



ગુજરાત વેપારી મહામંડળ

Gujarat Chamber of Commerce & Industry



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Hon. Treasurer

29th September, 2022

28193

The Member Secretary,
Gujarat Pollution Control Board,
Gandhinagar.

Sub: NOC for change in product mix

Dear Sir,

Greetings from Gujarat Chamber of Commerce & Industry.

This representation is with respect to the industries that wish to go for change in product mix without an increase in the pollution load.

There are many industries which were established prior to EIA Notification dt. 14/09/2006. Before 2006 notification, Environment Clearance (EC) was not required in many categories and hence these industries have not obtained EC at the time of establishment. In cases where there is no increase in pollution load and if industry has obtained prior Environment Clearance, then GPCB is giving NOC for change of product mix and GPCB is not insisting for Fresh Environment Clearance (EC).

However, for industries which had not obtained prior EC, GPCB is not giving NOC in change of product mix even though pollution load has not increased. In other words, these industries have to apply and obtain fresh Environment Clearance in spite of no increase in pollution load. The industries have to pass through the entire process of EC, which is time consuming and also adding to the financial burden.

Recently MoEF&CC has given clarification in case of Primary metallurgical industry sector regarding applicability of EC. MoEF&CC has clarified that **“those plant/unit established /running before the EIA notification 2006 with valid CTO may not require EC if no expansion/ modernization/change in product has been done / proposed post issue of EIA Notification 2006.”** Similarly other types of industries established before 2006 Notification may also be exempted from obtaining fresh EC.

We kindly request you to consider our presentation for exemption in EC during change of product mix application for those industries established before 2006 Notification and which have not obtained prior EC. We also request you to obtain necessary clarification in this regard from MoEF&CC, if required.

With regards,

Pathik Patwari
President.