

**PRESIDENT**  
Domnic Rumell

**IMMEDIATE PAST PRESIDENT**  
Boman Irani

**PRESIDENT-ELECT**  
Ajay Ashar

**STRATEGIC ADVISOR**  
Abhishek Lodha

**SENIOR VICE PRESIDENTS**  
Parag Shah  
Jayesh Shah  
Sukhraj Nahar  
Sanjeev Raheja  
Rasesh Kanakia

**VICE PRESIDENTS**  
Bandish Ajmera  
Shailesh Puranik  
Pritam Chivukula  
Amit Thacker  
Jackbastian Nazareth

**SECRETARY**  
Dhaval Ajmera

**TREASURER**  
Nikunj Sanghavi

**JOINT SECRETARIES**  
Tejas Vyas  
Pratik Patel  
Sunny Bijlani  
Rushi Mehta

**JOINT TREASURER**  
Gurminder Singh Seera

**COMMITTEE MEMBERS**  
Shahid Balwa  
Subodh Runwal  
Parag Munot  
Nainesh Shah  
Mukesh Patel  
Munish Doshi  
Raajesh Prajapati  
Shailesh Sanghvi  
Parth Mehta  
Harmohan Sahni  
Jayvardhan Goenka  
Umang Kuwadia  
Prashant Khandelwal  
Binitha Dalal  
Ayushi Ashar  
Samyag Shah  
Ricardo Romell

**SPECIAL ADVISORS**  
Ar. Hafeez Contractor  
Adv. Parimal Shroff  
Anuj Puri

**STATISTICS AND RESEARCH**  
Dr. Adv. Harshul Savla

**INVITEE MEMBERS**  
Rahul Sagar  
Ramkrishna Raheja  
Nishant Agarwal  
Harsh Hiranandani  
Ajay Nahar  
Azim F. Tapia  
Cherag Ramakrishnan  
Vijay Lakhani  
Jayesh Chauhan  
Aditya Shah  
Shraddha Goradia  
Sudhanshu Agarwal  
Hussain Lalani  
Sahil Parikh  
Aditya Mirchandani  
Rushi Ajmera

**YOUTHWING CONVENOR**  
Naman Shah

**PROCUREMENT CONVENOR**  
Nimish Ajmera

**WOMEN'S WING CHAIRPERSON**  
Sejal Goradia

Ref. No. MCHI/PRES/23-25/141

Date: 3/10/2023

To,

Shri Eknath Shinde,

Hon'ble Chief Minister,

Government of Maharashtra,

Mantralaya, Mumbai

Mumbai - 400032

Subject: Prayer to Introduce the Amnesty Scheme for delay in renewal of Consent to Operate (CTO) & Consent to Establish (CTE)

- Reference: 1. MPCB Circular Bearing No. BO/MPCB/AS (T)/Circular/B-220712FT50047 dated 12/07/2022  
2. Corrigendum letter bearing No. BO/P&L Div/B-414 dated 18/01/2013  
3. Circular issued by the MPCB vide No. BO/P&L Div/B-7159 dtd. 05.12.2012

Respected Sir,

This is with reference to imposition of heavy penal charges for delay in renewal of CTO & CTE for residential projects as per circular issued by the Maharashtra Pollution Control Board on 12/07/2022, No. BO/MPCB/AS (T)/Circular/B-220712FT50047. The same has been issued without the sanction of the environment committee.

We would like to bring to your notice that:

1. MPCB had previously issued a similar circular, no. BO/P & L Div/B-7159, dated 05/12/2012, for the imposition of lapse period consent fee and delayed payment charges in respect of grant of consent/authorization under various environmental laws, which was not sanctioned by the Environment department. As a result, MPCB issued a corrigendum letter, no. BO/P & L Div/B-414, dated 18/01/2013 for clarification to collect consent fee for the lapse period, however no penalty imposed.
2. MPCB has published a circular related to imposition of penal fee dated 12<sup>th</sup> July 2022 unfortunately the same has been imposed with retrospective effect. This is not only fair but also unreasonable. There have been genuine delays due to covid lockdown, however MPCB is also imposing penalties for NOC which have lapsed in the first lockdown ie from March 2020. Even Government of India followed by Government of Maharashtra and many other government agencies like MCGM, MHADA and SRA have given various concessions during covid19 pandemic period.
3. Due to the nonpayment of these heavy penalties MPCB has also stopped renewal of these Consents. In the meanwhile, we request you to at least renew this consent until a final decision is taken by the environment committee on the said issue.

**Maharashtra Chamber of Housing Industry**

Maker Bhavan II, 4<sup>th</sup> 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](http://www.mchi.net)

**Prayer:** In the interest of the real estate sector which has undergone unforeseen scenarios including the pandemic etc. it's our humble request to introduce an amnesty scheme for all the projects where there has been a delay in renewal of consent to operate (CTO) and consent to establish with a maximum penalty of Rs. 100000/- (INR One Lakh only) per project. We would also request you to kindly consider to revoke the circular issued by MPCB dated 12/7/22 & to expedite the process of renewal of consent to establish or consent to operate.

Thanking you.

Yours sincerely,  
For CREDAI-MCHI



**Domnic Romell**  
President



**Dhaval Ajmera**  
Hon. Secretary

**PS: Contact Person Mr. Sanjay Phope - + 91 9619345193**