



Government of India
Ministry of Environment, Forest and Climate Change
(Issued by the State Environment Impact Assessment
Authority(SEIAA), MADHYA PRADESH)

To,

The Director
HEADWAY LIFE SCIENCES PRIVATE LIMITED
E33/185 Arera Colony Bhopal -462016

Subject: Grant of Environmental Clearance (EC) to the proposed Project Activity under the provision of EIA Notification 2006-regarding

Sir/Madam,

This is in reference to your application for Environmental Clearance (EC) in respect of project submitted to the SEIAA vide proposal number SIA/MP/IND3/403589/2022 dated 08 Nov 2022. The particulars of the environmental clearance granted to the project are as below.

1. EC Identification No.	EC23B000MP120393
2. File No.	9135/2022
3. Project Type	New
4. Category	B
5. Project/Activity including Schedule No.	N/A
6. Name of Project	PROPOSED BULK DRUGS & ITS INTERMEDIATES PRODUCTION
7. Name of Company/Organization	HEADWAY LIFE SCIENCES PRIVATE LIMITED
8. Location of Project	MADHYA PRADESH
9. TOR Date	N/A

The project details along with terms and conditions are appended herewith from page no 2 onwards.

Date: 10/01/2023

(e-signed)
Mujeebur Rehman Khan
Member Secretary
SEIAA - (MADHYA PRADESH)

Note: A valid environmental clearance shall be one that has EC identification number & E-Sign generated from PARIVESH. Please quote identification number in all future correspondence.

This is a computer generated cover page.

PARIVESH

(Pro-Active and Responsive Facilitation by Interactive,
and Virtuous Environmental Single-Window Hub)



Ref: Proposal No. SIA/MP/IND3/403589/2022, Case No 9135/2022: Prior Environment Clearance for Proposed Bulk Drugs & its Intermediates Production at Khasra No. 298/2, 298/3/2 at Village - Barla, Tehsil Sanchi, Dist. Raisen, (MP) Production Capacity - 200 TPA by M/s. Headway Life Sciences Pvt. Ltd, E-3/185, Arera Colony, Dist. Bhopal, MP - 462016 Env. Consultant Creative Enviro Services, Bhopal (M.P.)

With reference to the above, the proposal has been appraised as per prescribed procedure & provisions under the EIA notification issued by the Ministry of Environment & Forests vide S.O. 1533 (E), dated 14th September 2006 and its amendments, on the basis of the mandatory documents enclosed with the application viz., Form 2, pre-feasibility report, EIA report, ppt. and additional clarifications furnished in response to observations by the State Expert Appraisal Committee (SEAC) and State Environment Impact Assessment Authority (SEIAA) constituted by the competent Authority.

- i. यह प्रकरण खसरा नंबर 298/2, 298/3/2 गांव - बरला, तहसील - साँची और जिला - रायसेन, (मप्र) में 200 टीपीए की क्षमता वाले बल्क ड्रग्स और एपीआई उत्पादन हेतु पूर्व पर्यावरण स्वीकृति का है। उक्त परियोजना Medium Scale Manufacturing Facility की है।
- ii. यह परियोजना 28510 sq-m भूमि के एक भूखंड क्षेत्र में है जो कि M/s. Headway Life Sciences Pvt. Ltd के अधिग्रहण में है।
- iii. Industry falls under the category of 5(f) of schedule of EIA Notification, 2006 and subsequent amendments, "Synthetic organic chemicals industry (bulk drugs and intermediates excluding drug formulations; synthetic rubbers; basic organic chemicals, other synthetic organic chemicals and chemical intermediates) and categorized under "B" because as per the amended EIA Notification 25.06.2014, small scale industries of cat. 5(f) may consider B category if unit will fulfill criteria mention in the said notification.
- iv. डीएफओ के पत्र 492, दिनांक 17.03.2022 के अनुसार परियोजना स्थल से 05 किलोमीटर के भीतर कोई भी राष्ट्रीय उद्यान और वन्य जीव उद्यान स्थित नहीं है।
- v. परियोजना में मुख्या रूप से बॉयलर, एमईई, रिएक्टर, कूलिंग टावर, एफ्लुएंट ट्रीटमेंट प्लांट (ईटीपी) और आरओ प्लांट स्थापित किया जाना प्रस्तावित है। योजना/आवश्यकता के अनुसार प्रशासनिक कार्यालय, पार्किंग एवं ग्रीनबेल्ट/वृक्षारोपण जैसी सुविधाएं भी विकसित की जाएंगी। उपचारित जल का उपयोग कूलिंग टावरों, फर्श की धुलाई और बागवानी/हरित पट्टी के लिए किया जाएगा।
- vi. प्रकरण को एसईएसी की 569 वीं बैठक दिनांक 06.05.22 को टीओआर हेतु अनुशंसा की गई थी जिसे SEIAA की 726वीं बैठक दिनांक 25.05.22 में मान्य करते हुए पत्र क्रमांक 670.71, दिनांक 24.05.22 के माध्यम से ToR जारी किया गया था।
- vii. परियोजना का विवरण निम्नानुसार है:-

S.N.	Component	Details
1	Name	M/s. Headway Life Sciences Private Limited
2	Location	Khasra no. 298/2/2, 298/3/2, village-Barla District - Raisen, Madhya Pradesh 464551
3	Product type	Basic Bulk Drug, Drug Intermediates and Fine Chemicals.
4	Category of Project	B1- MSME
5	Area Details in Sq Meter	
i	Total Plot Area	28510 m ²
iii	Green belt Area	9500 sqm (Approx. 33 % land area is allocated for green belt)
6	Production Capacity	Production Capacity of API & Pharmaceutical Intermediates, proposed (API & Pharmaceutical/ Drug Intermediates) and related products with production capacity of 200 TPA
7	Budgetary Allocation	
i	Project Cost	2,591.39 Lakhs
ii	EMP Cost	

	Capital cost	456 Lacs	for EMS viz. ETP, MEE, APCM etc
	Annual recurring cost	159 Lacs	for EMS - O&M and monitoring etc
8	Total Power Requirement	500 KW	Source:- MPSEB
9	Fuel Requirement		
i	Agro Waste for Boilers (1 TPH)	Agro Briquette (0.9 TPD) or steam coal 0.8 TPD	
ii	HSD for DG Set	DG set 500 KVA & fuel for DG set is HSD 45 Ltr/hr.	
10	Total Water Requirement	प्रस्तावित परियोजना के लिए कुल पानी की आवश्यकता 45 केएलडी एवं पुनर्चक्रण के बाद 21.5 केएलडी होगी, शुद्ध ताजे पानी की आवश्यकता केएलडी होगी। पानी की आवश्यकता द्वारा पूर्ति की जाएगी। भू जल से की जाएगी इसके लिए परियोजना प्रस्तावक द्वारा CGWA से NOC प्राप्त की गई है।	
11	Effluent Details	घरेलू स्रोत से कुल अपशिष्ट जल उत्पादन 0.5 केएलडी होगा और औद्योगिक अपशिष्ट जल उत्पादन 25 केएलडी होगा। प्रोसेस एफ्लुएंट को कंसन्ट्रेटेड एफ्लुएंट स्ट्रीम 6.5 केएलडी और सामान्य एफ्लुएंट स्ट्रीम 19.0 केएलडी में अलग किया जाएगा।	
12	Domestic Effluent	उत्पादन प्रक्रिया और अपशिष्ट जल उपचार प्रक्रिया के दौरान उत्पन्न ठोस अपशिष्ट मुख्य रूप से sludge है जिसका का निष्पादन अपशिष्ट (Management & Trans boundary Movement) नियम, 2008 (संशोधन 2016) के अनुसार अधिकृत TSDF सुविधा के द्वारा किया जाएगा। यूनिट के खतरनाक अपशिष्ट का निष्पादन अपशिष्ट (प्रबंधन, हैंडलिंग और ट्रांसबाउंड्री मूवमेंट), नियमों के तहत किया जायेगा।	
13	Odor Control Mitigation Measures	<ul style="list-style-type: none"> • गंध को दूर करने के लिए Wet scrubbing system रखा जाएगा जिसमें या तो एक उपयुक्त विलायक में अवशोषण या एक उपयुक्त अभिकर्मक के साथ रासायनिक उपचार शामिल है। • अवशोषण प्रणाली/स्क्रबर से पहले डबल कंडेन्सर सिस्टम का provision किया जायेगा जो आमतौर पर vapour stream को ठंडा और condense करने के लिए पानी या हवा का उपयोग करता है। • सभी उपकरणों को बेहतर हाउसकीपिंग के लिए नियमित रूप से स्टीम किया जायेगा। • bacterial contamination को नियंत्रित करने के लिए इफेक्टिव बायोसाइड्स का उपयोग किया जायेगा। तापमान का नियंत्रण सड़ने वाले सूक्ष्म जीवों के उत्पादन से बचने के लिए नालियों में ब्लीचिंग पाउडर का नियमित उपयोग किया जायेगा। • A Closed operation of the process should be practiced effectively. 	
14	The total fixed cost of the project is estimated as	INR 2591.39lacs	

- viii. अधिसूचना में निहित प्रावधानों के तहत जनसुनवाई अतिरिक्त जिला दण्डाधिकारी रायसेन की अध्यक्षता में दिनांक 12.09.2022 को ग्राम पंचायत भवन परिसर, ग्राम बरला तहसील साँची जिला रायसेन में आयोजन किया गया। लोक सुनवाई में उपस्थित लोगों से प्राप्त सुझाव एवं आपत्ति के अनुसार परियोजना प्रस्तावक द्वारा सभी विन्दुओं पर जवाब प्रस्तुत किया गया।
- ix. उक्त प्रकरण को राज्य स्तरीय विशेषज्ञ मूल्यांकन समिति की बैठक 611 वीं दिनांक 14.12.2022 में पर्यावरण स्वीकृति हेतु अनुशंसित किया गया, उक्त बैठक की कार्यवाही विवरण पृष्ठ क्र. 12 से 21 तक अंकित है।
- x. For protection of seasonal drain on the eastern side at approx 280 meters for which PP submitted that it will be zero liquid discharge unit and additionally they have proposed bamboo and khas slips plantation on the banks of this seasonal drain.
- xi. PP has obtained CTE vide letter no. 56904 dated 19/10/22 from the M.P. Pollution Control Board.
- xii. The fly ash generated from the boiler will be disposed off through sale to the brick manufacturers.

Based on the information submitted at Para i to xii above and others, the State Level Environment Impact Assessment Authority (SEIAA) considered the case in its 764th meeting held on 29.12.2022 and decided to accept the recommendations of 611th SEAC meeting held on dated 14.12.2022.

Hence, Prior Environmental Clearance is accorded under the provisions of EIA Notification dtd. 14th September 2006 & its amendments to the proposed Bulk Drugs & its Intermediates Production at Khasra No. 298/2, 298/3/2 at Village - Barla, Tehsil Sanchi, Dist. Raisen, (MP) Production Capacity - 200 TPA by M/s. Headway Life Sciences Pvt. Ltd, E-3/185, Arera Colony, Dist. Bhopal, MP - 462016 subject to the compliance of the Standard Conditions and the following additional Specific Conditions as recommended by SEIAA & SEAC in its meetings.

A. Specific Conditions as recommended by SEIAA

1. परियोजना स्थल नेशनल हाईवे के नजदीक स्थित है अतः इकाई के निर्माण तथा मशीनरी के स्थापना हेतु नियमानुसार दूरी का परिपालन सुनिश्चित करे। साथ ही इकाई को प्लाट के पिछले हिस्से में स्थापित करे ताकि नेशनल हाईवे से उसकी दूरी अधिकतम रहे।
2. परियोजना में उत्सर्जित खतरनाक अपशिष्टों का प्रबंधन पर विशेष व्यवस्थाओं पर ध्यान रखा जाये। उत्सर्जित खतरनाक अपशिष्टों का लेखा रखा जाये एवं उनका निष्पादन कैसे हुआ का भी विवरण का रिकार्ड रखें। यह सतत प्रक्रिया हो जिससे प्रतिदिन संधारित किये जाये एवं उनका विवरण मं.प्र. प्रदूषण नियंत्रण बोर्ड को अर्ध वार्षिक आधार पर भेजा जाये।
3. परियोजना में उत्सर्जित अपशिष्ट जैसे Spent HCL, H₂SO₄ एवं Bromine को अधिकृत रिसाइकलरों को बेचा जाये।
4. खतरनाक रसायनों, गैसों के प्रबंधन पर समुचित ध्यान रखा जाये एवं आपदा से निपटने के लिये समय-समय पर माकड्रिल आयोजित की जाये।
5. परियोजना में ZLD की शर्त अनिवार्य रूप से अधिरोपित है, परियोजना अंतर्गत उच्च COD वाले जल अपशिष्ट के MEE एवं ATFD द्वारा उपचारित किया जायेगा एवं निष्पादन हेतु भेजा जायेगा। निम्न COD वाले जल अपशिष्ट का उपचार ETP से उपचारित कर पुर्न उपयोग किया जायेगा।
6. परियोजना अंतर्गत उत्सर्जित उष्मा का समुचित प्रबंधन कर पुर्नउपयोग किया जाये।
7. ईकाई से निकलने वाली दुर्गन्ध के शमन के लिये Guidelines on Odour Pollution & Its Control, May 2008, Central Pollution Board, Ministry of Environment Govt. of India के सुझाये उपायों के अनुकूल व्यवस्था की जाये।
 - a. दुर्गन्ध उत्पन्न करने वाले घटकों को चिह्नित कर उनके लिये पर्याप्त बफर जोन रखा जाये। ETP के आस पास भूदृश्यीकरण कर उसे सुसज्जित करे साथ ही सुगंध उत्पन्न करने वाले पौधों / झाड़ियों का रोपण इस क्षेत्र में करे।
 - b. दुर्गन्ध वाले क्षेत्रों की सीमा रेखा पर नोजल स्प्रेयर एवं एटलाइजर का निरंतर छिड़काव की व्यवस्था की जाये।
 - c. उपाय जैसे मिस्ट फिल्टरेशन, वेट स्क्रबिंग, केमिकल उपचार एवं ग्रीन बेल्ट जैसे अन्य उपायों से दुर्गन्ध शमन पर प्रभावी कदम उढ़ाये जाये।
8. परियोजना अंतर्गत कार्बन फुट प्रिंट को कम करने के लिये गैर पारंपरिक ऊर्जा का उपयोग किया जाये एवं CO₂ उत्सर्जन पर नियंत्रण के उपायों पर भी व्यापक कार्य योजना बनाकर लक्ष्य प्राप्ति हेतु सतत प्रयत्न अनिवार्य रूप से किया जाये।

9. सघन हरित क्षेत्र (33% से कम नहीं) साइट के चारों ओर विशेष रूप से प्रमुख हवा की दिशा में विकसित किया जाना चाहिए ।
10. Effluent को त्रिस्तरीय उपचार प्रणाली तक उपचारित करने के लिए प्रस्तावनानुसार ETP अनिवार्य रूप से नियोजन किया जाये ।
11. जन सुनवाई में उठे मुद्दों का निश्चित रूप से परिपालन किया जाना सुनिश्चित करे।

12. Waste water Management:

- (a) PP should maintain zero discharge from the Industry as proposed.
- (b) Separation of High & Low COD values effluent for better management of process effluent.
- (c) RO treated water will be recycle for the process and High COD effluent generation shall be completely evaporated with help of MEE so as to achieve zero discharge.
- (d) There shall be no industrial effluent discharge from the unit.

13. For Air Pollution:

- (a) PP should ensure air pollution control measures and stack height as proposed in the EIA/ EMP.
- (b) The performance of air pollution control system should be regularly monitored and maintained.
- (c) PP should ensure regular stack monitoring & ambient air quality monitoring and should be carried out as per the guidelines/norms of MPPCB/CPCB.
- (d) In plant control measures for checking fugitive emission from all the vulnerable sources shall be provided. Fugitive emission shall be controlled by providing closed storage, closed handling & conveyance of chemicals/materials, multi cyclone separator/bag filters and water sprinkling system.
- (e) Dust suppression system including water sprinkler system/ foaming arrangement shall be provided at loading and unloading areas to control dust emission.
- (f) Fugitive emission in the work zone environment, product, raw material storage areas etc. shall be regularly monitored.
- (g) Transportation of raw material and finished goods should be carried out in covered trucks.
- (h) For control of fugitive emission and VOCs following steps should be followed:-
- Chilled brine circulation system shall be provided and it should be ensured that the solvent recovery efficiency will not be less than 95%.
 - Reactor and solvent handling pump shall be provided with mechanical seal to prevent leakage.
 - Closed handling system should be provided for chemicals.
 - System of leak detection and repair of pump/pipeline should be based on preventive maintenance.
 - Solvent shall be taken from underground storage tank to reactor through closed pipeline. Storage tank shall be vented through trap receiver and condenser operated on chilled water.

14. Hazardous Waste:

- (a) PP should ensure disposal of hazardous waste regularly and there should be no dumping of these materials in the premises/outside.
- (b) PP should ensure handling, disposal and management of hazardous waste as per the related prescribed rules.
- (c) PP should obtain renewal of authorization regularly from MPPCB for collection storage and disposal of hazardous waste (Management, Handling & Trans Boundary Movement) Rules 2008 and its amendments. Membership of the TSDF should be obtained for hazardous waste disposal.

- (d) Hazardous chemicals should be stored in sealed tanks, drums etc. Flame arrestors shall be provided on tanks. To avoid the spillage from processing unit, Industry shall provide fully mechanized filling and packaging operation unit.
- (e) PP should provide RCC layer and double layered HDPE lining for primary and secondary leachate collection.
15. PP should ensure installation of photovoltaic cells (solar energy) for lighting in common areas, LED light fixtures and energy efficient equipments.
16. **Green Belt:**
- (a) PP should ensure plantation in area of 33% of the total plot area and Plantation in the project area of indigenous local varieties like Neem, Peepal, Kadam, Kachnaar etc.
- (b) Every effort should be made to protect the existing trees on the plot.
- (c) Green area including thick green-belt shall be developed in the plot area to mitigate the effect of fugitive emissions all around the project area in consultation with the forest department as per the guidelines of CPCB.
17. PP should ensure the implementation of CER activities on regular basis in consultation with the Gram Panchayat of the respective villages & also adopt nearby villages for development of infrastructure in Anganwadi.
18. PP should obtain NOC /approval from competent authority for health & safety measure, Onsite & Offsite disaster management, and Risk management plan before commencing the operation of the unit.
19. In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.
20. PP should ensure to conduct regular on site and of site mock drill as per Health and Safety Norms.
21. PP should ensure disposal of storm water (if any) with proper drainage system.
22. Total quantity of runoff water generated and green belt area should be collected in underground tank & used for process in plant to minimize fresh water requirement.

B. Specific Conditions as recommended by SEAC

I Statutory Compliance

- i. The project proponent shall obtain Consent to Establish/Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of Pollution) Act, 1974 from the Madhya Pradesh Pollution Control Board (MPPCB).
- ii. The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.
- iii. The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act (MVA), 1989.

II Air quality monitoring and preservation

- i. The project proponent shall install 24x7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connected to MPPCB and CPCB online servers and calibrate these system from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.
- ii. The project proponent shall monitor fugitive emissions in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.
- iii. To control source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emissions from the boiler, DG set and scrubber shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.
- iv. Storage of raw materials, chemicals etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.

- v. The DG sets (500 kVA) shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.
- vi. National Emission Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608(E) dated 21st July, 2010 and amended from time to time shall be followed.
- vii. The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R. No. 826(E) dated 16th November, 2009 shall be complied with.

III Water quality monitoring and preservation

- i. The project proponent shall provide online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within the premises.
- ii. As already committed by the project proponent Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises.
- iii. Net waste water generation will be 2071 KLD. Blow downs from cooling towers, boiler, scrubber, Softener regeneration, Vacuum pump approx 1821 KL will go to ETP (40 KLD capacity), 150 KLD high COD high TDS wastewater will be sent to MEE (15 KLD capacity)/ ATFD followed by ETP.
- iv. PP shall be ensured solvent recovery for more than 95% and left out salt shall send to the CTSDF site.
- v. The Low COD/TDS effluent along with blowdown from utility and washing activity will be treated in an on-site ETP followed by RO& MEE. The treated effluent will be reused/recycled.
- vi. Adhere to 'Zero Liquid Discharge and No industrial effluent from the unit shall be discharged outside the plant premises. PP should also install Internet Protocol PTZ camera with night vision facility along with minimum 05X zoom and data connectivity must be provided to the MPPCB's server for remote operations.
- vii. The effluent discharge shall conform to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified by the Madhya Pradesh Control Board while granting Consent under the Air/Water Act, whichever is more stringent.
- viii. Total fresh water requirement shall not exceed 23.5 KLD.
- ix. Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.
- x. The Company shall harvest rainwater, after taking permission from State Pollution Control Board, from the roof tops of the admin buildings. Process building, raw material and finished goods storage building shall not be used for ground water recharging.
- xi. Dedicated power supply shall be ensured for uninterrupted operations of treatment systems.

IV Noise monitoring and prevention

- i. Acoustic enclosure shall be provided to DG(500 kVA) set for controlling the noise pollution.
- ii. The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation.
- iii. The ambient noise levels should conform to the standards prescribed under E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.

V Energy Conservation measures

- i. The energy sources for lighting purposes shall preferably be LED based.
- ii. The total power requirements for project will be 500 KW. The power will be supplied by MPPK Vidyt Vitaran Company Limited Raisen Region.

VI Waste management

- i. Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.

- ii. As proposed, 95% solvent recovery shall be achieved and recovered solvent shall be reused in the process.
- iii. Hazardous wastes such as spent solvents, organic incinerable wastes/residues, used filter bags, packaging materials, rejected/expired raw materials and off specification/ rejected finished products from the manufacturing plants shall be directly sent to TSDF, Pithampur/ Recyclers / Pre or coprocessors
- iv. The Fly ash generated from boilers shall be stored in Covered shed and disposed of through cement manufacturers or brick manufacturers by bulkers / closed containers and should comply with Fly Ash Utilization Notification, 1999 and as amended subsequently.
- v. If any Flammable, ignitable, reactive and non-compatible wastes should be stored separately and never should be stored in the same storage shed.
- vi. Automatic smoke, heat detection system should be provided in the sheds. Adequate firefighting systems should be provided for the storage area.
- vii. In order to have appropriate measures to prevent percolation of spills, leaks etc. to the soil and ground water, the storage area should be provided with concrete floor of inert material or steel sheet depending on the characteristics of waste handled and the floor must be structurally sound and chemically compatible with wastes.
- viii. Measures should be taken to prevent entry of runoff into the storage area. The Storage area shall be designed in such a way that the floor level is atleast 150mm above the maximum flood level.
- ix. The storage area floor should be provided with secondary containment such as proper slopes as well as collection pit so as to collect wash water and the leakages/spills etc.
- x. Storage areas should be provided with adequate number of spill kits at suitable locations. The spill kits should be provided with compatible sorbent material in adequate quantity.
- xi. Recent MSDS of all the chemicals used in the plant be displayed at appropriate places.
- xii. Proper firefighting arrangements in consultation with the fire department should be provided against fire incident.
- xiii. All the storage tanks of raw materials/products shall be fitted with appropriate controls to avoid any spillage / leakage. Bund/dyke walls of suitable height shall be provided to the storage tanks. Closed handling system of chemicals shall be provided.
- xiv. Log-books shall be maintained for disposal of all types hazardous wastes and shall be submitted with the compliance report.
- xv. Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF/ Preprocessor.
- xvi. The company shall undertake waste minimization measures as below:
 - a. Metering and control of quantities of active ingredients to minimize waste.
 - b. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes.
 - c. Use of automated filling to minimize spillage.
 - d. Use of Close Feed system into batch reactors.
 - e. Venting equipment through vapour recovery system.
 - f. Use of high pressure hoses for equipment clearing to reduce waste water generation.

VII Green Belt

- i. Total 2200 trees shall be planted in the area of 9500 m² (33 % of total plot area) which is developed as greenbelt development.
- ii. Plantation details are as given below:-

Description	Qty.	Location
Neem	50	Boundary Wall
Putran Jeeva	150	Boundary Wall

Amaltash	150	Road Main Gate - Admin Block
Ficus Virens	250	Around Admin Block, road & lawn
Satparni	200	Around Admin Block, road & lawn
Ashoka Tree	300	Around Admin Block, lawn and around boundary limit (backside of the site)
Mehandi	400	Around Boundary Wall
Kanak Champa	550	Around production area
Karonda	150	Along Periphery
TOTAL	2200	In addition Katang Bass and Khus slips will be planted along the nalla with 500 no

- iii. The additional green belt of 5-10 m width shall be developed along the nalla (500 nos.) etc with bamboo, Khas slips and other local species.
- iv. Peripheral plantation all around the project boundary shall be carried out using tall saplings of minimum 2.5 feet height of species which are fast growing with thick canopy cover preferably of perennial green nature and species as suggested by the committee. As proposed 2200 nos. of plants shall be planted green belt mainly along the periphery and at open spaces at existing green belt at a distance of 2 m x 2 m to achieve 2500 Nos of trees/ Ha. PP will also make necessary arrangements for the causality replacement and maintenance of the plants.

VIII Safety, Public hearing and Human health issues

- Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.
- The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire fighting system shall be as per the norms.
- The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.
- Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.
- Provision shall be made for the housing of construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, creche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.
- Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.
- There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.

IX EMP & CER

- The proposed EMP capital cost is Rs. 456.00 lakhs and 159.00 lakhs /year as recurring cost and out of which the Environment Monitoring Cost for the project is 12.32 lakhs and Rs. 3.19 lakhs is proposed for green belt development.
- Under CER activity, capital cost is Rs. 15.00 lakhs proposed for following different activities:-

Physical Activity and Action Plan (in Lakh)			
S No	Activity	Targets	1 st Year
1	Provision of Employment	Employment to 100 + 50 people (95 % from nearby places)	-
2	Developmental Activity	Education (Construction/ Extension/ additional facilities e.g. Laboratory, Library, Computer class, Toilets, Drinking Water Facilities etc. for village schools) at village Barla,	5
i		Drinking Water Facilities (Hand Pumps, Wells, Tap Water, Water Storage Tanks, Deepening & Cleaning of Ponds, Roof Top Rain Water Harvesting Structure at village Barla.	5

ii		Infrastructure facility viz chairs, playing material, black boards, fan, For drinking water for children of Aganwadi of village Barla	5
		Total	15.00

- iii. The industry shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/ wildlife norms/ conditions. The company shall have defined system of reporting infringements deviation / violation of the environmental/ forest/ wildlife norms/conditions and shareholders /stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.
- iv. A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly to the head of the organization.
- v. Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise funds earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.
- vi. Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.

X. Miscellaneous

- i. PP shall be responsible for discrepancy (if any) in the submissions made by the PP to SEAC & SEIAA.
- ii. The project authorities must strictly adhere to the stipulations made by the MP Pollution Control Board and the State Government.
- iii. The project proponent shall abide by all the commitments and recommendations made in the EIA/EMP report, commitment made during Public Hearing and also that during their presentation to the Expert Appraisal Committee.
- iv. No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).
- v. The above conditions shall be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 and the Public Liability Insurance Act, 1991 along with their amendments and Rules and any other orders passed by the Hon'ble Supreme Court of India/ High Courts and any other Court of Law relating to the subject matter.

Standard Conditions:

1. The company shall carry out the HAZOP study and the report shall be submitted to Regional Office of MoEF, Gol at Bhopal.
2. The company shall comply with the CREP guidelines prepared by MPPCB for Bulk Drug Plants.
3. During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixings of accidental spillages with domestic waste and storm drains.
4. Industry should get the Emergency Disaster Management Plan approved by DTSH and should also comply with the provisions made in Public Liability Insurance Act, 1991.
5. All parameters listed in Environmental Monitoring Plan approved by SEAC must be monitored at approved locations and frequencies.
6. The funds earmarked for environmental protection measures shall be kept in separate account and shall not be diverted for other purpose. Year wise expenditure shall be reported to the Regional office of the Ministry of Environment and Forest, Bhopal and MP PCB.


7. All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest Conservation Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained (as and when applicable), by the project proponent from the respective competent authorities.
8. The Regional Office, MoEF, Gol, Bhopal and MP PCB shall monitor compliance of the stipulated conditions. A complete set of documents including Environment Impact Assessment Report, Environmental Management Plan, should be given to Regional Office, MoEF, Gol, Bhopal and MP PCB.
9. A copy of the environmental clearance shall be submitted by the Project Proponent to the Heads of the Local Bodies, Panchayat and Municipal Bodies as applicable in addition to the concerned Government Departments / organization responsible for controlling the proposed projects who in turn has to display the same for 30 days from the date of receipt.
10. The project proponent has to strictly follow directions/guideline issued by the MoEF, Gol, CPCB and other Govt. agencies from time to time.
11. The Project Proponent shall advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the clearance letter informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with the State Pollution Control Board and also at web site of the State Level Environment Impact Assessment Authority (SEIAA) website at www.mpseiaa.nic.in and a copy of the same shall be forwarded to the Regional Office, MoEF, Gol, Bhopal and MP PCB.
12. The Project Proponent has to upload soft copy of half yearly compliance report of the stipulated prior environmental clearance terms and conditions on 1st June and 1st December of each calendar year on MoEF & CC web portal - <http://www.environmentclearance.nic.in/> or <http://www.efclearance.nic.in/> and submit hard copy of compliance report of the stipulated prior environmental clearance terms and conditions to the Regulatory Authority also.
13. The SEIAA of M.P. reserves the right to add additional safeguard measures subsequently, if found necessary, and to take action including revoking of the environment clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguard measures in a time bound and satisfactory manner.
14. These stipulations would be enforced among others under the provisions of Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and control of Pollution) Act 1981, the Environment (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006.
15. The Ministry or any other competent authority may alter/modify the above conditions or stipulate any further condition in the interest of environment protection.
16. Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.
17. Any appeal against this prior environmental clearance shall lie with the Green Tribunal, if necessary, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
18. The prior Environmental Clearance granted for the project is valid for a period of seven years as per EIA notification dtd. 14.09.2006 & its amendments.
19. The proponent shall upload the status of compliance of the stipulated EC conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; SPM, RSPM, SO₂, NO_x (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
20. The environmental statement for each financial year ending 31st March in Form-V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as

amended subsequently, shall also be put on the website of the company along with the status of compliance of EC conditions and shall also be sent to the Regional Office of MoEF & CC, Gol.


(Mujeeb Rehman Khan)
Member Secretary

Copy to:-

- (1). Principal Secretary, Department of Environment., Government of MP, Mantralaya Vallabh Bhawan, Bhopal.
- (2). Member Secretary, SEAC, Research and Development Wing Madhya Pradesh Pollution Control Board, ParyavaranParisar, E-5, Arera Colony Bhopal-462016.
- (3). Member Secretary, Madhya Pradesh Pollution Control Board, ParyavaranParisar, E-5, Arera Colony, Bhopal-462016.
- (4). The Collector, Distt- Raisen (M.P.).
- (5). Director, I.A. Division, Monitoring Cell, MoEF, Gol, Ministry of Environment & Forest Indira Paryavaran Bhawan, JorBagh Road, New Delhi – 110 003
- (6). Director (S), Regional office of the MOEF, (Western Region), Kendriya Paryavaran Bhawan, Link Road No. 3, Ravi Shankar Nagar, Bhopal-462016.
- (7). Guard file.


(Alok Nayak)
Officer-in-Charge

