

Ref. No. MCHI/PRES/20-21/045

November 9, 2020

PRESIDENT
Deepak Goradia

IMMEDIATE PAST PRESIDENT
Nayan A. Shah

PRESIDENT-ELECT
Boman Irani

SR. VICE PRESIDENTS
Harish Patel
Nainesh Shah
Domnic Romell
Bandish Ajmera

VICE PRESIDENTS
Sukhraj Nahar
Jayesh Shah
Ajay Ashar

HON. SECRETARY
Pritam Chivukula

TREASURER
Munish Doshi

SPECIAL PROJECTS
Parag Munot
Sandeep Raheja
Navin Makhija
Rasesh Kanakia
Shahid Balwa
Subodh Runwal

HON. JT. SECRETARIES
Shailesh G. Puranik
Dhaval Ajmera
Pratik Patel

JT. TREASURERS
Mukesh Patel
Tejas Vyas

CO-ORDINATORS
Nayan Bheda
Rajesh Prajapati
Dr. Harshul Savla

COMMITTEE MEMBERS
Gautam Ahuja
Deepak Gundecha

INVITEE MEMBERS
Shailesh Sanghvi
Sachin Mirani
Nikunj Sanghvi
Rajeev Jain
Shyamal Mody
Digant Parekh
Rushank Shah
Samyag Shah
Jayesh C. Shah
Sunny Bijlani
Sahil Parikh
Naman Shah
Ricardo Romell
Binitha Dalal

PAST PRESIDENTS
Mayur Shah
Dharmesh Jain
Vyomesh Shah
Paras Gundecha
Pravin Doshi
Mohan Deshmukh
Mofatraj Munot
Rajnikant Ajmera
Late G. L. Raheja
Late Lalit Gandhi
Late Babubhai Majethia

CREDAI-MCHI UNITS

PRESIDENT, THANE
Ajay Ashar

PRESIDENT, KALYAN DOMBIVLI
Shrikant Shitole

PRESIDENT, MIRA VIRAR CITY
Ashit Shah

PRESIDENT, RAIGAD
Kiran Bagad

PRESIDENT, NAVI MUMBAI
Vijay Lakhani

To,
Smt. Manisha Mahiskar (I.A.S.)
Principal Secretary
Environment Department
Government of Maharashtra
Mantralaya, Mumbai - 400032

Sub: Suggestions / Issues regard to Process of Environmental Clearance.

Respected Madam,

Trust you are doing Well

Thank you for accepting our request for the meeting.

CREDAI-MCHI is an apex body consisting of members from the Real Estate Industry among Mumbai Metropolitan Region (MMR). It is the most prominent and the only recognized body of Real Estate Developers in Mumbai and MMR.

It's an known fact that Real Estate sector contributes about 5-6% of the GDP of India. The second largest employer of the country which employs almost 50% - 60% of migrant labor across the industry as well as the 270 ancillary industries attached to it.

Real Estate Sector is employing the largest number of employees, both in organized and unorganized sector and it is important that these jobs not only remain protected, but at the earliest, it starts creating further employment. Central Government and State government has announced various measures to ensure the revival of Real Estate as key sector for reviving the economy. Hence Real Estate Sector needs to be looked at from the point of providing jobs of crores of employees and also which can create further jobs in the shortest time, to support economic revival.

We would also like thank environment department for initiating online hearing during Lockdown to ensure the continuity in the process of Environment Clearance process.

Madam, as you are aware that recently the validity of Current appraisal committee has been extended. Please find herewith our request which required your utmost attention due to which many of our members are project are stuck.

- 1) To Start the immediate Online hearing of cases of both Committees (SEIAA/SEAC) which was in practice in the month of September.
- 2) Expediting the process of uploading the Minutes of Meeting of hearing.
- 3) In the SEAC meeting, members raise lot of queries beyond the Environmental impact purview. Queries regarding permission, approval form ULB though the project is approvable by ULB are raised. A lot of submission from various authorities are asked for submission instead of relying on the report of the consultant as ruled in EoDB guidelines.

- 4) From the time Project Proponents submits the project on PARIVESH online portal to the time of granting Environmental Clearance there is time period of more than six months.
- 5) To adapt the ongoing trend Developer, have to make changes in the product mix to suit the buyer's preference. Hence minor modifications (height, size of the tenement, product mix user etc.) by the project proponent which does not change to the extent of 10% in the Environment parameters, no revised NOC to be insisted upon.
- 6) Presently, the EC is being granted on the basis of the plans approved by the planning authority. However, as per r para 3(b)(i) of the office memorandum reproduced herein below, the, the conceptual plans are required to be considered for grant of EC;

i. For building/construction projects (item 8 of the Schedule), in the prescribed Form-I given in Appendix I, along with Supplementary Form 1A as given in Appendix II, as prescribed in EIA Notification, 2006 and a copy of the detailed conceptual plain;

In view of the above and to avoid repetition of submission of proposals for environmental clearance, I would like to request you to take the cognizance of the MoEF & CC Notification issued on 22 Aug 2013 & the OM issued on 20th April 2018 (Copy Attached) to issue the necessary directions with clarifications to accept the project as per the earlier practice with full potential.

Owing to the lockdown real estate industry has been facing the downturn and real estate activities had come to a grinding halt. In spite of the unlock is in place development of projects is still not commenced as our members are facing various issues with the environment clearance process.

Therefore, we earnestly request you to look into above issues on priority and support us with urgent solutions. As further delay would impact on already stressed Real Estate.

Thanking you,

Yours Faithfully,
For CREDAI-MCHI



Deepak Goradia
President



Pritam Chivukula
Hon. Secretary