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KARJAT-KHALAPUR-KHOPOLI

To,
Smt. Manisha Mhaikar (I.A.S.),
Principal Secretary,
Environment Department,
Government of Maharashtra

GI-S-501/K
9/2/22
आवक लिपिक (नॉ.शा.)
पर्यावरण व वातावरणयुक्त बसत विभाग
मंत्रालय, मुंबई ४०० ०३२

Sub: Suggestions / Issues regard to Process of Environmental Clearance

Respected Ma'am,

At the onset, please accept your gratitude for the work carried out by the Environment department in the process of Environmental clearances. We are confident that under your guidance the said process will further witness the ease of doing business and the approvals will be streamlined.

We would like to suggest few points for your consideration:

- 1) **Approval on the basis of Conceptual Plan:** Presently, the EC is being granted on the basis of the plans approved by the planning authority. We request you to consider the projects with the valid concession report issued by Planning authorities in accordance with local planning regulations, while granting the Environment Clearance. The same is also mentioned in the circular of Government of Maharashtra dated 30 Jan 2014 issued by the Environment Department.
Also, we would like humbly put forth to your good office that along with IOD/IOA/ Concession documents, LOI which is issued by MCGM/SRA/MHADA should also be considered as a valid document for submission for Environmental Clearance.
- 2) **Not to insist on revised NOC for minor modification up to 10%:** To adapt to the market dynamics, Developers have to make changes in the product mix to suit the buyer's preference. Moreover, there are required amendment being made to DCPR / UDCPR. 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.
- 3) **Deferred Cases to be dealt on priority basis as on date 200 cases are pending:** We request that if the cases are deferred, the same need to be dealt separately on urgent basis. As currently, the cases have a waiting period of 2-3 months and if the cases are deferred for some amendment, they have to wait for the next hearing. Also, we request to increase the frequency of the meeting to clear huge pendency.
- 4) **Points already discussed in SEAC meeting should not be repeated with SEIAA:** We would also like to highlight that the point already presented and discussed with SEAC should not be repeated in the meeting with SEIAA. As this leads to duplication also the Ease of Doing business purpose is defeated.

- 5) **Scope / TOR for the SEIAA/ SEAC to be finalized:** We request the department to issue draft Scope / TOR for the committee, so that the project proponent prepares the presentation accordingly. SEACs / SEIAA to not to insist IOD/CC and other approvals issued by local planning authorities during appraisal of the projects. SEACs / SEIAA should appraise proposals on the parameters affecting Environment aspects.
- 6) **Suggestion in process time where TOR is applicable:** We would like to suggest that wherever the TOR is applicable, project proponent should be allowed to carry work till plinth as currently time required for this process is not less than 6 months. If this is received in the month of June, construction activity of plinth cannot be undertaken during monsoon season for 4 months. This means approx. 10 months are lost for the projects. The said delay results in huge financial losses for the developers for no fault of theirs. Hence, we request you to allow the construction until plinth level, with a registered undertaking to follow the order.
- 7) **SEAC should not hold on approval for various documents:** We would like to suggest that SEAC should hold on the clearance in the absence of other document like CRZ clearance, Traffic Noc, Tree NoC etc. The SEAC committee should process with a condition mentioned that the requisite documents to be obtained before SEIAA meeting.

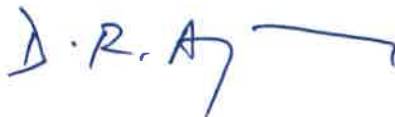
We hope that our above suggestions will be considered positively and necessary action will be initiated at the earliest.

Thanking you for your continuous support.

Yours faithfully,
For CREDAI-MCHI



Boman Irani
President



Dhaval Ajmera
Secretary