# COMPLIANCE REPORT OF CONDITIONS MENTIONED IN ENVIRONMENTAL CLEARANCE FOR THE PROJECT

(E. C. Granted on dated 8th February 2021 vide F. No. J-11011/123/2016-IA II (I) Government of India, The Ministry of Environment, Forest and Climate Change, (Impact Assessment Division)

### Expansion of Manufacturing of Bulk Drugs and Intermediates from 12.85 TPM to 34.8658 TPM

(Period October 2021 to March 2022)

By



M/s. Vadivarhe Speciality Chemicals Ltd; Gut No. 204, Nashik Mumbai Highway, Taluka - Igatpuri, District - Nashik, Pin Code - 422 403 State - Maharashtra Submitted by



M/s. Vadivarhe Speciality Chemicals Ltd; Gut No. 204, Nashik Mumbai Highway, Taluka - Igatpuri, District - Nashik, Pin Code - 422 403 State - Maharashtra

### **Brief About the Proposed Project**

1. Proposed Project : Expansion of Bulk Drugs and

Intermediates

2. Proposed Capacity : 12.85 TPM to 34.8658 TPM

(Expansion Project)

3. Type of Project : As per EIA Notification 2006

Category "A" 5 (f) Section "Synthetic Organic Chemicals Industry (Bulk Drugs and

Intermediates)

4. Location Details : Gut No. 204, Nashik-Mumbai

Highway, At Post – Wadivarhe, Taluka - Igatpuri, District – Nashik, State – Maharashtra Pin - 422 403

5. Land Area : The proposed expansion project will

be in the existing land area of

12,500 sq. mtr.

6. Project Proponent : Vadivarhe Speciality Chemicals Ltd;

7. Name of the Project Proponent : Shri. Pramod Waman Gajare,

Director of the Company

8. Cost of the Proposed Project : 15 Crore (Existing 21 crore)

9. Environmental Clearance Granted : MoEF & CC New Delhi, EC Letter

dated 8<sup>th</sup> February 2021 file No. J-11011/2016-IA (I) Government of India,

Soveriment of India,

Ministry of Environment, Forest and

Climate Change,

Impact Assessment Division

## Point-wise EC Compliance Status to various stipulations, terms and conditions laid down by the Ministry of Environment Forest & Climate Change (MoFE & CC) New Delhi

	Compliance Period Octobe	er 2021 to March 2022	
	(EC Received on 8th February 2021)		
	Compliance Co Specific Con		
Sl. No.	Terms and Conditions	Compliance	
i	The Bank guarantee shall be released after successful implantation of the Remediation Plan and Natural and Community Resources Augmentation Plan, and after recommendation by Regional Office of the Ministry, EAC and approval of the Regulatory Authority. In case of failure to complete the remediation plan within stipulated time line, the fresh bank guarantee shall be submitted.	The point is noted, we are abide of complying and implementing the remediation plan, natural and community resource augmentation plan submitted during the EAC Meeting of the proposed expansion project within the time frame for the release of BG submitted to the State Pollution Control Board.  (Copy is attached at Attachment 1).	
ii	As proposed, Rs. 216.82 Lakhs towards Remediation plan and Natural and Community Resource Augmentation plan to be spend within a span of three years as per Annexure, whereas bank guarantee shall be for 5 years.	Agreed, and the company is in process to fulfill the requirement as mentioned in EC for the proposed expansion project and as proposed Rs. 216.82 lakhs are being spent towards remediation plan, natural and community resource augmentation plan within a span of three years as per plan submitted and release of BG after 5 years.  In one year the company has spent (300 trees x 1,500/-) = Rs. 4,50,000/- for development of the green belt and plantation around and Ornamental plants within the plant premises (50 trees x 1,000/-) = Rs. 50,000/- Three colored Bins each in four corners of 1 village equivalent to 12 Bins in one village so for 5 villages total number of Bins purchased is 60 Bins. The cost of each bins including extraneous expenditure is Rs. 5,000/ Similarly in the premises at various places total number of Bins purchased 21 kept in seven places inside the premises. Total	

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		number of Bins purchased are 81 and
		total expenditure made is Rs. 4,05,000/
		(Photographs are attached as Annexure
		I and Annexure II).
iii	Approval / permission of the CGWA / SGWA shall be obtained before drawing ground water for the project activities, if applicable. State Pollution Control Board (SPCB) concerned shall not issue Consent to Operate (CTO) till the project proponent obtains such permission.	<ul> <li>It is to be mentioned here that, the industry is drawing surface water from Mukane Dam for the existing project and will also be for proposed expansion project for which permission for drawl of surface water is already taken from Irrigation Department for existing plant.</li> <li>(Copy is attached at Attachment 2).</li> <li>No ground water will be drawn for the proposed expansion project.</li> </ul>
iv	Preventive measures to be taken to control ignition sources in bulk storage area and fire protection system to be established above ground storage tanks. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done.	<ul> <li>All preventive measures are already taken-up to control ignition sources in bulk storage area for the existing plant and fire protection system is in place. Solvents are stored in a specified place with all safety measures.</li> <li>Adequate control measures are provided to detect fire and fight fires.</li> <li>The major firefighting arrangement provided includes: 40 numbers of optical smoke detectors along with 8 numbers manual call points and 8 number hooters.</li> <li>Firefighting Arrangements: Fire hydrant system consisting of 17 numbers of fire hydrants have been installed and 69 numbers of fire extinguishers consisting ABC, CO2 and Foam type are installed at various locations of the premises. Same system will be applicable and in practice for expansion project.</li> <li>Nitrogen Plant is provided for blanketing while transfer of flammable solvents. Training is</li> </ul>

provided to concern personnel for the operations. Same system will be applicable and in practice for expansion project. Earthing is provided in all the electrical equipment wherever solvent handling is done. For the proposed expansion the same will be extended if required. Flame proof electrical fittings are used wherever solvent handling is done for the purpose of have expansion. We also provided earth point identification for all over the plant location. We have also earth monitoring system for solvent storage facility and earth continuity meter at solvent loading and pumping system. Same will also be done for expansion project as and when required. The company is taking proper measures and made arrangement to prevent internal tank / drums explosion in the existing project and same will be carried out for the proposed expansion project. The following safety measures have been implemented in the solvent storage area in Proper measures to be taken to prevent existing plant and it will be internal tank explosion. Chemicals that extended in the same area for are water reactive needs to be separated  $\mathbf{v}$ proposed expansion also. The from chemicals that do not react with facilities and the arrangements water. already made in the industry are as follows: 1. Gas detectors are available 2. Alarm system are in place 3. Fire hydrant system is available 4. Fire extinguishers are in place 5. Jumpers are in place at flange points 6. Earthing and bonding are in place

Following control measures are implemented in the existing plant and will be continued in the proposed expansion project: 1. Fencing and No Smoking for prohibited area, warning signage are displayed in Hindi, English and local language at prominent places (Photographs are attached at Attachment 3). Trainings are being conducted regularly to all personnel's involved / engaged in handling solvent activity. The same system will be continued for expansion project for new recruitments if any. 2. PPE's are provided personnel working at different places workplaces as per the requirements. (Photographs are attached at Attachment 4). Chemicals that are water reactive required in the expansion project separated from other chemicals and stored in a safe and protected containers to avoid any reaction with water. Proper precautions are being taken in the existing plant and will be continued in the proposed expansion to prevent inadvertent mixing of chemicals and spillages. SoP's are adopting to prevent Proper precautions to be taken to any mixing of chemicals and spillages prevent inadvertent mixing during handling of chemicals and chemicals. Standard operating solvents. Regular training related to procedures to be strictly followed vi above is also given to the personnel during handling of chemicals. Solvents working and handling chemicals to shall be stored in a separate space avoid spillages and to specified with all safety measures. inadvertent mixing of chemicals. Separate storages are created for storage of chemicals and solvents with all safety

measures and guidelines and same will also be followed for expansion project.

prevent

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proposed

will

		(Photographs are attached at
		Attachment 5).
vii	Risk assessment studies conducting 3 D modelling studies for identification of hazards, consequence analysis due to the accidental release of hazardous chemicals, quantification of risk based on failure probability of equipment, mitigation measures to reduce risk and delineation of disaster management plan shall be undertaken and submitted to the Ministry within 3 months.	Risk assessment studies conducting 3 D modeling studies for identification of hazard consequence analysis due to the accidental release of chemicals and quantification of risk based on failure probabilities of equipments, mitigation measures to reduce risk and delineation of disaster management plan are carried out and report is already submitted to MoEF & CC, New Delhi.  (Copy is attached at Attachment 6).
viii	The company shall comply with all the environmental protection measures and safeguards proposed in the documents submitted to the Ministry. All the recommendations made in the EIA / EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.	The company is complying and further will comply as per the documents submitted and recommendation in EIA / EMP Report in respect of Environment Management and Risk Mitigation Measures related to the expansion project.
ix	As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste / treated water shall be discharged outside the premises. Treated effluent shall be reused in the process / utilities. Treated Industrial effluent shall not be used for gardening / greenbelt development / horticulture.	It is to be mentioned here that zero liquid discharge is being achieved for the existing project and same will be done for expansion project also. No waste / treated effluent is discharged out-side the premises. The company is not using treated industrial effluent for green belt development / gardening / horticulture.  (The water balance diagram is attached at Attachment 7).
x	Continuous online (24x7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel / drain carrying effluent within the premises.	The activities related to the continuous online (24x7) monitoring system for stack emissions is in process. The quotations raised are scrutinized and selection of vendor is made final and PO regarding above is raised. After setting up of the continues online (24x7) monitoring system, flue gas discharge, pollutant concentration and related data will be transmitted to Central Pollution Control Board and State Pollution Control Board Server as mentioned in the condition.

		For online continuous monitoring of effluent, the company is in process to install web camera with night vision capability and flow meters in the channel / drain carrying effluent within the premises. Action related to implementation of above are also in process.  The activity regarding installation of continues monitoring system will be carried out in consultation with the State Pollution Control Board. Relevant documents (PO) related to above is enclosed at <a href="Attachment 8">Attachment 8</a> .  However, the company is monitoring flue gases emissions through stacks / vents attached to different pollution control equipments regularly. The details of the monitoring data for gases emission along with stack / vent details, ETP and STP inlet and outlet effluents (untreated and treated) along with the solid and hazardous waste generated and its disposal pattern as well as ambient air quality within the plant premises and also potable water quality are given in <a href="Attachment 9">Attachment 9</a> .
xi	The storage of toxic / hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.	Inventory with respect to quantity and storage of toxic and hazardous raw materials are already in practice for the existing project and same will be followed for the proposed expansion project.  (Copy is attached at Attachment 10).
xii	Occupational Health Center for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits / mask for personal protection.	Separate Occupational Health Center already existing in the company, the company is regularly making health check-ups of the workers and employees (Attachment 11) and accordingly deployment of the duties of the workers / employees is made in the company. The company is providing PPE's to the workers and the employees working at the workplace. Same will be followed for the expansion project.

xiii	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Safety and visual reality training shall be provided to employees.	The company is regularly and periodically arranging induction training to their workers and employees those who are engaged in chemicals / solvents handling for safety and health aspects along with the visual trainings. Pre-employment and periodic employment health checkups and health records are maintained regularly by the company and same will be followed for expansion project.  (Photographs are attached at Attachment 12).
xiv	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Fire-fighting system shall be as per the norms.	As mentioned in compliance of point no. IV, adequate fire control measures are already taken by the company for protecting the possible fire hazards during the manufacturing process in the material handling. Same will be extended and implemented to the proposed expansion project as and when required during the manufacturing of the proposed products. Firefighting system is already available in the company as mentioned earlier at various locations in the premises.
XV	Solvent management shall be carried out as follows:  (a) Reactor shall be connected to chilled brine condenser system  (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages  (c) Solvents shall be stored in a separate space specified with all safety measures  (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done  (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses  (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.	All these from (a) to (f) are already in practice in the existing plant and will be continued in the proposed expansion plant.  (Attachment 13).

		<b>Noted,</b> The permission for water
		requirement for the existing plant is
		already taken from the irrigation
		department (Copy of the same is
		attached at Attachment 14) and the
	T ( 1 ( 1 )	permission for additional water
	Total fresh water requirement shall not	requirement for the proposed expansion
	exceed 37.92 cum/day, proposed to be	is in process and awaited. (Application
	met from Mukane Dam water supply	for getting permission for additional
xvi	through tankers. Necessary permission	water requirement is attached at
	in this regards shall be obtained from	Attachment 15). The total fresh water
	the concerned regulatory authority, and	requirement will not exceed 37.92
	renewed from time to time.	cum/day for drawl from Mukane Dam.
		Necessary permission in this regard will
		be obtained from the concerned
		regulatory authority and renewed from
		time to time as mentioned in the
		condition.
		Storm water collection from the roof top
		and its storage in constructed tanks is
		available. The storm waters coming
		from low line areas are directly fed into
	Storm water from the roof top shall be	the constructed tanks through drain line.
	channelized through pipes to the	The harvested water will be used for
	storage tank constructed for harvesting	various industrial process required after
	of rain water in the premises and	proper treatment. Proper care is being
xvii	harvested water shall be used for	taken not to mix the process effluent
AVII	various industrial processes in the unit.	with the storm water as the storm water
	No recharge shall be permitted within	collection system is channelized directly
	the premises. Process effluent / any	through pipeline to the storage tank. It is
	waste water shall not be allowed to mix	to be mentioned here that storm water
	with storm water.	collection tanks are already constructed.
		The rain water harvested is being used
		Į
		for flushing and washing to save raw / treated water.
	The company shall undertake weete	Noted and agreed,
	The company shall undertake waste minimization measures as below:	a. Waste minimization is our top
	(a) Metering and control of quantities of	most priority. It is to be
		mentioned here that all the raw
	active ingredients to minimize waste	
V17:::	(b) Reuse of by-products from the	materials that are being used in
xviii	process as raw materials or as raw	the manufacturing process are
	material substitutes in other processes	added through pipelines to avoid
	(c) Use of automated filling to minimize	any spillages and contamination
	spillage	of the working area / soil. Other
	(d) Use of Close Feed system into batch	means of waste generation are
	reactors	minimum.

b. There (e) Venting equipment through vapor will by-products be recovery system generation from the proposed (f) Use of high pressure hoses for manufacturing of drugs and equipment clearing to reduce waste intermediates however these bywater generation products will not be used in the other manufacturing processes as raw materials as it is not required and will be sold to the authorized vendors. c. All the raw materials that are charged in the reactors are through pipeline and same practice will be adopted for the manufacturing of the products in expansion project, so there are no / remote chances for spillages anywhere. d. Use of closed feed system in batch reactors is already in practice in the existing manufacturing and same practice will be adopted for manufacturing of the proposed products. e. Although vapor condensing system for recovery of solvent is already installed in the existing scrubber will be plant, new installed if required in the manufacturing of proposed products to control vapors, if any. The company is already using high pressure hoses for equipment cleaning to reduce waste water generation and same will be practiced for the proposed expansion project. These practices (a) to (f) are already being adopted by the company in the existing plant and will be continued in proposed expansion unit also. (Attachment 16). The green belt of at least 5-10 m width Plantation around and within the shall be developed in nearly 33% of the premises already plant is total project area, mainly along the plant developed in 4,600 sq. mtr

(36.8%) area of the total plant area

(12,500 sq. mtr).

periphery. Selection of plant species

shall be as per the CPCB guidelines in

xix

consultation with the State Forest Additional plantation around Department. Records of tree canopy periphery of the plot boundary is shall be monitored through remote carried out (Number of plants sensing map. 300) as per Central Pollution Control Board guidelines. Proper maintenance of the plantation is taking care by the company with forest officer. the help of (Attachment 17). Noted and the company is complying for the same as per CER action plan proposed and also as per the ministry's OM dated 30/09/2020 to address the As per the Ministry's OM dated public hearing and 30/09/2020 superseding the OM dated socioeconomic issues in the study 01/05/2021 regarding the Corporate area. Environmental Responsibility, and as is The company already per the action plan proposed by the providing support project proponent to address the public educational assistant, cleanliness, hearing and socio-economic issues in and hygiene programs to the the study area, the project proponent schools, medical assistance, shall provide support for educational plantation, sanitation, waste XX assistance, cleanliness and hygiene management, drinking water schools, medical facilities in nearby villages and it program to the assistance, Plantation, Sanitation and will be continued further. waste management, drinking water The action plan given will be facility in the nearby villages. The action completed within 3 years. The plan shall be completed within three company ensures the satisfactory years as proposed. All the commitments implementation the of made during public hearing shall be commitments made during the satisfactorily implemented. public hearing. Provision for necessary budget has been made by the company under CER. (Photographs are attached at Attachment 18). The company is having quality control A separate Environmental Management equipped with necessary lab all Cell (having qualified person with facilities. infrastructures and Environmental Science instrumentations required for the Environmental Engineering additional facilities industry, specialization in the project area) xxi developed related to the infrastructure equipped with full-fledged laboratory the equipment required facilities shall be set up to carry out the analytical laboratory for environmental Environmental Management and samples analysis and monitoring. Monitoring functions. (Attachment 19). The company

having its Environment Management Cell and safety unit equipped with all the facilities and manpower. management of the industry adheres in conforming and maintaining the standards set by the State Pollution Control **Board** in totality. The organogram of EMC which is functional at M/s. Vadivarhe Speciality Chemicals Ltd; along with responsibilities are shown in (Attachment 20).

### **Compliance of other General Conditions**

No further expansion or modification in the plant, other than mentioned in the Notification. 2006 and amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change / SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry / SEIAA, as applicable, to assess the adequacy of conditions imposed and to add addition environmental protection measures required, if any

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#### Agreed and point is noted.

The EC granted by MoEF & CC, New Delhi dated 8th February 2021 for the expansion of the product manufacturing from 12.85 TPM to 34.8658 TPM. The proposed expansion is to be carried out in the existing land area. Please see the attached EC Letter from MoEF & CC, New Delhi at (Attachment 21). We have obtained CTE and CTO for the proposed expansion from MPCB (Attachment 22 a and Attachment 22 b).

The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.

The total power requirement will be 450 KVA. The main source of is MSEDCL. Solar power Electricity Generation Plant is installed at the factory premises for the energy generation between 886 units to 1063 units per day and utilized for the production activity. Same will be practiced for the proposed expansion project (Attachment **23)**.

For lighting purpose mentioned in the condition LED based advanced having energy preference in conservation and environment betterment is in practice presently (Attachment 24).

The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all source of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz 75 dBA (day time) and 70 dBA (night time).

- We are regularly monitoring noise levels in and around the plant area and found to be within the prescribed limit of Central Pollution Control Board for day and night time (Attachment 25). However for noise control measures viz. acoustic hoods. silencers and enclosures etc. are provided at all the sources of noise generation in the existing plant and will be continued / extended further for the proposed expansion as per the requirements. Moreover, additional plantation raised in and around the periphery of the plant will help to attenuate the noise level
- We have made mandatory use of PPE's for all the workers working in the noise generating area and at source equipments. We have made the peripheral plantation to reduce / attenuate the noise effect to the surrounding area. Ambient noise levels of the surrounding area are regularly monitored (Attachment 26). In addition to this. additional plantation is also carried out along the periphery and within the plant area to restrict the pollutants and noise levels. (Photographs are attached at Attachment 27).

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The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. CER activities shall be undertaken by involving local villages and administration and shall be implemented. The company shall undertake eco-developmental measures including community welfare measures

The point is noted and will comply, all the relevant measures are being takenup and in process for improving the socio-economic conditions surrounding area. CER activities are being undertaken and implemented by villages local involving and administration. The company is in process of undertaking ecodevelopmental measures including

	in the project area for the overall improvement of the environment.	community welfare measures in the surrounding project area for improving the environment.
V	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management / pollution control measures shall not be diverted for any other purpose.	The company has made budgetary provision of Rs. 1,90,00,000/- (cost as per EMP given in EIA / EMP report) towards capital and Rs. 29,00,000/- recurring expenditure per annum to implement the conditions stipulated by MoEF & CC. The company will adhere to implement as per the schedule for all the conditions stipulated. The funds allocated will not be used or diverted for any other purposes.
vi	A copy of the clearance letter shall be sent by the project proponent to concerned Panchayat, ZillaParishad / Municipal Corporation, Urban local Body and the local NGO, if any from whom suggestions / representations, if any were received while processing the proposal.	Already Complied (Attachment 28).
vii	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated Environment Clearance conditions including results of monitored data (both in hard copies as well as by e-email) to the respective Regional Office of MoEF & CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.	Noted and complying After Environmental Clearance issued by the MoEF & CC New Delhi on dated 8th February 2021, first six monthly EC Compliance Report (February 2021 to March 2021) was submitted on 27/05/2021, and second compliance report (April 2021 to September 2021) on 26/11/2021 to the Regional Officer, MoEF & CC, Maharashtra, Member Secretary, MoEF & CC, New Delhi, Zonal Officer, CPCB, Regional Officer, SPCB and Member Secretary, SPCB (Acknowledgement Copy is attached at Attachment 29).

viii	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board 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 compliance of environment clearance condition and shall also be sent to the respective Regional Offices of MoEF & CC by e-mail.	• Noted and complying, we are regularly submitting Environment Statement for each financial year ending 31st March in Form-V to State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently and also on the website of the company along with the status of compliance of Environment Clearance conditions through email to the Regional Office of the MoEF & CC and will continue the same.
ix	The project proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB / Committee and may also be seen at Website of the Ministry and at https://parivesh.nic.in/. This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	Complied (Attachment 30).
х	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and date of start of the project.	Noted, the date of financial closure and the final approval of the project is made by the board of directors. However it is to be mentioned here that mostly existing facilities and infrastructure will be utilized for the proposed expansion project as per the requirement of the demand of the market.
xi	This Environmental Clearance is granted subject to final outcome of	The point is noted.

Hon'ble Supreme Court of India,	
Hon'ble High Court, Hon'ble NGT and	
any other Court of Law, If any, as may	
be applicable to this project.	