

Torrent Pharmaceuticals Ltd. Indrad
EC Compliance Report

Status of Compliance of stipulated conditions of the Environment Clearance No. J-11011/344/2009 –IA.II (I) Dtd. 04.02.2010 (Expansion of Capacity from 31.1 MTPA to 60 MTPA for Bulk Drug Manufacturing Unit at Village Indrad)

Period: April 2017 to September 2017

Cond. No.	Description of Condition	Compliance Status
01	<ul style="list-style-type: none"> It is noted that total water consumption will increase from 1000-1200 m³/day to 1200-1300 m³/day. 	Water consumption limit amended 2100 m ³ /day in CC&A.
	<ul style="list-style-type: none"> Fresh water requirement of 1000 m³/day will be met from the Sardar Sarovar Narmada Nigam Ltd. (SSNL) and 300-400 m³/day will be met from the recycled water by increasing the capacity of RO plant. 	Complied. Recycle quantity increased by installation of new effluent recycling RO.
	<ul style="list-style-type: none"> Approval for draw of 1000 m³/day of water has been obtained from the SSNL. 	Complied, Additionally, we have built up intermediate storage tank of 90 Lacs liter to avail the Narmada water all time. SSNL has granted the additional approval of 2500 m ³ / day
	<ul style="list-style-type: none"> Power requirement of 6500KVA will be sourced from State Electricity Board. 	Noted.
	<ul style="list-style-type: none"> DG sets of 8x750 KVA & 2x1500 KVA (existing) and 1x1500 (proposed) will be installed for emergency power back-up. 	We have installed 8 x 750 KVA, 2000 x 03 KVA DG set.
	<ul style="list-style-type: none"> Fuel for DG set will be diesel (550 kl/year) and for boiler will be FO/Natural gas. 	Complied.
02	<ul style="list-style-type: none"> The wastewater generation will be 1000 m³/day of which 810 m³/day will be the industrial waste and 190 m³/day will be the domestic effluent. 	Treated Effluent meeting prescribed limit as per amendment in CC &A granted by SPCB valid 17/05/2022 Waste water generation limit revised in CC&A as follows Industrial 990 KLPD Domestic 260 KLPD
	<ul style="list-style-type: none"> The capacity of the existing ETP will be augmented. The effluent streams will be segregated into biodegradable and non biodegradable effluent. The treated biodegradable waste water will be used for green belt development and utilities. 	Complied.
	<ul style="list-style-type: none"> The non biodegradable effluent will be further 	Complied.

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	<p>segregated into solvent rich mother liquor and aqueous base. The solvent rich mother liquor will be distilled in the distillation plant and recovered solvent will be recycled or sold to registered recyclers.</p> <ul style="list-style-type: none"> • The residue will be sent to common incineration facility for incineration. The aqueous base after neutralization and chemical treatment will be treated in ETP. The high TDS stream will be treated in RO plant and rejects from the RO will be sent to MEE or Solar evaporation pond during the non monsoon period. • The residue from the solar evaporation pond after packing in the HDPE bags will be sent to the TSDF facility. • Permeates from the RO plant will be recycled in the cooling tower and other utilities. The domestic effluent will be treated in ETP plant. • The process emissions in the form of HCl, CL₂, SO₂ & NO_x will be controlled by water and alkali scrubbing system and emissions from the 10 mt/hr and 6 mt/hr FO / NG fired boilers, LDO fired thermo pack and DG Sets will be dispersed through stacks 	<p></p> <p>Residue is sent to common incineration facility, High TDS effluent is treated as per directives.</p> <p>Dried residue is sent to GPCB Authorized TSDF facility.</p> <p>Complied.</p> <p>Complied.</p>
03	<ul style="list-style-type: none"> • Solid / hazardous waste generation will be in the form of process waste (132 MT/ annum). ETP sludge (1000 MT/ annum), Solid waste from evaporator (684 MT/ annum), carbon waste (72 MT/ annum), fly ash/boiler ash/spent carbon from oil fired boiler (5 MT/ annum) and resins from water purification system (3 MT/ annum) will be disposed to TSDF site. Process and resins (120 MT/ annum), off specification drugs/medicines (200 MT/ annum) will be incinerated. Spent Catalyst (0.5 MT/ annum) will be sold to register recyclers. Spent mother liquor, solvent rich mother liquor and aqueous based ML (6800 Kl/month), Solvent rich ML will be taken for distillation. Residues will be sent to common 	<p>Complied.</p> <p>Hazardous Waste Handling and disposal as per amendment in CC & A granted by GPCB and valid up to 17/05/2022.</p>

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	incineration facility.	
	<ul style="list-style-type: none"> Distilled solvent is either reused or sold to actual users/registered recyclers. 	Distilled solvents are sold to registered recyclers.
	<ul style="list-style-type: none"> Aqueous based ML will be given primary treatment followed by steam stripper followed by incineration. Spent organic solvent (240 kl/annum) will be sent for fractional distillation followed by residue for incineration. Spent oil (5 kl/annum) will be sent to CPCB registered recyclers. Discarded containers/barrels/liners used for hazardous waste/chemicals (7200 nos/annum) and liners/plastic bags (5 MT/annum) will Sold to actual users/recycler. 	New stripper and MEE system installation work completed and put in regular operation.
A.	Specific Conditions	
i	<ul style="list-style-type: none"> The industrial effluent generation shall not exceed 1000 m³/d. The effluent shall be segregated based on the pollution load. The treated biodegradable waste shall be used for green belt development after conforming to the prescribed standards and utilities. The non biodegradable effluent will be further segregated into solvent rich mother liquor and aqueous base. The solvent rich mother liquor will be distilled in the distillation plant and recovered solvent will be recycled or sold to registered recyclers. The residue will be sent to common incineration facility for incineration. The aqueous base after neutralization and chemical treatment will be treated in ETP. The high TDS stream will be treated in RO plant and rejects from RO will be sent to MEE or Solar evaporation pond during the non monsoon period. The residues from the solar evaporation pond after packing in the HDPE bags will be sent to the TSD facility. Permeates from the RO plant will be recycled in the cooling tower and other Utilities. The domestic will be treated in the ETP plant. 	<p>Complied.</p> <p>Treated Effluent meeting prescribed limit as per amendment in CC &A granted by SPCB valid 17/05/2022</p> <p>Waste water generation limit revised in CC&A as follows Industrial 990 KLPD Domestic 260 KLPD</p>

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ii	The company shall explore the possibility of use of soluble salt for sale or for some other applications instead of sending to TSDF for disposal.	Noted
iii	The company shall explore the possibility to send all organic residues to cement plant.	Noted and Complied. We have started Disposal of co incinerable waste at M/s. Ambuja cement for which Authorization from GPCB has been also Granted.
iv	<ul style="list-style-type: none"> The process emissions on the form of HCl.Cl₂, SO₂ & NO_x shall be scrubbed with water and alkali scrubber. The scrubber efficiency shall not be less than 97%. The emissions shall be dispersed through stack of adequate as per CPCB / State Pollution Control Board standards 	Noted & Complied Water and alkali Scrubber with adequate Stack height has been installed. Inlet and outlet emission are monitored regularly to check scrubber efficiency.
v	The company shall monitor HCl and Cl ₂ concentration before and after scrubbing and data submitted to RO, MOEF/State Pollution Control Board. Monitoring of VOC shall be carried in the work zone	Complied. Monthly Environmental Monitoring done by NABL/MoEF approved Laboratory and reports are being submitted to GPCB on regular basis.
vi	The gaseous emissions from the DG set, boilers and thermo pack shall be dispersed through stack height as per CPCB standards shall be provided. To mitigate the noise pollution, DG sets shall be provided with acoustic enclosures.	Complied. Flue gas stack height is as per CPCB standards. Acoustic enclosures are provided in DG Sets.

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vii	<ul style="list-style-type: none"> The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update periodically. 	Noted & Complied.
	<ul style="list-style-type: none"> It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal official to CPCB and the state Pollution Control Board. The levels of PM₁₀, SO₂, NO_x, HCl and VOC (ambient levels) and emissions from the stacks shall be monitored and displayed at a convenient location near the main gate of the company and at important public places. 	<p>Complied.</p> <p>Status of compliance of EC Condition for 6 month is being submitted to MoEF Bhopal, CPCB Zonal Office and GPCB.</p> <p>Emission details displayed at convenient location near to main gate on regular basis.</p>
viii	The company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Tran's boundary Movement) Rules, 2008 for management of hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. The concerned shall undertake measures for fire fighting facilitates in case of emergency.	<p>Complied.</p> <p>Authorization for collection, storage and disposal of Hazardous Waste has been granted by GPCB on 24/5/2016 and its subsequent amendment on 15/09/17 and valid upto 17/05/2022.</p> <p>Fire protection & detection system covering entire premises has been developed. We have approval for fire fighting facility from IRDA & Regional fire brigade - Gandhinagar.</p>
ix	The project authorities shall strictly comply with the rules and guidelines under Manufacture, Storage and import of Hazardous Chemicals Rules, 1989 as amended in October, 1994 and January, 2000. All Transportation of Hazardous Chemicals shall be as per the MVA, 1989.	Noted and Condition in compliance
x	Hazardous chemicals shall be stored in tanks farms, drums, carboys etc. Flame arresters shall be provided on tank farm. Solvent transfer shall be by pumps.	Complied.
xi	The company shall undertake following waste Minimization measures :-	Complied.

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	a. Metering and control of quantities of active ingredients to minimize waste.	Material is being charged through close loop system as per standard procedures.
	b. Reuse of by-products from the process as raw materials or as raw materials substitutes in other processes.	All the possible recovery is carried out to increase the productivity & minimize the pollution.
	c. Use of automated filling to minimize spillage	Implemented.
	d. Use of “Close Feed” system into batch reactors.	Implemented.
	e. Venting equipment through vapor recovery system.	Double condenser in reactor.
	f. Use of high pressure hoses for equipment cleaning to reduce wastewater generation	Spray jet system is being utilized for equipment cleaning & floor cleaning.
xii	For control of fugitive emission following steps shall be followed:	
	1. Closed handling system shall be provided for Chemicals.	Complied.
	2. Reflux condenser shall provide over reactor.	Complied.
	3. System of leak detection and repair of pump/pipeline based on preventive maintenance.	Well define preventive maintenance to avoid leakage.
	4. The acids shall be taken from storage tanks to reactors through closed pipeline. Storage tanks shall be vented through trap receiver condenser operated on chilled water. Cathodic production shall be provided to the underground solvent storage tanks.	No bulk acid is in use. HCL gas is used and available in gas cylinder. Adequate safety control measure has been provided as per the factory act.
xiii	Solvent management shall be as follows:	
	a. Reactor shall be connected to chilled brine condenser system.	Complied.
	b. Reactor and solvent handling pump have mechanical seals to prevent leakages.	All the solvents are being handled by pumping system with adequate safety measures. All the installations Solvent area in the plant are with flame proof fittings.
	c. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery.	
	d. Solvents shall be stored in a separate space specified with all safety measures.	
	e. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is	

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	done f. Entire plant shall be flame proof. The solvent storage tanks shall be Provided with breather valve to prevent losses.	
xiv	Fugitive emissions in the work zone environment, product, raw materials storage area etc. shall be regularly monitored. The emissions shall conform to the limits imposed by GPCB.	Complied. Work zone monitoring is regularly carried out as per the Factories Act and records are maintained as per Form no. 37
xv	During transfer of materials, spillages shall be avoided and garland drains be constructed to avoid mixing of accidental spillages with domestic waste and storm drains.	Complied. Dykes at appropriate locations in bulk storages are provided. Spillage control kits are also provided.
xvi	The company shall make the arrangement for protection of possible fire hazards during manufacturing process in materials handling.	Complied. Prohibition of match box and other ignitable items are in place. Flame proof electric fitting is provided. Hydrant line with adequate water storage is provided. Fire hydrant system is approved by IRDA competent person in 2011. Dedicated fire squad is also deployed round the clock. Other fire fighting facilities e.g. fire extinguishers, sand buckets, emergency equipments etc. are provided. Basic fire fighting training is imparted to relevant staff. HAZOP study is conducted as preventive measure to asses the hidden risk
xvii	The company shall undertake measures for uncontrolled blasting and containment of highly toxic/inflammable chemicals during storage, handling and transport.	Complied.

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xviii	Measures shall be taken for fire preventive and fire fighting arrangements	Complied.
xix	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted	Complied. Training on various topics with respect to safety and health imparted to all employees & workers. Pre-employment & periodical Medical examination is compulsion for the employees & workers. Dedicated Occupational Health center with full time Doctors are available.
xx	Usage of PPEs by all employees/workers shall be ensured.	Complied.
xxi	Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.	Complied. Health check up of workers are regularly carried out & records are maintain
xxii	Green belt shall be developed in 69,229 m ² of the plant area. Selection of plant species shall be as per the CPCB Guidelines.	Complied. Green belt develop 1,06,000 m ² area has been developed as Green Belt as per CPCB guidelines.
xxiii	The Company shall harvest surface as well as rainwater from the rooftops of the building and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.	Complied. 26 Nos. recharge well has been developed as Rain water harvesting wells within premises.
xxiv	The adequate financial provisions shall be made in the budget of the project for implementation of the above suggested environmental safeguards. Fund so earmarked shall not be diverted for any other purposes	Complied. Dedicated budget allotted for implementation of Environmental safeguards.

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xxv	The company shall comply with the recommendations made in the EIA/EMP/Risk assessment report and public hearing. Risk assessment shall be included in the safety manual.	Complied. Risk Assessment details are covered in Safety Manual and On Site emergency plan is prepared & submitted to office of Factory inspector.
xxvi	Provision shall be made for the housing for the constructions labor within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile sewage treatment plant, safe drinking water health care, crèche etc. The housing may be in the form of temporary structure to be removed after the completion of the project. All the construction wastes shall be manages so that is no impact on the surrounding environment	It is not applicable as man power is being arranged from nearby villages. On-site stay is not permitted.
B.	GENERAL CONDITIONS:	
i	The project authorities shall strictly adhere to the stipulations made by the State Pollution Control Board.	Noted and Complied.
ii	No further expansion or modification in the plant shall be carried out without prior approval of the ministry of environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of condition imposed and to add additional environmental protection measures required, if any.	Noted and Complied.
iii	At no time, the emissions shall exceed the prescribed limits. In the event or failure of any pollution control system adopted by the unit, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.	Noted and Complied.

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iv	The gaseous emissions (NO _x , SO ₂ , and PM ₁₀) along with emissions from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emissions levels shall go beyond the stipulated standards. In the event of failure of pollution control system (s) adopted by the unit, the respective unit shall not be restarted until the control measures are rectified to achieve the desired efficiency. Stack monitoring for SO ₂ & NO _x shall be carried.	Complied. Monthly Environmental Monitoring done by NABL/MoEF approved Laboratory and reports are being submitted to GPCB on regular basis for prescribed parameters.
v	The location of ambient air quality monitoring shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall be ensured that at least one stations is installed in the up wind and downwind direction as well as where maximum ground level concentrations are anticipated.	Complied. Data on ambient air quality is being submitted to GPCB on monthly basis.
vi	Dedicated scrubbed and stacks of appropriate height as per the Central Pollution Control Board guidelines shall be provided to control the emissions from various. The scrubbed water shall be sent to ETP for further treatment.	Complied. Dedicated system installed as per CPCB guideline.
vii	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under Environment (protection) Act, 1986 Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (night time)	Complied Noise monitoring is regularly carried out as per standard operating procedure & maintained the record of the same.
viii	The project proponent shall also comply with environmental protection measures and safeguards in project report submitted to the Ministry. All the recommendations made in respect of environmental management and risk mitigation relating to the project shall be implemented.	Complied.
ix	The company will undertake all relevant measures including the socioeconomic conditions of the surrounding area. CSR activities will be undertaken by	Complied. Well functioned Separate CSR cell is

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	involving local village and administration	established for the said activity
x	The company shall under eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	Complied. Well functioned Separate CSR cell is established for the said activity
xi	A separate Environmental Management Cell equipped with full fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions	Complied Environmental cell with equipped with full fledge laboratory facility is established.
xii	The project authorities shall earmark adequate funds to implement the condition stipulated by the Ministry of Environment and Forests as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.	Complied. Dedicated budget allotted for implementation of Environmental safeguards.
xiii	The implementation of the project vis-à-vis environmental action plan shall be monitored by the concerned Regional official of the Ministry/SPCB / CPCB. A six monthly compliance status reports shall be submitted to monitoring agencies and shall be posted on the website of the company	Complied. Six monthly reports regularly submitted to concern authority.
xiv	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parisad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions / representations, if any were received while processing the proposal.	Complied.
xv	The project proponent shall also submit six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e=mail) and to the respective Regional Office of MoEF, the respective Zonal Office of CPCB and the State Pollution Control Board.	Complied. Six monthly reports regularly submitted to concern authority.

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xvi	The environmental statement for each financial year ending 31 st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environmental (protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance clearance conditions and shall also be sent to the respective Regional Offices of MoEF by e-mail.	Environmental statement for each financial year is being regularly submitted to GPCB. Last environmental statement submitted to GPCB on 10/05/2017
xvii	The Project proponent shall inform the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB / Committee and may also be seen at website of the Ministry at http://envor.nic.in This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.	Complied.
xviii	The project authorities shall inform the Regional Office as well as the Ministry the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.	Noted & Will be complied.
4	The ministry may revoke or suspend the clearance, if implementation of any of the above conditions is not satisfactory.	Noted.
5	The Ministry reserves the right to stipulate conditions, if found necessary. The company in a time bound manner will implement these conditions.	Noted.

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6	Any appeal against this environmental clearance shall lie with the National Appellate Authority, if preferred, within a period of 30 days as prescribed under section 11 of the National Environmental Appellate Authority Act, 1997.	Noted.
7	The above conditions will be enforced, inter-alia under the provisions of the Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Water Pollution) Act, 1981, the Environmental (Protection) Act, 1986 Hazardous Wastes (Management and Handling) Rules, 2003/2008 and the Public Liability Insurance Act, 1991 along with their amendments and rules.	Noted.