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MCHI/PRES/14-15/161

June 2, 2015

To,
Hon'ble Shri Prakash Javadekar
Minister of State (Independent Charge)
for Environment & Forest & Climate Change,
Paryavaran Bhavan,
Government of India,
New Delhi.

Subject: Developing uniform and transparent parameters for environmental protection for projects listed under schedule 8(a) of EIA Notification 2006 and enlisting these parameters in by-laws of local body.

Reference: The Environment (Protection) Act, 1986, subsection 3 of section 3

Respected Sir,

Greetings from MCHI-CREDAI!!!

In order to have a sustainable development with minimum impact to the environment, uniform environmental parameters must be developed which are common across India.

The whole purpose of introducing uniform environmental parameters is to avoid duplicity of work, redundancy in approval processes and misuse of discretionary powers which leads to delays. These uniform parameters must be incorporated in by-laws of local planning and sanctioning authorities so that implementation, monitoring, transparency and accountability can be brought into the environmental approval process.

We have observed that the points raised by the experts in SEAC's are similar in nature. We propose that based on the MoEF Office Memorandum No. 21-270/2008-IA.III dated June 19, 2013 the MoEF should direct the local planning and sanctioning authorities to include the following in their by-laws.



MCHI-CREDAI (ISO 9001:2008)

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UNIFORM ENVIRONMENT PARAMETERS					
Sr. No.	Environment Criteria	Parameter	Built-up Area		
			20,000 - 50,000 sq.m	50,000 - 1,00,000 sq.m	1,00,000 - 1,50,000 sq.m
a.	Brief Description and project location and planning	1. Name of the project, Survey number, Village, Taluka, District, State to be mentioned.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		2. Total Built-up area (FSI and Non- FSI) should be mentioned with detailed calculations certified by Architect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		3. Google earth image of plot showing landmarks to be submitted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		4. The conceptual building layout to be prepared based on local building bye-laws by a licensed Architect.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		5. All legal due-diligence is carried out.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		6. The setback/side margin, podium, basement ventilation etc will be done as per local bye laws.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		7. Provisional fire NOC to be obtained from local CFO (Chief Fire Officer)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Environment Impacts on Project Land.	8. The excavation/demolition debris must be disposed off in designated landfill areas or to be used for site levelling purpose. Under no circumstance, the debris will be disposed in river bed/lakes etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		9. The flow of existing storm water channel should not be blocked or restricted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		10. Top fertile soil to be preserved and to be later used in landscape.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c.	Water	11. Water balance table/chart should be submitted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		12. Source of water to be identified for areas where planned water supply lines are not available.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		13. Water treatment measures such as filtration, softeners etc should be submitted if the supply of water is non-potable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		14. Treated waste water to be recycled for flushing and gardening.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		15. Low flow fixtures to be used to promote water conservation.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		16. Common water meters to be installed to monitor consumption of water.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Waste Water Treatment	17. Sewage treatment plant of capacity capable of treating 100% waste water to be installed on site as per technologies mentioned in CPHEEO sewerage manual.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		18. Tertiary treatment to be provided so that the treated water characteristics are as per Central Pollution Control Board (CPCB).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		19. If STP and pump room are installed in 1 st basement, adequate ventilation as per NBC air changes norms should be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	Drainage Pattern	20. Excess treated water disposal plan to be submitted and the disposal shall be in accordance with CPCB guidelines	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		21. Storm water disposal plan to be submitted and in areas where storm water network is absent, the storm water surface runoff can be disposed off in nearby natural water streams/nallas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		22. Reduce hard paved area by using grass pavers/interlocking blocks for at least 10% of paved area so as to allow maximum water percolation and minimum surface run-off.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	Ground Water	23. Hydro-geological survey, Aquifer capacity and Ground water yield for ground water analysis shall be submitted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		24. Rain water harvesting plan shall be submitted indicating the number of recharge pits and bores and total rain water to be harvested. Only roof top rain water to be harvested so as to avoid contamination due to any polluted surface runoff. As a safety precaution, rain water on-line filters shall be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	Solid Waste Management	A) During Construction Phase:			
		25. Miscellaneous site debris such as broken tiles etc may be used on site for levelling /backfilling purpose.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		26. Packaged STP /mobile toilets shall be provided for labour camp.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		27. Polymer bags, cardboard boxes and other packaging material shall be handed over to authorized recyclers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		B) Post Construction Phase:			
		28. Organic waste composter (OWC) or vermiculture pits shall be installed on site for biodegradable waste treatment (capacity calculated at 0.3kg/person/day for residential project & 0.15kg/person/day for commercial project) The manure generated shall be used for landscaping.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		29. The non-biodegradable waste or e-waste shall be handed over to authorized recyclers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		30. STP sludge may be used as manure in landscaping.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	Air Quality and Noise Levels	31. The site to be made No Smoking zone and burning of waste to be banned	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		32. The Diesel Generator to be maintained regularly so that the smoke emission and noise levels are as per permissible norms.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		33. Regular P.U.C check for all construction machinery coming on site.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		34. Dust prevention by water sprinkling and barricading.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		35. Noise attenuation and insulation measures to be taken to reduce noise propagation to adjoining areas.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i.	Energy	36. Timer switch/ motion sensor/ automation for common area lighting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		37. Central/individual solar water heater providing a minimum of 25 lit/bathroom to be installed.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		38. 50% Common area lighting should be LED/ SOLAR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j.	Traffic Circulation System	39. Width of driveways, parking provision, ramp width and slope to be kept as per local bye laws.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k.	Green Belt/Green Cover	40. Provide 1 tree for every 200 sq.mt of net plot area. Native species of trees to be planted and trees causing allergies should not be planted.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		41. Wherever trees are cut or transplanted, compensatory plantation in the ratio of 1:3 to be done either on the same land or on the land directed by the Govt./ planning authority	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I.	Disaster/Risk Assessment plan	42. Fire tender movement plan/ Fire NoC to be submitted.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		43. Fire fighting system to be provided as per the fire NOC.	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m.	Socio Economic Impact and CSR	44. Biodegradable and non-biodegradable waste bins/bags to be provided to promote waste segregation at source.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		45. Importance of environment and various environment drives to be initiated after occupancy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		46. Importance of maintenance of environment infrastructure to be showcased by issuing pamphlets etc. after occupancy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		47. Provision for health care, medical kit, crèche, First aid room shall be given during construction phase for the construction workers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		48. Clean and potable drinking water to be provided to construction workers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n.	Environment Management Plan (EMP)	49. Detailed environment management plan comprising of estimated capital cost and O&M cost for the following environment infrastructure should be submitted:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		i. Sewage Treatment Plant			
		ii. Landscaping			
		iii. Rain Water Harvesting			
		iv. Power backup for environment infrastructure.			

		v. Environment Monitoring			
		vi. Solid Waste Management			
		vii. Solar and Energy Conservation			
		50. Environment monitoring cell comprising of only society / ultimate governing body shall be set up to ensure that the environment protection related infrastructure in the project is maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o.	Any Other (Materials)	51. Fly ash to be used in concrete.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		52. Fly ash bricks or AAC blocks to be used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		53. Wherever possible recycled materials having low embodied energy to be used.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		54. Processes and material to be used in order to encourage reduction in carbon foot print.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Therefore, MCHI-CREDAI would like to request that, in exercise of the powers conferred by sub-section 3 of section 3 of The Environment (Protection) Act, 1986, kindly empower the local planning and sanctioning authorities to implement the above mentioned uniform environmental parameters in their by-laws and thereby remove the SEAC and SEIAA appraisal required for category 8(a) projects.

Yours truly,

Yours Sincerely,
For MCHI-CREDAI



Vimal Shah
President