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06 January 2020

**Shri S. P. Singh Parihar, IAS**

Chairman

Central Pollution Control Board

Parivesh Bhawan, CBD-cum-Office Complex East

Arjun Nagar,

DELHI - 110 032

**Subject: Apprehension about CEPI 2018 calculations and its effects on the growth of Chemicals, Paper & Textile Industries of Gujarat**

Dear Sir,

Greetings from the Gujarat Chamber of Commerce & Industry.

The Gujarat Chamber of Commerce & Industry, is a leading organization established in the year 1949 and since then GCCI is in forefront to highlight the issues related to Industries and commercial establishments at highest level and center and state governments.

The Central Government has established Comprehensive Environmental Pollution Index (CEPI) with the objective to verify the environmental health of the industrial clusters of India. First CEPI evaluation was done in the year 2010 at 88 clusters. In the beginning, industries were not aware about effects of pollution but CEPI created that awareness and as a results Industries Associations begun to work on reducing CEPI scores based on Action Plan prepared by SPCBs.

In Gujarat nearly Rs. 2000 crores investments had been done in establishing Common Treatment facilities like CETP, Spray Dryers, MEE, TSDF, Incinerations etc. and as a results by November 2016 all the industrial clusters were out of Critically polluted area list.

As per the protocol, in 2018, CPCB had again checked the CEPI scores and surprisingly, in spite of operating all the common treatment facilities, the scores of 07 areas out of 10 are found under either CPA or SPA and as per NGT's directions, the expansion and new projects are stopped.

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We were confident that as there is massive improvement done since last decade in ambient pollution so we studied the complete documents of CEPI 2018 calculations and found some major flaws done by the CPCB. The list is as under;

1. As per the CEPI guideline 2009, page no 24, Criteria pollutants shall be selected prior to CEPI monitoring but in CEPI 2018 calculations, it is not followed and the criteria pollutants selected based on worst scenario case after seeing the monitoring results.
2. There are many source apportionment studies done in the country and it revealed that not a single ambient air pollutants is origin only from the Industries alone so as per the guideline given in the Revised CEPI 2016, criteria pollutants are to be selected as per predominant of the industrial activities of that area but in CEPI 2018 calculations it is ignored. Particularly in the cases of where PM10 & PM 2.5, Total Hardness and total dissolved Solids are selected for calculations, the industries have to suffer a lot without contributing to it fully.
3. There is also mentioned in the guidelines of CEPI that outlet of ETP, CETP shall not to be considered in surface water calculation for factor B but we found that in CEPI 2018 calculation, CPCB had considered CETP outlets in the calculation in Vatva – Narol, Vadodara, Surat Etc. Such error makes a huge difference in score and also put such estates in bad shape in spite of doing remarkable work in control pollution control.
4. We also came to know that Member Secretary GPCB wrote a letter to MS - CPCB on 19<sup>th</sup> December 2018 and clearly mentioned about criteria pollutants to be selected for CEPI calculations but it was not considered.

Sir, our humble request to your good self to look into our submission and instruct your CEPI team to be very careful in CEPI calculations because the impact of such misleading calculations is highly negative on Industrial growth. It is a loss to States and Nation both.

With Regards,



**Yogesh Parikh**

**Chairman – Environment Committee, GCCCI**