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5th August, 2019

Shri Vijay Rupani Hon'ble Chief Minister Gujarat

Respected Sir,

Reg.: National Green Tribunal's judgment dated July 10, 2019 related to Critically Polluted Area depending on CEPI score of industrial areas.

Greetings from Gujarat Chamber of Commerce and Industry.

We would like to bring to your kind notice the anomalies in the recent judgement given by National Green Tribunal on July 10, 2019 against original application no. 1038/2018 in which NGT has covered 100 industrial estates/clusters under the critically polluted area (CPA), specially polluted area (SPA) and other polluted areas 90PA) depending upon the CEPI score of each of these industrial areas.

Sir, the industries of Gujarat have always been proactive and ready to adopt new technologies aimed at mitigating the solid and liquid pollution. Gujarat is the first state to take up the initiative to control pollution by establishing Common Effluent Treatment Plants (CETPs) and TSDF Sites for industrial waste by investing huge amounts.

We at GCCI have always supported only the genuine cases of the industries and have always encouraged bold steps taken towards future betterment of the industries. We appreciate the initiatives taken by the government and NGT towards environmental conservation. However, the recent judgement of NGT is causing more harm to the genuine and compliant industrial units instead of curbing only the non-compliant polluting industrial units.

Sir, the current judgment by NGT overrides the CEPI guidelines issued in the matter and are therefore unreasonable. Further, the sampling done by GPCB and CPCB show quite different results. In this case, the benefit of doubt should be given to the industries for re-sampling. GPCB has even submitted a written request to CPCB for the same, but it has not been considered.

Sir, it is important to note that the industries have been successful in achieving approx. 90% reduction in pollution load within a short period. Further improvement from this stage shall require upgradation of technology and a comprehensive plan which requires reasonable

Durgesh V. Buch President

Natubhai Patel Sr. Vice President

Bhargav Thakkar Vice President

Sanjeev Chhajer Secretary

Dilip M. Padhya Secretary (R)



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time. We therefore request that stage-wise benchmarks from this stage onwards should be provided to the industries and reasonable time should be provided for complying with the same.

Further, in most cases, the industry is already complying to meet the environmental norms while the Civic Authorities are largely failing to comply with their treatment norms. As an example, we would like to put forth the case of Sabarmati River where out of the total discharge of approx. 1200 MLD, 1050 MLD is discharge of Ahmedabad Municipal Corporation, which is 90% untreated. On the other hand, the nearly 1200 industrial units operating in GIDC designated industrial estates at Naroda, Odhav and Vatva are discharging a total of 5.5 MLD by reducing more than 90% of their pollution load. As a step towards further improvement, these industrial estates have even started their upgradation plans. The Textile Cluster at Narol consists of around 120 industrial units and discharge a total quantity of nearly 13 MLD out of which AMC is contributing 86%, the industrial units in the textile cluster are contributing 10% and only 4% is contributed by the industrial units of Naroda, Vatva and Odhav.

Sir, under these circumstances, we strongly believe that NGT should provide more support to those industries which are already trying their best to comply to the norms and have submitted their further upgradation plans to GPCB.

Sir, we would also like to put on record that Govt. of Gujarat has already taken up the Deep-Sea Discharge project at a cost of nearly Rs. 1500 crores and necessary contribution has already been paid by the industries of Naroda, Vatva, Odhav and Narol to start the project. This Deep Sea Discharge pipeline with 300 MLD capacity will start from Naroda, Vatva and Narol and will take the effluent of Vadodara, Nandesari, Ankleshwar, Sachin Industrial Estate, Surat and will then discharge it 13 kms. in deep sea. This pipeline will remove the pollution of Sbarmati River by the industries and we are pleased to state that Deep Sea Discharge norms have already been acheieved by all the 3 CETPs namely Naroda, Vatva and Odhav which may please be taken on record.

Sir, it is the dream of our Hon'ble Prime Minister to make India a \$5 trillion economy by the year 2024. This dream could only be achieved with the support of the MSMEs. It is therefore critical to ensure that the genuine MSMEs get all possible support and do not have to face bottlenecks in their growth journey.

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We therefore request Hon'ble National Green Tribunal (NGT), Ministry of Environment and Forests, Govt. of India and Central Pollution Control Board (CPCB) to consider the positive approach taken by the industries of Ahmedabad and other cities of Gujarat for reducing/minimizing the pollution load. Harsh actions such as closure, penalties and prosecution cases should be dropped for a period of 2 years from now so that the industries get reasonable time to fully meet the GPCB prescribed norms.

We look forward to your positive intervention in the matter, and thank you in anticipation.

With Regards,

Sincerely,

Durgesh Buch President

CC: DR. Rajiv Kumar Gupta, IAS
Chairman, GPCB & Additional Chief Secretary,
Department of Forests & Environment,
Gujarat Pollution Control Board
Govt of Gujarat
Paryavaran Bhavan, Sector-10A
Gandhinagar-382010.

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5th August, 2019

Dr. Harsh Vardhan
Hon'ble Minister/EF& CC
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhavan
Jorbagh Road
New Delhi - 110 003

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Durgesh Buch President

CC: Shri S P Singh Parihar (IAS)

Chairman CPCB Parivesh Bhawan, East Arjun Nagar, New Delhi-110032 Durgesh V. Buch President

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