

## Letter regarding project not falling under ESZ

**File No IA- J-11011/528/2021-IA-II(I)**  
Government of India  
Ministry of Environment, Forest & Climate Change  
Impact Assessment Division

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Indira Paryavaran Bhawan,  
Jor Bagh Road, New Delhi-110 003

Dated: 27<sup>th</sup> December, 2023

To

**Shri Hardik Agrawal (Director),**  
M/s. Sufalam Industries Limited  
Navrang, Vasudev, Vrindavan,  
Jamtha, Nagpur (Rural), Maharashtra-441122.

**Sub: Proposed establishment of new grain based 210 KLPD Ethanol Distillery Unit at Village D-3, MIDC, Deori, Taluka - Deori, District - Gondia, Maharashtra State by M/s. Sufalam Industries Limited - Environment Clearance reg.**

Sir,

This has reference to your online proposal No. IA/MH/IND2/246505/2021, dated 06th January, 2022 for environmental clearance to the above-mentioned project. Based on the proposal submitted by PP and the recommendations of the EAC (Industry-II), the Ministry has granted environmental clearance to the project (EC ID EC22A060MH144844 dated 25.02.2022).

2. Subsequently, the Ministry received a complaint from Shri. S.S. Patil, a resident of Solapur, Maharashtra, alleging that the M/s. Ampl Environ Pvt. Ltd. (the consultant) provided inaccurate information by stating that there are no eco-sensitive regions within a 10 km radius of the project site whereas the entire 'Deori' village, where the proposed distillery site is located, falls within the Ministry's ESZ Notification dated 25.02.2016, covering Nagzira WLS, New Nagzira WLS, Koka WLS, Navegaon WLS, and Navegaon NP.

3. Based on complaint received and after due examination, Ministry issued a Show Cause Notice (SCN) to M/s. Sufalam Industries Limited vide letter dated 26.05.2023 under para 8 (vi) of the EIA Notification of 2006 read with Section 5 of the Environment (Protection) Act, 1986 for concealment of factual information, as the project site falls within the New Nagzira and Koka Eco Sensitive Zone (ESZ) notified on 25.02.2016.

4. In response to the SCN, the project proponent, through letter dated 22.06.2023, acknowledged that during the EC application, the distance from the national park and wildlife sanctuary was measured from the buffer area

boundary. However, the distance from the eco-sensitive zone (ESZ) was not measured due to ambiguity surrounding the ESZ area and it was realized later that the activity is not permitted as per the ESZ Notification, and there was no deliberate attempt to conceal information or misguide the authorities. The PP has also stated that construction or erection of the distillery unit was not commenced after the realization that the project site is located within the ESZ. The PP has also informed that, as per the draft ESZ notification SO 876 (E) dated 24.02.2023 of MoEF&CC, the area of MIDC Deori is exempted from the eco-sensitive zone (ESZ) of Nagzira Wildlife Sanctuary, New Nagzira Wildlife Sanctuary, Koka Wildlife Sanctuary, Navagaon Wildlife Sanctuary, and Navegaon National Park in Gondia and Bhandara Districts in Maharashtra. Considering the aforementioned facts, the industry requested that no legal action be taken against their proposed distillery unit with a request for personal hearing before any adverse action is taken.

5. Opportunity for Personal Hearing was given as per request of PP which was held on 09.08.2023 at 10:30 AM. During the personal hearing PP admitted that Industry was located within the area included in the ESZ Notification dated 25.02.2016 and there was no deliberate attempt to conceal information or misguide the Authorities and requested not to revoke the EC as no construction had been started and as per draft ESZ notification SO 876 (E) dated 24.02.2023, the area of MIDC Deori is exempted from the Eco-Sensitive Zone (ESZ).

6. The matter has been examined in Ministry and it is found that the project site falls outside draft ESZ notification SO 876 (E) dated 24.02.2023. The draft ESZ got finalized vide S.O. 4132(E) dated 20.09.2023 and as per the final notification the area of MIDC Deori is exempted from the Eco-Sensitive Zone (ESZ) of Nagzira Wildlife Sanctuary, New Nagzira Wildlife Sanctuary, Koka Wildlife Sanctuary, Navegaon Wildlife Sanctuary and Navegaon National Park.

7. Further, the proposed site was inspected by Regional Office on 26.09.2023 and RO has submitted the factual report of the site vide letter EC-2221IRON/2023-NGP-12240 dated 27.09.2023 wherein it was reported, along with some observations, that the site is vacant open land and no activity had been carried out at the site.

8. Subsequently, the matter was considered in EAC (Ind-II) held on 04<sup>th</sup> - 05<sup>th</sup> October, 2023 wherein PP has submitted compliance to observations made in inspection report, budgetary allocation of EMP, revised ecological profile of the proposed site. Details are enclosed as Annexure. The Committee was satisfied with the information furnished by the Project Proponent. After detailed deliberations the Committee stipulated the following additional specific conditions as safeguard measures:

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(i) The project proponent shall prepare a site-specific conservation plan and wildlife management plan for Schedule-I species in the study area, as applicable to the project, and submit to Chief Wildlife Warden for approval. The recommendations shall be implemented in consultation with the State Forest/Wildlife Department in a time bound manner.

(ii) ESP along with stack height of 60 m shall be provided to bagasse/coal fired boilers to meet the particulate matter emissions within the statutory limit of 30 mg/Nm<sup>3</sup>. The SO<sub>2</sub> and NO<sub>x</sub> emissions shall be within the prescribed norms of 100mg/Nm<sup>3</sup>. At no time, the emission shall exceed the prescribed standards. In the event of failure of any pollution control system adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency. Performance assessment of pollution control devices/ systems will be conducted annually.

(iii) 6 feet high compound wall and 2 feet barbed wire fencing above compound wall along nala boundary shall be provided and 10 m thick plantation buffer from compound wall towards nala shall be created. PP shall ensure that no wastewater/treated water and solid waste is discharged into the nallah.

(iv) As proposed, 5 m thick plantation buffer from compound wall towards dilapidated school building of Z.P Gondia.

(v) Storage of raw materials shall be either in silos or in covered areas to prevent dust pollution and other fugitive emissions. All stockpiles should be constructed over impervious soil and garland drains with catch pits to trap runoff material shall be provided. Biomass shall be stored in covered sheds and wind breaking walls/curtains shall be provided around biomass storage area to prevent its suspension during high wind speed. All Internal roads shall be paved. Industrial vacuum cleaner shall be provided to sweep the internal roads. The Air Pollution Control System shall be interlocked with process plant/machinery for shutdown in case of operational failure of Air Pollution Control Equipment.

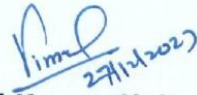
(vi) PP shall sensitize and create awareness amongst the people working within the project area as well as its surrounding area on the ban of Single Use Plastic in order to ensure the compliance of Notification published by MOEFCC on 12th August, 2021. A report along with photographs on the measures taken shall also be included in the six-monthly compliance report being submitted to concerned authority.

9. The MoEF&CC has examined the proposal in accordance with the extant provisions of the Environment Impact Assessment (EIA) Notification,




2006 & further amendments thereto and based on the recommendations of the Expert Appraisal Committee, hereby withdraws the SCN issued vide letter dated 26.05.2023 and further stipulates above additional conditions in EC ID EC22A060MH144844 dated 25.02.2022. All other terms & conditions stipulated vide EC ID EC22A060MH144844 dated 25.02.2022 for granted for proposed establishment of new grain based 210 KLPD Ethanol Distillery Unit at Village D-3, MIDC, Deori, Taluka - Deori, District - Gondia, Maharashtra State by M/s. Sufalam Industries Limited remain unchanged.

10. This issues with the approval of the competent authority.

  
(Dr. Vimal Kumar Hatwal)  
Scientist-'E'

**Copy to: -**

1. The Secretary, Department of Environment, Government of Maharashtra, Mumbai 400 032
2. The Regional Officer, Ministry of Env., Forest and Climate Change, Integrated Regional Office, Ground Floor, East Wing, New Secretariat Building, Civil Lines, Nagpur- 440001 Maharashtra
3. The Chairman, Central Pollution Control Board Parivesh Bhavan, CBD-cum-Office Complex, East Arjun Nagar, Delhi -32
4. The Member Secretary, Maharashtra Pollution Control Board, Kalpataru Point, 3rd and 4th floor, Opp. Cine Planet, Sion Circle, Mumbai - 22
5. Monitoring Cell, Ministry of Environment, Forest and Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi
6. The District Collector, Gondia District, Maharashtra
7. Guard File/Monitoring File/Parivesh portal/Record File.

  
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**Annexure**

<b>S. No.</b>	<b>Points raised by IRO in his report</b>	<b>Compliance by PP</b>
1	PP informed that the site does not fall under the ESZ, however, PP has not submitted any map in this regard.	As per the ESZ notification S.O. 4132(E) dated 20/09/2023 of MoEF&CC, the area of MIDC Deori is exempted from the eco-sensitive zone (ESZ) of Nagzira Wildlife Sanctuary, New Nagzira Wildlife Sanctuary, Koka Wildlife Sanctuary, Navegaon Wildlife Sanctuary and Navegaon National Park. Project site is located approx. at 0.44 km from ESZ boundary. Map showing distance of project site to the ESZ boundary has been submitted.
2	School building at about 213 m on Western side of the site	School building is present at 213 m on the western side of the site which belongs to Deori Nagar Parishad and same is not in use from the year 2015. The building itself is in dilapidated state. PP has submitted Photographs of school.
3	Nalla is flowing adjoining the North- West corner of the site flowing from west to eastern direction.	NOC for the establishment of proposed 210 KLD distillery is received from Executive Engineer, Gondia Irrigation Division & same is submitted.
4	Wildlife Schedule -I species data may be obtained from the Wildlife Division of the Ministry.	PP has prepared conservation plan for schedule I species as per the list shared by the DFO, Gondia and the same is submitted to DFO, Gondia for approval. Fund earmarked towards Conservation of Schedule - I species is considered in revised EMP.  <b>Brief Conservation Plan:</b> An integrated forest and wildlife conservation plan for Sufalam Industries Limited encloses the methods employed by the organization to safeguard the forests and wildlife in Gondia district with special attention on the closely located Navegaon National Park. The

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		conservation plan focuses on the protection of the predominant forest types and listed umbrella species of the region. Conservation of wildlife and forests in the region shall be a continuous process evolving with each new findings of the monitoring process and will be constantly upgraded based on the observations of experts and all stakeholders.
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**Budgetary allocation for Environment Management Plan:**

S. No.	COMPONENT	PARTICULARS	CAPITAL INVESTMENT (IN LAKHS)	RECURRING INVESTMENT (IN LAKHS)	
1.	Air	Construction of new stack for boiler and ESP	250	20	
2.	Water	<ul style="list-style-type: none"> <li>Construction distillery CPU</li> <li>MEE &amp; spray dryer for Distillery</li> </ul>	1600	100	
3.	Noise	Acoustic enclosures, Silencer pads, ear plugs etc	30	2	
4.	Environment monitoring and Management	Quarterly Environment Monitoring (Per Year)	--	10	
		Ambient air monitoring			PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , NOx
		Boiler & DG Set Monitoring			TPM, SO <sub>2</sub> , NOx
		Effluent (Treated & Untreated)			pH, COD, BOD, TSS, TDS, Oil & Grease

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5.	Occupational Health	Glares, Breathing Masks, Gloves, Boots, Helmets, Ear Plugs etc. & annual health-medical checkup of workers, Occupational Health (training, OH center)	80	15
6.	Greenbelt	Green belt development activity	10	3
		Maintenance of green belt	--	3
7.	Biodiversity	Conservation of Schedule I species	00	3.5
8.	Solid Waste Management	Solid Waste Management	50	7
9.	Rain water harvesting	Rain water harvesting	15	2
10	Energy Conservation measures	Solar PV panel, Solar street light, High efficiency pump for CPU	400	4
		<b>TOTAL COST (INR, LAKHS)</b>	<b>2435</b>	<b>169.5</b>

**Revised distances of ESZ, forest areas and water bodies:**

Features	Description	Direction w.r.t. site	
Nearest Reserved Forests	Reserved Forest near Parastola ~2.4Km	S	
	Reserved Forest near Deori~2.2 Km	W	
	Reserved Forest near Nawatola~0.2 Km	N	
State boundary	Maharashtra- Chhattisgarh State boundary~6.92 Km	E	
Nearest National Park/Wildlife Sanctuary	<b>Approximate distance as per Ministry S.O 4132. (E) dated 20/09/2023</b>	<b>From ESZ</b>	<b>Heading in Degrees</b>

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	Nagzira Wildlife sanctuary	0.44	168.50
	New Nagzira Wildlife sanctuary	0.4	168.50
	Koka Wildlife sanctuary	0.44	168.50
	Navegaon Wildlife sanctuary	0.44	168.50
Forest	Malewada Forest Range ~ 12.75 Km		
Nearest Defence installation	None within 10 km radius of the project		
Nearest CRZ	None within 10 km radius of the project		

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