



5th December, 2019

Shri Mansukh Mandaviya

Hon'ble Minister of State for Chemicals & Fertilizers
Govt. of India
Transport Bhavan, Sansad Marg
New Delhi, 110001

Sir,

Subject : Suggestions for steps to be taken to achieve USD 300 billion/20-25% growth for chemical & fertilizer sectors as desired by the Hon'ble Minister for Chemicals & Fertilisers.

Greetings from Gujarat Chamber of Commerce & Industry.

This is as per the statement given by you to achieve the growth of chemical and fertilizer industries in next 5 year. We would like to put forth before you the following issues which require intervention by the Government of India on urgent basis.

Sir, currently the main hurdles in growth of Chemicals and Fertilisers industries are due to some environmental related issues. If these can be addressed properly without compromising in respect of pollution control laws, then the scenario can be changed.

1. There is an atmosphere of disappointment in the chemical and fertiliser sector due to the judgement given by NGT pertaining to CEPI and other environmental issues for various industrial clusters of India. Hence our request is that the MoEF&CC may put CEPI in abeyance for next 5 years, because there are enough environmental laws and powers are available with CPCB and SPCBs to take actions against defaulting industries to take care of pollution attributed by the Industries.

2. If abeyance of CEPI for next 5 years is not possible, then keep all the punitive actions arising from high CEPI score of critically polluted areas and severely polluted areas on hold for next 5 years, for example processing of the Environment Clearance applications of B1 category industries of CPAs and SPAs are now shifted

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to Central Government from the State Government. The data of Andhra Pradesh, Uttar Pradesh, Gujarat etc. shows that the EC and expansions applications are processed and SPAs are now shifted to Central Government from the State Government. The data of Andhra Pradesh, Uttar Pradesh, Gujarat etc. shows that the EC and expansions applications are processed more rapidly and fast at the State then at the Centre level. The authentic data reveals that more than 200 such cases are cleared in more than 500 days at the Centre against the stipulated norms of 120 days while States are taking not more than 150 days. Moreover, State has equal technical capacity and capabilities as Centre to deal with such applications.

Our request is to direct CPCB to allow states to process the EC and expansion applications at their end irrespective of categories of industries of CPA and SPA.

3. The public consultation clause is mostly misused by the so called NGOs by provoking public against establishing Common Environment Infrastructure and as a result no landfill site by co-operative bodies for industrial solid waste is allowed to commission in the state of Gujarat. The private players have managed to establish their landfill site. Hence our request is to direct MoEF&CC to remove the clause of public hearing for the common environmental infrastructure projects which are working on co-operative basis for more than 5 years. We would also like to request you to kindly direct State Governments to provide notified land to industrial clusters for the landfill sites of the capacity up to next 25 years on nominal rate. This will boost the growth of chemical and fertilizer sectors in manifolds.

4. At the moment CPCB and SPCBs are not involving Industries Associations and Common Environmental Infrastructures authorities in the committees related to policy making for the environmental issues of the industries. We request you to advise MoEF&CC to make it compulsory to involve Industries Associations of concerned areas in all the committees of CPCB and SPCBs related to policy making process.

5. At present there is no financial assistance available for setting up the Common Environment Infrastructure by the Central Government. The State Government is giving only 25% of the project cost that is up to a ceiling of Rs.50 crores which is insufficient. We need at least 75% of the project cost up to a ceiling of Rs.100 crores from Central and State Governments for setting up the Common Environment Infrastructure Projects.

Gujarat Chamber of Commerce & Industry



ગુજરાત વેપારી મહામંડળ ગુજરાતી કાર્યવિત

6. At the moments CPCB and SPCBs are pressurising the industries and industrial cluster to establish Zero Liquid Discharge System (ZLDs), even though it is not techno economically viable. The carbon foot print is also higher in ZLD than regular discharge. Hence our request is to appraise MoEF&CC to direct CPCB and SPCBs not to pressurise industries and industrial clusters to go for ZLD where CETPs and other common environmental infrastructure are available. Instead of that, the focus should be given on recycling of treated sewage and discharge of treated effluent into the deep sea by establishing common deep sea disposal line, wherever feasible.

We hope that you will consider our request positively and act upon it. We ensure that if above environment related issues are cleared then the chemical and fertilizer industries will grow rapidly and fulfil your desire to go up to USD 300 billions within 5 years.

With regards,

Sincerely,

Durgesh Buch
President

C.C. to:

Hon'ble Prime Minister's Office
South Block, Secretariat Bldg.
Raisina Hill
New Delhi.