



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

Date : 20th Jan 2021
From : Director – Goa Plant
Sidharth Choudhary
Phone : 0832 – 2347100
E mail : choudhary.s@pg.com
Letter no. : HSE/21/03

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 June 2020 to 31st Dec 2020.

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
(Formerly known as Merck Limited)
CIN: L99999MH1967PLC013726
Godrej One, 8th Floor, Pirojshanagar,
Eastern Express Highway, Vikhroli East.
Mumbai 400 079 | Tel: (91-22) 6866 9000

Site Address:

Procter & Gamble Health Limited
(Formerly known as Merck Limited)
CIN: L99999MH1967PLC013726
Usgaon, Ponda Taluka,
Goa 403 407 | Tel: (91-832) 2347105
www.pghealthindia.com

Half yearly EC compliance report for Environmental Clearance

Period : From June 2020 to Dec 2020

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.	The expansion in production quantities will be in existing facility without any additional construction of buildings. However, Ready-Mixed Concrete (RMC) will be used for minimizing air / water / land pollution and water usage for construction, if any.	
2	b. PP should prioritize the issues related to health and hygiene in complying with the matters related to waste disposal and treatment / air and water pollution / Waste-water management.	Issues related to health & hygiene will be taken care while complying to waste management issues.	
3	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 natural drainage will be disturbed. Local species of plants are already grown in the factory premises.	
4	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 land use categorization / zoning.	Any public objections will be clarified. No objections received from public till date.	
5	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 will be furnished in hard as well as soft copy format to the Authority for the period upto project completion.	
6	f. This environmental clearance is issued subject to restricting of total Built up Area 34226 sq.mts.	Total built-up area of 34226 will be maintained for implementation of the subject expansion project.	

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 will be in existing facility without any addition construction of buildings.</p>	
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 will be discharged into any water body.</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>	
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>The expansion in production quantities will be in existing facility without any additional construction of buildings.</p>	
11	<p>k. ETP capacity shall be increased appropriately considering waste water generation.</p>	<p>ETP capacity will be increased appropriately considering waste water generation.</p>	
12	<p>l. 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>Necessary permissions will be obtained from relevant Govt authorities in case required. NOC from Deputy Conservator of Forests, Wild Life & Ecotourism is available & is submitted with earlier report..</p>	
13	<p>m. PP has to abide by all the conditions stipulated by Goa-SEAC & Goa-SEIAA.</p>	<p>All the conditions stipulated by Goa-SEAC & Goa-SEIAA will be followed.</p>	

14	<p>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.</p>	<p>The expansion in production quantities will be in existing facility without any additional construction of buildings.</p>	
15	<p>o. All required sanitary and hygienic measures should be in place before starting construction activities and to be maintained throughout the construction phase.</p>	<p>The expansion in production quantities will be in existing facility without any additional construction of buildings.</p>	
General conditions for construction phase			
1	<p>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.</p>	<p>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.</p>	
2	<p>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.</p>	<p>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.</p>	
3	<p>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.</p>	<p>No change will be made in the Surface Layout Plan / Civil Plan submitted to the Authority without its prior permission,</p>	
4	<p>iv. Project proponent shall make suitable provisions for sewage / wastewater disposal and storm water release independently.</p>	<p>The expansion in production quantities will be in existing facility without any additional construction of buildings.</p>	

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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
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.	Any change in existing ETP will be informed to GSPCB.
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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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 will be in existing facility without any additional construction of buildings.
10	x. Arrangements shall be made that waste water and storm water do not get mixed.	Arrangement is already in place.
11	xi. All the top soil excavated during construction activities should be stored if or use in horticulture/landscape development within the project site.	The expansion in production quantities will be in existing facility without any addition construction of buildings.
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 will be in existing facility without any additional construction of buildings.

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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
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 expansion in production quantities will be in existing facility without any additional construction of buildings.
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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.

21	xxi. Storm water controlled and its re use as per CGWB and BIS standard for various applications. 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 will be in existing facility without any additional construction of buildings. The expansion in production quantities will be in existing facility without any additional construction of buildings.
22	xxiii. The ground water level and its quality should be monitored regularly in consultation with ground water authority.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
23	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.	Any change in existing ETP will be informed to GSPCB.
24	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 will be in existing facility without any additional construction of buildings.
25	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 will be in existing facility without any additional construction of buildings.
26	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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
27	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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.
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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>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>The expansion in production quantities will be in existing facility without any additional construction of buildings.</p> <p>Energy conservation measures such as installation of CFLs, LED lamps are already in place.</p>	
30		<p>No additional DGs will be installed for the subject expansion project.</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>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 will be in existing facility without any additional construction of buildings.</p>	
32	<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 will be in existing facility without any additional construction of buildings.</p>	
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34	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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.	
35	xxxv.The building should have adequate distance between them to allow movement of fresh air and passage of natural light air and ventilation.	The expansion in production quantities will be in existing facility without any additional construction of buildings.	
36	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.	The expansion in production quantities will be in existing facility without any additional construction of buildings.	
37	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.	EC available. Ref no. : 3-181-2010/STE-DIR/176 dated 26th November 2015 and is submitted with earlier report.	
38	xxxviii. Six monthly compliance report should be submitted to the MOEF with copy to the Goa-SEIAA and GSPCB.	Six monthly compliance report will be submitted to the MoEF with copy to the Goa-SEIAA and GSPCB.	
	General Conditions - Post construction Phase	Compliance	
1	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.	The expansion in production quantities will be in existing facility without any addition construction of buildings. Any change in existing ETP will be informed to GSPCB.	
2	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.	Canteen waste is given to piggery. (Organic waste Convertor Installation is in process)	

3	iii. Local body should ensure that no occupation certification is issued prior to operation of ETP/MSW site etc. with due permission of GSPCB.		
4	iv. A complete set of all the documents submitted to Goa-SEIAA should be forwarded local authority and GSPCB.	Documents submitted to Goa-SEIAA forwarded to local authority and GSPCB as per requirement.	
5	v. In the case of any change(s) in the scope of the project, the project would require a fresh appraisal by Goa-SEIAA.	In the case of any change(s) in the scope of the project, the project will be submitted for fresh appraisal.	
6	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.	Adequate budget / financial provision made for environmental management. Budget for 2020-2021 : Rs. 1,40,00,000/-.	
7	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.	No suggestions/ representation received from any local body. The EC letter is put on company's website.	
8	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, RSPIVI, SO2 and NOx (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.	Status of the compliance of the stipulated EC conditions including results of monitoring data will be published on company's website. Online monitoring is done for ambient air, treated effluent & stack. Data on Electronic Display board is displayed.	

9	ix. The environmental statement for each financial year 3 rd 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.	Environmental statement for the current activities is submitted to GSPCB every year.	
10	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.		
11	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.		
12	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.		
13	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 seven days 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.	Advertisement given in two local newspaper (The Navhind Times & Daily Gomantak on 6th December 2015) . Copy of the Advertisement is submitted with earlier report.	

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>Central Act 19 of 2010</i>).</p>		