



**SILVASSA**

**Industries & Manufacturers Association**

Reg. No. 27/SIAMA /2011 Dt. 11-11-2011

Office No. 8, Danudyog Shopping Center,  
Opp, Hirvavan Garden,  
Piparia, Silvassa- 396 230.  
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Website : www.simadnh.org

**President**

Sh. C. M. Parekh

**Vice-President**

Sh. Atul Shah

**Vice-President**

Sh. Sunil Ijari

**Vice-President**

Sh. Ajit Deshpande

**Hon. Secretary**

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**Executive Secretary**

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**Advisory Board Members**

Sh. Vinit Mundra

Sh. Harshad Doshi

Sh. Nitin Kopikar

Sh. Pradeep Lele

Sh. Nirmal Jain

Date : 6/12/2014

To,

Member Secretary,  
Pollution Control Committee,  
Dadra & Nagar Haveli,  
Silvassa

Sub:- Suggestions/Objections in reference to the notification No. PCC/DMN/13-III/755, dated 10-10-2014.

Dear Sir,

On behalf of our association SIMA we submit our suggestions and comments on the proposed Draft Notification no. PCC/DMN/13-III/755, dtd:10/10/2014, we would like to submit our suggestion and comments as under.

1. While going through the categorization it is found that the categorization are not proper and are very confusing. The industries which are in orange category have been included in Schedule - III Red Category in proposed notification for example.
  - a. In proposed category Red Category Schedule - III, the Item No. 8, "Ferrous and Nonferrous metal extraction involving different furnace through melting, refining, reprocessing, casting and alloy making" should be removed from proposed Red Category Schedule - III and should be included in orange category as per existing categorisation.
  - b. Red Category Schedule - III Item No. 41, i.e. Synthetics detergent and soaps (excluding formulation) should be deleted from proposed Red Category Schedule - III and included in Orange Category as the said product is in Orange Category in existing categorization. Same way as per the old notification No. PCC/DMN/13-III/1999-2000/20, dtd:03-07-1999, "Production of Acid Sultry through Sulphuric acid Sulphonation and

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8/12/2014  
प्रेषण लिपिक / Despatch Clerk

प्रदूषण नियंत्रण  
POLLUTION CONTROL COMMITTEE  
क्षेत्रीय कार्यालय / Regional Office  
ददरा नगर हवेली



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Sulphur burning process" is in Orange Category in existing categorization. The said product has been omitted so we suggest that this product ie "Production of Acid Sultry through Sulphuric acid Sulphonation and Sulphur burning process" should be included in Orange Category.

- c. Item No. 42, i.e "Synthetic fibres including rayon, tyre cord, polyester filament yarn and polymers" are in the proposed schedule – III Red Category the said product should be removed from proposed Red Category Schedule – III and should be continue in Orange Category as per existing categorization. In light of office memorandum No. J-13012/12/2013-IA-11 (I) dated 24/12/2013 , which is reproduce here in as under

"Ministry of Environment and Forest has issued an office memorandum No. J-13012/12/2013-IA-11 (I) dated 24/12/2013 and they kept the All mandate fibre manufacturing units producing fibres from granules or chips under B2 Category and waived from EIA report looking the hazardous emission effect which state that these units either have very less hazardous emission or under the control. While other that all are made under B1 Category which require EIA Report".

- d. Then Item No. 14, in proposed Red Category Schedule – IV, " flakes from rejected pet bottle" is under banned category which should be allowed and that will help our territory to recycle the rejected pet bottle. If the said recycle process is not allowed the used pet bottles shall be threat to our environment . To protect our environment and to reduce the threats of chalking the natural water flow in river, koter and nala any recycle process of plastic waste in any form should be allowed and encourage.

2. On one hand we want industrial growth in our territory but at the same time we want to ensure that environment of our territory should not be hampered. Hon'ble Prime Minister has also advised industries to adopt the process to ensure Zero Defects and Zero Effect. So we industries are duty bound to ensure that the environment of our territory should not be adversely effected. For this we proposed that the PCC should share the data of last 20 years wherein the detail environment impact caused to the territory should be



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furnished. At the same time we request PCC to conduct an environment impact assessment causing to our environment by existing industrial units. The PCC should also assess the carrying capacity of our territory. In light of the report of environment impact assessment and carrying capacity of our territory the exercise of revised categorisation should be undertaken. So, the detail of environment assessment report and report of carrying capacity of our territory should be shared with the people of the territory and after that only the decision in respect of liberalization in existing Red Category should be taken. Till that the existing categorization should be continued and PCC norms and safe guard norms of the environment norms should be strictly adhere in the existing orange category industries to ensure that environment of our territory should not have any adverse effect. This will also ensure better public health.

It is common complaint that in our territory the only source of water is ground water and the ground water is also contaminated and is not potable water. So, an alternate source of drinking water should be developed first and discharge of water from industries should be strictly monitor to ensure that even quality of ground water also improve and the contamination should be reduce within permissible limit.

The industries which may cause pollution can be permitted only in a special designated zone. The said zone/cluster should be far away from resident and inhabitant area and the said zone should be equipped with adequate pollution control measures including CETP. In the said zone the CEPT and all infrastructure should be provided and erected before granting any permission to any such industries causing pollution. These industries should be strictly in vigilance and PCC should have regular monitoring, inspection and even surprise checking of such units.

The real purpose for collection of consent fee is to develop the pollution control measures, to established a modern well equipped laboratory for testing of various sample and ascertain pollution level in such water sample and pollution level in air. The said fee is to be utilised to bring awareness in people and industries about pollution and to teach them how to reduce



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pollution by conducting the seminars and distributing pamphlets. But unfortunately the PCC has not utilised the said fund for the said purpose and fee which is collected from industries are either laying idle or is used for some other purpose. **Therefore still the unutilized huge fund is laying with the PCC, in this circumstances it is not necessary to revise and enhance fee structure.** Even the penalty and interest should not be charged from the innocent entrepreneurs.

We are sure that your good self and other members of PCC shall take a very appropriate and pragmatic view in the interest of environment of our territory, and in the interest of health of the people of our area PCC should ensure that only Zero effect industries and process are allowed. Only after detail study of impact on environment and after developing the special zone with all the infrastructure measure as mentioned here-in-above the Red category industries may be allowed. It is common feeling of our fellow industrialist that industries should be encouraged but at the same time environment of our territory is not damaged and is preserved. So at present the said categorisation and Notification should put in abeyance.

Thanking you,

With regards,

For Silvassa Industries & Manufacturers Association

Sunil Ijari  
(Vice-President)

Copy to:- Hon'ble Administrator, Daman & Diu and Dadra & Nagar Haveli  
for necessary information.