

To
**Additional Principal Chief Conservator of Forests (C),
Ministry of Environment, Forest and Climate Change,**
Regional Office (WZ), E-5, Kendriya,
Paryavaran Bhawan, Aera Colony,
Link Road No. – 3, Bhopal – 462 016.
E-mail: rowz.bpl-mef@nic.in

Sub : Half Yearly Compliance for Environment and CRZ clearance for 'Expansion of notified Multi-product SEZ by adding 1840 Ha notified SEZ with existing approved area of 6641.2784 ha to make it 8481.2784 ha at Mundra' by M/s Adani Ports and Special Economic Zone Ltd.

Ref : Environment & CRZ clearance vide letter no. F. No. 10-138/2008-IA.III, dated 12th February, 2020
(Annexure – A)

Dear Sir,

Please refer the above cited reference for the said subject matter. In connection to the same it is to state that M/s. Adani Ports and SEZ Limited has been granted Environment & CRZ clearance vide letter no. F. No. 10-138/2008-IA.III, dated 12th February, 2020 for Expansion of notified Multi-product SEZ by adding 1840 Ha notified SEZ with existing approved area of 6641.2784 ha to make it 8481.2784 ha. Further, inline to the APSEZ's request, Ministry of Commerce & Industry (MoCI) vide Gazette order dtd. 4th July 2019 has de-notified 46.6894 from total area of 8481.2784 Ha, thereby making resultant area of notified Multiproduct SEZ as 8434.5890 Ha.

We would like to state that, no development activities has been carried out in the notified SEZ area of 1840 Ha, after obtaining Environment Clearance, during the compliance period i.e. Oct'19 to Mar'20.

Kindly consider above submission and oblige.

Thank you,
Yours Faithfully,
For, M/s Adani Ports and Special Economic Zone Limited



Avinash Rai
Chief Executive Officer
Mundra & Tuna Port

Encl: As Above

Copy to:

- 1) The Director (IA Division), Ministry of Environment, Forests & Climate Change, Indira Paryavaran Bhawan, Jor Bagh Road, New Delhi-110003
- 2) Zonal Officer, Regional Office, CPCB – Western Region, Parivesh Bhawan, Opp. VMC Ward Office No. 10, Subhanpura, Vadodara – 390 023
- 3) Member Secretary, GPCB – Head Office, Paryavaran Bhawan, Sector 10 A, Gandhi Nagar – 382 010
- 4) The Director, Forests & Environment Department, Block – 14, 8th floor, Sachivalaya, Gandhi Nagar – 382 010
- 5) Regional Officer, Regional Office GPCB (Kutch-East), Gandhidham, 370201

ANNEXURE – A

F. No. 10-138/2008-IA.III
Government of India
Ministry of Environment, Forest and Climate Change
Impact Assessment Division (Infra-1)

Indira Paryavaran Bhawan
Jor Bagh Road, Ali Ganj
New Delhi - 110 003
Dated: 12th February, 2020

To

The Joint President

Adani Ports and Special Economic Zone Ltd.
Adani House near Mithakhali six roads, Navrangpura
Ahmedabad-380 009 (Gujarat)

Sub: 'Expansion of notified Multi-product SEZ by adding 1840 Ha notified SEZ with existing approved area of 6641.2784 ha to make it 8481.2784 ha at Mundra' by M/s Adani Ports and Special Economic Zone Ltd. - Environmental and CRZ Clearance regarding.

Sir,

This has reference to your proposal no. IA/GJ/MIS/75351/2018 dated 8th June, 2018, and subsequent clarifications vide your letters dated 16th August, 2018, 17th October, 2018, 23rd October, 2018, 1st November, 2018 and 3rd November, 2018, submitting online to this Ministry for grant of Environmental and CRZ Clearance in term of the provisions of the Environment Impact Assessment (EIA) Notification, 2006 and Coastal Regulation Zone (CRZ) Notification, 2011 under the Environment (Protection) Act, 1986.

2. The above mentioned proposal was considered by the Expert Appraisal Committee (EAC) for Infrastructure Development, Coastal Regulation Zone, Building/ Construction and Miscellaneous projects, in its 191st meeting on 25th June, 2018, 195th meeting on 30-31 August, 2018 and 201st meeting on 1st November, 2018.

3. The details of the project, as per documents submitted by the project proponent, and also as informed during the above said EAC meetings along with EIA Consultant M/s Aditya Environmental Services Private Limited, Mumbai, are reported to be as under:

- (i) Expansion of notified Multi-product SEZ by adding 1840 ha notified SEZ with existing approved area of 6641.2784 ha to make it 8481.2784 ha at Mundra by APSEZ. The project is located in Village Mundra, Tehsil Mundra, District Kutch, Gujarat.
- (ii) The proposed project envisages addition of 1840 ha notified SEZ in existing approved area of 6641.2784 ha to make it 8481.2784 ha. (i.e. expansion proposal).
- (iii) Facilities like Processing Zones, Non-processing Zones, Warehousing Zones, Road Network (Trunk as well as Internal), Bridges or Culverts over natural drain, Rail Network, IT-Telecommunication Network, Electric Network, Water Supply, Conservation & Drainage Network, Effluent Collection Network and Utilities & Supporting Infrastructure will be developed within the proposed project area.
- (iv) **Whether the project is in a Critically Polluted Area: No.**

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- (v) **Details of Tor and EC issued under EIA Notification, 2006:** ToR was issued on 31st March, 2009. Public Hearing was conducted on 5th October, 2010 at Ganesh temple, Luni, Mundra, Kachchh, Gujarat. Major issues include Legal status of land, blockage of creeks/CRZ area, destruction of vegetation including mangroves, effects on fishermen livelihood, effects on agriculture/farmers/animal husbandry, possibility of environmental pollution, environmental monitoring, and employment generation.
- The Expert Appraisal Committee considered the proposal in its meetings dated 16th April, 2012 (111th meeting), 4th June, 2012 (113th meeting) and 9th July, 2012 (114th meeting) and recommended for the grant of EC & CRZ clearance to Multi-product SEZ spread over an area of 8481.2784 ha. However, the Ministry issued EC for 6481.2784 ha only, after reducing 1840 ha vide letter no. 10-138/2008-IA.III dated 15th July, 2014.
- (vi) **If the Project involves diversion of forest land:** Forest Clearance for the proposed project area, i.e., 1840 ha was obtained vide MoEF&CC's letter No. 8-2/1999-FC (pt.) dated 30th September, 2009.
- (vii) **If the project falls within 10 km of eco-sensitive zone:** Not applicable as there is no eco-sensitive area within 10 km of the project site.
- (viii) **Water requirement, source, status of clearance:** Water requirement for the proposed project will be to the tune of 95 MLD. Source of water will be desalination plant / Narmada water supplied through APSEZ's utility division. Requisite permissions for the desalination plant are already obtained by APSEZ. No groundwater will be extracted for the proposed project.
- (ix) **Waste water quantity, treatment capacity detail:** Sewage and effluent generated will be treated in decentralized STPs (total capacity of 62 MLD) and decentralized CETPs (total capacity of 67 MLD) respectively. Permissions for mentioned capacities of STP and CETP are already obtained as part of the EC and CRZ clearance for the existing Multi-product SEZ project (6641.2784 ha).
- (x) **Recycling / reuse of treated water and disposal:** Treated water will be utilized for development of greenbelt within the project site.
- (xi) **Solid waste management:** Municipal wastes in the form of canteen wastes will be converted to manure. Other solid wastes such as papers, plastic, cardboard etc. will be segregated and send to authorised recyclers. Disposal of municipal solid waste will be carried out as per prevailing norms.
- (xii) **Hazardous waste management:** Hazardous waste generated will be disposed through authorized vendors / registered recyclers under the preview of Hazardous and other wastes (management and transboundary movement) rules, 2016.
- (xiii) **If the Project is in CRZ Area:**
- Components in CRZ Area: The proponent has assured that only activities permitted within the CRZ area (as per the CRZ notification 2011 and its subsequent amendments) will be carried out after obtaining due approvals. No other activities will be carried out within the CRZ areas.
 - Recommendation of Coastal Zone Management Authority: CRZ recommendation for the entire area of 8481.2784 ha (including the sea water intake and outfall

facility) is obtained from GCZMA vide their letter no. ENV-10-2010-1601-E dated 27.03.2012. Further, recommendation for addition of 1840 ha land into presently approved SEZ area of 6641.2784 ha (so that total is 8481.2784 ha) is also obtained from GCZMA vide their letter no. ENV-10-2010-1601-E dated 4th January, 2017.

- Layout on CRZ Map of 1:4000 scale prepared by authorised agency: CRZ maps in the respective scale are submitted to GCZMA and MoEF&CC as per the requirements.

(xiv) **Cost of the Project:** Estimated cost of the project is INR 5105 Crore.

(xv) **Employment potential:** 75,500.

(xvi) **Benefits of the project:** Economic development, Employment opportunities, Infrastructure development in the region.

(xvii) **Details regarding pending court cases:**

Sl. No.	Case reference	Matter description	Present status	Remarks
1	Supreme Court of India SLP (c) No.1526 of 2014	Appeal has been filed by the Company and 12 units against the Hon'ble Gujarat High Court order in relation to 12 units in Mundra SEZ. Public Interest Litigation was filed by Mr. Gajubha Bhimaji Jadeja and others before the Hon'ble Gujarat High Court alleging that 12 units in Mundra SEZ have continued their operational and construction activities though Mundra SEZ has not been granted the environmental clearance. The Hon'ble Gujarat High Court disposed of the petition in January, 2014 and directed MoEF&CC to consider grant of environmental clearance to Mundra SEZ within a period of 30 days and also ordered that in the meantime, no activities can be carried out by the 12 units in SEZ.	Pending	MoEF&CC granted the Environmental and CRZ clearance to Multiproduct SEZ on 15 th July, 2014.
2	Supreme Court of India SLP (c) No. 28788 of 2016	Appeal against the Hon'ble Gujarat High Court order in relation to ship recycling project. Public Interest Litigation was filed before the Hon'ble Gujarat High Court by Mr. Pravin singh Bhurubha Chauhan alleging that though no clearance is granted to ship recycling project, work has been undertaken in this regard. It also alleged that the site for ship recycling project falls in area having sand dunes which is not allotted to APSEZ. The Regional Officer of MoEF&CC visited the site and filed an affidavit stating that: (a) No work has been undertaken for ship recycling project; (b) Ship recycling project is not part of area containing alleged sand dunes; (c) The area is sandy and is part of 1840 ha of forest land The Hon'ble Gujarat High Court dismissed the petition in February, 2015.	Pending	The Hon'ble Supreme Court in October, 2017 requested the Sunita Narain Committee to look into the matter once again and report at the earliest with regard to the levelling of sand dunes especially with regard to the Port facilities in Mundra District. The Committee has filed its report to the Hon'ble Supreme Court.

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- (xviii) There are no settlements in the present land hence there is no requirement of R&R plan.
- (xix) Necessary permissions for STP/CETP considering the development of entire area of 8481.2784 ha are already obtained (as part of EC dated 15th July, 2014). Hence no new proposal for the water treatment facilities is required. No new CETP will be proposed.
- (xx) Source and quantum of water & power requirement for the overall SEZ area of 8481.2784 ha will remain unchanged as per the original proposal. Hence, no additional resource consumption is required.
- (xxi) Provided a list of 41 industrial units presently running or under construction along with lay out plan of proposed 1840 ha for further addition to SEZ area. Also provided the details of water treatment facilities (STPs & CETPs) for various operational units.
- (xxii) Provided data for monitoring of air quality, groundwater (bore well) and soil during period between October, 2017 and March, 2018.
- (xxiii) Predicted air quality scenario for PM₁₀ and PM_{2.5}, SO₂ and NO₂ in respect of all approved and proposed development till year 2030.
- (xxiv) Provided details of green belt along with map in the SEZ area.
- (xxv) The landuse breakup showing various Developmental zones within the proposed additional area (1840 ha) is as under:

Sl. No.	Development Zone	Area (ha)
1	Port backup and Related Industrial Developments (Requiring waterfront)	187.22
2	Industrial Zone (Chemical, Textile & Apparel, Heavy/Light Engineering, Plastic, Cement)	978.64
3	Warehousing & Container Freight Station (CFS) Zone	88.33
4	Green/Renewable Energy	24.15
5	Open/Green Spaces	607.00
6	Facilities / Amenities & Utilities / Transportation	256.20
	TOTAL AREA	1840.00

Note: (1) This is an illustrative and tentative planning for the purpose of carrying out the impact assessment studies.
 (2) Proposed greenbelt by APSEZ = 305 ha (16.6%) and by industrial units = 302 ha (16.4%).

- (xxvi) There is no change in the proposal in respect of industries proposed in earlier EC application of 1840 ha and in present application.
- (xxvii) Details of estimated storage capacity at port is given in the following table:

Cargo	Storage area(ha)	Storage capacity(MT)	Handling capacity(MMTPA)
Coal	93.6	2.62	28.08
Liquid	74.9	0.97	11.98
Dry bulk	18.7	0.52	5.61
Total	187.2	4.11	45.67

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(xxviii) Impact assessment and related mitigation measures for cargo handling and storage activities have already been covered as part of EIA study.

(xxix) In respect of high quantity of heavy metals in soil, it was informed that dredged material naturally contains certain concentration of heavy metals. The said dredged material was used for level raising within SEZ areas hence soil samples show higher levels of heavy metals. However, the soil quality from surrounding villages is intact and does not show any contamination of heavy metals. As per TCLP analysis, all the parameters of leachate are well within the prescribed limits as per Hazardous and Other Wastes (Management & Transboundary Movement) Rules – 2016.

(xxx) Provided details of study by National Centre for Sustainable Coastal Management (NCSCM), Chennai showing an increase of 246 ha in the mangrove cover between 2011 and 2016. Also provided the details of various measures being undertaken for the conservation of mangrove and associated creeks.

(xxxi) Mangrove cover has been increased by 281 ha from year 2011 to year 2018. The status of Mangrove cover, as provided by the project proponent, is as under:

Category	2011	2018
Dense	382	643
Sparse	590	906
Scattered	1122	826
Total	2094	2375

(xxxii) Detailed activity wise CER planning as per Ministry's O.M. dated 1st May, 2018 as provided by the proponent is as under:

Sl. No.	Core Area	Fund provision (Rs. In Lakh)
1	Biodiversity	152
2	Water Conservation and Water Recharge Projects	380
3	Fisherman alternate livelihood	125
4	Women Empowerment Project to promote entrepreneurship	84
5	Agriculture Promotion	233
6	Community Resource Center/Training Center	275
TOTAL		1249

(xxxiii) Provided information about change in the mangrove cover with geo-coordinates using satellite data of 2016-17 and 2018:

Point	Co-ordinates		Area in ha	Status
1	22°47'48.97"N	69°44'11.95"E	1.45	Growth
2	22°47'44.36"N	69°43'50.74"E	6.6	Growth
3	22°46'38.19"N	69°43'46.11"E	2.9	Reduction

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Point	Co-ordinates		Area in ha	Status
4	22°46'7.5"N	69°41'58.44"E	3.75	Growth
5	22°44'55.56"N	69°42'53.38"E	0.36	Reduction
6	22°45'52.43"N	69°40'4.02"E	7.6	Growth
7	22°45'30.15"N	69°39'30.19"E	4.8	Growth
8	22°45'1.59"N	69°39'49.92"E	2.84	Reduction
9	22°45'18.62"N	69°38'54.16"E	1.8	Reduction
10	22°45'26.74"N	69°38'37.14"E	9.1	Growth
11	22°46'6.48"N	69°39'18.27"E	1.2	Growth
12	22°46'5.45"N	69°39'33.18"E	1.6	Reduction
13	22°46'10.15"N	69°39'45.96"E	2.5	Reduction
14	22°45'49.75"N	69°39'21.36"E	1	Growth
15	22°46'1.10"N	69°38'52.67"E	4.7	Growth
16	22°46'32.56"N	69°39'16.91"E	6.7	Reduction
17	22°47'3.79"N	69°38'44.13"E	4.8	Growth
18	22°46'29.82"N	69°38'15.99"E	3	Growth
19	22°46'19.73"N	69°37'38.90"E	6	Growth

4. The EAC has noted that the project was recommended by the EAC in its 114th meeting held on 9th July, 2012 for an area of 8481.2784 ha. However, the Ministry of Commerce and Industries (MoCI) de-notified 1840 ha of land from SEZ vide its notification S.O. 2501 (E) dated 12th October, 2012. In view of this, MoEF&CC granted Environmental Clearance to the said project for an area of 6641.2784 ha only (8481.2784 ha - 1840 ha) vide MoEF&CC's letter no. 10-138/2008-IA.III dated 15th July, 2014. The Ministry of Commerce and Industries (MoCI) had re-notified the de-notified portion of SEZ vide its notification S.O. 3029(E) dated 11th December, 2015. Upon request of the proponent, vide their online application no. IA/GJ/MIS/75351/2018 dated 8th June, 2018, the Ministry considered the proposal for grant of Environmental Clearance for expansion of SEZ from 6681.2874 ha to 8481 2874 ha by including the earlier de-notified area of 1840 ha. The proposal was appraised by EAC in its 191st meeting held on 25th June, 2018, 195th Meeting on 30-31 August, 2018 and 201st meeting on 1st November, 2018. After detailed deliberation during 201st meeting on 1st November, 2018, the EAC recommended the proposal for grant of Environmental Clearance for the proposed expansion of Multi-product SEZ Mundra by M/s APSEZ Limited with certain specific conditions. The Ministry, therefore, grants the environmental clearance to M/s APSEZ for the said expansion, with following specific conditions in addition to all conditions stipulated in earlier EC letter no. 10-138/2008-IA.III dated 15th July, 2014:

PART A - SPECIFIC CONDITIONS

- (i) This Environmental and CRZ Clearance for the said expansion shall be subject to the outcome of ongoing court cases.

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- (ii) Total area of Multi-product SEZ run by APSEZ Limited will be 8481.2784 ha after this expansion. The geo-coordinates of the additional piece of land (1840 ha) are 22°47'35.41" - 22°47'57.67"N and 69°40'6.15" - 69°32'46.58"E.
- (iii) The proponent shall obtain, wherever applicable, separate Environmental Clearance including Risk Assessment for the Isolated Storage and Handling of Hazardous Chemicals under schedule 6(b) of the EIA Notification, 2006 and subsequent amendments thereto.
- (iv) The proponent shall prepare and implement the Mangrove Conservation and Management Plan in consultation with the State Forest Department. This Plan shall be subject to monitoring by the third party. The implementation report and third party audit report be submitted to the Regional Office, MoEF&CC and the State Forest Department.
- (v) All the recommendations and mitigation measures as proposed in the Cumulative Impact Assessment report of Waterfront, SEZ and ancillary Developments along Mundra, Kutch District, Gujarat shall be complied in letter and spirit. Proper record of monitoring should be placed along with six monthly compliance report.
- (vi) This environmental clearance is only for the Multi-product SEZ. Any other activity within the Multi-product SEZ would require separate environmental clearance, as applicable under EIA Notification, 2006 and subsequent amendments. For all individual units, environmental clearances, as applicable, shall be obtained from the respective regulatory authorities.
- (vii) An Emergency Response Centre to be established to take care for prevention of and management of accidents, chemical spills etc. including that during transportation of chemicals with the arrangement of antidotes and necessary equipment.
- (viii) All the provisions of the CRZ Notification, 2011 and subsequent amendments shall be strictly complied with, and in case of any change in scope of work, necessary recommendations from the concerned CZMA shall be obtained for further consideration by the concerned regulatory authority.
- (ix) The project proponent shall ensure that the project is in consonance with the new Coastal Zone Management Plan prepared by the State Government under the provisions of CRZ Notification, 2011 and subsequent amendments.
- (x) On the project site physical HTL demarcation has to be compulsorily made with the help of Government of India organizations/Institutions.
- (xi) No construction works other than those permitted in CRZ Notification shall be carried out in CRZ area.
- (xii) Non vegetated mudflats must be clearly demarcated on the map and no artificial plantation to be undertaken on non- vegetated mudflats.
- (xiii) The temperature at the discharge point has to be monitored regularly and also the physico-chemical and biological parameters including benthic fauna and flora, primary and secondary productions as well as fishery populations has to be monitored regularly during the construction and operation phase by employing qualified persons.

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- (xiv) The project proponent shall report to the State Pollution Control Board about the compliance of the prescribed standards for all discharges from the Industrial Area into the sea.
- (xv) No New CETP shall be permitted in SEZ area.
- (xvi) Periodic monitoring of coastal water shall be carried out at outfall location by the project proponent by establishing minimum 3 monitoring stations. Proper record of monitoring should be placed along with six monthly compliance report.
- (xvii) Fund allocation of Rs. 12.50 Crore for Corporate Environment Responsibility (CER) shall be made as per Ministry's O.M. No. 22-65/2017-IA.III dated 1st May, 2018 for various activities therein. The report having activity wise detail along with the time frame shall be submitted to this Ministry and its concerned regional office within 3 months.
- (xviii) No groundwater extraction is permitted. The project proponent shall obtain the necessary permission from the competent authority for use of surface water for the project.
- (xix) The project proponent shall obtain authorization under the Hazardous and other Waste Management Rules, 2016 as amended from time to time.
- (xx) The project proponent shall install system to carryout Ambient Air Quality monitoring for common/criterion parameters relevant to the main pollutants released (e.g. PM₁₀ and PM_{2.5} in reference to PM emission, and SO₂ and NO_x in reference to SO₂ and NO_x emissions) within and outside the Industrial area at least at four locations (one within and three outside the plant area at an angle of 120° each), covering upwind and downwind directions.
- (xxi) The quantity of fresh water usage, water recycling and rainwater harvesting shall be measured/recorded to ensure the water balance as projected by the project proponent. The record shall be submitted to the concerned Regional Office of the Ministry along with six monthly monitoring reports.
- (xxii) Provide LED lights in their offices and residential areas.
- (xxiii) Used LEDs shall be properly collected and disposed off/sent for recycling as per the prevailing guidelines/rules of the regulatory authority to avoid mercury contamination. Use of solar panels may be done to the extent possible. Energy conservation measures should be as per Bureau of Energy Efficiency (BEE) standards.
- (xxiv) The company shall have a well laid down environmental policy duly approved by the Board of Directors. The environmental policy should prescribe for Standard Operating Procedures (SOP) to have proper checks and balances and to bring into focus any infringements/deviation/violation of the environmental/forest/wildlife norms/conditions. The company shall have defined system of reporting infringements/deviation/violation of the environmental/forest/wildlife norms/conditions and/or shareholders/stake holders. The copy of the board resolution in this regard shall be submitted to the MoEF&CC as a part of six-monthly report.

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- (xxv) A separate Environmental Cell both at the project and company head quarter level, with qualified personnel shall be set up under the control of senior Executive, who will directly report to the head of the organization.
- (xxvi) Self-environmental audit shall be conducted annually. Every three years third party environmental audit shall be carried out.
5. This issue with the approval of the Competent Authority.

Reema
12/2/2020
(Raghu Kumar Kodali)
Director/Scientist F

Copy to:

- 1) The Principal Secretary, Department of Forests & Environment and Chairman, GCZMA, Govt. of Gujarat, Sachivalaya, Gandhinagar.
- 2) The Chairman, Central Pollution Control Board, Parivesh Bhawan, CBD-cum-Office Complex, East Arjun Nagar, Delhi – 32.
- 3) The Member Secretary, Gujarat Pollution Control Board, Sector 10-A, Gandhi Nagar – 382 043.
- 4) The APCCF (C), MoEF& CC, RO (WZ), E-5, Kencuriya Paryavaran Bhawan, Arera Colony, Link Road No.3, Ravishankar Nagar, Bhopal –16.
- 5) IA - Division, Monitoring Cell, MoEFCC, New Delhi – 3.
- 6) Guard File/Record File.
- 7) Notice Board.

Reema
12/2/2020
(Raghu Kumar Kodali)
Director/Scientist F