



NATCO PHARMA LIMITED
Chemical Division- Chennai

Compliance Statement for Environmental Clearance vide Letter No. SEIAA / TN/F.5869/5 (f)/EC-67/2019 dated: 20.02.2019

Environmental Clearance (EC)

Letter .No. SEIAA/TN/F.5869/5(f)/EC-67/2019 dated:20.02.2019 & Amended EC F.No. J 11011/456/2006-IA-II (I) dated 20.07.2020

Period: Oct 2024 to March 2025

EC Compliance Status Report

Submitted to:

1. Ministry of Environment, Forest and Climate Change-Regional Office, Chennai.



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S. No.	Conditions	Compliance Status	Remarks
(A) Statutory Compliance			
i	The project proponent shall obtain forest clearance under the provision of forest (Conservation) Act, 1986, in case of diversion of the forest land for non-forest purpose involved in the project.	Not Applicable	-
ii	The project proponent shall obtain clearance from the National Board for Wildlife, if applicable.	Not Applicable	-
iii	The project proponent shall prepare a Site-Specific Conservation Plan & Wildlife Management Plan approved by the Chief Wildlife Warden. The recommendation of the approved Site-Specific Conservation Plan / Wildlife Plan shall be implemented in consultation with State Forest Department. The implementation report shall be furnished along with six monthly compliance report. (In case of the presence of schedule-I species in the study area.	Not Applicable	-
iv	The project proponent shall obtain Consent to Establish / Operate under the provisions of Air (Prevention & Control of Pollution) Act, 1981 and the Water (Prevention & Control of the Pollution) Act, 1974 from the concerned State Pollution Control Board / Committee.	Yes, Complied with given condition. CTE (Expansion) obtained and CTO Expansion Phase-01 obtained	Copy of CTE & CTO attached.
v	The project proponent shall obtain authorization under the hazardous & other Waste Management Rules, 2016 as amended from time to time.	Complied Hazardous waste authorization obtained & valid up to 31.03.2027.	Copy of HWA attached.
vi	The company shall strictly comply with rules and guidance under the Manufacturer, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989 as amended from time to time. All transportation of hazardous chemicals shall be as per the Motor Vehicle Act (MVA)	Yes, Complied with given condition.	Brief write-up for MSIHC rules attached



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(B) Air Quality Monitoring & Preservation			
i	The project proponent shall install 24×7 continuous emission monitoring system at process stacks to monitor stack emission with respect to standards prescribed in Environment (Protection) Rules 1986 and connect to SPCB and CPCB online servers and calibrate these systems from time to time according to equipment supplier specification through labs recognized under Environment (Protection) Act, 1986 or NABL accredited laboratories.	Complied Process stacks are connected with scrubber & Scrubber stack Monitoring done by NABL lab once in 3 month.	Copy of Latest Scrubber Analysis NABL Lab report attached
ii	The project proponent shall monitor fugitive emission in the plant premises at least one in every quarter through labs recognized under Environment (Protection) Act, 1986	Complied Fugitive emission Analysis get done by NABL accredited Lab & results are well within the limits	Copy of Latest Fugitive emission Analysis NABL Lab report attached
iii	The project proponent shall install system to carryout Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM10 and PM2.5 in reference to PM emission, and SO2 and NOx in reference to SO2 and NOx emissions) within and outside the plant area at least at four locations (one within and three outside the plant area at an angle of 120 each), covering upwind and downwind directions.	Complied Plant Ambient Air Quality are being monitored in 6 locations every 3 month once by NABL lab. Also, Existing AAQ parameters are being monitored through AAQ mobile van, Data's are uplinked to TNPCB.	Copy of Latest AAQ Analysis NABL Lab report attached



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iv	To control source and fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. Sulphur content should not exceed 0.5% in the coal for use in coal fired boilers to control particulate emissions within permissible limits (as applicable). The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines.	Complied We are operating our boiler with clean fuel (natural Gas -CNG) with Adequate stack height & Coal fired boilers are not available in our plant.	CNG usage bill copy attached
v	Storage of raw materials, coal etc shall be either stored in silos or in covered areas to prevent dust pollution and other fugitive emissions.	Yes, Complied with given condition. CNG sourced through pipeline & our Raw materials stored properly in separate RM store racks.	-
vi	National Emissions Standards for Organic Chemicals Manufacturing Industry issued by the Ministry vide G.S.R. 608€ dated 21 st July, 2010 and amended from time to time shall be followed.	Yes, Complied with given condition.	-
vii	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R.No.826(E) dated 16 th November, 2009 shall be complied with	Yes, Complied with given condition.	-
(c) Water Quality Monitoring & Preservation			
i	The project proponent shall provide online continuous monitoring of effluent, the shall install web camera with night vision capability and flow meters in the channel/drain carrying effluent within in the premises (applicable in case of the project achieving ZLD)	Complied Our plant adopted with ZLD system. CCTV with night vision capability and flow meters are installed in the ETP Inlets & Outlet points. ZLD is achieved.	-



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ii	As already, committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste/treated water shall be discharged outside the premises (applicable in case of the project achieving the ZLD.	Complied Our plant adopted with ZLD system and no waste/treated water shall be discharged outside the premises.	Undertaking Letter attached.
iii	The effluent discharge shall confirm to the standards prescribed under the Environment (Protection) Rules, 1986, or as specified Pollution Control Board while granting Consent under the Air/Water Act, Whichever is more stringent.	Yes, Complied with given condition. We achieved ZLD & we are reusing our treated water for our utility purpose & our reuse effluent are well within the prescribed limits as per our TNPCB-ROA.	-
iv	Total fresh water requirement shall not exceed the propose quantity or as specified by the committee. Prior permission shall be obtained from the concerned regulatory authority/CGWA in this regard.	Complied Source of Water from CMWSSB for fresh water supply & usage of fresh water well within the proposed quantity.	Fresh water (CMWSSB) usage last 3 month bill attached.
v	Process effluent/any wastewater shall not be allowed to mix with storm water. The storm water from the premises shall be collected and discharged through a separate conveyance system.	Yes, Complied with given condition. We also installed online pH & TDS meter in the storm water gutter for effective monitoring.	-
vi	The Company shall harvest rainwater from the rooftops of the building and storm water drains to recharge the ground water and utilize the same for different industrial operations within the plant.	Complied Rainwater harvesting system has been installed in the plant in 5 locations to recharge the ground water & for reuse for gardening.	Photo copy – Rain water Harvesting plan & Details attached



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vii	The DG sets shall be equipped with suitable pollution control devices and the adequate stack height so that the emissions are in conformity with the extant regulations and the guidelines in this regard.	Complied DG stacks- 2nos are retrofitted with PM emission control device.	-
(D) Noise Monitoring & Preservation			
i	Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	Complied Acoustic enclosures are provided to our DG set for controlling the noise.	-
ii	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 sources of noise generation.	Yes, Complied with given condition. Overall Noise level well within the limit.	-
iii	The ambient noise level should be conform to the standards prescribed under the E(P)A Rules, 1986 viz. 75 dB(A) during day time and 70 dB(A) during night time.	Yes, Complied with given condition. Noise level monitoring done by TNPCB lab	Copy of Latest Noise Level TNPCB Lab report attached
(E) Safety, Public hearing & Human health issues			
i	Emergency preparedness plan based on the Hazard identification and Risk Assessment (HIRA) and Disaster Management Plan shall be implemented.	Yes, Complied with given condition. Emergency preparedness plan & Disaster management plan available & submitted to IF	Copy of OSEP plan acceptance attached
ii	The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling. Firefighting system shall be as per the norms.	Complied Fire protection & Firefighting system in place.	Fire NOC Attached
iii	The PP shall provide Personal Protection Equipment (PPE) as per the norms of Factory Act.	Yes, Complied	-



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		PPE provided to all workers as per factory act.	Training records & Medical examinations report attached.
iv	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	Complied Yearly training schedule prepared & training imparted to all employees. Pre-employment and routine periodical medical examinations are being conducted for all employees	Training records & Medical examinations report attached.
v	Provision shall be made for the housing of construction labour within the site will all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, safe drinking water, medical health care, crèche etc. the housing may be in the form of temporary structures to be removed after the completion of the project.	Complied Toilet, drinking water & medical health care facility provided for construction labour within the site	-
vi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Yes, Complied with given condition.	Workers Occupational health surveillance record attached.
vii	There shall be adequate space inside the plant premises earmarked for parking of vehicles for raw materials and finished products, and no parking to be allowed outside on public places.	Yes, Complied with given condition. Adequate parking facility available in the site.	-
(F) Corporate Environment Responsibility			
i	The project proponent shall comply with the provisions contained in this Ministry's OM vide F.No.22-65/2017-IA.III dated 1 st May 2018, as applicable, regarding Corporate Environment Responsibility.	Yes, Complied with given condition. CER Activity Execution under progress	CER statement with proofs attached



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ii	The company shall have a well laid down environmental policy duly approve by the Board of Directors. The environmental policy should prescribe for standard operating procedures to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/wildlife norms/ conditions. The company shall have defined system of reporting infringements/deviation/violation of the environmental/forest/wildlife norms/ conditions and / or shareholders / stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF & CC as a part of six-monthly report.	Yes, Complied with given condition. EHS policy are made available.	Copy of EHS policy attached
iii	A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of Senior Executive, who will directly to the head of the organization.	Yes, Complied with given condition.	Environmental Cell Flowsheet attached
iv	Action plan for implementing EMP and environmental conditions along with responsibility matrix of the company shall be prepared and shall be duly approved by competent authority. The year wise earmarked for environmental protection measures shall be kept in separate account and not to be diverted for any other purpose. Year wise progress of implementation of action plan shall be reported to the Ministry/Regional Office along with the Six Monthly Compliance Report.	Yes, Complied with given condition EMP details given EIA report & action plans are being followed.	EMP plan with status attached
v	Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.	Complied Yearly Environmental audit conducted by certification body (DNV) & certified for Environmental Management System, ISO 14001:2015	Environmental Management System, ISO 14001:2015 certificates Attached



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(G) Waste Management			
i	Hazardous chemicals shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.	Yes, Complied with given condition. Hazardous chemicals stored in dedicated tank farm area, Flame arresters are provided & solvents are transferred via closed loop system.	-
ii	Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic & evaporation salt shall be disposed off to the TSDF.	Yes, Complied with given condition. Agreement made with Pre-processor to handle the hazardous waste to sent to cement industry.	Process residue & waste, Spent carbon & ETP sludge sent to Pre-processor. Agreement copy attached
iii	The company shall undertake waste minimization measures as below:-	Yes, Complied with given condition.	-
	a. Metering and control of quantities of active ingredients to minimize waste.	Solvents are pumped through closed loop system with automated digital flowmeters. Also using spray nozzle for reactor/tank cleaning to minimize the waste water. Reuse of by-products not feasible to pharma industry.	
	b. Reuse of by-products from the process as raw materials or as raw materials substitutes in other processes.		
	c. Use of automated filling to minimize spillage.		
	d. Use of Close Feed system into batch reactors.		
	e. Venting equipment through vapor recovery system.		
	f. Use of high pressure hoses for equipment clearing to reduce wastewater generation		



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<u>(H) SPECIFIC CONDITIONS</u>		
i	It is mandatory for the project proponent to furnish to the SEIAA, Half yearly compliance report in hard and soft copies on 1 st June and 1 st December of each calendar year in respect of the conditions stipulated in the prior Environmental clearance issued.	Yes, Complied with given condition. Last EC compliance submitted on 02.11.2024
ii	“Consent for Establishment” shall be obtained from Tamil Nadu Pollution Control Board and a copy of the same shall be furnished to the SEIAA, Tamil Nadu before start of project construction activity at the site.	- Complied CTE (Expansion) obtained from Tamil Nadu Pollution Control Board
iii	“Consent for Operate” shall be obtained from Tamil Nadu Pollution Control Board before the start of the operation of the project and a copy of the same shall be furnished to the SEIAA, Tamil Nadu	- Complied CTO (Expansion Phase-01) obtained from TNPCB.
iv	The implementation of Environmental Management Plan in regard to treatment and disposal of sewage & Effluent, Solid waste Management, Hazardous - Waste Management, and CSR Activities should be carried out, as proposed and committed. Regular monitoring should be carried out during operation phases	Yes, Complied with given condition. Agreement made with GCC authorized vendor for handling Non-Hazardous solid waste handling. Sewage & Effluent handled in STP & ETP (ZLD) respectively Agreement copy with GCC authorized vendor attached & CSR Details FY 2023-24 attached.
v	The residue collected from the evaporator shall be documented by maintaining proper register and it should be made available at the time of inspection.	Yes, Complied with given condition. Evaporator salt register photo copy attached.



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vi	Adequate dust extraction system such as Ducting with dust extracting arrangement wherever required shall be established to achieve Occupational –health standards and ambient air quality standards	Yes, Complied with given condition.	Adequate dust extraction system provided
vii	The proponent shall carryout best housekeeping practices as spillage management for handling and maintenance of raw materials and products inside the unit premises.	Yes, Complied with given condition. Daily housekeeping log maintained to ensure the best housekeeping practices.	-
viii	Nature of chemicals Handled, the Do and Don'ts shall be displayed at all vital locations as laid down in MSDS.	Yes, Complied with given condition. Do's & Don'ts displayed wherever required.	-
ix	The proponent shall ensure that the quantity of Hazardous Waste handed over to the TSDF shall match with the quantity generated	Yes, Complied with given condition. Generated Hazardous waste qty sent to TNPCB authorized vendor & Every year Form-IV submitted to TNPCB	Copy of Form-4 attached.
x	The proponent shall provide a separate closed area earmarked for storing solid waste including Hazardous Waste as proposed	Yes, Complied with given condition. Separate Hazardous waste storage yard provided with 170 sq.m.	-



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xi	The proponent shall dispose Hazardous Waste generated as per the Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016. Spent oil from D.G sets should be stored in HDPE drums in an isolated covered facility and disposed off through TNPCB registered recyclers	Hazardous waste authorization for Phase-01 Project obtained & valid up to 31.03.2027.	-
xii	The Plastic wastes shall be segregated and disposed as per the provisions of Plastic Waste (Management & Handling) Rules 2016.	Yes, Complied with given condition. Plastics disposed to GCC authorized waste handler.	MOU attached in H(iv)
xiii	The e - waste generated should be collected and disposed to a nearby authorized e-waste centre as per e waste (Management & Handling), Rules 2016 as amended	Yes, Complied with given condition. E-waste disposed to TNPCB authorized vendor	Copy of agreement attached.
xiv	The Municipal solid waste generated shall be collected, segregated and disposed as per Solid Waste Management Rules, 2016.	Yes, Complied with given condition	-
xv	The industry shall conduct air sampling at least once in six months for the general core parameters (PM ₁₀ , PM _{2.5} , SO _x , NO _x) through TNPCB/NABL Accredited Laboratory and maintain records of the same and it should be made available at the time of inspection.	Complied we are conducting ambient air Quality monitoring in the plant through TNPCB (yearly) /NABL approved laboratory for every 3 months.	Latest TNPCB & NABL Environmental Monitoring report attached
xvi	Regular monitoring on the air quality, water quality and noise on the selected locations in and around the project site as mentioned in the EMP report for creating base line data shall be continued and records shall be maintained.	Yes, Complied with given condition we are conducting monitoring as per EMP.	-



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xvii	A separate environment and safety management cell with qualified staff shall be set up before establishment of the facility and shall be retained throughout the lifetime of the industry, for implementation of the stipulated environmental safeguards	Yes, Complied with given condition	F(iii) Environment management cell attached & safety management cell attached.
xviii	The Green belt area already developed withinS the project area shall be properly maintained.	Yes, Complied with given condition We are maintaining greenbelt area properly.	-
xix	The green belt of 5-10 m width shall be developed in more than 33% of the total project area, mainly along the plant periphery, in downward wind direction, and along road sides etc. Selection of plant species shall be as per CPCB guidelines in consultation with the state forest department.	Complied The green belt area developed & we are maintaining more than 33% of the total project area with plant species as per CPCB.	Greenbelt area Details & photos attached
xx	The industry shall promote tree plantation to neutralize their carbon foot print. The industry shall engage regularly in afforestation programme.	Yes, Complied with given condition.	Carbon foot print reduction details attached.
xxi	The proponent shall ensure effective risk management strategy regarding confined space management to avoid risk while handling raw materials, products in the process area and storage	Complied Work permit system in place.	-
xxii	The energy sources for lighting purposes shall preferably be LED based.	Yes, Complied with given condition We replaced LED lights in our unit.	-
xxiii	The industry shall conduct air sampling at least twice in a week (104 times in a year), as stipulated under EP Act 1986.	Complied Online air quality monitoring station available.	-



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xxiv	Risk cum disaster management plan should be in placed in the industry premises at all time.	Yes, Complied. Risk cum disaster management plan included in the Onsite Emergency Preparedness plan & submitted to IF	Copy of OSEP plan acceptance attached in E(i)
xxv	Water conservation scheme including rain water harvesting measures to augment ground water resources shall be implemented so as to collect and reuse the entire rainwater harvested as a supplement to fresh water	Yes, Complied with given condition. Short & mid-term action plan taken for water conservation to reduce the fresh water consumption.	Water conservation scheme with targets attached
xxvi	The natural drainage pattern in the project area shall be maintained and storm water drain along the boundary and appropriate places shall be provided considering the Catchment area and maximum intensity of rainfall to collect runoff water/rain water for proper disposal to avoid flooding around the premises.	Yes, Complied with given condition Rain & storm water arrangement system provided	Refer Attached c(vi)
xxvii	The Environmental Clearance is issued without prejudice to any order that may be passed by the Hon'ble NGT/ Honb'le High Court of Madras.	Noted for compliance	-
xxviii	All the assurances given in EIA and EMP shall be adhered to strictly	Yes, Complied Assurances given in EIA and EMP is being followed	Undertaking letter attached
xxix	Detail study shall be carried out by engaging accredited agencies / reputed institutions for Risk management and detailed Disaster management plan prepared for compliance.	Yes, Complied Site Appraisal committee	Approval Copy of Site Appraisal



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		approved the unit for compliance	committee has attached
xxx	Sufficient funds should be provided for Audit management.	Yes, Complied with given condition.	-
xxxi	The Project Proponent shall provide disinfection by UV system for the sewage treatment plant for treating the sewage before applying on land for gardening	Complied UV system provided in STP treated water discharge point.	-
xxxii	The project proponent shall provide sufficient ventilation (air circulation) in the hazardous waste storage yard where the hazardous waste like spent carbon, Chemical sludge, used or spent oil are being kept	Yes, Complied with given condition.	-
xxxiii	The Project Proponent shall carry out safety audit in the different operating zones of the plant at least once in a year and the same shall be considered as base for reviewing the unsafe conditions during the plant safety meeting	Complied Yearly Safety audit conducted by certification body (DNV) & certified for Occupational Health & Safety Management System, ISO 45001:2018	OH & Safety Management System, ISO 45001:2018 certificate Attached
xxxiv	The Project Proponent shall prepare a code of practice for safe operation for educating the safety standards to the work force deployed in the plant through appropriate training by the concerned experts	Yes, Complied Safety Training given to the employees as per schedule, also tools box talks periodically.	Training attendance copy attached
xxxv	As the plant operation involves the sensitive processing, the medical officer and the supporting staff involved in the health centre activities shall be trained in occupational health surveillance (OHS) aspects through the outsourced training from the experts available in the field of OHS for ensuring the health standard of persons employed	Yes, Complied with given condition. OHS team attended training	Copy of training certificate attached.



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	The Activity of the industry should not impact on agricultural, irrigation system and mangroves surrounding the area.	Noted for compliance	-
xxxvi	The EMP cost of Rs.500 lakhs and operation and maintenance cost Rs. 1200 lakhs shall be deposited in a nationalized bank by opening separate account and the head wise expenses statement shall be submitted to TNPCB with a copy to SEIAA annually.	SAP GL account maintained for EMP and same will be submitted to TNPCB & SEIAA.	Amount spent towards EMP project cost & recurring cost attached
xxxvi i		Yes, Complied with given condition. No threat to biodiversity due to our operations.	-
xxxix	The flora & fauna present in and around the project site should not get affected due to the activity as reported	Noted for compliance Flora & Fauna not disturbed by our activity.	-
xl	The Project Proponent has to provide rain water harvesting collection tank to the capacity of 80cu.m in order to recover and reuse the rain water during normal rains	Complied Rainwater Harvesting pond provided. Yes, Complied with given condition.	Refer Attached c(vi)
xli	The operation of the activity should not impact on the soil, micro flora & Fauna present in and around the project site	Yes, Complied with given condition.	-
xlvi	The project proponent shall carry out risk assessment process for all the operations involved in the plant and a suitable risk management plan showing the contours of sensitive zones should be prepared	Yes, Complied HIRA done for all the operations	-
xliii	The project proponent shall take up better housekeeping measures including scraps disposal and up keeping the machineries, pipes, etc.	Yes, Complied Housekeeping being followed as per our SOP.	-
xliv	The proponent should continuously monitor the VOC and ensure that VOC levels are within permissible limits	Yes, Complied. VOC levels are well below the limits, VOC monitoring	VOC monitoring report attached



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		done on monthly basis manually & 3 VOC online analyzers installed in the site.	
(I) General Conditions			
i	This Environmental Clearance shall not be cited to relax any other rules applicable to this project.	Noted for compliance	-
ii	The Project Proponent should advertise at least in two local newspapers widely circulated, one of which shall be in the vernacular language of the locality concerned, within 7 days of the issue of the Environmental Clearance informing that the project has been accorded environmental clearance and a copy of the clearance letter is available with TNPCB	Complied Advertisement given in two local newspapers widely circulated in Tamil & English on 13.03.2019.	Newspaper photo copies Attached
iii	A copy of the Environmental Clearance shall be sent by the project proponent to concerned local body and local NGO, if any from whom suggestions/representatives, if any were received while processing the proposal.	Noted for compliance	-
iv	The project proponent shall monitor the criteria pollutants level namely; PM10, SO2, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects and display the same at a convenient location for disclosure to the public and put on the website of the company.	Yes, Complied with given condition AAQ Monitoring data- Display board installed in gate entry for disclosure to the public	Photo copy of display board attached
v	The Environmental Clearance shall also be put on the website of the company.	Complied EC copy uploaded in to the company website. Complied with given condition	-
vi	No expansion or modernization in the project shall be carried out without prior approval of the	Noted for compliance	-



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	SEIAA-TN. In case of any deviations or alterations in the project proposal from those submitted to this Authority for clearance, a fresh reference shall be made to the SEIAA-TN to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.		
vii	All the environmental protection measures and safeguards as recommended in the EIA report shall be complied	Noted for compliance	-.
viii	The project proponent shall submit the environmental statement for each financial year in Form-V to the concerned SPCB as prescribed under the environment(Protection) rules, 1986, as amended subsequently and put on the website of the company	Yes, Complied with given condition	Proof of Form-V submission 2024-25 attached
ix	The implementation of the project vis-à-vis environmental action plans shall be monitored by the Regional office of MoEF& CC at Chennai, TNPCB and CPCB. A six monthly compliance status report shall be submitted to monitoring agencies regularly.	Yes, Complied with given condition Six monthly report submitting regularly.	-.
x	Data on ambient air, stack and fugitive emissions shall be regularly submitted online to the Regional office of MoEF&CC, GOI, at Chennai, TNPCB and Central Pollution Control Board as well as hard copy once in six months and display data on RSPM, SO ₂ and NO _x outside the premises at the appropriate place for the general public.	Yes, Complied with given condition Online monitoring available for all required parameters.	-.
xi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Yes, Complied with given condition OH surveillance done on regular basis	-.
xii	Proper house-keeping and cleanliness must be maintained within and outside the plant.	Yes, Complied with given condition Good house keeping being followed by our unit.	-.



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xiii	Occupational health surveillance programme shall be undertaken as regular exercise for all the employees, especially for those engaged in handling hazardous substances. The first aid facilities in the occupational health centre shall be strengthened and the medical records of each employee should be maintained separately	Yes, Complied All the hazardous waste handlers health records are being monitored	-
xiv	The overall noise levels in and around the plant area shall be kept well within the standards prescribed for by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75dBA (day time) and 70 dBA (night time).	Yes, Complied with given condition Noise levels are well within the prescribed limits.	-
xv	A separate Environmental Management Cell equipped with full fledged laboratory facilities to carry out the various Environmental Management and Monitoring functions shall be set up under the control of a Senior Executive.	Yes, complied with given condition Lab facility available with chemist.	-
xvi	The requisite amount earmarked towards capital cost and recurring cost/annum for implementing pollution control measures shall be used judiciously to implement the Environment Management Plan as furnished in the EIA report. The funds so provided shall not be diverted for any other purposes	Yes, Complied with given condition	-
xvii	The project proponent shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEF&CC, GOI at Chennai, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; RSPM, SO ₂ , NO _x (ambient levels as well as stack emissions) or critical sector parameters, indicated for the projects shall be monitored and displayed at a convenient location	Yes, Complied with given condition	



NATCO PHARMA LIMITED
Chemical Division- Chennai

Compliance Statement for Environmental Clearance vide Letter No. SEIAA / TN/F.5869/5 (f)/EC-67/2019 dated: 20.02.2019

	near the main gate of the company in the public domain		
xviii	The environmental statement for each financial year ending 31 st March in Form-V as is mandated to be submitted by the project proponent 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 environmental conditions and shall also be sent to the respective Regional Offices of the MOEF by e-mail	Yes, Complied with given condition	-.
xix	Environmental Clearance is being issued without prejudice to the action initiated under Environment (Protection) Act, 1986 or any court case pending or any other court order shall prevail.	Noted for compliance	-.
xx	The SEIAA, TN may alter/modify the above conditions or stipulate any further condition in the interest of environment protection	Noted for compliance	-.
xxi	The SEIAA/SEAC or any Competent Authority may suitably add any further condition(s) on receiving reports from the project authority. The above condition shall be monitored by the Regional Office of MoEF located at Chennai.	Noted for compliance	-.
xxii	The SEIAA, TN may revoke or suspend the Environmental clearance, if implementation of any of the above conditions is not satisfactory	Noted for compliance	-.
xxiii	The SEIAA, TN may cancel the environmental clearance granted to this project under the provisions of EIA Notification, 2006, if, at any stage of the validity of this environmental clearance, if it is found or if it comes to the knowledge of this SEIAA, TN that the project proponent has deliberately concealed and/or submitted false or misleading information or	Noted for compliance	-.



NATCO PHARMA LIMITED
Chemical Division- Chennai

Compliance Statement for Environmental Clearance vide Letter No. SEIAA / TN/F.5869/5 (f)/EC-67/2019 dated: 20.02.2019

	inadequate data for obtaining the environmental clearance		
xxiv	Failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of the Environment (Protection) Act, 1986.	Noted for compliance	-
xxv	The SEIAA-TN reserves the right to stipulate additional conditions if found necessary. The industry in a time bound manner shall implement these conditions.	Noted for compliance	-
xxvi	The above conditions will be enforced inter-alia, under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, the Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, the Public Liability Insurance Act, 1991, along with their amendments ,draft Minor Mineral Conservation & Development Rules , 2010 framed under MMDR Act 1957,National Commission for protection of Child Right Rules, 2006 and rules made there under and also any other orders passed by the Hon'ble Supreme Court of India/Hon'ble High Court of Madras and any other Courts of Law relating to the subject matter.	Complied PLI available	PLI copy attached
xxvii	Any appeal against this environmental clearance shall lie with the Hon'ble National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	Noted for compliance	-

16.05.2025
(J. ARUN / IN-04445)

Prepared by

16.05.2025
Checked by (R. S. Ramadas)



EC Compliance Report

Sub: Six Monthly EC Compliance- Bulk Drug Unit at Manali Industrial Area, Thiruvottiyur(Tq), Thiruvallur, Tamil Nadu by M/s. Natco Pharma Limited, Chennai Division, Chennai -reg.

Ref: MoEF Lt.No.J.11011/456/06/2006-IA-II (I) Dated: 15.06.2007

Period: Oct 2024 to March 2025

A. Specific Conditions

S.No.	Conditions	Compliance
i	The gaseous emissions (SO ₂ , NO _x , HCl) and particulate matter from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency.	Complied The gaseous emissions (SO ₂ , NO _x , HCl) and particulate matter are monitored through external approved laboratory and the levels are within the limit. No time, the emission levels has gone beyond the stipulated standards and also we assured that in the event of failure of pollution control system(s) we would not be restart until the control measures are rectified to achieve the desired efficiency.
ii	Ambient air quality monitoring station shall be set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the TNPCB.	Complied Ambient Air quality monitoring station are set up in the downwind direction as well as where maximum ground level concentration are anticipated in consultation with the TNPCB and monitored through external approved laboratory. The parameters are within the limit.
iii	Efficient scrubber for control of Chlorine, Bromine and Methyl amine shall be installed. SO ₂ shall be adsorbed by caustic lye scrubber and HCl, Cl ₂ and Br ₂ gas by alkali scrubber. Scrubbers shall also be provided to the furnace oil fired boiler and incinerator to control air emissions. The scrubber water after neutralization shall be sent to ETP for further treatment.	Complied Efficient scrubbers (Two-stage & Single stage scrubber) are provided for control of process emissions with proper neutralizing (alkali) media. The scrubber water has been sent to ETP for further treatment. In boiler we are using Natural gas (CNG). Incinerator though it has installed it is not operated.

S.No.	Conditions	Compliance
iv	Solvent recovery system shall be installed. Spent solvents shall be recovered as far as possible and recovery shall not be less than 95 percent. During purification process, solvent vapours are emitted from purification tanks as fugitive emissions. Action shall be taken to reduce the emissions as far as possible. Reactor vents shall be provided with vent condensers after the chillers or brine to condense all the evaporated solvents. Chemical/solvents shall be handled in closed circuit system. Closed centrifuge shall be provided to minimize the solvent emission.	Complied Solvent Recovery Systems is installed and where ever possible and the solvents are recovered up to 95% and reused. The recovery system is connected with two stage condensers primary with chilled water water and secondary with chilled brine to condense all the evaporated solvents and reduce emissions during purification. All the reactors and storage tank vents are provided with vent condensers by circulating with chilled water / brine to condense all the evaporated solvents. Chemicals and solvents are handled in a closed system and connected with the scrubbers. Centrifuges are not installed, since it is not required
v	Use of toxic solvents like Methylene Chloride (M.C) etc. shall be minimum and Benzene shall be replaced with alternate solvents. All venting equipment shall have vapour recovery system. Methylene chloride shall be phased out in a time bound manner. A report shall be submitted to the Ministry after 2 years on the status of replacement of Methylene Chloride and Chloroform solvent.	Complied. EC Amendment obtained for relaxation & usage of Methylene Chloride and Chloroform solvent. Amended EC F. No. J 11011/456/2006-IA-II (I) dated 20.07.2020. Benzene not used in our process.
vi	Necessary arrangement shall be made for monitoring of vent exhaust from solvent recovery system and in the work environment for specific solvents like Methylene Chloride, Toluene, Chloroform, VOCs.	Complied Necessary arrangements such as VOC analyser, LEL (Lower Explosive Limit) analyser are installed for monitoring of vent exhaust from solvent recovery system in the work environment and the levels are below the limit. VOC online levels/readings are connected to TNPCB-Care air centre. Also Portable VOC analyser are used to check the exposure in work environment periodically for better control.
vii	Industry shall switch over to aqueous based coating film in place of use of Methylene Chloride in coating operation and to non-halogenated solvents in place of halogenated solvents in a phased manner.	Complied Coating operation is not carried out in this plant and therefore this condition is not applicable.

S.No.	Conditions	Compliance
viii	Hazardous and toxic waste generated during the process like distillation residue, spent carbon, spent mixture solvents, process organic residue shall be incinerated in a properly designed incinerator with energy recovery facility. The incinerator shall meet the CPCB standards and guidelines.	Complied. The Hazardous and toxic waste generated during the process are stored properly in the shed. Since incinerator in the site is not in operation, we are sending our hazardous waste to Pre-Processor & recyclers.
ix	The company shall undertake the following Waste Minimization measures: • Metering and control of quantities of active ingredients to minimize waste • Reuse of by products from the process as raw materials or as raw material substitutes in other processes • Use of automated filling to minimize spillage • Use of “close feed” system into batch reactors • Venting equipment through vapour recovery system • Use of high pressure hoses for equipment cleaning to reduce waste water generation	Complied. Proper equipment's are provided for weighing/metering the solid and liquid materials to minimize waste By-products are reused as raw material in the process. All liquids are transferred/filled with pumps in a closed circuit to minimize spillages. All the raw materials & products are handled in a close feed system. All the equipment vents are provided with vent condensers to condense all the evaporated solvents Separate high pressure pump with hose and nozzle are provided for cleaning process and usage of water has minimized.
x	Fugitive emissions in the work zone environment, product, raw materials storage area shall be regularly monitored. The emissions shall conform to the limits imposed by TNPCB.	Complied. Fugitive emissions in the work zone environment, product, and raw materials storage area are monitored regularly by installing VOC analyser in the area and the values are within the limit of the prescribed standards given by the board and the online results are connected to care air centre of TNPCB.
xi	Total water requirement from Chennai Metropolitan Water Supply and Sewerage Board shall not exceed 216.5 m3/day and prior permission shall be obtained. The effluent generation shall not exceed 113.7	Complied. Total water consumption by the unit is below the consented limit as per current EC/CTO.

S.No.	Conditions	Compliance
	m3/day. Low TDS x Low COD effluent shall be treated in ETP for primary, secondary and tertiary treatment. Reverse Osmosis –plant shall be installed for the recovery of fresh water and totally recycled back into the plant process. High TDS x High COD effluent shall be incinerated in the incinerator. No wastewater shall be discharged on land and “zero” discharge shall be adopted. The high TDS effluent shall be sent to MEE and then agitated in thin film drier. The salts from MEE and thin film drier shall be sent to CHWTSDF (TWML). The domestic wastewater shall be treated in the septic tank followed by soak pit.	“Zero Liquid Discharge” methods are adopted to treat the effluent generated in the plant. Low TDS & High effluents are segregated at source. Low TDS effluent are sent to ETP for primary treatment. After the primary treatment, the treated water has sent to Reverse Osmosis plant for recovery of fresh water (Permeate) and recovered permeate water totally recycled back into the plant utilities. RO rejects are sent to evaporation system to treat along with High TDS effluents. High TDS effluents and R.O. reject water are sent to Multi Effect Evaporation (MEE) plant followed by Agitated Thin Film Drier (ATFD). The salts generated from AFTD are stored properly. Steam condensate is collected and recycled in utilities.
xii	The solid waste generated in the form of organic residue, inorganic residue, spent carbon, sludge from the ETP and forced evaporator salts shall temporarily be stored at site and sent to T.N Common TSDF (TWML) for final disposal whenever comes into operation. The solvents from the mother liquor shall be recovered and reused in the plant operation wherever possible. The incinerator ash shall also be disposed off in common CHWTSDF (TWML). All the solid/hazardous waste shall be disposed off as per the Hazardous Waste (Management & Handling) rules.	Complied. All the generated solid waste sent to pre-processor as per agreement. Solvents from mother liquor are recovered and reused in the plant. Hazardous waste authorization has obtained by the unit and all the solid/hazardous waste are disposed to pre-processor/recyclers periodically as per Hazardous Waste (Management & Handling) rules.
xiii	The company shall adopt surface as well as roof top rain water harvesting measures to harvest the runoff water for recharge of ground water. Methods shall also be adopted for the conservation of water through and recycling and reusing the treated wastewater.	Complied. Rain water harvesting system is provided and maintained by the plant and all the treated water totally recycled back into the plant for utilities.
xiv	Green belt shall be raised in 4.961 ha. (47%) out of total 10.57 ha. land to mitigate the effects of fugitive emissions as per the Central Pollution Control Board guidelines.	Complied. As per the current EC conditions, Green belt is provided in more than 33% of land area out of total available land area around the

S.No.	Conditions	Compliance
		factory & maintaining properly to mitigate the effects of fugitive emissions: The green belt development work survival are good.
xv	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories act.	Complied. Occupational Health surveillance for all the workers are carried out once in a year and records are maintained as per the Factories act.

B. General Conditions

S.No.	Conditions	Compliance
i	The project authorities must strictly adhere to the stipulations made by the Tamil Nadu Pollution Control Board (TNPCB) and the State Government.	Complied. We are implemented all the stipulations made by Tamil Nadu Pollution Control Board (TNPCB) and the State Government. The consent for operation is valid upto march 2027.
ii	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment and Forests.	Complied. We have carried out expansion with MoEF approval. Current EC valid till Feb 2029.
iii	Adequate number of influent and effluent quality monitoring stations shall be set up in consultation with the TNPCB. Regular monitoring shall be carried out for relevant parameters.	Complied. The treated and untreated effluent quality is monitored and the parameters are within the limit. For monitoring we have provided laboratory & online monitoring system (Water Quality Watch).
iv	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA report.	Complied. We had implemented all the environment protection measures and safeguards recommended in the EIA report.
v	As proposed in EIA/EMP, Rs. 5.00 Crores and Rs. 3.50 Crores earmarked towards capital and recurring cost/annum for environmental protection measures shall be exclusively used to implement the conditions stipulated by the Ministry of	Complied. An amount of Rs.15 Crore was incurred as capital expenditure and Rs.2.5Cr/year is incurred as recurring expenditure, this amount has not been diverted for any other purpose.

S.No.	Conditions	Compliance
	Environment and Forests and State Government. A time bound action plan alongwith the implementation schedule to comply with all conditions stipulated herein shall be submitted to the Ministry's Regional Office at Bangalore. The funds so provided shall not be diverted for any other purpose.	
vi	The implementation of the project vis-a-vis environmental action plans will be monitored by Ministry's Regional Office at Bangalore/TNPCB/CPCB. A six monthly compliance status report shall be submitted to the monitoring agencies.	Refer below A six monthly compliance status report are being submitted for the EC conditions to MOEF- regional office at Chennai. Earlier we have submitted EC compliance to MoEF & CC on Dec-2024.
vii	The Project Proponent shall advertise in at least two local newspapers widely circulated in the region around the project, one of which shall be in the vernacular language of the locality concerned informing that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the TNPCB/Committee and may also be seen at the website of the Ministry and Forests at http://envfor.nic.in . The advertisement shall be made within 7 days from the date of issue of the clearance letter and a copy of the same should be forwarded to the Ministry's Regional Office at Bangalore.	Complied. We had given an advertisement in two local newspapers on 25.06.2007 in Deccan Chronicle in English & Dhinamalar in Tamil and submitted copies of the same to RO.
viii	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 the date of start of land development work.	Complied The date of financial closure and final approval of all the concerned authorities and the date of start of land development work were informed to regional Office.

Dr 16.05.2025
(J-AJAY SUNDARAJ)
Prepared by

Sund
16.05.2025
Checked by (R.S. Ramesh)

Reviewed by

 16.05.2025