

**MANAGING COMMITTEE
2023-2025**

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Nikunj Sanghavi

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Pratik Patel
Sunny Bijlani
Rushi Mehta

JOINT TREASURER
Gurminder Singh Seera

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Subodh Runwal
Parag Munot
Nainesh Shah
Mukesh Patel
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Parth Mehta
Harmohan Sahni
Jayvardhan Goenka
Umay Kuwadia
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Binitha Dalal
Ayushi Ashar
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Adv. Parimal Shroff
Anuj Puri

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Dr. Adv. Harshul Savla

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Ajay Nahar
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Cherag Ramakrishnan
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Jayesh Chauhan
Aditya Shah
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Sudhanshu Agarwal
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Sahil Parikh
Aditya Mirchandani
Rushi Ajmera

YOUTHWING CONVENOR
Naman Shah

PROCUREMENT CONVENOR
Nimish Ajmera

WOMEN'S WING CHAIRPERSON
Sejal Goradia

CREDAI-MCHI

मध्यवर्ती टपाल केंद्र

मुख्यमंत्री सचिवालय

महाराष्ट्र शासन

मंत्रालय, मुंबई ४०० ०३२

अ.क्र. ३१७/२०२३

Ref. No. MCHI/PRES/23-25/081

Date: 3/7/2023

To

Shri Eknath Shinde,

Hon'ble Chief Minister,

Government of Maharashtra,

Mantralaya, Mumbai

Mumbai – 400032

**Sub: Issues/Suggestions for MPCB affecting the real estate sector and
Infrastructure Industry**

Respected Sir,

There are certain serious concerns in the functioning of the MPCB Department as mentioned below:

- 1. Delay in CC and CAC Meeting:** We would like to bring to your kind attention that more than 500 cases are pending with MPCB for CTE & CTO permissions. There have been no hearings scheduled in the last three months to appraise the projects. We humbly request that the hearing be scheduled at the earliest. Most of the cases are done with scrutiny & are still pending with documents/details demanded from project proponents like (audited balance sheet, OC and old documents which are at times 20 years old) this are just few examples. This documentation does not affect any environmental norms neither are related with the jurisdiction.
- 2. Validity of CTE & CTO permissions:** We humbly request to ensure that the validity of CET and CTO should be extended equal to the validity of EC.
- 3. Penalties Imposed not as per the Guidelines:** In recent times heavy penalties are being imposed by MPCB which is not as per the guidelines of CPCB. For eg. In Industries/Projects acquired through the NCLT route provision of penalty does not exist. In certain cases, old EC has been transferred to a new developer as directed by the SEIAA of Maharashtra since there was no process for the surrender of EC. In such cases MPCB has levied heavy penalties on the old EC which is no more valid.
- 4. One Time Permanent Permission by the CTO:** In cases of all Real Estate projects the CTO should be granted as one-time Permanent permission and no renewal revalidation condition should be applied as the developer hands over the project to Society and it is an unnecessary burden on the Societies to comply for renewal every year.
- 5. Submission of Bank Guarantees:** The condition of submission of Bank guarantees for CTE & CTO should be waived as CTO is only granted after all EC Conditions are met. The amount of bank Guarantees are arbitrarily decided and there is no defined process of reversing them once the Project is handed over to the Society. Due to this Crores of Rupees of Capital of developers across Maharashtra is lying blocked in the form of Bank Guarantees which directly affects the economy of the State.

Maharashtra Chamber of Housing Industry

Maker Bhavan II, 4th Floor, 18, V. Thackersey Marg, New Marine Lines, Mumbai - 400 020.

Tel: 42121421, Fax: 4212 1411/407 Email: secretariat@mchi.net Website: www.mchi.net

CREDAI-MCHI CHAPTERS : THANE | KALYAN-DOMBIVLI | MIRA BHAYANDAR | RAIGAD | NAVI MUMBAI |
BHIWANDI | PALGHAR BOISAR | SHAHAPUR-MURBAD | URAN-DRONAGIRI |
VASAI VIRAR | ALIBAG | KARJAT-KHALAPUR-KHOPOLI | YOUTH NMR

Sir, Needless to mentioned due to above mentioned issues with MPCB, Industries of all the sectors are facing unreasonable delays and ease of doing business cannot be achieved if the above issues are not mitigated.

We hope that an immediate action will be taken to support the growth of the industry.

Yours sincerely,
For CREDAI-MCHI



Domnic Romell
President



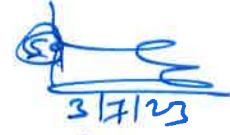
Dhaval Ajmera
Hon. Secretary

CC

✓ **1. Shri Devendra Fadnavis**
Hon'ble Deputy Chief Minister
Government of Maharashtra
Mantralaya, Nariman Point,
Mumbai – 400032

✓ **2. Shri Pravin Darade (I.A.S.),**
Principal Secretary,
Environment & Climate Change Department,
Mantralaya, Mumbai – 400032.

✓ **3. Shri Avinash Dhakane (I.A.S.),**
Member Secretary,
Maharashtra Pollution Control Board,
Kalpataru Point, 3rd Floor,
Opp. Cine Plannet, Sion-E-,
Mumbai - 400013.



लिपिक
उपमुख्यमंत्री यांचे कार्यालय
महाराष्ट्र शासन
मंत्रालय, मुंबई ४०० ००२

03/07/23
लिपिक,
प्रधान सचिव कार्यालय,
पर्यावरण व बातावरणीय बदल विभाग,
मंत्रालय, मुंबई-४०० ०३२



Maharashtra Pollution Control Board
Kalpataru Point, 2nd Floor, Sion Circle,
Opp. Cine Planet, Sion (East),
Mumbai - 400 022.
Tel. 24010437 / 24020781.
Website : www.mpcb.gov.in