



To,
The Member Secretary,
Goa- SEIAA
1st Floor, Pandit Deendayal
Upadhyay Bhavan, Behind Pundalik
Devasthan, Near Sanjay School,
Porvorim, Bardez, Goa – 403 521.

Date : 1st December, 2021
From : Director, Goa Plant
Sidharth Choudhary
Phone : 0832 – 2347100
e-mail : choudhary.s@pg.com
Letter No. : HSE/21/97

Subject: Half yearly compliance report with regards to Environmental clearance no. 3-181-2010/STE-DIR/176 dated 26th November 2015 for Proposed expansion in manufacturing capacity of the existing enhancement of bulk drug product in Procter & Gamble Ltd (Formerly Known as Merck Limited), plot No. 11/1, Marvasodo, Usgaon, Ponda, Goa.

Dear Sir,

With reference to the environmental clearance of enhancement of production capacities of bulk drug products, the Proposed expansion project had been completed. Please find attached herewith half yearly condition wise compliance report for the period from 1st Jan 2021 to 30th June 2021.

Thanking you.

Yours faithfully,
For **PROCTER & GAMBLE HEALTH LIMITED**

Sidharth Choudhary
Director, Goa Plant

CC : Member Secretary, GSPCB
: Additional Principal Chief conservator
of Forests (C), Bengaluru.

Registered Office :

Procter & Gamble Health Limited
CIN L95999MH1967PLC013726
Godrej One, 8th Floor, Pirojshanagar,
Eastern Express Highway, Vikhroli East,
Mumbai - 400 079 | Tel: (91) 22 6266 6000

Site Address:

Procter & Gamble Health Limited
CIN L95999MH1967PLC013726
Usgaon, Ponda Taluka,
Goa 403 607 | Tel: (91) 832 234 7000
www.pghealthindia.com

**Half yearly EC compliance report for Environmental Clearance
Period : From January 2021 to June 2021**

Subject : Proposed expansion in manufacturing capacity of the existing enhancement of bulk drug product in M/s Procter & Gamble Ltd (Formerly Merck Limited) , plot No. 11/1, Marvasodo, Usgaon, Ponda, Goa.
Ref no. : 3-181-2010/STE-DIR/176 dated 26th November 2015

Sr. No.	General Conditions	Compliance	Annexures, if any
1	a. The PP should use Ready-Mixed Concrete (RMC) to minimize air / water / land pollution and water usage during the construction phase. b. PP should prioritize the issues related to health and hygiene in complying with the matters related to waste disposal <i>and</i> treatment / air and water <i>pollution</i> / Waste-water management.	The expansion in production quantities is done in the existing facility without any additional construction of buildings. Modifications done internally with addition of reactor. Issues related to health & hygiene is taken care while complying to waste management issues. Existing wash rooms, drinking facility, canteen are used during the modification work.	
2	c. PP should not disturb the natural drainage and as far as possible maintain the original topography while designing for landscape development by planting local plant species and which are not alien to the prevailing environment,	No change in drainage systems are done. Existing effluent piping are used.	
3	d. PP should clarify any issue related to public objections. if any, and should not conceal the scientific facts in light of the proposed developmental activity vis-a-vis its landuse categorization /zoning.	No objections received from public till date.	
4	e. PP should submit half-yearly compliance report(s) in hard as well as soft copy format to the Authority for the period upto project completion.	Half yearly compliance report are furnished in hard as well as soft copy format to the Authority for the period upto project completion.	
5	f. This environmental clearance is issued subject to restricting of total Built up Area 34226 sq.mts.	Total built-up area of 34226 is maintained for implementation of the subject expansion project. No additional land is used for the project. Internal modification is done.	

7	<p>g. This environmental clearance is issued subject to land use verification. Local authority /planning authority should ensure this with respect to Rules, Regulations, Notifications, Government Resolutions, Circulars. etc. issued if any. Judgements/orders issued by Hon'ble High Court, Hon'ble NGT, Hon'ble Supreme Court regarding DCR provisions, environmental issues applicable in this matter should be verified. PP should submit exactly the same plans appraised by the concern Goa-SEAL and Goa-SEIAA. If any discrepancy found in the plans submitted or details provided in the above para may be reported to this Authority. This environmental clearance issued with respect to the environmental consideration and it does not mean that Goa-SEIAA approved the proposed land.</p>	<p>The expansion in production quantities is done in existing facility without any addition construction of buildings.</p>	Annexure 1 Plan of OXY, Vit E, TDS is attached
8	<p>h. PP to ensure no treated water or any waste sewage shall be discharged into any water body.</p>	<p>No treated water or any waste sewage is discharged into any water body. Site is ZLD plant. Effluent is treated & used for utilities & for irrigation.</p>	
9	<p>i. E-waste shall be disposed through Authorised vendor as per E-waste (Management and Handling) Rules. 2011.</p>	<p>E-waste is disposed through Authorised vendor as per E-Waste (Management) Rules, 2016.</p>	Annexure 2 E waste manifest is attached
10	<p>j. Occupation certificate shall be issued to the project only after ensuring availability of drinking water and connectivity of the sewer line to the project site.</p>	<p>Occupation certificate is not required as the expansion is in the existing facility. Drinking water, wash rooms are available in the premises.</p>	
11	<p>k. ETP capacity shall be increased appropriately considering waste water generation.</p>	<p>No increase in ETP capacity was required as vacant capacity was available to take the additional load.</p>	
12	<p>1. This environmental clearance is issued subject to obtaining NOC from Forestry & Wildlife angle including clearance from the standing committee of the National Board for wildlife as if applicable & this environmental clearance does not necessarily implies that Forestry & Wildlife clearance granted to the project which will be considered separately on merit.</p>	<p>NOC from Deputy Conservator of Forests, Wild Life & Ecotourism is available.</p>	Annexure 3 NOC from Deputy Conservator of Forests, Wild Life & Ecotourism is attached

13	m. PP has to abide by all the conditions stipulated by Goa-SEAC & Goa-SEIAA.	All the conditions stipulated by Goa-SEAC & Goa-SEIAA are followed	
14	n. The height, construction built up area of proposed construction shall be in accordance with the existing FSI/FAR norms of the urban local body & it should ensure the same along with survey number before approving layout plan and before according commencement certificate to proposed work, Plan approving authority should also ensure the zoning permissibility for the proposed project as per the approved development plan of the area.	The expansion in production quantities is in the existing facility without any additional construction of buildings. No change in building plan.	
15	o. All required sanitary and hygienic measures should be in place before starting construction activities and to be maintained throughout the construction phase.	The expansion in production quantities is in the existing facility without any additional construction of buildings. Drinking water, Washrooms are available in existing building.	
	General conditions for construction phase	Compliance	
1	i. 'Consent to Establish' shall be obtained from the Goa State Pollution Control Board (GSPCB) under Air Act and Water Act. as applicable and a copy shall be submitted to the Authority before start of any construction work at the site.	Received consent to operate from Goa State Pollution Control Board. Having valid CTO (Consent to operate no. 12/2020-PCB/531609/R0004148 Dated 13/-1/2021). Valid till 02/07/2025.	Annexure 4 CTO Attached is attached
2	ii. Permission to draw groundwater, as applicable. shall be obtained from the Groundwater Cell of the Water Resources Department (WRD) prior to construction / operation of the project.	Permission to draw groundwater, are available from the Groundwater Cell of the Water Resources Department (WRD) for the existing facility. In case of any additional requirement, necessary permissions will be obtained.	Annexure 5 WRD permissions is attached
3	iii. Project proponent shall not make any change in the Surface Layout Plan / Civil Plan submitted to the Authority without its prior permission, In case of any change(s) in the scope of the project and/or otherwise, the project would require a fresh appraisal by the Authority.	No change is made in the Surface Layout Plan / Civil Plan.	
4	iv. Project proponent shall make suitable provisions for sewage / wastewater disposal and storm water release independently.	The expansion in production quantities is done in existing facility without any additional construction of buildings. There is existing sewage system/ effluent transfer system which is not changed.	

5	v. The diesel generator sets (D.G. set) to be used during construction / after commissioning should be low-sulphur diesel type and should conform to Environment (Protection) Rules prescribed for air and noise emission standards as laid down by the GSPCB.	There are existing DG sets which are used in case of power failure. The Diesel used is of low sulphur content. The flue gas from stack of DG is analysed on quarterly basis as per consent condition from external MoEF recognised laboratory.	Annexure 6 Analysis report of DG sets is attached
6	vi. The installation of the Effluent Treatment Plant (ETP) should be certified by the GSPCB and a report in this regard should be submitted to the Authority before the ETP is commissioned.	There is existing ETP and no change is done in the ETP for the expansion project.	
7	vii. Adequate drinking water and sanitary facilities should be provided for construction workers at the site. Provision should be made for mobile toilets. The safe disposal of waste water and solid waste generated during the construction phase should be ensured.	Drinking water facility & wash rooms are available in the existing facility. The same were used during the expansion work.	
8	viii. The solid waste generated should be properly connected and segregated. Dry /inert solid waste should be disposed off to the approved sites for land filling after recovering recyclable material.	The solid waste generated (metal) is sold as scrap to scrap vendor. No inert waste generated during the project.	
9	ix. Disposal of muck during construction phase should not create any adverse effect on the neighbouring communities and be disposed taking the necessary precautions for general safety and health aspects of people, only in approved site with the approval of competent authority.	The expansion in production quantities is done in existing facility without any additional construction of buildings. Waste generated during the project was stored at site without any adverse effect to the neighbourhood. The waste was disposed to authorised vendors.	
10	x. Arrangements shall be made that waste water and storm water do not get mixed.	Arrangement is already in place of segregating process effluent & rain water. Effluent is carried through pipelines whereas rain water is carried through open drains.	Annexure 7 Photos of storm water drain & effluent pipes is attached
11	xi. All the top soil excavated during construction activities should be stored if or use in horticulture/landscape development within the project site.	Soil during civil activities are refilled in the same area. No excess soil is generated during the project.	

12	xii. Additional soil for levelling of the proposed site shall be generated within the sites (to the extent possible) so that natural drainage system of the area is protected and improved.	The expansion in production quantities is done in the existing facility without any additional construction of buildings. No additional soil was used in the project.
13	xiii. Green belt development shall be carried out considering CPCB guidelines including selection of plant species and in consultation with the Forest/Agriculture Department.	Green belt is already existing in the premises. The capacity expansion project is carried out without any additional construction activity at the site.
14	xiv. Soil and ground water samples will be tested to ascertain that there is no threat to ground water quality by leaching of heavy metals and other toxic contaminants.	The capacity expansion project is carried out without any additional construction activity at the site.
15	xv. Construction spoils, including bituminous material and other hazardous materials must not be allowed to contaminate water courses and the dump sites for such materials must be secured so that they should not leach into ground water.	The capacity expansion project is carried out without any additional construction activity at the site.
16	xvi. Any hazardous waste generated during construction phase should be disposed off as per applicable rules and norms with necessary approvals of the GSPCB.	The capacity expansion project is carried out without any additional construction activity at the site. No hazardous waste generated during the expansion activity.
17	xvii. The diesel requires for operating DG sets shall be stored in underground tanks and if required. Clearance from concerned authority shall be taken.	The capacity expansion project is carried out without any additional construction activity at the site. Site has DG sets & storage facility for HSD.
18	xviii. Vehicles hired for bringing construction material to the site should be in good condition and should have a pollution check certificate and should conform to applicable air and noise emission std and should be operated during non-peak hrs.	Checks of the vehicles are done at the security office at the main gate. PUC are checked before entry. Vehicles complying to all norms are allowed to enter the site.
19	xix. Ambient noise levels should conform to residential standards both during day and night. incremental pollution load on the ambient air and noise quality should be closely monitored during construction phase. Adequate measures should be made to reduce ambient air and noise level construction phase, so as to conform to the stipulated standard by CPCB/ GSPCB.	The capacity expansion project is done in the closed building. No increase in the ambient noise. Ambient noise is monitored on quarterly basis from external laboratory.

20	xx. The approval of competent authority shall be obtained for structural safety of the buildings due to any possible earthquakes, adequacy of fire fighting equipments etc. as per National Building Code including measures from lighting.	Structural stability is checked from competent authority are monitored on regular basis.	
21	xxi. Storm water controlled and its re use as per CGWB and BIS standard for various applications.	Storm water is collected in rain water collection pond and is used to recharge ground water table.	
22	xxii. Water demand during construction should be reduced by use of pre-mixed concrete, curing agents and other best practices referred.	The expansion in production quantities are done in existing facility without any additional construction of buildings.	
23	xxiii. The ground water level and its quality should be monitored regularly in consultation with ground water authority.	The expansion in production quantities are done in existing facility without any additional construction of buildings. No additional water is used for the project.	
24	xxiv. The installation of the Effluent Treatment Plant (ETP) should be certified by an independent expert and a report in this regard should be submitted to GSPCB before the project is commissioned for operation. Discharge of this unused treated effluent, if any should be discharged in the sewer line. treated effluent emanating from ETP shall be recycled / refused to the maximum extent possible. Discharge of this unused treated effluent, if any should be discharged in the sewer line. Treatment of 100% grey water by de centralised treatment should be done. Necessary measured should be made to mitigate the odour problem from ETP.	Existing ETP is having capacity for the additional pollution load. No modification/ changes done in existing ETP.	
25	xxv. Permission to draw ground water and construction of basement if any shall be obtained from the competent authority prior to construction / operation of the project.	The expansion in production quantities is done in the existing facility without any additional construction of buildings. However, permission is available from Water Resource department for drawing groundwater.	Please refer Annexure 5 Bore well permissions copy is attached
26	xxvi. Separation of grey and black water should be done by the use of dual plumbing line for separation of grey and black water.	The expansion in production quantities is done in existing facility without any additional construction of buildings. No construction activities carried out.	

27	<p>xxvii. Fixtures for showers, toilet flushing and drinking should be of low flow either by use of aerators or pressure reducing devices or sensor based control.</p>	<p>The expansion in production quantities is done in existing facility without any additional construction of buildings. Fixtures of toilets & showers are low flow devices, Taps are with sensors.</p>
28	<p>xxviii. Use of glass may be reduced upto 40% to reduce a electricity consumption and load on air conditioning. If necessary use high quality double glass with special reflective coating in windows.</p>	<p>The expansion in production quantities is done in existing facility without any additional construction of buildings.</p>
29	<p>xxix. Roof should meet prescriptive requirement as per energy conservation building code by using appropriate thermal insulation material to fulfil requirement.</p>	<p>The expansion in production quantities is done in existing facility without any additional construction of buildings. No additional construction of roof.</p>
30	<p>xxx. Energy conservation measures like installation of CFLs/ TFLs for the lighting the areas outside the building should be integral part of the project design and should be in place before project commissioning. Use of CFLs and TFLs should be properly collected and disposed off/ sent for recycling as per the prevailing guidelines/rules of the regulatory authority to avoid mercury contamination. Use of solar panels may be done to the extent possible like installing solar street lights, common solar water heater system. PP should install, after checking feasibility, solar plus hybrid non conventional source as source of energy.</p>	<p>Energy conservation measures such as CFLs & LED lamps are installed at site.</p>
31	<p>xxxi. Diesel power generating sets proposed as source of backup power for elevators and common area illumination during operation phase should be of enclosed type and conform to rules made under the environment (protection) Act 1986, The height of stack of DG sets should be equal to the height needed for the combine capacity of all proposed DG sets.</p>	<p>No additional DGs are installed for the subject expansion project.</p>
32	<p>xxxii. Noise should be controlled to ensure that it does not exceed the prescribed standards. During night time the noise levels measured at the boundary of the building shall be restricted to the permissible levels to comply with the prevalent regulations.</p>	<p>The expansion in production quantities is done in existing facility without any additional construction of buildings. However ambient noise is monitored once in a quarter from external MoEF recognised laboratory.</p>

33	<p>xxxiii. Traffic congestions near the entry and exit points from the roads adjoining the proposed project site must be avoided. Parking should be fully internalised and no public place should be utilised.</p>	<p>The expansion in production quantities is in the in existing facility without any additional construction of buildings.</p>	
34	<p>xxxiv. opaque wall should meet prescriptive requirement as per energy conservation board which is proposed to mandatory for all air conditioned spaces while it is aspiration for non- air conditioned spaces by use of appropriate thermal insulation material to fulfil requirement.</p>	<p>The expansion in production quantities is in the in existing facility without any additional construction of buildings.</p>	
35	<p>xxxv. The building should have adequate distance between them to allow movement of fresh air and passage of natural light air and ventilation.</p>	<p>The expansion in production quantities is in the in existing facility without any additional construction of buildings.</p>	
36	<p>xxxvi. Regular supervision of the above and other measures for monitoring should be in placed all through the construction phase, so as to avoid disturbance to the surroundings.</p>	<p>The expansion in production quantities is in the in existing facility without any additional construction of buildings.</p>	
37	<p>xxxvii. Under the provisions of environment protection act 1986, legal action shall be initiated against the PP if it was found that construction of the project has been started without obtaining EC.</p>	<p>EC available. Ref no. : 3-181-2010/STE-DIR/176 dated 26th November 2015 and is attached herewith.</p>	<p>Annexure 8 Copy of EC is attached</p>
38	<p>xxxviii. Six monthly compliance report should be submitted to the MOEF with copy to the Goa-SEIAA and GSPCB.</p>	<p>Six monthly compliance report will be submitted to the MoEF with copy to the Goa-SEIAA and GSPCB.</p>	<p>Annexure 9 Copy of earlier six monthly report is attached</p>
General Conditions - Post construction Phase		Compliance	

	<p>i. PP shall ensure completion of ETP. MSW disposal facility, green belt development prior to occupation of the buildings. The PP to explore possibility of utilising excess treated water in the adjacent area for gardening before discharging into sewer line. No physical occupation of allotment will be given unless all above said environmental infra structure is installed and made functional including water requirement prior certification from appropriate authority shall be obtained.</p>	<p>The expansion in production quantities is done in the existing facility without any addition construction of buildings. No change in existing ETP is done.</p>	
1	<p>ii. Wet garbage should be treated by organic waste convertor and treated waste should be utilise in the existing premises for gardening. And no wet garbage will be disposed outside the premises. Local authority should ensure this.</p>	<p>Organic waste Convertor Installation is installed at site</p>	<p>Please refer Annexure 7 - Photo of OWC is attached</p>
2	<p>iii. Local body should ensure that no occupation certification is issued prior to operation of ETP/MSW site etc. with due permission of GSPCB.</p>		
3	<p>iv. A complete set of all the documents submitted to Goa-SEIAA should be forwarded local authority and GSPCB.</p>	<p>Documents submitted to Goa-SEIAA are submitted to GSPCB as per requirement.</p>	
4	<p>v. In the case of any change(s) in the scope of the project, the project would require a fresh appraisal by Goa-SEIAA.</p>	<p>No change in the scope of the project. The project is closed with</p>	
5	<p>vi. Separate funds shall be allocated for implementation of environmental protection measures/EMP along with item wise breakups. These Costs shall be included as part of the project cost. The funds earmarked for the environment protection measures shall not be diverted for other purposes and year wise expenditure should reported to the GSPCB and Authority.</p>	<p>Adequate budget are available for Environment.</p>	
6	<p>vii. A copy of the clearance letter shall be sent by PP to the concerned local body if any, from whom suggestions/representation, if any, were received while processing the proposal. The EC letter shall also be put on the company website by PP.</p>	<p>No suggestions/ representation received from any local body. The EC letter is put on company's website.</p>	
7			

8	<p>viii. The PP shall upload the status of the compliance of the stipulated EC conditions, including results of monitoring 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 CPCB and the GSPCB. The criteria pollutant levels namely SPM, RSPM, SO₂ and NO_x (ambient levels as well as stack emissions) or critical sector 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.</p>	<p>Status of the compliance of the stipulated EC conditions including results of monitoring data is published on company's website. Online monitoring is done for ambient air, treated effluent & stack. Data on Electronic Display board is displayed.</p>	Annexure 10 Screen shot of website is attached
9	<p>ix. The environmental statement for each financial year 31st march in Form V as is mandated to be submitted by the PP to the GSPCB 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 the compliance of the EC conditions and shall also be sent to the respective regional office of the MoEF.</p>	<p>Environmental statement for the current activities is submitted to GSPCB every year.</p>	Annexure 11 Form V is attached
10	<p>x. The EC is being issued without prejudice to the action initiated in the EP act or any court case pending in the court of law and it does not mean that PP has no violated any environmental laws in the past and whatever decision under EP Act or of the Hon'ble Court will be binding on the PP hence this clearance does not immunity to the PP in the case filed against him, if any or action initiated under EP act.</p>		
11	<p>xi. In case of submission of false document and non-compliance of stipulated conditions, this Authority will revoke or suspend the EC without any intimation and initiate appropriate legal action under EP Act 1986.</p>		
12	<p>xii. The Goa-SEIAA reserves their right to act any stringent condition or to revoke the clearance if conditions stipulated are not implemented to the satisfaction of the Authority or for that matter, for any other administrative reason.</p>		

13	<p>3. Project proponent shall advertise at least in two local newspapers widely circulated in the region around the project, one of which shall be in the Konkani or Marathi language within <u>seven days</u> of receipt of this communication, informing that the proposed project has been accorded prior Environmental Clearance (EC) and the copies of the clearance letter will be available on the PP website.</p>	<p>Advertisement given in two local newspaper (The Navhind Times & Daily Gomantak on 6th December 2015) . Copy of the Advertisement is submitted with earlier report.</p>	<p>Annexure 12 Copy of newspaper advertisement is attached</p>
14	<p>4.The Environmental Clearance is being issued without prejudice to the legal interventions / court case pending in the Court of law and it does not mean that project proponent has not violated any environmental laws in the past and whatever decision of the Hon'ble Court National Green Tribunal (NGT) will be binding on the project proponent, Hence, this EC does not give immunity to the project proponent in the case filed against it.</p>		
15	<p>5.The Authority reserves the right to add any stringent conditions or to revoke the EC, if conditions stipulated are not implemented / complied with to the satisfaction of the Authority or for that matter, for any other administrative reasons.</p>		
16	<p>6. Validity of the Environmental Clearance (EC) accorded shall be for a period of 07(seven) years from the date of its issue.</p>		
17	<p>7. Any appeal against this prior environmental clearance shall lie with the National Green Tribunal (NOT), if preferred, within 30 days as prescribed under Section 16 of the National Green Tribunal Act. 2010 (<i>Cemiral Act 19 of 2010</i>).</p>		