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Shailesh Puranik

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Arvind Goel

Hon. Secretary, Mira Virar City
Shailesh Sanghvi

Ref. No. : MCHI/TO/13-14/013

October 14, 2013

To
Shri. R. A. Rajeev (I.A.S.)
Principal Secretary,
Environment Department,
Government of Maharashtra,
Mantralaya, Mumbai 400 032

Respected Sir,

Sub: Minor Modification in MoEF NOC's.
Ref: MoEF Notification dated 22nd August, 2013

You are aware of the fact that getting Environment Clearance for a Construction projects, be it housing or commercial, takes a considerable time of a project proponent. After a lot of efforts, the project proponent gets sanctions for the plans from Urban Local Bodies (ULBs). There after this, they seek Environment NOC by first approaching State Level Expert Appraisal Committee (SEAC) and then the State Environment Impact Assessment Authority (SEIAA).

Construction and Real Estate projects being dynamic in nature, take minimum 3 to 6 years for completion and during this time it undergoes for amendments based on various aspects such as policy changes, consumer preferences etc.. Considering the time span and other factors like market scenario, change in configuration as per market demand, change in rules and regulations by planning authority etc.; it sometimes results in the modification of plan. All this again leads to modification of MoEF Environmental Clearance, causing a lot of hardships to the Project Proponents in terms of delays and escalation in the Project costs.

It is suggested that revised MOEF be insisted only if the proposed changes will substantially increase (more than 25% inc) in key Env impact parameters of any Construction projects which are 1. Sewage generation 2. solid waste generation .

Thus changes of floor plans , change users , inc in Builtup area by way of fungible area may be allowed , as only conceptual plans need to be presented for MOEF.

Please find attached herewith copy of the MoEF Notification dated 22nd August, 2013 wherein the Environment Ministry has accepted the recommendations of the High Level Committee constituted vide OM No.21-270/2008-IA.III, dated the 11th December, 2012. Accordingly the ministry amended sections of MoEF S.O. 1533(E), dated the September, 2006 thereby dispensing the requirement of scoping for all projects and activities listed as category 'B' in item 8 of the schedule (Construction or Township or Commercial Complexes or Housing). The ministry stated that the aforementioned projects and activities shall be appraised on the basis of Form 1 or Form 1A and the conceptual plan.

Received
14/10/13
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MCHI-CREDAI (ISO 9001:2008)

Maker Bhavan II, 4th Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.
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aforementioned projects and activities shall be appraised on the basis of Form 1 or Form 1A and the conceptual plan.

In this context, our humble request is to do away with the requirement for revised Environment NOCs wherein there are minor modifications subject to the following:

There is no change in Built-up Area
There is no change in the User (Residential/Commercial)
Minor modifications upto 25% of the original sanctioned plan

This will save a lot of time and hardships for both, Project Proponents as well as the Environment Authority.

And or accord highest priority for the amendments resulting from the modification of plans at the SEIAA level itself. As all the site related appraisals were done in the SEAC and hence we feel that reappraisal can be done at the SEIAA levels itself for approval of amendments. This will save our considerable time and hardship which we face from consumers and approvals of various agencies.

We hope to receive a positive response from your end.

Thanking you,

Sincerely,
For MCHI-CREDAI



Deepak Goradia
Vice-President

Encl: Copy of the MoEF Notification dated 22nd August, 2013.