400 workers and their families. Also, there is loss of business and clients, we have order commitments. And as we have a 55 years reputation which is also affected. We humbly request to take all this in consideration and revoke closure. Additionally, we request that you kindly depute an officer to our manufacturing plant to conduct a visit and verify the corrective actions taken.

We are confident that the measures implemented will meet the MPCB's standards, and we are committed to maintaining compliance going forward. Thank you for your attention to this matter. We look forward to your favorable response and continued cooperation.

Yours faithfully,

For The Shakti Plastic Industries

Rahul V. Podaar  
Partner



Copy submitted to:-

- 1) Hon'ble Chairman, MPC Board, Mumbai
- 2) Hon'ble Member Secretary, MPC Board, Mumbai
- 3) Regional Officer (BMW), MPC Board, Mumbai
- 4) Law Officer, MPC Board, Mumbai
- 5) Sub Regional Officer, MPC Board, Tarapur II

Exh "X"

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# MAHARASHTRA POLLUTION CONTROL BOARD

Tel : 25802272		Regional Office, Thane
Fax : 25805398		5 <sup>th</sup> Floor, Office Complex Bldg.,
Website: <a href="http://mpcb.gov.in">http://mpcb.gov.in</a>		Near Mulund Check Naka,
E-mail Id: rothane@mpcb.gov.in		Wagle Estate, Thane-400 604.
No. MPCB/ROT/EC/240921-FTS-0001		Date:- 21/09/2024

To  
M/s. Shakti Plastic Industries.,  
Gut No.158 & 159, Vill-Nandgaon,  
Manor, Dist-Palghar.

**Sub:** To Levy Environmental Compensation on the industry as per provisions of Plastic Waste Management Rules,2016 & amendment thereto on excess EPR credits generated than estimated plastic waste quantity processed.

- Ref:** 1) CPCB Direction u/s 5 F.No. CP-20/80/2021-UPC-II-HO-CPCB-HO Part(1) dt. 26.10.2023.  
2) Consent to Operate granted dt. 15.06.2023 valid upto 31.08.2026  
3) Plastic EPR registration granted by the M P C Board vide no.PR-31-MAH-07-AAMFS7839M-23 dt.31.07.2023.  
4) Joint inspection of your industry on 30 & 31 January 2024.  
5) Show Cause Notice for Closure issued by the Board vide dtd.08.04.2024.  
6) Reply Submitted by the industry vide letter dtd.09.04.2024.  
7) Minutes of personal hearing extended on 14.05.2024.  
8) Reply (II) submitted by the industry dtd.18.05.2024.  
9) Approval of competent authority of the Board on dt.12.06.2024.  
10) Closure Direction issued to you vide No. MPCB/ROT/CD/240618-FTS-0307 dtd.18.06.2024  
11) CPCB Guidelines for assessment of environment compensation to be levied for violation of plastic waste management rules, 2016- April 2024.

This refers to Directions issued by CPCB vide above reference cited at 1. In connection with the said Directions, the CPCB officials and M P C Board Officials have jointly visited to your industry on 30 & 31 January 2024 to check plant production capacity, machinery details, Manpower deployed, GST invoice uploaded on the EPR portal, sales invoices & EPR credit generation etc and observed following non-compliances of your industry.

- i. Assessed production capacity as per the trial run conducted by the inspection team was found to be much less than the Registered processing capacity of the unit. The assessed production capacity of the unit is 10,141.2 TPA as per the trial run conducted by the inspection team, wherein the Registered Processing capacity is 2,88,000 TPA. The trial run was conducted as per the details (Plant machinery and Process Flow Diagram) provided in the application form.

- 719
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- ii. Assessed Average Monthly power consumption for production of 10,141.2 TPA recycled product was found to be less than the actual power consumption as per the electricity bills. Assessed Average Monthly power consumption as per the trial run is 27,456 KWh for production of 842 TPM i.e. 10,141.2 TPA. However, average Monthly power consumption as per electricity bills of 3 months (i.e. September'23 to November'23) is 17,455 KWH which is 64% of the assessed power consumption required for production. Based on the electricity consumption, the actual production for a year is assessed as 6447 TPA.
  - iii. Appropriate sales invoices of recycled products were not found uploaded on the EPR Portal by the unit. The industry has made 698 sale entries on EPR portal till date. Out of which, only 2 invoices correspond to sale of grinded plastic waste of quantity 11.6 Tons uploaded on the EPR Portal. No invoice has been uploaded for the sale of recycled plastic on the EPR Portal. 468 no. of the invoices have been issued for services provided by the unit. For the remaining 228 sale entries, invoices have not been uploaded.
  - iv. The sale of recycled plastic was not confirmed by the buyers as claimed by you.
  - v. As per your ETP logbook, you are treating 27 m<sup>3</sup>/day of effluent, but as per consent to operate ETP having capacity 3.0 m<sup>3</sup>/day.
  - vi. Considering the BIS 14534:2023 the Grinding, Agglomeration & extruder activity the total capacity of the plant is 74519 TPA, which is also less than registered processing capacity of 2,88,000 TPA.
  - vii. You have generated EPR certificates of the order of 2,74,000 Tonnes and transferred EPR certificates of 2,68,000 Tonnes which is very high considering actual processing capacity i.e 74519 TPA (considering the BIS 14534:2023).
  - viii. You have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules for total 2,73,988.4 Tonnes.

According to the above non-compliances the Board had issued show cause notice for closure vide above reference cited at 5. You have submitted reply to the show cause notice for closure vide above reference cited at 6 without necessary documents and supplementary information the reply was not adequate. Further, the personal hearing to your industry was extended before Hon'ble Chairman of the Board on 14.05.2024 and during the personal hearing it was understood that you have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules for total 2,73,988.4 Tonnes. Considering the BIS 14534:2023 the Grinding, Agglomeration & extruder activity the total capacity of the plant is 74519 TPA, which is also less than registered processing capacity of 2,88,000 TPA. During the personal hearing it was decided to issue Closure Directions to your industry and to levy Environmental Compensation as per provisions of Plastic Waste Management Rule, 2016 and amendment thereto on excess EPR credits generated than estimated plastic waste quantity processed. Accordingly, the Closure direction was issued on dated 18/06/2024 vide ref. no10 for the above non-compliances.

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As per CPCB direction to levy environmental compensation (EC) corresponding to the quantum of EPR certificates generated not to conformity with requirement prescribed in CPCB guidance manual for operating centralized EPR portal. Environmental compensation is to be levied on PWP@ Rs. 5000/- per ton of Plastic Waste misreported for quantity of EPR certificate generated, with Cancellation of Registration and & EC of double of application fees proportionate Penalty up to Rs. 1,00,000/-. The unit to be directed to deposit the same in the designated escrow account created by MPC Board.

From the above, it is noticed that you have generated 2,74,000 Tons of EPR credits and in which only 11.6 Tons sale invoice of grinded plastic waste is uploaded on EPR portal. Therefore, you have generated EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules for total quantity 2,73,988.4 Tons.

Therefore, you are directed to deposit the Environmental Compensation amount of Rs.136,99,42,000 /- plus penalty of Rs.1,00,000/- total Rs.137,00,42000/- in the account of MPC Board for excess quantity of EPR credit generated than actual quantity plastic waste processed. In case of non-deposition of said amount, the Board will have no option to initiate further appropriate action against your industry, which may be noted.

This is issued with the approval of the competent authority of the Board.

For and behalf of M.P.C. Board,



(Kiran Hasabnis)  
Regional Officer, Thane

Copy submitted to:-

- 1) Hon'ble Chairman, MPC Board, Mumbai.
- 2) Hon'ble Member Secretary, MPC Board, Mumbai

Copy f.w.cs to:

- 1) Regional Officer (BMW), M.P.C. Board, Mumbai.
- 2) Law Officer, MPC Board, Mumbai.

Copy to:

Sub Regional Officer, MPC Board, Tarapur II - Directed to take follow up and ensure the compliance of the aforesaid directions. It is directed to ensure that these Directions to be served to the industry and competent authorities & submit the compliance verification report.



08/11/2024

To,  
**The Member Secretary,**  
Central Pollution Control Board (CPCB),  
Parivesh Bhawan, East Arjun Nagar,  
Delhi - 110032

**Subject:** Representation Regarding Non-Receipt of Benefits Under BIS Guidelines, Request for Restarting Operations, and Review of Fine for False Reporting

Dear Sir,

**Introduction:**

We, M/s Shakti Plastic Industries, a prominent plastic recycling unit located at Nandgaon, Palghar, Maharashtra, submit this representation in response to the ongoing issues concerning our operations, compliance with the Plastic Waste Management Rules, 2016, and Extended Producer Responsibility (EPR) framework. Our company, established in 2000, has been committed to the recycling and responsible management of plastic waste, aligning with national environmental objectives. However, recent audits by the Maharashtra Pollution Control Board (MPCB) and the Central Pollution Control Board (CPCB) have resulted in discrepancies and have led to the suspension of our factory operations. We respectfully request the CPCB's kind intervention to resolve the issues outlined below.

**1. Background of Audits and Findings:**

Our company underwent several inspections, audits, and trials conducted by both the CPCB and MPCB in the period between 2023 and 2024. These audits, including a surprise inspection by CPCB on September 1st, 2023, and subsequent visits by MPCB, raised concerns about the capacity utilization of our machinery. During these audits, the plant was subjected to brief trial runs of one hour, where a capacity deviation of 30% was recorded. However, this short-duration testing fails to accurately reflect the full capacity of our plant. Our operational capacity, which includes a range of machinery such as extruders, grinders, agglomerates, and squeezers, can only be properly assessed over a continuous 24-hour operational period. During full operational runs, our plant has the capacity to process up to 2,50,000 TPA of recycled material. Additionally, the CPCB audit did not take into account machinery that was under maintenance during the inspections, which impacted the capacity readings.





## 2. Agglomerates and Regrinding as Recycling Processes:

On April 8th, 2024, MPCB issued a Show-Cause Notice, raising concerns about the eligibility of agglomerates and regrinds produced at our plant for EPR credits. The notice cited non-compliance with IS 4534:1998. However, it is important to clarify that both agglomerates and regrinds (or recycled fluff, flake, chips, and pellets) are recognized and valid processes under the Plastic Waste Management Rules, 2016. These processes are in accordance with the standards set by IS 14534:1998 (amended), which governs the recycling and transformation of plastic waste. The production of agglomerates and regrinds is integral to the recycling process, and as per the guidelines outlined in IS 14534:2023, these processes are deemed compliant. Our operations, therefore, fall within the regulatory framework set by the Ministry of Environment, Forest, and Climate Change (MoEFCC), and our practices comply with the objectives of the Plastic Waste Management Rules, 2016.

We have attached a copy of the IS 14534:2016 and IS 14534:2023 guidelines for your reference (Annexure-A).

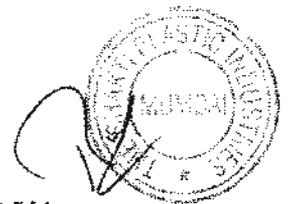
## 3. Reply to Show-Cause Notice:

In response to the Show-Cause Notice issued by MPCB on April 8th, 2024, we have submitted a detailed reply on May 18th, 2024. Our response, included as Annexure-B, thoroughly addresses the concerns raised about our processes, specifically the production of agglomerates and regrinds, and clarifies our adherence to environmental regulations.

Additionally, we have fully complied with the requirements of the Water (P & CP) Act, 1974, and Air (P & CP) Act, 1981, in all our operations, and our Consent to Operate (CTO) is valid and remains in effect.

## 4. Validity of Consent to Operate and Inspection Reports:

Our plant holds a valid CTO issued by MPCB, which permits operations for recycling plastic waste, and we have consistently met the environmental standards outlined by both CPCB and MPCB. A recent joint audit, conducted on January 30th and 31st, 2024, revealed that the plant is capable of processing between 2.32 lakh TPA and 4.51 lakh TPA under normal operating conditions. The audit also noted that our plant is designed to process over 2.5 lakh TPA, a fact that was disregarded during the brief trial period. Further, the MPCB audit report of November 8th, 2023, confirms our compliance with the set standards (Annexure-C).





MACHINERY DETAILS IN CAPACITY		
Type	Total No. of Machines	No. of Machineries for direct Sales
Extruders (Granule making)	6	6
Agglomerators	7	5
Grinder Machine	8	6
Shredder Machine	2	1
Squeezer Machine	1	1
Washing Line	2	
	<b>26</b>	<b>19</b>

Moreover, the Institute of Chemical Technology (ICT) performed a third-party audit of our machinery, which confirmed that the equipment has a processing capacity of 1,420 TPD, equating to an estimated 5,18,300 TPA (Annexure-D).

#### 5. Consistent Power Consumption Aligned with Production Capacity:

Over the last two to three years, our monthly power consumption has consistently ranged between 25 lakhs to 30 lakhs, which is in line with our actual production capacity. As per the literature review, Source: [http://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2F1b\)%20o%20plastic%20processed.](http://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2F1b)%20o%20plastic%20processed.)

electricity of around 0.4 to 0.6 kWh electricity/kg of plastic waste recycling (extrusion/granule making) is required. Therefore, electricity consumption of the industry for F.Y. 2022-23 i.e. 23.33 lakhs kWh corresponds to 11.66 lakh tonnes of plastic recycling.

#### 6. Financial and Operational Impact of Factory Shutdown:

The suspension of our operations has led to severe financial losses. Our company has faced substantial economic hardship due to the inability to process plastic waste and supply recycled materials to the market. Despite these challenges, we have continued to meet our financial obligations, including paying wages to our 600 employees, who depend on our operations for their livelihood. Additionally, we have continued investing in machinery maintenance and upgrading, which has further strained our resources. Our clients have also been adversely impacted by the suspension, resulting in a loss of business.





Total GST Liability Discharge			
	F.Y. 2022-2023	F.Y. 2023-2024	F.Y. 2024-2025
Month	Total Tax	Total Tax	Total Tax
April	87,77,156	1,93,37,710	1,00,03,794
May	96,67,625	2,17,38,519	85,32,568
June	1,68,64,624	1,41,64,270	23,12,041
July	1,05,55,828	1,66,54,927	1,32,70,905
August	1,60,61,790	2,05,59,775	97,18,986
September	59,02,647	1,33,59,985	2,24,31,495
October	1,00,26,528	1,34,96,896	-
November	1,27,27,027	1,20,24,408	-
December	1,99,44,882	78,86,921	-
January	1,50,96,445	43,46,590	-
February	2,16,79,861	1,17,26,968	-
March	7,38,53,257	2,19,53,963	-
<b>Total</b>	<b>22,11,57,670</b>	<b>17,72,50,934</b>	<b>6,62,69,789</b>

Details of Wages paid for period 01.04.24 - 31.09.2024		Details of Salary for period 01.04.24 - 31.09.24	
Month	Amount	Month	Amount
April	8,07,875.00	April	47,14,343.00
May	12,28,381.00	May	47,47,328.00
June	13,93,395.00	June	45,21,880.00
July	7,31,380.00	July	45,45,809.00
August	6,99,427.00	August	46,35,981.00
September	8,21,314.00	September	44,73,179.00
	<b>56,82,312.00</b>		<b>2,76,38,520.00</b>





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**7. Request for Resumption of Operations:**

In view of the above, we respectfully request that CPCB allow the resumption of our operations at the earliest.

We have made significant efforts to ensure full compliance with environmental standards and are committed to addressing any remaining issues. We assure CPCB that we will take all necessary steps to rectify any discrepancies noted during audits and maintain our commitment to sustainable recycling practices.

**8. Prayer Clause:**

In light of the foregoing, we humbly pray that:

1. **CPCB** review and approve the resumption of operations at our plant, based on the capacity and compliance assessments provided in this representation and the attached supporting documents.
2. **CPCB** take into consideration the discrepancies arising from brief trial runs and consider the actual 24-hour operational capacity of our plant for future audits.
3. **CPCB** allow the inclusion of agglomerates and regrinds in the EPR process, recognizing these as valid recycling processes under the Plastic Waste Management Rules, 2016.
4. **CPCB** reconsider the fines and penalties imposed for alleged misreporting, given the corrective actions we have undertaken and our ongoing commitment to compliance.
5. **CPCB** review and approve our request to restart operations as a matter of urgency, as the continued suspension is severely affecting our operations, employees, and stakeholders.

We are confident that with the support of CPCB, we will continue to contribute to India's circular economy and plastic waste management goals. We thank you for your attention to this matter and look forward to a favourable response.

Yours sincerely,

For The Shakti Plastic Industries

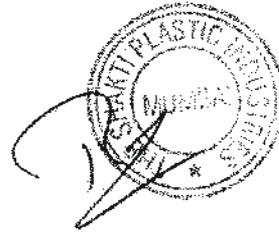
Rahul V. Podaar

Partner



**Enclosures:**

1. IS 14534:2016 and IS 14534:2023 Guidelines (Annexure-A)
2. Reply to Show-Cause Notice (Annexure-B)
3. MPCB Audit Report (Annexure-C)
4. ICT Machinery Capacity Report (Annexure-D)



IS 14534 : 2016

organization's activities or products or services that can interact with the environment (see IS/ISO 14001).

**3.13 Environmental Impact** — Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects (see IS/ISO 14001).

**3.14 Feedstock Recycling** — Conversion to monomer or production of new raw materials by changing the chemical structure of plastics waste through cracking, gasification or depolymerization, excluding energy recovery and incineration.

NOTE — Feedstock recycling and chemical recycling are synonyms.

**3.15 Flake** — Plate-like reground.

NOTE — The size of reground depends both on the plastic being processed and the manner of processing.

**3.16 Fluff** — Filament-like reground.

NOTE — Common usage of the term "fluff" also includes shredded residue fractions produced in the commercial recycling of durable goods such as automobiles.

**3.17 Homogenizing** — Processing to improve the degree to which a constituent and/or property is uniformly distributed throughout a quantity of plastics material (see EN 14399 : 2005).

**3.18 Landfill** — Waste disposal site for the deposit of waste on to or into land under controlled or regulated conditions.

**3.19 Lot** — Definite quantity of some commodity manufactured or produced under conditions that are presumed uniform (see IS 2828).

NOTE — This primarily a commercial term.

**3.20 Material Recovery** — Material processing operations including mechanical recycling, hydrolytic (chemical) recycling and organic recycling, but excluding energy recovery.

**3.21 Mechanical Recycling** — Processing of plastics waste into secondary raw material or product without significantly changing the chemical structure of the material.

NOTE — Plastic secondary raw material is a synonym of regranulate.

**3.22 Micronizing** — Process by which a plastics material is ground into a fine powder.

**3.23 Organic Recycling** — Controlled microbiological treatment of biodegradable plastics waste under aerobic or anaerobic conditions.

NOTE — The term "biological recycling" is used synonymously.

**3.24 Post-Consumer** — Descriptive term covering material generated by the end-users of products that

has fulfilled its intended purpose or can no longer be used (including material returned from within the distribution chain).

NOTE — The term "post-use" is sometimes used synonymously.

**3.25 Pre-Consumer** — Descriptive term covering material diverted during a manufacturing process.

NOTES

1 The term excludes re-usable material, such as scrap, reground or scrap that has been generated in a plastic process and is capable of being re-processed within the same process.

2 The term "pre-consumer material" is sometimes used synonymously.

**3.26 Purge Material** — Material resulting from the passing of polymer through plastics processing equipment for the purpose of cleaning the equipment or when changing from one polymer to another, or when changing from one colour or grade of polymer to another.

**3.27 Recovered Material** — Plastics material that has been separated, diverted or removed from the solid-waste stream in order to be recycled or used to substitute virgin raw materials (see IS/ISO 14021).

**3.28 Recovery** — Processing of plastics waste material for the original purpose or for other purposes, including energy recovery.

**3.29 Recyclate** — Plastics material resulting from the recycling of plastics waste.

NOTES

1 The terms "plastics secondary raw material", "recycled plastic" and "regranulate" are sometimes used synonymously.

2 As soon as the used plastics material has been treated in such a way that it is ready to replace a virgin produced material or substance in a production process, it is to be characterized as recyclate.

**3.30 Recycling** — Processing of plastics waste materials for the original purpose or for other purposes, excluding energy recovery.

**3.31 Reground** — Shredded and/or granulated recovered plastics material in the form of free-flowing material.

NOTE — The term "reground" is frequently used to describe plastics material in the form of chips generated in a plastics processing operation and re-used on-site. This term is also used to describe fine plastics powder used as filler in the recovery of plastics.

**3.32 Re-use** — Use of a product more than once in its original form.

NOTE — In view of the fact that a re-usable product has not been discarded, re-use does not constitute a recovery option.

**3.33 Shredding** — Any mechanical process by which plastics waste is fragmented into irregular pieces of any dimension or shape.

### 5.2.2.2 Pre-treatment

Depending both on the intended application of the recyclate and on the characteristics of the waste stream, a preparatory step may be used to decontaminate as far as practically possible the collected materials and products, and to optimize their handling characteristics for shipping, processing and other downstream operations. In the absence of homogeneous plastics waste consisting of materials of similar grade or type, material identification, sorting and separation steps become essential, such as in specialized sorting centres for household packaging or end-of-life electrical and electronic equipment. Wherever possible, these pre-selective operational steps should be carried out prior to any downstream mixing (commingling) with other waste streams. In some cases, particularly affecting post-consumer sources, attainment of this objective will require automated separation and sorting unit operations. In the absence of such automatic process control, precise identification of the sources of the components of the waste may be of crucial importance.

**NOTE** — In order to optimize the recovery efficiency of plastics products and component parts, it is desirable to design for ease of disassembly and material identification as well as for minimization of variety in the types of plastic used in their manufacture. Such criteria may evolve as a function of the future development and implementation of technical options for resource recovery.

#### 5.2.2.2.1 Identification

Various in-line analytical methods using techniques such as infrared analysis and trace-element tracking are available for the identification of specific types of plastic and associated additives, thus permitting their efficient downstream separation and segregation.

**NOTE** — In some cases, identification codes, moulded into or printed on to plastics parts or products, will also provide a means of separating materials, by type of plastic, at any point in the process, including the post-consumer stage, during manual or automatic sorting at the collection facility, and during disassembly of durable goods. In addition, other methods are often used to identify specific types of plastic, for example by the part shape or geometry, or acoustically by impact noise, or by combustion odour and copper wire corrosion test procedures.

#### 5.2.2.2.2 Separation and sorting

Plastics separation and sorting operations, which are generally required in all material recovery processes, may be carried out manually or automatically using appropriate means of identification. The more accurate and efficient the means of identification, sorting and separation, the better is the quality of the recovered product obtained. Depending on specific circumstances, a compaction process such as crushing or baling, or a size reduction process such as grinding or shredding, may be necessary to ensure easier handling. In manual sorting risk of chemical, microbiological and ergonomic problems due to repetitive work can appear. Therefore

if manual sorting cannot be avoided, the workplace should be designed to minimize such problems.

#### NOTES

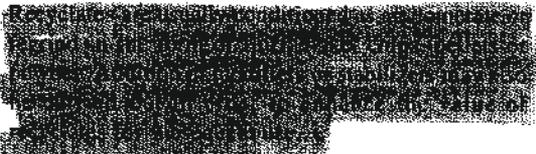
1 The consumer products can generally be sorted by type of plastic, in order to permit their reuse in the production process. Re-use of post-consumer products is generally made more complex as a result of their contamination by additional heterogeneous plastics waste.

2 Some post-consumer materials may consist of the same basic plastic containing legions with different material properties, such as in the case of HDPE bottles having different thickness, densities or colours. This may lead, as output of the next regenerating step, to recyclates with distinct, controlled levels of physical characteristics. In some cases, it may not be practically or commercially viable to achieve the desired level of separation or cleanliness, with the result that the output consists of recyclates suited only for applications with lower requirements, as in the case of certain commingled plastics. Standards for the characterization of recyclates may be efficient tools for assessing the fit with the requirements of market outlets.

3 Recycling of reinforced plastics may be carried out in some cases without separating the polymeric matrix from fibre reinforcements. When sufficiently efficient separation is required for the desired property profile of the recyclate, as may be feasible at this preparatory process stage, appropriate preliminary operations should be conducted at the next regenerating step.

### 5.2.2.3 Recyclate production process

The commercial production of plastics recyclate comprises various unit operations, including the separation of materials, efficient removal of contaminants by washing or other methods, drying where appropriate, handling, constitution of lots, storage, packaging and shipment. In addition, other processes, such as grinding, additional sorting, homogenizing, extruding, pelletizing, micronizing or dissolution in solvent, may be necessary in order to regenerate the plastics material.



**NOTE** — All separated contaminants, such as those entrained in waste water, should be taken into account and handled properly during these preparatory steps.

### 5.2.3 Feedstock or Chemical Recycling

Using various processes, well-known within the petrochemical industry, it is possible to convert some plastics into their basic monomeric chemical constituents or into hydrocarbon fractions. These chemicals can then be used either as polymerization feedstock or in other chemical processes.

#### NOTES

1 The depolymerization technique has already been demonstrated, for example for PET obtained from post-consumer packaging sources such as collected commingled plastic bottles where the

and equipment and the relevant recovery targets in terms of material or energy content requirements. When the target is disposal of the waste, compliance of emissions and other relevant environmental norms specified by the regulatory authorities, is to be ensured. Relevant selection criteria include the relative costs, competitiveness and environmental performance of the available options (see Annex C). Access to markets for recovered materials or energy is also an important consideration.

**NOTE** — Concepts and definitions of recovery are continually evolving. The basic principle of recovery lies in the transformation of an input (waste) into an output (product). Recovery is complete when secondary materials, fuels or products have been manufactured, or energy has been generated, in accordance with consensus-standardized criteria. Plastics recyclates with specified properties (secondary raw material) is a product, and recovery is accomplished when this product has been produced and has become commercially available, or energy has been generated (see Annex C and Annex D).

## 5.2 Material Recovery

### 5.2.1 General

Material recovery of plastics waste encompasses three distinct recycling routes: Mechanical recycling, feedstock or chemical recycling and biological or organic recycling.

### 5.2.2 Mechanical Recycling

#### 5.2.2.1 Sequence of operations

**5.2.2.1.1** The mechanical recycling option generally comprises of the following sequence of operations, some of which may occur simultaneously, that are carried out as part of the recyclate preparation and production process:

Collection → Identification → Sorting/Separating (Into types and forms of plastic) → Grinding/Shredding → Washing → Drying → Agglomerating/Mixing → Extruding/Compounding → Pelletizing

**5.2.2.1.2** Over the years, technology and machinery for mechanical recycling have significantly improved with automation, process control, higher output to produce good quality of recyclates, which can be used in plastics processing or product manufacturing techniques.

#### NOTES

1 In practice, many plastics processors or recyclers use plastics recyclates in the form of flake, eliminating the need for a prior pelletization step

2 Plastics waste of all categories of plastics packaging as defined in MoEF&CC notification for EPR need to be effectively sorted, washed and cleaned by utilizing appropriate machinery and equipment

3 Plastics waste for mechanical recycling may be offered in the form of bulk waste as collected, or in a value-added grade such as sorted, cleaned, standardized for weight etc

4 For testing and characterization of mechanically recycled polyethylene (PE) and polypropylene (PP), ISO 5677 shall be used

5 For recycling of waste from engineering plastics (ABS, PC, Nylon variants), PVC, PET and all other plastics including mixed waste recycling, proven technology of machinery and processes from India or outside India shall be used to produce processable recycled material in conventional plastics processing, as applicable for products with desired specification.

#### 5.2.2.2 Pre-treatment

Depending on the intended application of the recyclate and the characteristics of the waste stream, a preparatory step may be used to decontaminate the collected material, as far as practically possible and to optimize their handling characteristics for shipping, processing and other downstream operations.

In the absence of homogeneous plastics waste consisting of materials of similar grade or type, material identification, sorting and separation steps become critical, such as in specialized sorting, washing and cleaning for household packaging or end-of-life electrical and electronic equipment.

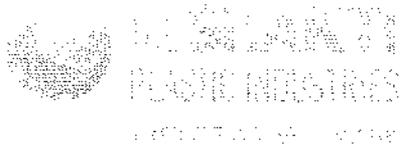
Wherever possible, these pre-selective operational steps should be carried out prior to any downstream mixing (commingling) with other waste streams. In some cases, particularly affecting post-consumer sources and at higher quantity operation level, attainment of this objective may require automated separation and sorting unit operations. In the absence of such automatic process control, precise identification of the sources of the components of the waste may be of crucial importance.

**NOTE** — In order to optimize the recovery efficiency of plastics products and component parts, it is desirable to design for ease of disassembly and material identification as well as for minimization of variety in the types of plastic used in their manufacture. Such criteria may evolve as a function of the future development and implementation of technical options for resource recovery.

#### 5.2.2.2.1 Identification

**5.2.2.2.1.1** The implementation of product identification code on both rigid and flexible plastics products facilitate in mode of separating materials, by type of plastics, at any point in the process, including the post-consumer stage, during manual or automatic sorting at the collection facility, and during disassembly of durable goods. With known and regular source of waste and with the involvement of experienced manual operators, identification in local level / decentralized segregation systems achieve the desired level of efficiency.

**5.2.2.2.1.2** For large scale operation, various in-line analytical methods using techniques such as infrared analysis and trace-element tracking are available for



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www.shaktiplastic.com

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**MAHARASHTRA POLLUTION CONTROL BOARD**

**Date 18/05/2024**

**Show cause Notice for Closure under Water (P & CP) Act, 1974, Air (P & CP) Act, 1981 and r/w Plastic Waste Management Rules, 2016**

**No. MPCB/RO (BMW)/B-237**

**REPLY & DOCUMENTS FILED BY  
THE SHAKTI PLASTIC INDUSTRIES**

*[Faint, illegible text or stamp]*

**THE SHAKTI PLASTIC INDUSTRIES**  
202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malad (W), Mumbai 400 064.  
MH-INDIA PH: 022 49671500/01/02



Date :18/05/2024

To,  
The Chairman,  
Maharashtra Pollution Control Board,  
Sion Circle Sion East.

**Kind Attention: Mr. Siddhesh Ramdas Kadam, The Chairman, MPCB**

**Subject: Reply to the Show cause notice no. MPCB/RO/(BMW)/B-237 dated 8<sup>th</sup> April, 2024.**

Respected Sir,

We are writing in response to the Show Cause Notice No. MPCB/RO/(BMW)/B-237 dated 8<sup>th</sup> April, 2024 regarding our compliance with the Plastic Waste Management Rules, 2016 and Extended Producer Responsibility (EPR) guidelines. We take environmental responsibility seriously and are committed to operating in accordance with all regulations.

Below is the point wise reply to the concerns raised:

1. In response to the point made about clause 5(a) of the Plastic Waste Management Rules, 2016, Grinding and Agglomerate of plastic does not amount to transforming of plastic waste and hence cannot be considered as Recycling, Owe would like to address each point raised as:

THE SHAKTI PLASTIC INDUSTRIES  
202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malad (West),  
MH-INDIA PH: 022 49671500/01/02

  
Maharashtra Pollution Control Board  
Kalpataru Point, 2nd Floor, Sion Circle,  
Sion Circle, Sion (East),  
Mumbai - 400 022.

Tel. 24010437 / 24020781.  
Website : www.mpcb.gov.in

18/5/24  
Submit



**1.3. Consent to Operate by MPCB and PWP Registration:** The permission to engage in the production of agglomerate and grinding was granted by MPCB in Consent to Operate (CTO) dated 15<sup>th</sup> June, 2023. The approval granted for the manufacture of plastic grinding and agglomerate, as outlined in the CTO. This supporting document highlights our compliance with regulatory requirements and validates our actions in utilizing these materials for recycling process. During the PWP registration process, multiple inspections were conducted by the authorities. These inspections were carried out to ensure compliance with the regulations and to grant permission for generating EPR credits. **It is important to note that** during these inspections, there were no issues raised specifically regarding agglomerates and re-grind. Consequently, permission was granted by the authorities to generate EPR credits from agglomerates and re-grinds to us. A copy of Consent to Operate, and PWP certificate is attached for your reference as **Annexure-C**.

**1.4. Clients purchases agglomerate and grinding material:** To further support this point, we are providing information of the clients to whom we supply the agglomerate and grinding materials. This information highlights the manufacturing process carried out by these clients, demonstrating how they utilize these materials to produce new products. This evidence serves to confirm that the agglomerates and grinding are integral to the recycling process and contribute to the creation of sustainable plastic products. A copy of clients to whom we supply agglomerate and grinding materials is attached for your reference as **Annexure-D**.

**1.5. Industry Practice:** Additionally, it is worth mentioning that our industry is not alone in this practice. Along with **2000 other PWP registrations**, we have also been granted permission to generate EPR credits from agglomerates and re-grinds. This practice of generating EPR credits from agglomerate and re-grind is widely accepted and implemented within the industry.



- Ia. Capacity of Agglomerate and Grinding not taken into consideration:** The assessed production quantity by the inspection team does not account for the capacity of the agglomerate and grinding, resulting in lower output than the registered capacity.
- Ib. MPCB Report:** According to the MPCB Audit report with respect to CPCB directions issued w/s 5 of EP Act, 1986 issued after the physical visit to our plant on 08<sup>th</sup> November, 2023, our plant has 26 machineries for plastic waste processing with the production capacity of minimum of 2.32 lakhs tonnes per annum to maximum of 4.51 lakhs tonnes per annum of production. This production capacity aligns with our consented capacity and the EPR registration quantity of 2.88,000 tonnes. A copy of MPCB report is attached for your reference as **Annexure-E**.

MACHINERY DETAILS IN CAPACITY		
Type	Total No. of Machines	No. of Machineries for direct Sales
Extruders (Granule making)	6	6
Agglomerators	7	5
Grinder Machine	8	6
Shredder Machine	2	1
Squeezer Machine	1	1
Washing Line	2	
	<b>26</b>	<b>19</b>

- I.c. Third Party Report:** The Report on Machinery Capacity Audit for Manufacturing and Feasibility of Effluent Treatment Plant of *Institute of Chemical Technology (ICT)* dated 15<sup>th</sup> February, 2024 states that the capacity of the equipment in our plant is 1420 TPD (tonnes per day) which comes to 5,18,300 TPA. This further supports our claim

*Rohit Bhat*



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ii. Assessed Average monthly power consumption for production of 10141.2 TPA Recycled product found to 64 % be less than actual power consumption as per trial run.

In response to the claim of discrepancy in the assessed average monthly power consumption for production of 10141.2 TPA, we would like to address the point raised and draw a conclusion:

ii.a. **Electricity Bills:** Based on the electricity bills summary for the period ranging from June, 2022 to December, 2023, as mentioned below:

Electricity Bill Details - TSPi		
Month	Units	Amount
Jun-22	178635	1979235
July	192690	2108895
August	258158	2863727
Sept	172935	2067145
Oct	187853	2100001
Nov	246480	2646377
Dec	224655	2512685
Jan-23	166553	2010529
Feb	205328	2286244
March	208890	2436382
April	237870	2606033
May	150180	1792550
June	200145	2412570
Jul	268485	3046219
Aug	283065	3153268
Sept	246660	2958448
Oct	279083	3200148
Nov	189720	2402866
Dec	250800	2871381
	<b>Total</b>	<b>47454703</b>



*based on the electricity bills accurately reflects the power usage for the production process.*

**iii. Appropriate Sale of Recycled Products were not found uploaded on the portal.**

Our responses to the points raised are as follows:

- iii.a. Uploading of sales invoices:** We have diligently uploaded all sales invoices on the portal, but unfortunately, not all of them are currently reflected due to a technical glitch. We have proactively communicated this issue to the authorities through multiple emails. A copy of emails to CPCB is attached for your reference as **Annexure-II**.
- iii.b. Sales invoice:** To ensure accuracy in reflecting the sales of recycled products, we are providing hard copies of all 698 sales entries as an alternative method. A copy of invoices is attached for your reference as **Annexure-I**.
- iii.c. Additives:** Additionally, we use some percentage of additives/pigments/masterbatch/processingaids/fillers/anti-oxidants/moisture powder/lime powder which justifies our actual production of granules. A copy of invoices is attached for your reference as **Annexure-J**.
- iii.d. GST Payments:** Our active sales operations are reflected in several key financial metrics. These include annual GST collection of Rs. 22 crores and GST payments of 10 crores, timely salary and labour wages payments, and consistent annual purchases of additives. This strong financial performance demonstrates our commitment to regulatory compliance and business operations.

**Total GST Liability Discharged**

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Month	Amount	Month	Amount
June	26,87,752.00	June	31,36,146.00
July	19,59,088.00	July	32,36,287.00
August	31,64,256.00	August	33,12,094.00
September	41,33,824.00	September	33,65,831.00
October	26,50,743.00	October	34,92,598.00
November	24,47,189.00	November	34,10,507.00
December	12,98,874.00	December	35,79,755.00
January'24	19,90,720.00	January'24	54,60,153.00
February	28,42,301.00	February	37,82,559.00
March	16,18,348.00	March	38,33,449.00
April	18,63,819.00	April	44,95,805.00
May	16,50,248.00	May	46,36,113.00
June	16,30,766.00	June	45,32,078.00
July	20,34,331.00	July	46,12,638.00
August	22,46,261.00	August	45,44,000.00
September	28,44,921.00	September	43,51,558.00
October	16,52,439.00	October	42,87,753.00
	<b>4,10,29,075.00</b>		<b>7,51,11,575.00</b>

A copy of GST payments is attached for your reference as **Annexure-K**.

iii.e. **Technical glitches:** *We along with the industry, is facing a critical issue with recurring technical glitches on the portal, portal is under maintenance now and then.* These multiple failures over the past year are well-documented with the authorities and require an immediate action. Furthermore, we would like to raise concerns about a recent security incident where our portal password was changed without our prior knowledge. This incident highlights the need for robust security protocols on the EPR portal to ensure the data integrity and user confidence. The EPR portal unfortunately encountered recurring technical glitches. These issue cause frustration and hinder PWP from efficiently utilizing the system for EPR compliance. We all, PWP are working towards the success of dream project "Swachh Bharat Abhiyaan" of our Prime Minister.



iv.e **Visit by CPCB Official:** The visit by Mr. Mayank Purbey, CPCB Delhi to our client M/S R.P. Industries in Vasai on 31st January, 2024 reaffirms our commitment to supplying recycled post-consumer plastic to our clients. A copy of the confirmation letter is attached for your reference as **Annexure-N**.

*In conclusion, we have provided the necessary information to the inspection team and obtained the confirmation of our customers regarding their purchase of recycled plastic from us. We reiterate our commitment to promoting sustainable practices and aim to contribute positively to the environment and society.*

v. **ETP Consent only for 3.0 m3/day against 27M3/day given in the log book.**

We would like to address the claim regarding the capacity of Effluent Treatment Plant. Our response is as follows:

v.a **Crown Chemical Report:** According to the report from Crown Chemicals, the capacity to operate our ETP is determined to be 30 KLD, which is appropriate for treating the amount of effluent mentioned in our ETP logbook. It is important to note that Crown Chemicals is our ETP vendor and is responsible for the deployment and commissioning of our ETP. A copy of report of Crown Chemicals is attached for your reference as **Annexure-O**.

v.b **ICT-ETP Report:** Furthermore, the ETP report from the Institute of Chemical Technology (ICT) confirms that the amount of effluent treatment per day is in line with the established capacity to operate the ETP. A copy of ICT report is attached for your reference as **Annexure-P**.

*Based on the assessments by both Crown Chemicals and ICT-ETP report, it is evident that the capacity to operate our ETP is suitable for treating the specified amount of*



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Over past six months, our facility has undergone several audits by state, centre and other agencies. During these audits, we fully cooperated by providing all requested documentation related to our production capacity (2,88,000 TPA). These documents were submitted to CPCB Delhi, CPCB Pune, MPCB. We have also attended physically multiple meetings with state and centre to address concern regarding our production capacity and sales. We are confident that our production capacity of 2,88,000 TPA, production for F.Y. 2022-2023, and the associated EPR credits are all completely aligned.

Unfortunately, recent show-cause notices issued by CPCB and MPCB have caused unintended consequences. These notices have negatively impacted our business operations, including reputational damage with clients.

We understand the importance of responsible operations and appreciate the role of regulatory bodies in ensuring compliance. Our commitment to this is demonstrated by our well-established organization with over 600 employees (labour and staff), our support for over 1000 ragpickers, and a strong network of over 1000 suppliers and customers. We have consistently worked to maintain a highly organized and responsible business.

Our Company is classified as MSME and in case any penalty or closure of the at this time will lead to financial crisis to Company apart from severely affecting the livelihood of around 600 families who are directly and indirectly employed/connected with our unit.

In light of the above, we firmly believe that the reasons outlined above substantiate our position that our consent should not be revoked, and environmental compensation should not be levied. We are open to providing any additional information or

THE SHAKTI PLASTIC INDUSTRIES

202/203/204/205, 2nd Floor, Business Classic, Chincholi Bunder Road, Malad (W), Mumbai 400 064.

MH-INDIA PH: 022 49671500/01/02

**Report with respect to CPCB directions issued u/s 5 of EP Act, 1986 to Maharashtra Pollution Control Board regarding non-compliance of M/s Shakti Plastic Industries**

**1 Introduction**

**1.1 Chronology of Consent Management**

M/s Shakti Plastics Industries, Palghar is engaged in recycling of plastic waste, having plant at Gat No.158, 159, Nandgaon, Manor, Tal-Palghar. The unit was commenced in the year 2000 as per Udyog Adhar certificate submitted by the industry.

The industry was having Consent to Operate (CTO) dated 28.07.2020, granted by Regional Officer (Thane) for capacity of 1,20,000 TPA.

Thereafter, the industry applied for Consent to Establish (Expansion) i.e. CTE(Expansion) on 16.01.2023 for capacity of 14,000 MT/month i.e. 1,68,000 TPA. The application for CTE (Expansion) was duly processed and recommended for approval, by Sub-Regional officer, Tarapur II, MPCB and it was granted on 24.03.2023.

Thereafter, the industry applied for Consent to Operate (expansion) on 22.05.2023 for aforesaid expansion. The application was duly processed and recommended for approval, by Sub-Regional officer, Tarapur II, MPCB and accordingly, Regional Officer (BMW), MPCB has granted the application on 15.06.2023 (copy enclosed as Annexure 1) for total plastic waste processing capacity of 2,88,000 Tonnes per Annum (TPA) (earlier CTO capacity of 1,20,000 TPA + expansion of 1,68,000 TPA), for following products:

- i. Plastic granules & reprocess plastic granules (without washing activity)- 7500 MT/Month
- ii. Plastic grinding & agglomerate (without washing activity) 2500 - MT/Month
- iii. Plastic granules & reprocess plastic granules (with washing activity) 10000 - MT/Month
- iv. Plastic grinding & agglomerate (with washing activity) - 4000 MT/Month

**1.2 Plastic EPR registration & physical verification- CPCB guidelines**

As per PWM Rules 2016, the Extended Producer Responsibility (EPR) guidelines were published in February 2022, according to which, plastic waste processors (PWP) are mandated to obtain EPR registration from CPCB/ SPCB/ PCC as per their location. CPCB has published Standard Operating Procedure (SOP) for Registration of Plastic Waste Processor (PWP) through Plastic EPR Portal as per PWM Rules 2016 on 15<sup>th</sup> March, 2022.

As per the aforesaid SOP, Physical Audit of the PWP is required to be completed by SPCB/PCC within 30 days of grant of Registration. The PWP shall be able to issue certificates to PIBOs post conduction of Audit and validation of its facilities by the

In view of the observations made by the audit team, CPCB issued directions to Maharashtra Pollution Control Board on 26.10.2023 under Section 5 of the EPA, 1986 regarding compliance of various provisions under Schedule —II of Plastic Waste Management Rules, 2016, Guidelines on Extended Producer Responsibility (EPR). CPCB directed to take necessary action immediately with submission of action taken report within 10 days from the date of issuance of the aforesaid direction.

### **3 Visit to Shakti Plastic Industries on 08.11.2023**

Accordingly, a team for investigation of the matter has been constituted comprising of Regional Officer, Thane, Sub-Regional Officer (ROBMW) and Field Officer (ROBMW). The team conducted surprise visit on 08.11.2023 to the Shakti Plastic Industries, Gat No.158, 159, Nandgaon, Manor, Tal-Palghar.

During the inspection the following observation were made:

- 298 workers attendance on 08.11.2023 was shown to the team.
- Inward register (raw material) and outward register (product) for the month of November 2023 was shown.
- 27 plastic recycling/ processing machineries were present.
- Capacity of observed machinery not available on machines (only KW, RPM, Ampere etc.)
- 2 Washing lines along with grinder (capacity of 2300 T/A)
- Inward and Outward registers copy submitted.
- Light bill – hard copies submitted (After expansion, not much variation)
- GST bills- at corporate office
- OEM receipts called from company.

Due to above incomplete information, industry representatives were called with aforesaid information to compile all the relevant information at MPCB Office. Industry representative provided following documents on 20.11.2023.

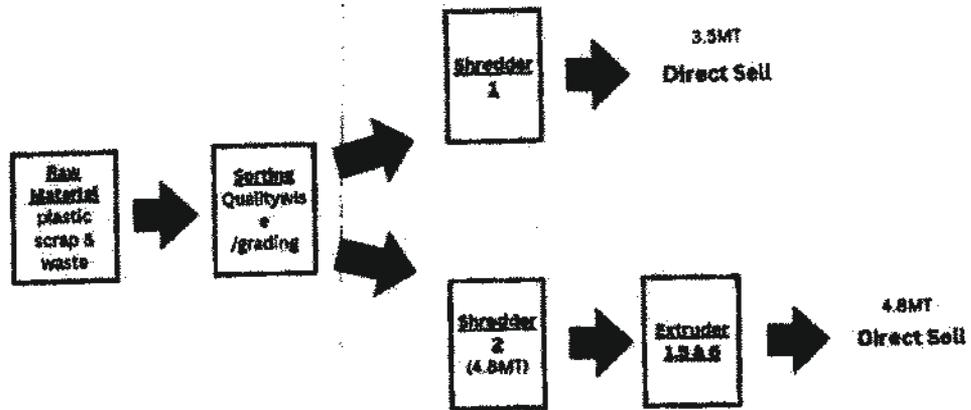
### **4 Key observations regarding Details of Industry process and documentation**

#### **4.1 Process description**

During visit, the following process was observed at the plant.

- a. Washing line process

## d. Shredding process

**Manufacturing Flow Chart**  
Total capacity 8.3TPM**Shredding Process****4.2 Plant layout/storage**

Plant layout is enclosed as annexure.

**4.3 Machinery details with capacity**

During visit, It was noted that the industry has total of 26 machineries for plastic waste processing, out of which 23 are used for direct sale of finished product.

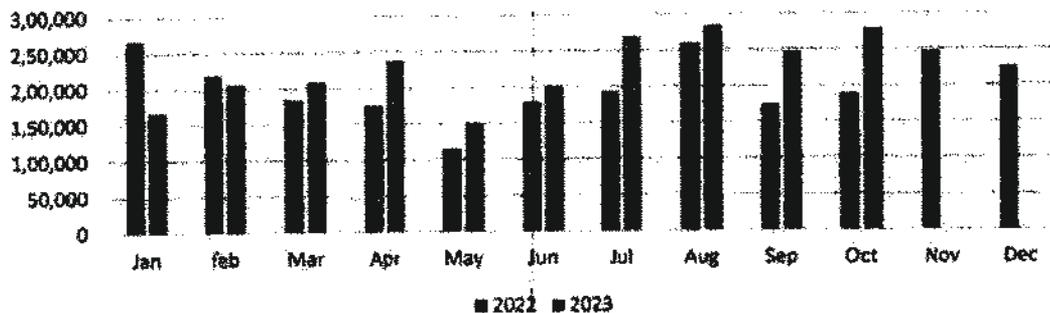
Sr No	Type	Total No. of machineries	No. of machineries for direct sale
1	extruders (granule making)	06	06
2	agglomerators	07	05
3	grinder machine	08	06
4	shredder machine	02	01
5	squeezer machine	01	01
6	washing line	02	—
	<b>Total</b>	<b>26</b>	<b>19</b>

Total estimated capacity of the Machines is 2,32,872 to 4,51,140 TPA as per purchase bills submitted by industry, used for direct sale (Annexure 6).

**Table 1 Estimated Capacity\* of plastic processing machines for direct sale/ finished product as per invoice/ bills**

Oct-22	1,87,853	746	21,00,001
Nov-22	2,46,480	757	26,46,377
Dec-22	2,24,655	847	25,12,685
Jan-23	1,68,553	867	20,10,529
Feb-23	2,05,328	789	22,86,244
Mar-23	2,08,890	897	24,36,382
Apr-23	2,37,870	767	26,06,033
May-23	1,50,180	780	17,92,550
Jun-23	2,00,145	925	24,12,570
Jul-23	2,68,485	920	30,46,219
Aug-23	2,83,065	911	31,53,268
Sep-23	2,46,660	960	28,58,448
Oct-23	2,79,083	985	32,00,148

Comparison of Electricity consumption (kWh/month) (FY 2022 and FY 2023)



As per literature review, electricity of around 0.4 to 0.6 kWh electricity/ kg of plastic waste recycling (extrusion/ granule making) is required<sup>1</sup>. Therefore, electricity consumption of the shakti plant for FY 2022-23 i.e. 23.33 lakh kWh corresponds to 11.66 lakh tonnes of plastic recycling. Some of the electricity consumption may be for other purposes such as lighting, fans, water pumping, ETP operation etc.

#### 4.6 Raw Material/final product in out details

Industry has submitted material in-out register's copies for last 3 months (August, Sept, Oct 2023)

#### 4.7 Raw material purchase details

Industry has submitted soft copies of GST invoices for raw material procurement for FY 2022-23 by procurer's name.

<sup>1</sup> Source: [https://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2Fib\)%20of%20plastic%20processed.](https://www.ptonline.com/articles/whats-your-process-energy-fingerprint#:~:text=A%20typical%20extrusion%20plant%20will,%2Fib)%20of%20plastic%20processed.)

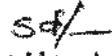
- ii. Electricity bills submitted by industry are in line with consented capacity of industry.
- iii. Physical verification of the industry was conducted as per SOP formulated by CPCB.
- iv. it is noted that the industry has generated some of the EPR credits for Services provided towards collection and recycling and not for the requisite actual sales of recycled plastic/granules.
- v. Shakti plastic industries has submitted soft copies of around 17,800 GST invoices for the plastic waste for plastic EPR portal of CPCB website. In view of the voluminous data, and also it was not possible to come out with opinion w.r.t. quantity of actual plastic waste processing carried out by the industry. Therefore, it is recommended that Chartered Account may be appointed for verification of the invoices.

**List of Annexures**

1. Annexure 1: Consent to Operate granted to Shakti Plastic Industries on 15.06.2023
2. Annexure 2: physical verification of the plant conducted on 08.11.2023.
3. Annexure 3: plastic EPR Registration certificate to the plant on 31.07.2023 for capacity of 2,88,000 MT/annum
4. Annexure 4: Details of workers attendance at the plant
5. Annexure 5: Copies of Electricity bills for January 2022 to October 2023
6. Annexure 6: Copies of purchase bills/ invoices for plastic recycling machines
7. Annexure 7: Land Documents provided by the industry

  
(Sandeep Shinde)  
Field Officer,  
RO(BMW) section

  
(Rutuja Bhalerao)  
Sub-Regional Officer,  
RO(BMW) section

  
(Kiran Hasabnis)  
Regional Officer, (Thane)

The Shakti Plastic Industries

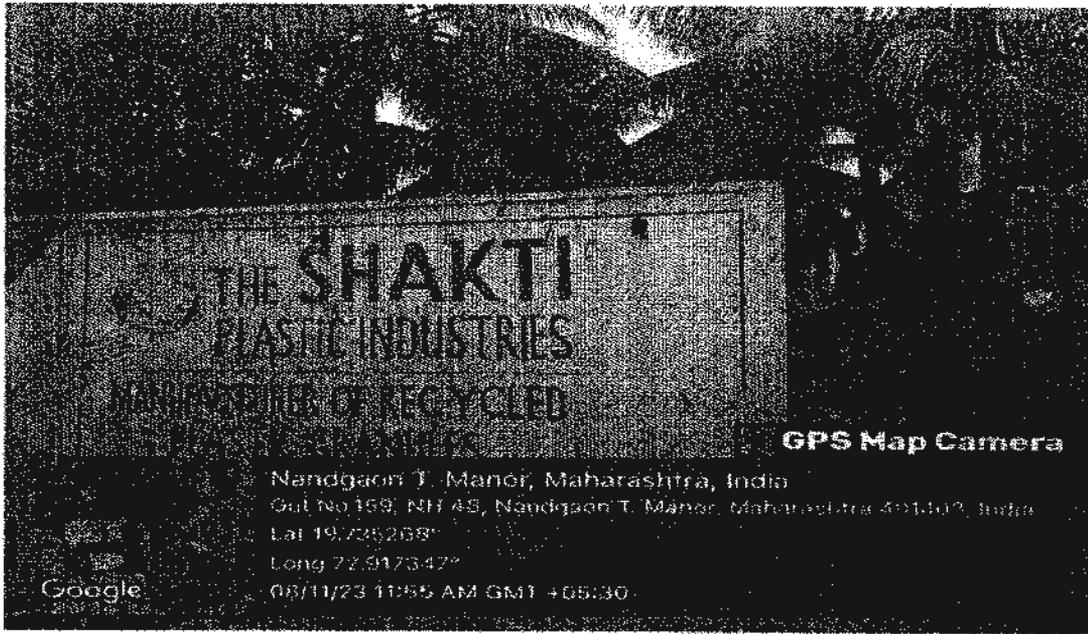


Photo No.1 Plant Main Gate

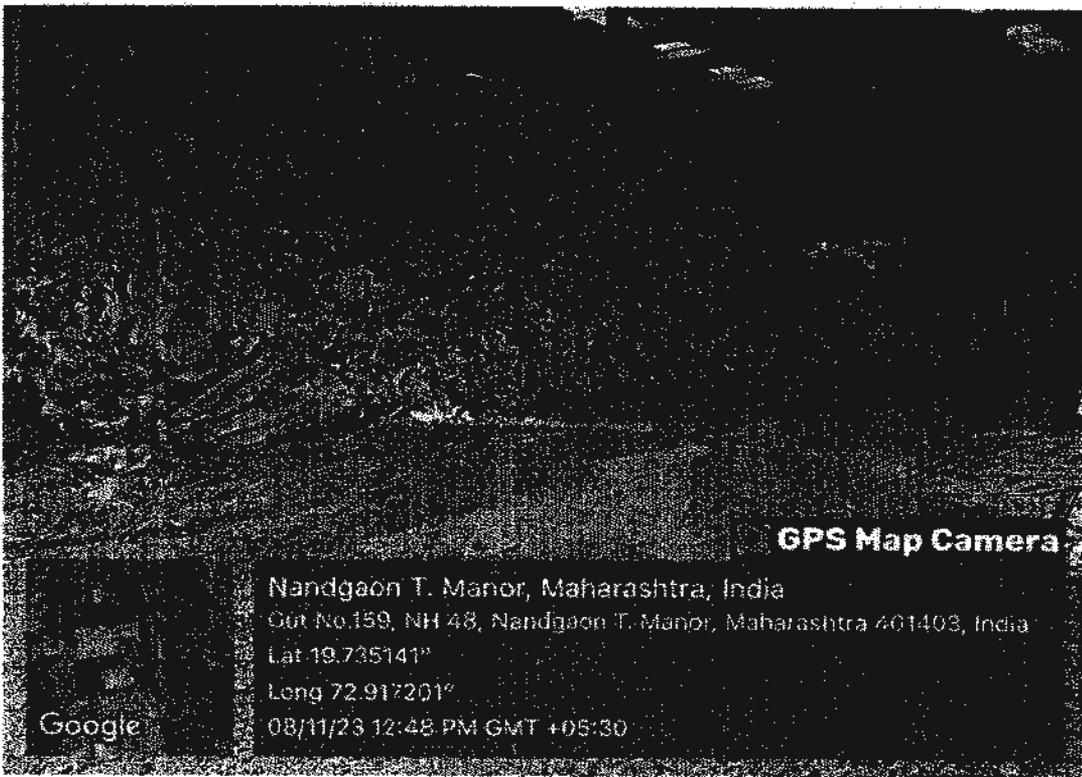


Photo No.2 Storage Area

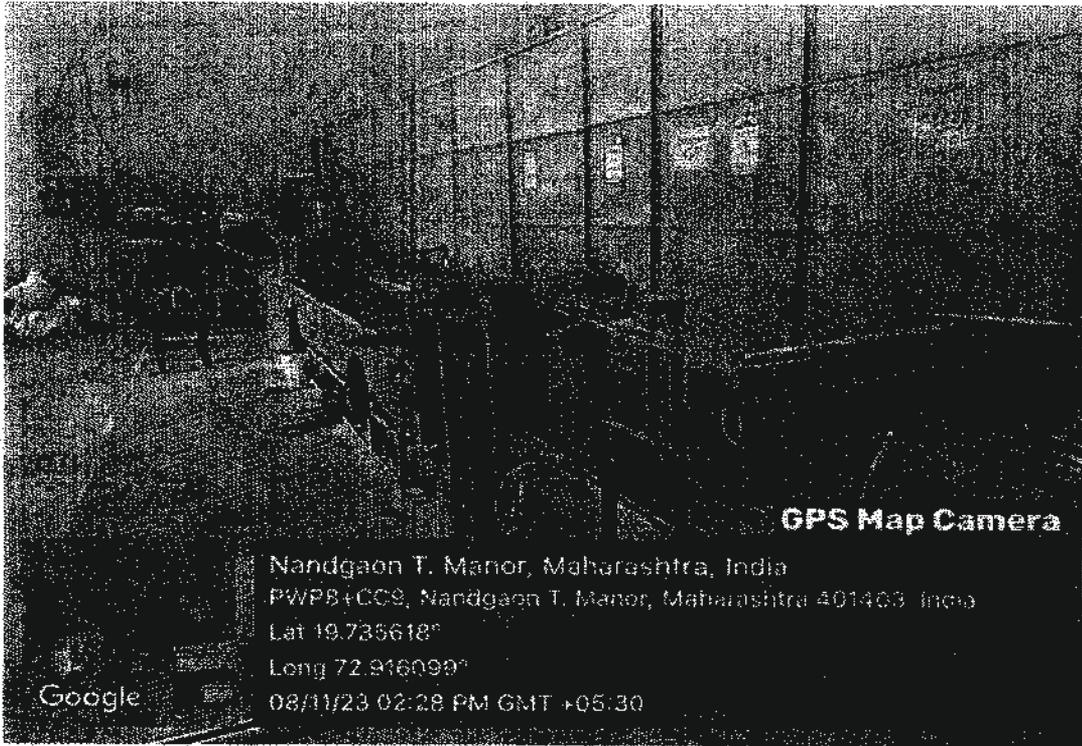


Photo No.5 Extruder No.1

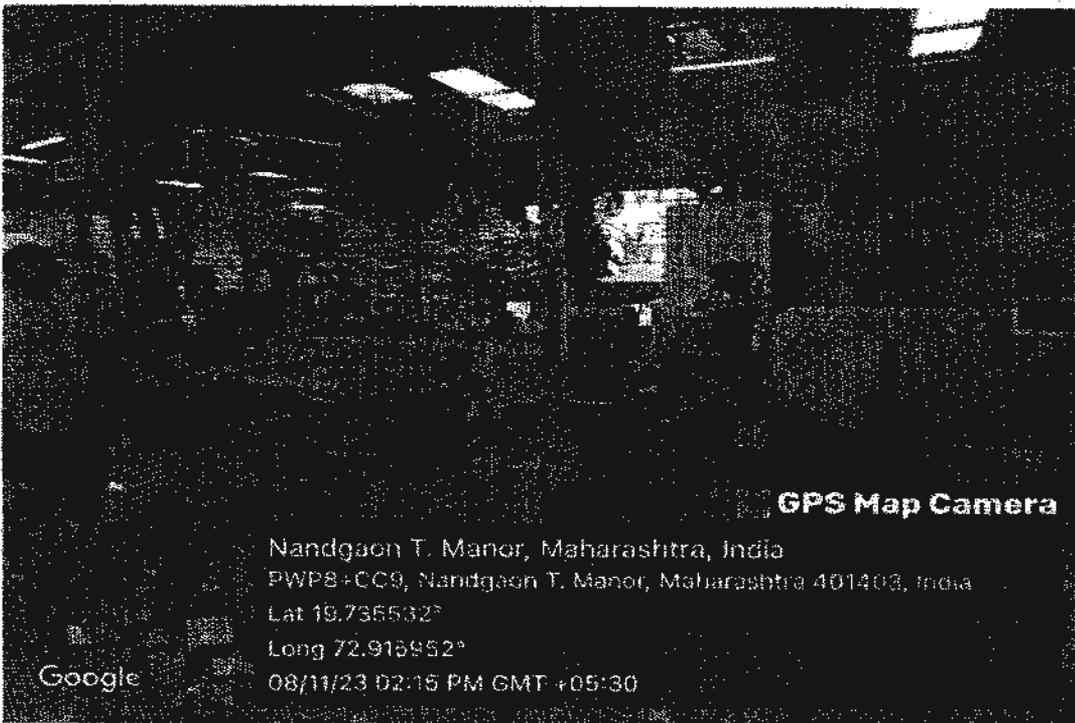


Photo No.6 Extruder No.2



Photo No.9 Extruder no.5

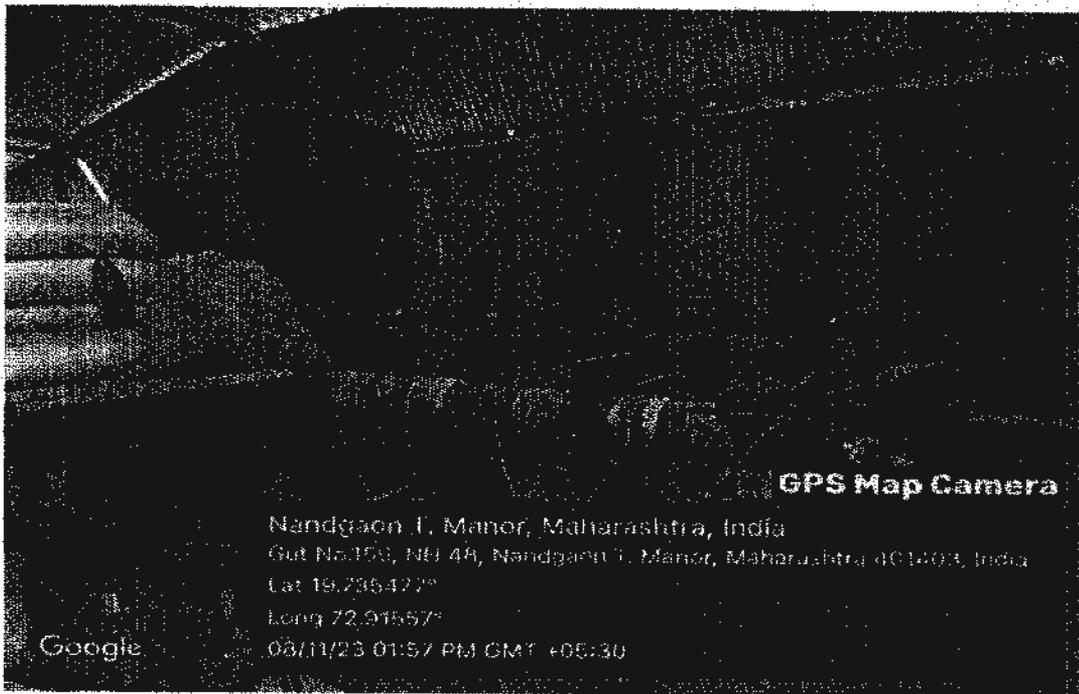


Photo No.10 Extruder not working No.06

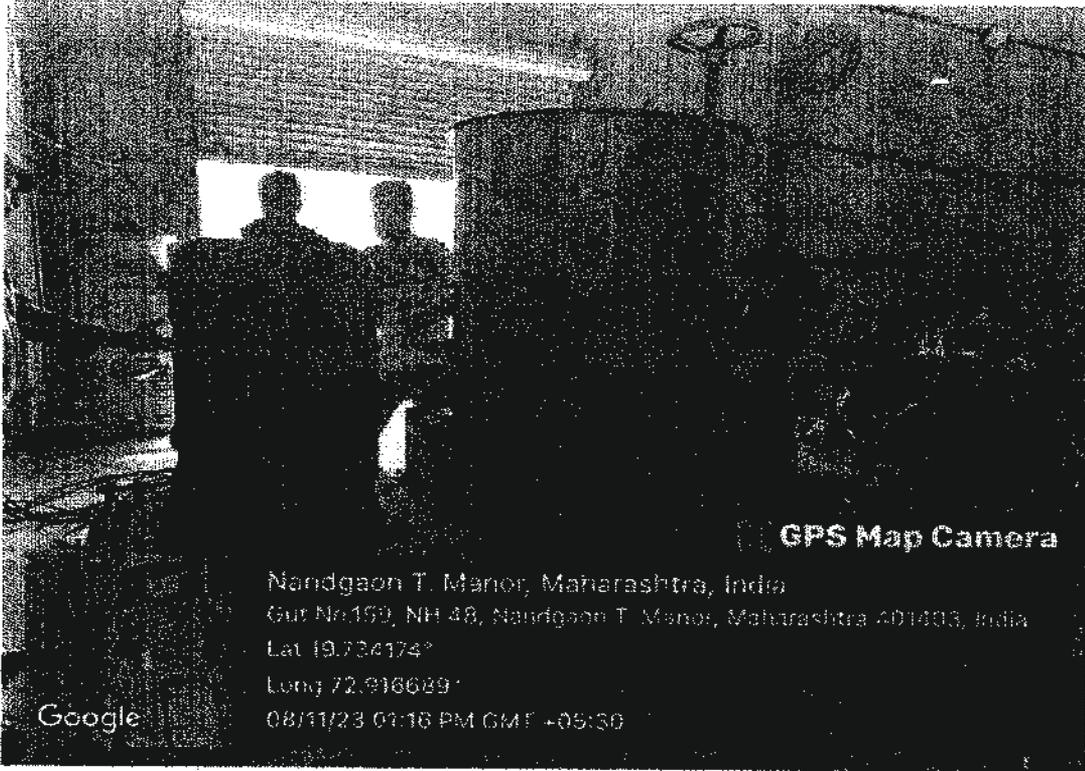


Photo No.13 Agglomeration machine No.3

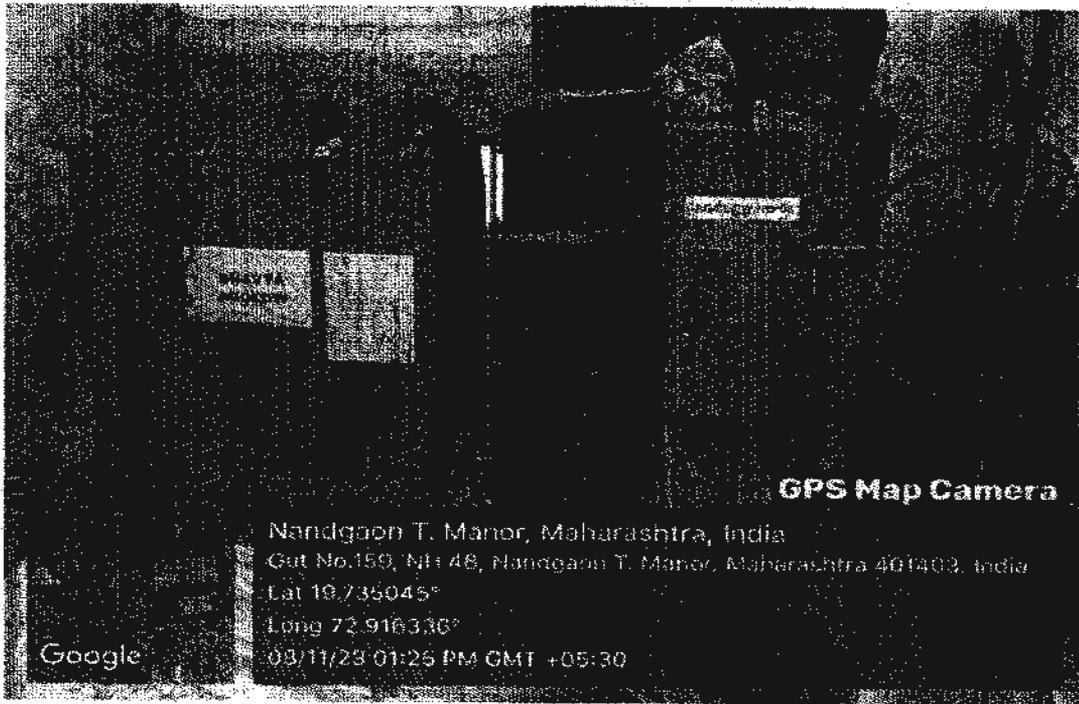


Photo No.14 Agglomeration machine No.4

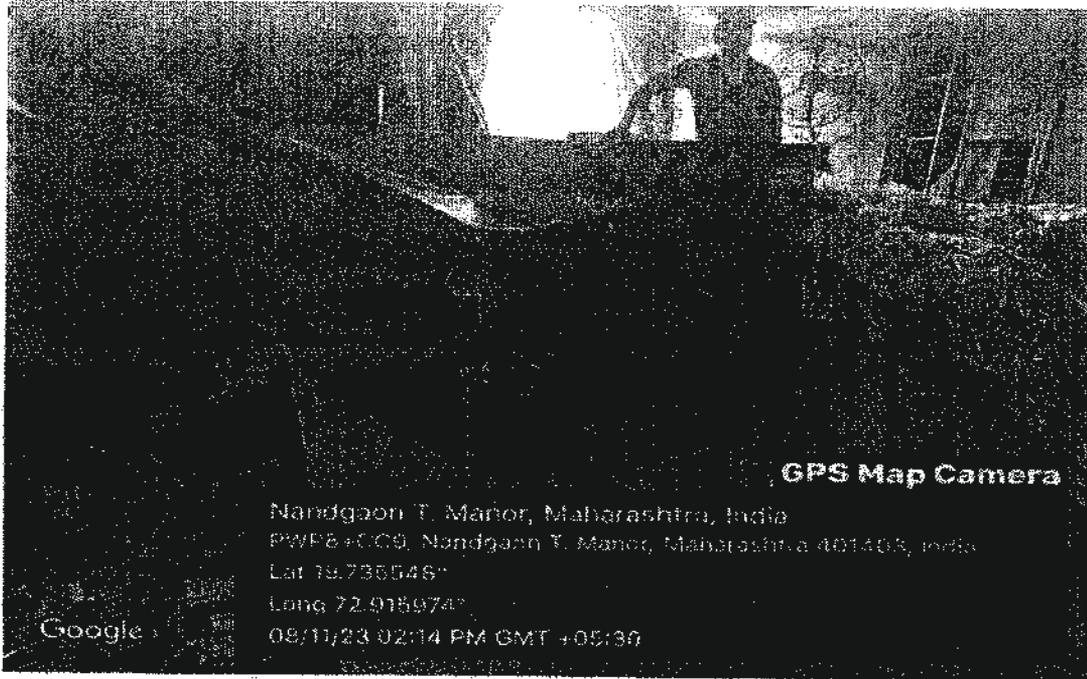


Photo No.17 Agglomeration machine no.7

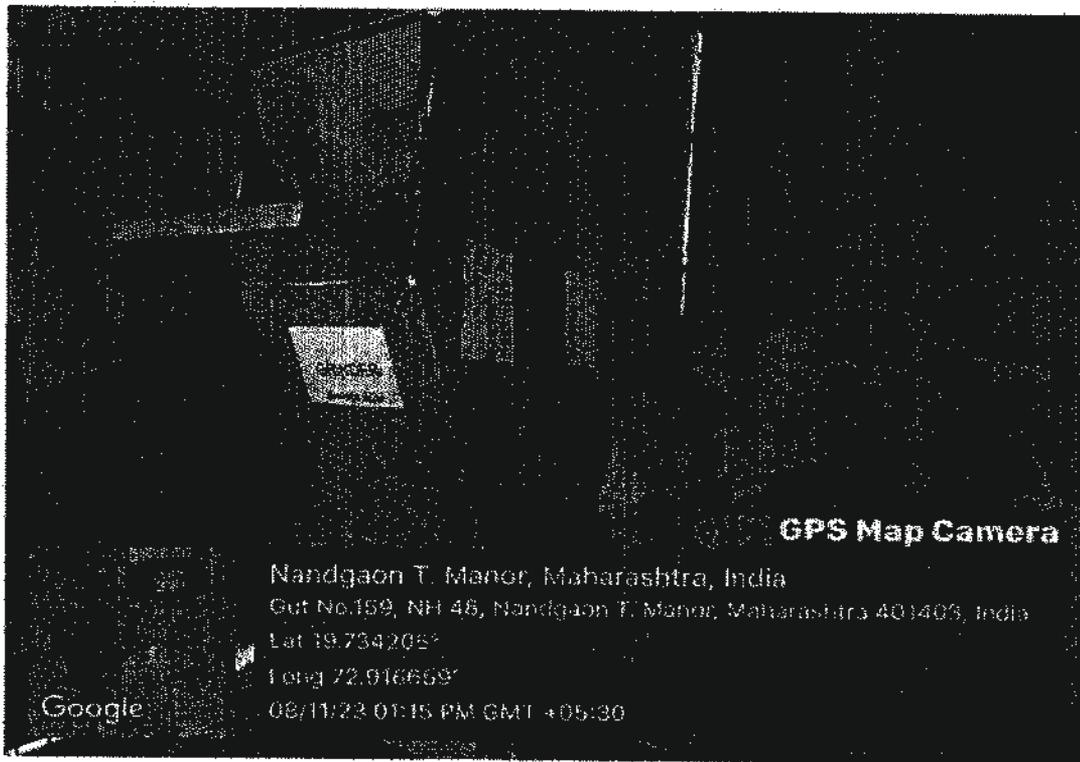


Photo No.18 Grinder No.1

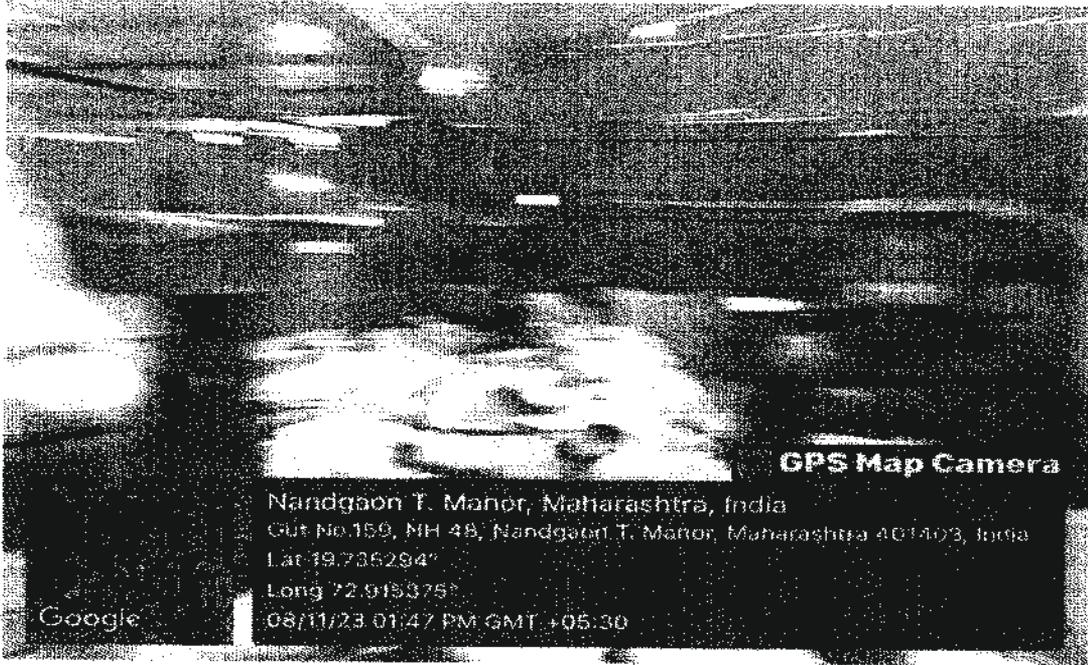


Photo No.21 Grinder No.4,5 (02) Nos.

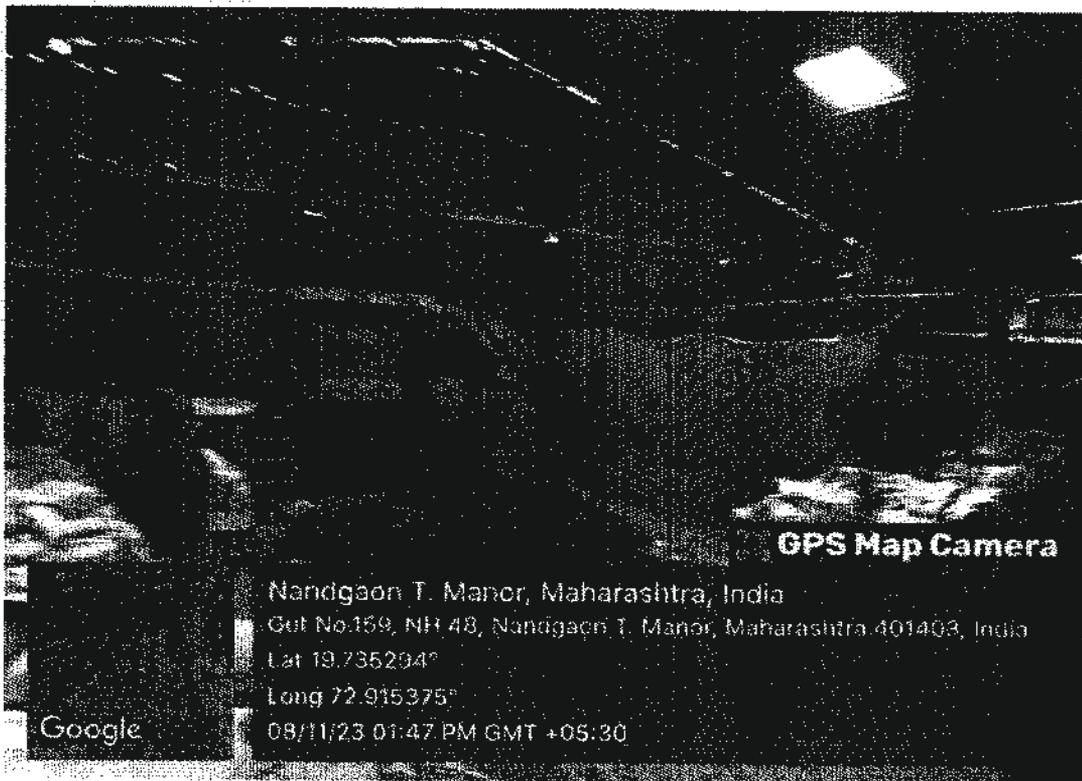


Photo No.22 Grinder No.6



Photo No.25 Shredder No.1

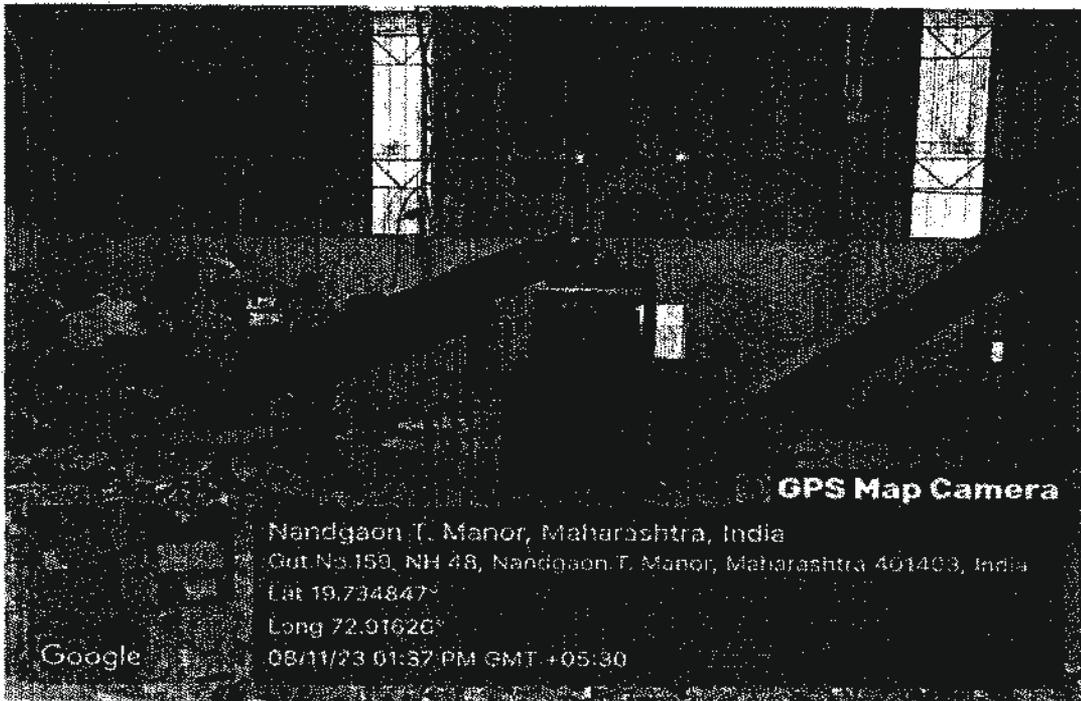


Photo No.26 Shredder no.2

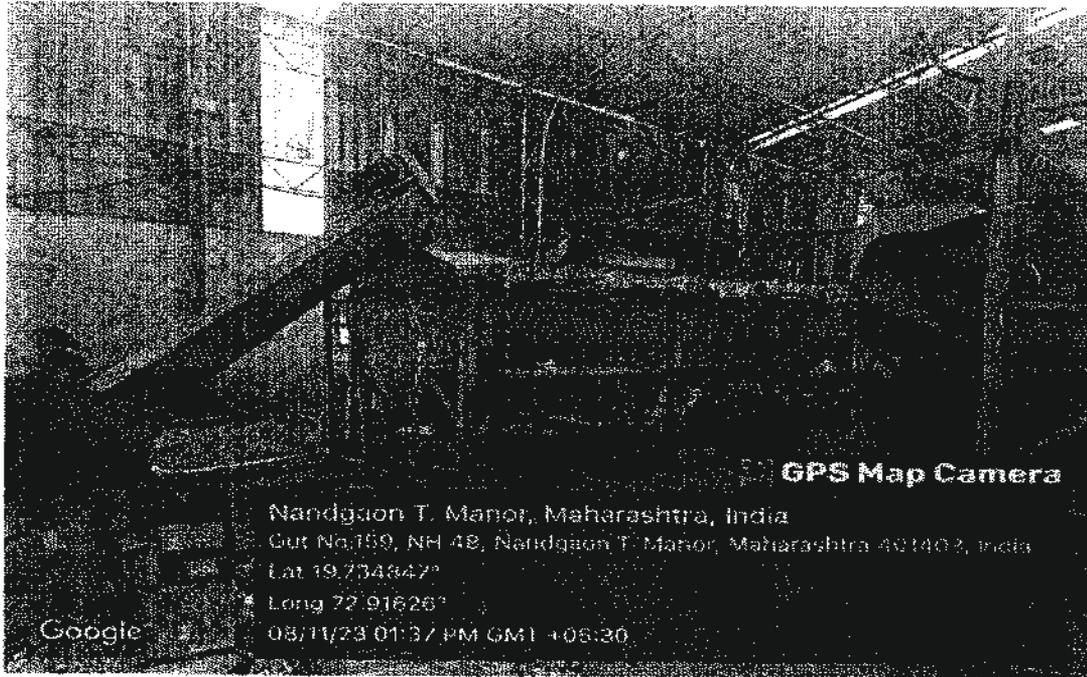


Photo No.29 Washing Line 2

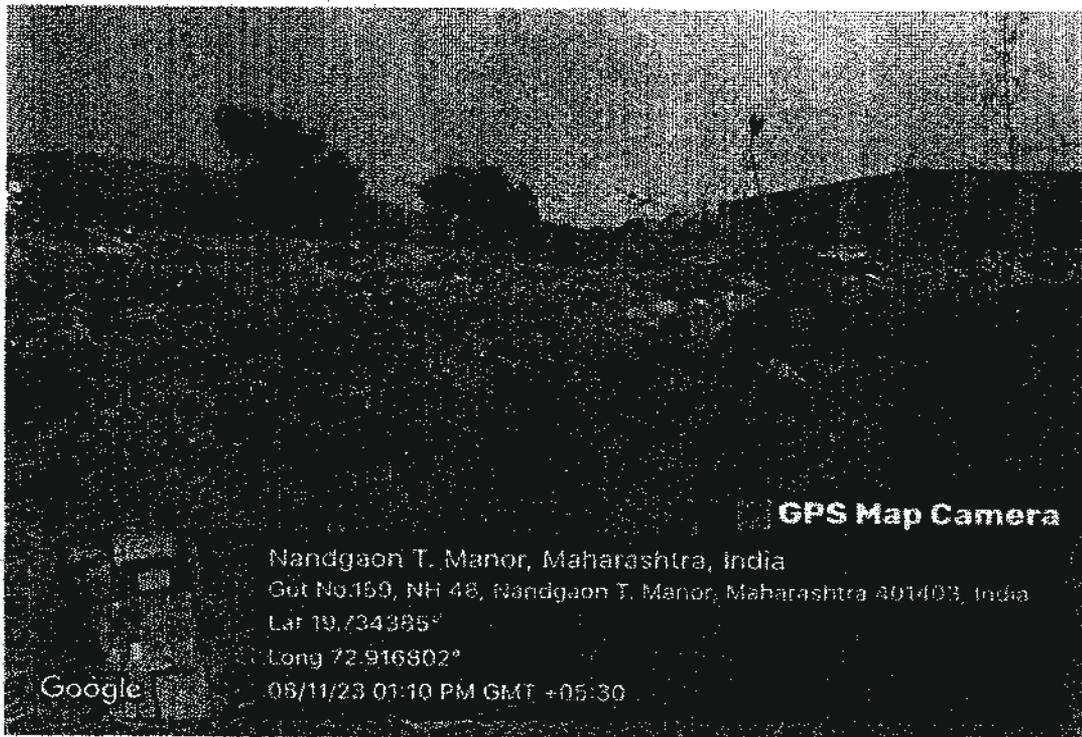


Photo No.30 Open Land

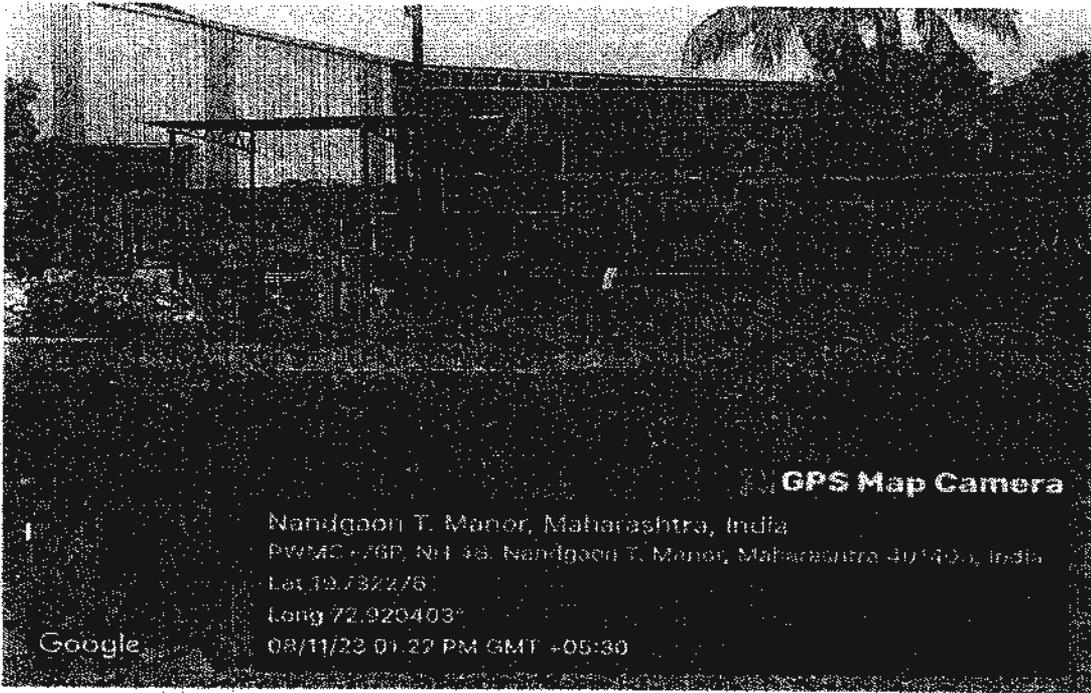


Photo No.33 ETP Plant

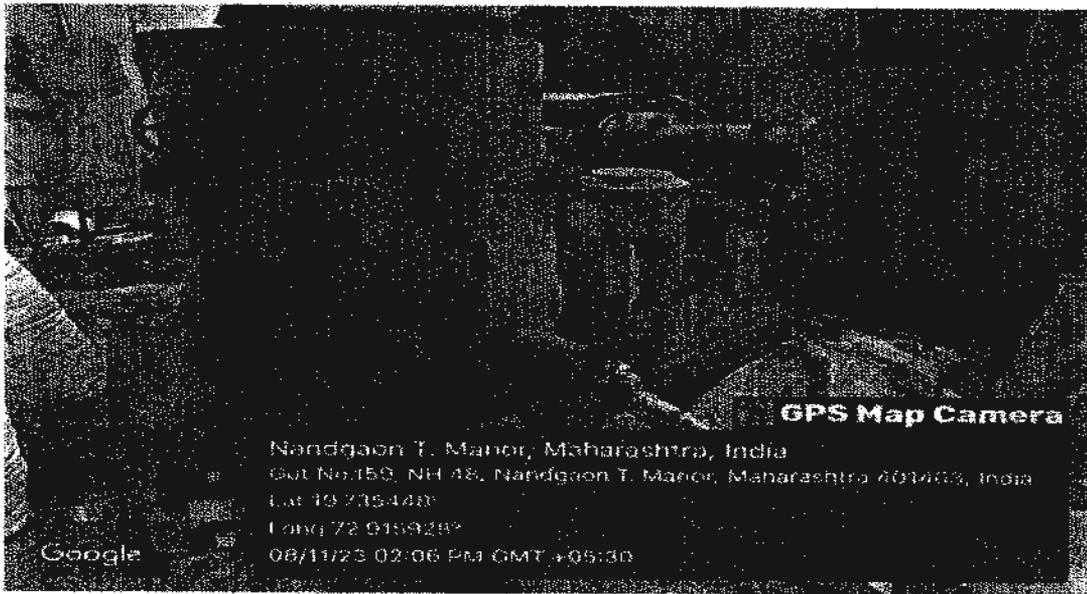


Photo No.34 Mixer not in working



INSTITUTE OF CHEMICAL TECHNOLOGY 753

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Directorate of Technical Education, Government of Maharashtra

Category I Deemed to be University (MHRD/UGC)

National Rank 1 in A+ Innovation Ranking (ARIIA), by MHRD, Category : Govt Aided Universities (2020)



223

# Report on Machinery Capacity Audit for Manufacturing and Feasibility of Effluent Treatment Plant

## For

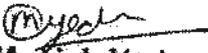
The Shakti Plastic Industries,

Gut No. 159, Manor Palghar Road, Village Nandgoan, Palghar  
Maharashtra - 401403

Prepared by  
**Dr Manish Yadav**  
Assistant Professor,  
Department of Chemical Engineering,  
Institute of Chemical Technology,  
Nathalal Parekh Marg,  
Matunga (East)  
Mumbai 400019



February 15, 2024

  
**Dr. Manish Yadav**  
Assistant Professor  
Department of Chemical Engineering  
Institute of Chemical Technology  
Mumbai - 19, India

Page 1 of 9

### ICT MUMBAI

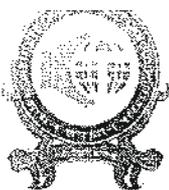
Nathalal Parekh Marg, Matunga, Mumbai - 400 019, India  
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email : vc@ictmumbai.edu.in  
GSTIN : 27AAAT14951J12G

### ICT IOC, BHUBANESWAR

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Category I Deemed to be University (MHRD/UGC)

National Rank 1 in Atal Innovation Ranking (ARIIA), by MHRD, Category : Govt Aided Universities (2020)

### Introduction

M/s. The Shakti Plastic Industries is a Manor, Palghar Maharashtra based one of its own kind of company that specializes exclusively in upcycling Multilayered Plastic (MLP), high density polyethylene (HDPE), Low density polyethylene (LDPE), Polypropylene (PP) and other plastic material. MLPs in India, are primarily phased out of the system by either burning them in cement kilns and converting them into alternate fuel, dumping them in landfills or littering in the oceans.

M/s. The Shakti Plastic Industries have recycling facility which is incorporated with the latest technologies for plastic recycling and an in-built quality testing lab for the re-processed products. In addition, effluent treatment plant to treat the wastewater generated during the existing manufacturing activities. Plant layout is depicted in Annexure 1. It can be observed that the total area in which the plant is situated is approximately 270000 sq.ft. The plant site is well equipped with electrical connections with safety features along with a regular supply of water from the in-house ETP. The total number of man power working in the plant is around 350 (including security personnel, cleaning staff, etc.

M/s. The Shakti Plastic Industries has appointed Dr Manish Yadav, Assistant Professor in the Department of Chemical Engineering at the Institute of Chemical Technology, Nathalal Parekh Marg, Matunga East Mumbai – 400019 as consultant to understand the capacity of the existing facility along with detailed audit of effluent treatment plant. The entire report is divided into three sections.

Section 1: Process flow sheet of major unit operations

Section 2: Capacity of processing of the equipment's

Section 3: Effluent treatment plant audit

**Dr. Manish Yadav**  
Assistant Professor  
Department of Chemical Engineering  
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Mumbai - 19, India



#### ICT MUMBAI

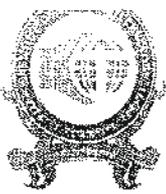
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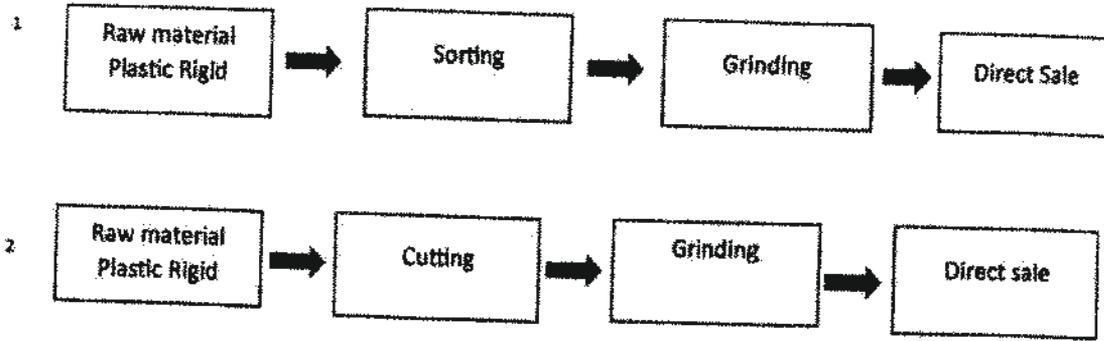
M/s Baej Shreejai Innovations Centre Private Limited,  
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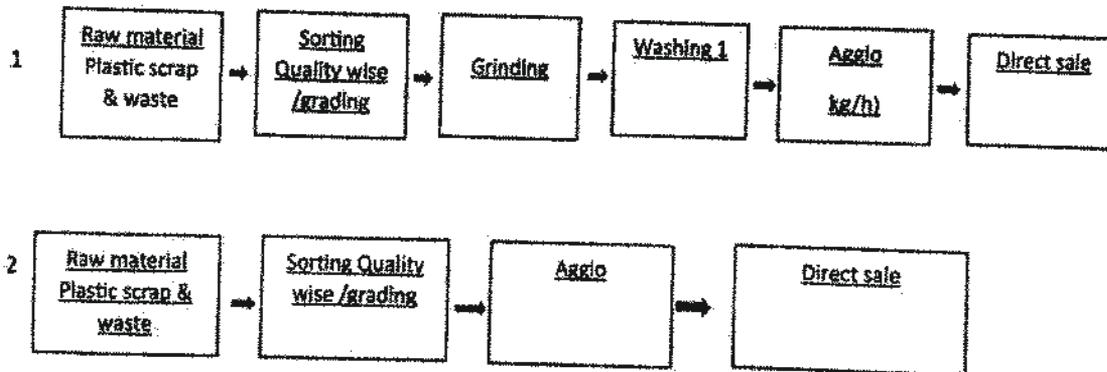
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Category I Deemed to be University (MHRD/UGC)  
National Rank 1 in Atal Innovation Ranking (ARIIA), by MHRD, Category : Govt Aided Universities (2020)

**Manufacturing Flow Chart of Grinding Process**



**Manufacturing Flow Chart of Agglomeration Process**



*Dr. Manish Yadav*  
**Dr. Manish Yadav**  
 Assistant Professor  
 Department of Chemical Engineering  
 Institute of Chemical Technology  
 Mumbai - 19, India



**ICT MUMBAI**

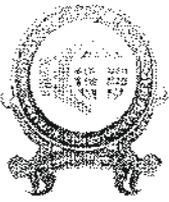
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Category I Deemed to be University (MHRD/JGC)

National Rank 1 in Atal Innovation Ranking (ARIIA), by MHRD, Category : Govt Aided Universities (2020)			
<b>(D) SHREDDER MACHINE</b>			
1	Shredder	1 no	3500
2	Shredder	1 no	4800
<b>(E) SOUZER MACHINE</b>			
1	Squeezer Machine	1 no	3100
<b>(F) WASHING MACHINE</b>			
1	Small Washing Line	1 no	2200
2	Big Washing Line	1 no	2500

As per my knowledge the total capacity of the plant

Sr.No.	Process	Capacity (TPD)
1	Extruder	367.2
2	Agglomeration	403.2
3	Grinding	300.6
4	Shredding	206.4
5	Squeezer	28.2
6	Washing	112.8
<b>Total Capacity</b>		<b>1418.4</b>

Total Capacity of the Plant :: 1420 TPD

*Dr. Manish Yadav*  
**Dr. Manish Yadav**  
 Assistant Professor  
 Department of Chemical Engineering  
 Institute of Chemical Technology  
 Mumbai - 19, India



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**ICT MARATHWADA, JALNA**  
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Deemed to be University under Section-3 of UGC Act 1956

State Institute of Technology, Government of Maharashtra

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### 3.2 Tertiary Treatment

The purpose of tertiary treatment is to provide a final treatment stage to raise the effluent quality before it is discharged to the receiving environment (sea, river, lake, ground, etc.). More than one tertiary treatment process may be used at any treatment plant. In the existing facility activated carbon based tertiary treatment is installed.

*Dr. Manish Yadav*

**Dr. Manish Yadav**  
Assistant Professor  
Department of Chemical Engineering  
Institute of Chemical Technology  
Mumbai - 19, India



#### ICT MUMBAI

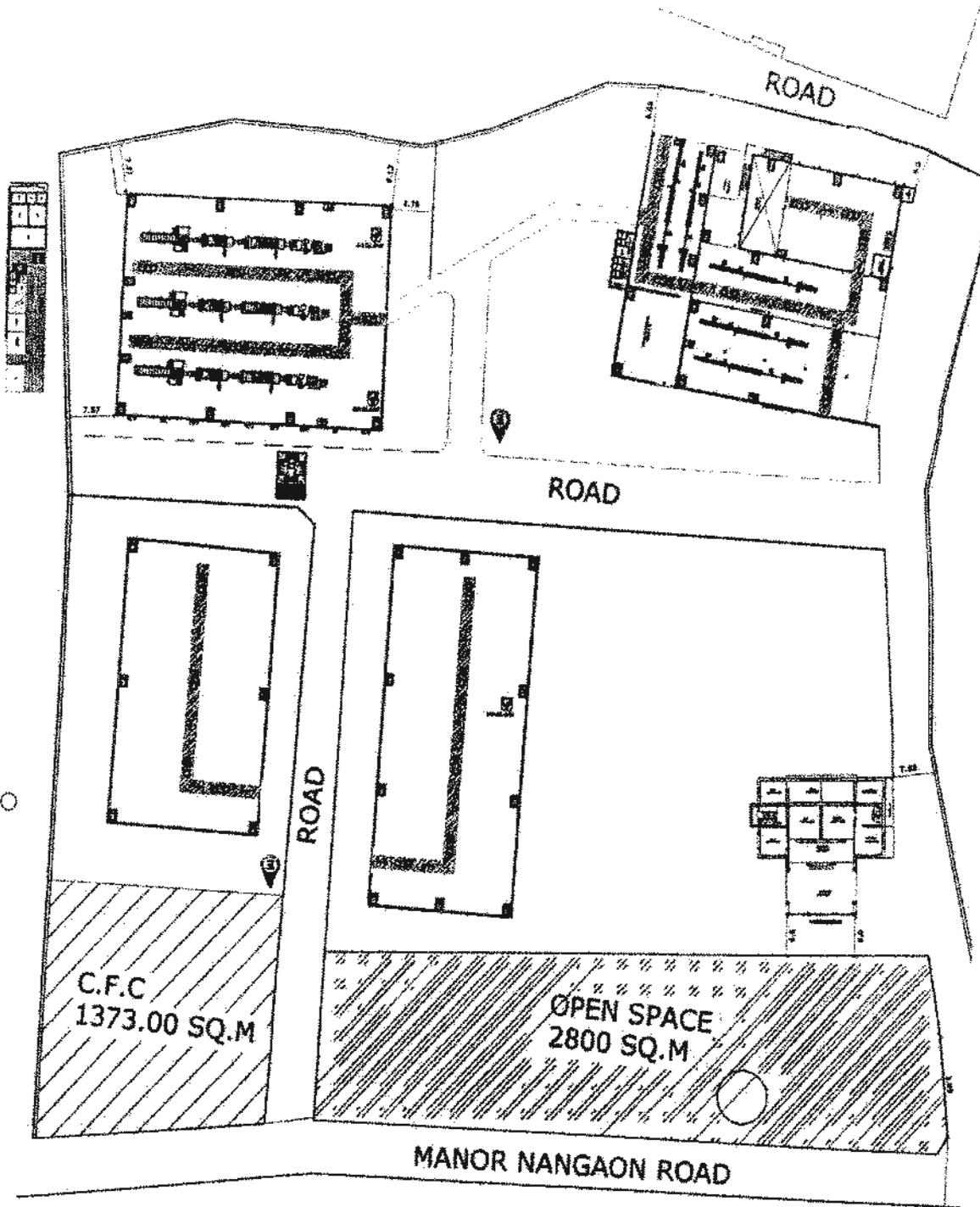
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#### ICT IOC, BHUBANESWAR

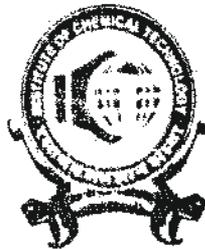
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*Dr. Manish Yadav*  
**Dr. Manish Yadav**  
 Assistant Professor  
 Department of Chemical Engineering  
 Institute of Chemical Technology  
 Mumbai - 19, India



	Electrical
	Fire Alarm
	Fire Extinguisher
	Fire Hose
	Fire Blanket

**In case of Emergency**

Emergency Contact No.	
Address of the Institute	
Location of the Institute	
Nearest Police Station	
Nearest Fire Station	

**To**  
Member Secretary,  
Maharashtra Pollution Control Board  
5th Floor, Office Complex Building  
Near Mulund Check Naka,  
Wagle Estate, Thane

**Date:** 12/03/2025

**Subject:** Request for Withdrawal of Closure Directions dated 18/06/2024

Respected Sir,

We, M/s Shakti Plastic Industries, Palghar, are engaged in the recycling of plastic waste at our facility located at Gat No. 158/159, Village Nandgaon, Manor, District Palghar. With over 50 years of experience in the recycling industry, we have provided direct and indirect employment to more than 500 individuals, particularly from tribal areas.

Our company has obtained the necessary **Consent to Establish** and **Consent to Operate** from the Maharashtra Pollution Control Board. Additionally, we hold a **Recycler Certificate** under the Plastic Waste Management (PWM) Rules, demonstrating our compliance with **Extended Producer Responsibility (EPR)** norms. We had duly communicated this information in response to the Show Cause Notice issued on 08/04/2024.

We believe there may have been a miscalculation in assessing our production capacity. The regulator appears to have considered only recycled granules while evaluating industry norms. However, as per **BIS Guidelines 2023**, grinding and agglomerate are also by-products that can be used as raw materials. Consequently, these should not be classified as final products, leading to a difference in production capacity calculations.

Furthermore, as a recycling unit, our input materials are not standardized, and production output varies based on the quality and composition of the waste received. Despite these variations, we have ensured complete transparency and compliance by accurately reporting our revenues.

In light of the above, we respectfully request the Hon'ble Board to **withdraw the Closure Directions issued on 18/06/2024** and allow us to continue operations in compliance with all regulatory requirements.

We appreciate your time and consideration and look forward to your positive response.

**Yours sincerely,**

**For Shakti Plastic Industries**

  
**Partner**



महाराष्ट्र राज्य प्रदूषण नियंत्रण बोर्ड  
अवकाश पॉलि, २ फ्लोर, बिजनेस क्लासिक,  
चिंचोली बंडर रोड, मालड (पश्चिम),  
मुंबई - ४०००६४.  
फोन: २२२४९६७१/५०१/०२  
Website: www.mpcb.org



**To**

**Date:** 18.06.2025

The Chairman

**Maharashtra Pollution Control Board (MPCB)**

Sion Circle, Sion (East),

Mumbai – 400 022

**Subject:** Request for Revocation of Closure Order and Permission to Resume Operations

**Ref:** Closure Order No. MPCB/ROT/CD/240618-FTS-0307 dated 18th June 2024

Respected Sir,

We, **M/s The Shakti Plastic Industries**, operating a plastic waste recycling unit at Gut No. 158 & 159, Village Nandgaon, Taluka Manor, District Palghar, Maharashtra, humbly submit this request for the revocation of the **Closure Order dated 18th June 2024**, and for permission to resume plant operations.

It has now been over **one year since the closure was enforced**, and during this period, we have complied with all instructions issued by MPCB and CPCB, including submission of responses to the Show Cause Notices and adopting necessary corrective measures.

In this regard, we would like to bring to your kind attention the following:

1. **One-year closure timeline has elapsed**, and as per **Clause 6.4 of the SOP for Assessment & Characterization of Plastic Waste issued by CPCB**, a unit that remains non-operational for more than one year is subject to regulatory review, and eligible for reassessment and reinstatement of operations, provided corrective actions have been taken and compliance submissions have been made.
2. The extended closure is severely affecting the livelihood of **over 600 workers** and numerous associated families.
3. We are **registered under CPCB as an authorized Plastic Waste Processor (PWP)** and have been a significant contributor to fulfilling the EPR targets of many PIBOs. Our continued closure is also impacting their statutory compliance.



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4. **Significant financial and environmental implications** have arisen due to unprocessed stockpiles of plastic waste at our site.
5. We assure you of **full cooperation for any future inspection or compliance verification** that may be required by your department.

We hereby request the Hon'ble Board to:

- Kindly **revoke the closure directions** dated 18.06.2024;
- Reinstate our **Consent to Operate (CTO)**;
- Allow **resumption of operations** with immediate effect to restore environmental service delivery and prevent further losses.

We respectfully seek your support and intervention in facilitating the reopening of our plant, which has remained non-operational for a year. We remain committed to upholding all environmental and legal obligations.

Looking forward to your favorable response.

Thanking you,

Yours sincerely,

**For M/s The Shakti Plastic Industries**

*Rahul V. Podaar*

**Rahul V. Podaar**  
Partner



**CC:**

1. The Chairman, Central Pollution Control Board (CPCB)  
Parivesh Bhawan, East Arjun Nagar, Delhi – 110032
2. The Member Secretary, Central Pollution Control Board (CPCB)  
Parivesh Bhawan, East Arjun Nagar, Delhi – 110032
3. Regional Officer, MPCB – Thane
4. Sub-Regional Officer, MPCB – Boisar
5. CPCB Regional Directorate – Pune



To,  
**Sh. Vir Vikram Yadav, IAS**  
Chairman  
Central Pollution Control Board (CPCB)  
New Delhi

Date: 16.11.2025

**Subject: Request for Reopening Permission of Our Recycling Facility – More Than One Year Closure Completed**

Respected Sir,

I, on behalf of **The Shakti Plastic Industries (TSPI)**, humbly submit this request seeking your kind intervention for reopening our plastic waste recycling facility located at **Gut No. 158 & 159, Village Nandgaon, Taluka Manor, District Palghar, Maharashtra.**

Our unit has been under closure as per directions issued in June 2024, and **more than one full year has now passed.** During this period, we have complied with all requirements and responded to all notices issued by CPCB and MPCB. We remain committed to maintaining the highest environmental standards and ensuring complete adherence to the Plastic Waste Management Rules, 2016 (amended 2018 & 2022).

### **About The Shakti Plastic Industries**

- Established in **1970**, TSPI is India's oldest and largest plastic waste recycling organization.
- Authorized by CPCB and multiple SPCBs as a **Plastic Waste Processor (PWP)**.
- Recycling capacity: **2,80,000 MT per annum** at our Manor-Palghar plant.
- We support more than **350+ PIBOs** in fulfilling their EPR obligations.
- TSPI directly supports **over 7,000 ragpickers** and sustains employment for more than **600 workers.**

### **Impact of Continued Closure**

Sir, the prolonged closure has resulted in extremely serious consequences:

1. **Livelihood of more than 600 workers is severely affected**, who are dependent on this plant for daily income.





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2. **Environmental impact** due to idle recycling capacity and unprocessed plastic waste accumulating across supply chains.
3. **Recycling services to 350+ PIBOs have been halted**, risking their EPR compliance for FY 2024-25 & FY 2025-26.
4. **Financial losses running into crores**, affecting sustainability of operations and vendor networks.

### Our Compliance

- All responses to Show Cause Notices have been furnished in detail.
- We have complied with all directions issued by CPCB and MPCB.
- As per EPR & CPCB operational guidelines, **closure beyond one year without further review or hearing is not prescribed.**

### Our Humble Request

Through this letter, we sincerely request your kind intervention to:

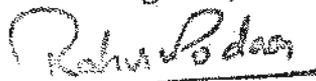
1. **Direct CPCB/MPCB to review our case on priority and revoke the closure order**, allowing us to restart operations immediately.
2. Permit us to resume recycling activities to serve our PIBO clients whose compliances are getting affected due to our non-operation.
3. Allow us to utilize our installed recycling capacity to continue contributing to India's national circular economy goals and Swachh Bharat Mission.

We assure you of complete cooperation and readiness to comply with any additional conditions prescribed by the Ministry or CPCB.

Sir, we earnestly seek your support to help restart an industry that has worked selflessly for India's sustainability mission for over five decades.

We shall remain grateful for your kind intervention.

Warm regards,



**Rahul V. Podaar**

Partner

**The Shakti Plastic Industries**

Mumbai



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765

BEFORE THE HON'BLE NATIONAL  
GREEN TRIBUNAL  
(N.G.T)  
WESTERN ZONE BENCH PUNE  
APPEAL NO. 148 OF 2025

The Shakti Plastic Industries ... Appellant

Versus

CPCB & Others .. Respondent

**WRITTEN NOTES OF ARGUMENT**

**ON BEHALF OF APPELLANT**

Dated this 20<sup>th</sup> day of December, 2025

Mr. Ashok M. Saraogi,  
Advocate for the Appellant  
6A, 6B Old Oriental Building  
N.M. Road, Fort,  
Mumbai 400 001