Seshasayee
Paper and
Boards Limited

Regd Office & Works : Pallipalayam, Namakkal District,
Erode - 638 007, Tamilnadu, India. Ph : 91 - 4288 - 240221 to 240228,
Fax : 91-4288-240229 email : edoff@spbltd.com Web : www.spbltd.com
CIN : L21012TZ1960PLC000364

Ref: Env/ W-1/ 485 **2025 05 30**

The Director(s)
Regional Office (South Eastern Zone)
Ministry of Environment, Forests & Climate Change (MOEF&CC)
Government of India
The Handloom Export Promotion Council Building
34 (Old No.18) Cathedral Garden Road
Nungambakkam, Chennai 600 034

Dear Sir,

Sub: Compliance Report for the period Oct 2024 – March 2025

Ref: Environmental Clearance F.No J-11011/56/95-IA-II (I) dated 21.05.1996

Environmental Clearance F.No J-11011/194/2013-IA II (I) dated 22.01.2016 and Amendment dated 18.11.2019.

We submit the compliance report for the various conditions stipulated in the above Environmental Clearances dated 21 05 1996, 22 01 2016 and 18 11 2019 (amended) respectively, issued by your esteemed Ministry, for the period Oct 2024–March 2025, together with relevant enclosures.

Thanking you,

Yours faithfully
For Seshasayee Paper and Boards Limited

GANESH BALAKRISHNA BHADTI
Director (Operations)

Encl: as above

ISO 9001 • ISO 14001 • ISO 45001
SPB

SESHASAYEE PAPER AND BOARDS LIMITED

PALLIPALAYAM, CAUVERY R.S. P.O
ERODE 638 007, NAMAKKAL DISTRICT
Unit: Erode

Compliance Report for the Period
October 2024 - March 2025

SESHASAYEE PAPER AND BOARDS LIMITED

Environment Clearance F.No. J-11011/56/95 –IA- II (I) dated 21.05.1996

COMPLIANCE REPORT FOR THE PERIOD Oct 2024- March 2025

Sl.No	EC Condition	Compliance Status
1	The Project Authority must strictly adhere to the stipulations made by the State Pollution Control Board and the State Government	• We strictly adhere to the stipulations made by the State Pollution Control Board and the State Government. Status: **Complied**
2	No expansion or modification of the plant should be carried out without prior approval of this Ministry	SPB mill abide with this condition. No further expansion or modifications in the plant shall be carried out without prior approval of the MoEF& CC.
3	Gaseous and Particulate Emissions from various processes should conform to the standards prescribed by the competent authority from time to time. At no time, the emission levels should go beyond the prescribed standards. In the event of failure of any Pollution Control System adopted by the units, the respective unit should be put out of operation immediately and should not be restarted until the pollution control measures are rectified to achieve the desired efficiency.	• Monitoring of gaseous emissions and particulate matter from various process units was carried out through Environmental Laboratory, TNPCB twice in a year. The monitored data shows that the values are within the standards. • In addition to the above, gaseous and particulate emissions are also continuously monitored online round-the-clock basis. • Industry has installed online stack monitoring system in all the stacks and stack emissions are well within the standards prescribed. The Advanced Environmental Laboratory, TNPCB, Salem conducts AAQ/Stack Survey twice in a year and their analysis reports confirm compliance of stipulated standards. The report is enclosed as **Annexure -1.** • In the event of any pollution control system failure, the unit will be put out of operation immediately and restarted after achieving the desired values. Status: **Complied**
4	At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of SPM, SO2 and NOx are anticipated. The selection of the AAQ monitoring stations should be based on modelling	• Industry has established Ambient Air Quality Monitoring Stations in the periphery and being continuously monitored at four locations. The report is enclosed **(Annexure-2)** • Stack Emissions are monitored online 24x7 and transmitted to SPCB/CPCB. • Ambient Air Quality Monitoring Stations have been set up in the

	exercise to represent short term ground level concentration, sensitive targets etc in consultation with the State Pollution Control Board Stack Emissions should also be regularly monitored by installing stack monitoring device in consultation with the State Pollution Control Board Data on AAQ and Stack Emissions should be submitted regularly to the Ministry once in six months and the State Pollution Control Board once in three months along with the statistical analysis and interpretation	downwind direction as well as in upwind directions where maximum ground level concentrations are anticipated in consultation with SPCB. • Monitoring of ambient air quality was carried out on half -yearly basis through Environmental Laboratory, TNPCB AEL Salem. The monitored data shows that the values are within the limits. • Industry has installed online stack monitoring system in all the stacks and stack emissions are well within the standards prescribed. The Advanced Environmental Laboratory, TNPCB, Salem is conducting AAQ/Stack Survey twice in a year and their analysis reports confirm compliance with stipulated standards in this regard. The report is enclosed **(Annexure 1)** • Statistical analysis as below **Jan-25 II Bi-Annual Report** Ref: TNPCB, AEL Salem

Unit	mg /Nm3	kg/Nm3/day
	PM	
CPP (Power Boiler)	45	196.77
Chemical Recovery	20	35.5
Lime Kiln	15	7.34
	SO2	
CPP (Power Boiler)	27	118.06
Chemical Recovery	16	26.0
Limekiln	11	5.39
	Nox	
CPP (Power Boiler)	33	144.26
Chemical Recovery	24	39.0
Limekiln	11	5.39
	H2S	
Chemical Recovery	0.202	0.33
Limekiln	0.27	0.01

Extract from Advanced Environmental Laboratory Analysis Report, Tamil Nadu Pollution Control Board, Salem.

Industry has submitted data on AAQ and Stack Emissions regularly to the RO, MoEF&CC along with six monthly compliance report, and to TNPCB once in three months.

Status: **Complied**

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Sl.No	EC Condition	Compliance Status
5	Interlocking facilities should be provided in the ESP's installed in the process equipments and Captive Power Plant so that the plant automatically shuts down in case of ESP failure/emissions exceeding the limits if any	• Interlocking facilities have been provided in the ESP's installed in the process equipment and Captive Power Plant. Status: **Complied**
6	Fugitive emissions should be controlled, regularly monitored and data recorded	• Sprinkler systems are in place to mitigate the fugitive emissions. • The raw materials storage area was covered with a shed (Limestone, fuel storage). • We have installed water sprinklers and tanker mounted trailer with sprinkling arrangements to control the same. Photos are enclosed **(Annexure -3)** • Additional green belt have developed in the boundaries to contain fugitive emissions. 

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		 Greenbelt Development – Additional Plantations Activity (Geotagged Photos) • Monitoring of fugitive emissions in the work zone, environment, product and raw materials storage area were regularly carried out. Status: **Complied**
7	Liquid wastes should be reduced in both volume and concentrations by a combination of in plant control measures and better work practices. Liquid Effluents coming out of the plant and township should conform to the Standards as prescribed by the State Pollution Control Board/ Central Pollution Control Board under the Environment (Protection) Act, 1986.	• Volume of liquid effluent is reduced by adapting recycling in various plants of the mill and the specific water consumption is reduced. • The treated effluent and township wastewater are regularly monitored by the Tamil Nadu Pollution Control Board / Central Pollution Control Board which is monitored online and conforming to standards. Status: **Complied**
8	Recycling and reuse of the treated waste water should be maximized to the extent possible including its use for irrigation purposes. Adequate storm water drains should be provided for avoiding flooding during monsoon period	• Various in plant water recycling and conservation measures have been implemented and specific water consumption has been reduced. • Wastewater from paper machines – about 11000m3/day is recycled, treated in Clari-flocculator and reused with in the mill. • The final treated effluent is used for irrigation after maximized recycling. • About 40% of pre-treated wastewater is recycled in the process underwater

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		conservation - report enclosed as **Annexure – 4.** • Adequate storm water drains were provided to avoid flooding during the monsoon period. Status: **Complied**
9	Adequate number of influent and effluent quality (pH, BOD, COD, TSS) monitoring stations should be set up in consultation with Tamil Nadu Pollution Control Board. Monitored data along with the statistical analysis and interpretation in the form of a report should be submitted to this Ministry on a half yearly basis and to SPCB once in three months.	• Adequate number of influent and effluent quality monitoring stations were set up in consultation with the Tamil Nadu Pollution Control Board and the reports are submitted to the ministry on half yearly basis and to SPCB once in three months. • Monitored data along with statistical details as below. Parameters Kg/t ppm TSS 0.27 7.0 TDS 38.49 1012 Chlorides 7.43 195 Sulphates 7.52 199 BOD 0.36 9.47 COD 4.72 124 Extract from the Analysis Report of Advanced Environmental Laboratory, Tamil Nadu Pollution Control Board, Salem (for the period Oct 24 Jan 2025). Status: **Complied**
10	The project proponent should take measures to monitor the Cauvery river water quality in the upstream and downstream sides on a regular basis through an independent agency who should report results directly to the SPCB.	• Monitoring of Cauvery water upstream and downstream was carried out. It is done regularly through in-house as well as through NABEL-accredited laboratories. • Copy of our River Water Analysis - report enclosed in Annexure – **5).** Status: **Complied**
11	Chemical Recovery Plant should be set up for recovering the chemical from the Black Liquor to the maximum extent possible	• Industry has installed Chemical Recovery Plant with 250 TPH water evaporation plant and 950 tonnes / day Chemical Recovery Boiler with which they are able to recover the chemicals and reused back in pulp process. Status: **Complied**

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Sl.No	EC Condition	Compliance Status
12	The effluent from the bleaching section should be segregated from other waste water streams and treated for decolourisation. The feasibility of using only Hydrogen Peroxide instead of Calcium Hypochlorite as a bleaching agent for the bleaching of Bagasse pulp should be considered and a report submitted to the Ministry for review. A limit of 150 cubic meters of effluent per MT of paper should be adhered to	• Industry has Installed ECF Bleaching System for Bagasse Pulping thereby eliminating the use of Calcium hypochlorite and by replacing the same with Hydrogen Peroxide. • At present treated wastewater discharged is around 37 m^3/ton of paper. Status: **Complied**
13	Organic Matter from Black Liquor and pith removed from the Bagasse should be used as a fuel in the Soda Recovery and Power Boiler	• Black Liquor from the Bagasse Pulp Mill is evaporated and used in the Chemical Recovery Boiler for White Liquor Production and Power Production. Pith is used as a fuel in the Captive Power Boiler. Status: **Complied**
14	The hazardous wastes should be handled as per the Hazardous Waste (Management and Handling) Rules, 1989 and (Hazardous Substance Import, Manufacture and Storage), Rules 1989 of the Environment Protection Act 1986	• SPB has obtained Hazardous Wastes Authorization No. 22HFC36355066 dated 07/07/2022 issued by TNPCB with a validity of five years from the date of issue and the Hazardous wastes are disposed as per authorization only. Form 4 for Filling Annual Returns Submitted on 15/05/2025 Status: **Complied**
15	Adequate measures for the control of noise should be taken so as to keep the noise levels below 85 dBA in the work environment. Persons working near the noisy machines in the different units, blowers, compressors etc should be provided with a well designed ear muffs/plugs. Besides, measures should be taken to reduce the noise at the sources itself by employing Engineering methods	• Noise control measures such as Silencers, Hoods, etc have been installed in the Power Plant and other noisy areas. Personal Protective Equipment such as ear muffs/plugs have been provided to all the employees.

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Noise control measures, including the installation of silencers, have been implemented. Additionally, green cover has been developed to serve as a natural barrier to mitigate sound dispersion.

- Monitoring of Ambient Noise level is being carried out on half yearly basis though Advanced Environmental Laboratory, TNPCB, Salem and their analysis report confirm compliance of stipulated standards.

Plant area	75 dBA
Near River Bed	54.9
Coal yard area	52.3
Bagasse Zone Area	52.4
Time office gate	54.8

Extracted from Analysis Report of Advanced Environmental Lab, TNPCB, Salem for the period Oct 24 - March 2025 (TNPCB survey has been conducted on 24.01 2025 & 25 01 2025)

Status: **Complied**

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16	A community welfare scheme for improving the Socio Economic Environment should also be worked out and report submitted to this Ministry for review within a period of 6 months	The following community welfare schemes for improving the Socio-Economic Environment have been implemented and Industry has submitted reports regularly to the RO, MoEF&CC along with six monthly compliance report. • Supply of protected potable drinking water to all the villages and neighbouring community through network of pipelines 400 numbers of drinking water taps were installed in strategic places. • Supply of treated wastewater after meeting inland surface water discharge standards for irrigation. • Desilting of community check dams for collection of rain water during monsoon for the recharge of ground water. • Education facility for the rural community in three schools run by the Company • Donated land for the Government school Running of Community Health Centres for the benefit of the downtrodden. • Regular sports activities like Cricket, Tennis, Volleyball, Kabaddi, Shuttle etc are carried out to improve the skills of the rural folk. • Contribution to supply of drinking water to nearby villages as a cost of Rs; 58.99 lakh (Oct 24- March 2025) Status - **Complied**
17	An action plan for utilisation of fly ash and lime sludge from Hypo plant should be prepared and a report to be submitted to this Ministry for review within a period of six months	• SPB has prepared an action plan and submitted for the fly ash disposal **(Annexure 6 a)** • Industry has installed a limekiln for burning the lime sludge and reuse in the process. Lime sludge /mud generated from Limekiln has been sent to the cement industry for Co-processing. • Fly ash is sent to the fly ash brick manufacturing unit. Action plan prepared and sent to Ministry **(Annexure 6 b)** • No Hypo process for bleaching since the installation of RDH pulping (ECF bleaching in 2010 under MDP II).

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		Status: **Complied**
18	Soil samples from the land fill site, lignite handling area and area irrigated by the treated effluent should be regularly analysed for any signs of soil degradation and if required corrective action should be promptly taken	• Monitoring of Soil samples of areas irrigated by the treated effluent is regularly monitored. It is done once in year through NABEL-accredited laboratories/TNAU, Coimbatore. • Test reports are enclosed as **Annexure – 7.** Status: **Complied**
19	Ground water around the land fill site, lignite handling area and areas irrigated by treated effluent should be regularly monitored and report submitted to the SPCB once in three months and to the Ministry and its Regional Office at Bangalore every six months	• Monitoring the groundwater quality of existing wells and piezometers in and around the site through TNPCB/ NABEL-accredited laboratories / in-house for all four seasons of the year and data collected are submitted to the to MoEF&CC and Regional Office • Biannual Report enclosed as Annexure-**8(i), (ii), (iii))** • The ground water quality of existing wells and piezometers water quality report were submitted regularly. Status: **Complied**
Sl.No	**EC Condition**	**Compliance Status**
	General Conditions	
1	The ministry or any other competent authority may stipulate any additional conditions, if required from Environmental angle after review of monitoring reports or any other report prepared by the Project Authority	Till date, no additional conditions have arisen. In future, if so, the same will be complied
2	The ministry may revoke Environmental Clearance if implementation of any of the conditions is not found satisfactory. The stipulated conditions will be monitored by this Ministry as also by its Regional Office located at Bangalore. Six monthly status reports on the compliance of above conditions should be sent to the ministry (Regional Office, Banaglore) .	Till date, no additional conditions have arisen. In future, if so, the same will be complied SPB has submitted six monthly compliance report along with monitored data to Regional office, MoEF &CC, Chennai regularly. Submitted on: 18/10/2024 for the period - April 24 – Sep 24
3	The above conditions will be enforced interalia under the	Till date, no additional conditions have arisen. In future, if so, the same will be

	provisions, of the Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution), Act 1981; the Environment Protection Act 1986; and the Public Liability Insurance Act 1991 with their amendments and Rules.	complied

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Environment Clearance F.No. J-11011/194/2013-IA II (I) dated 22 01 2016

COMPLIANCE REPORT FOR THE PERIOD Oct 2024 - March 2025

A	Specific Condition	
Sl.No	**EC Condition**	**Compliance Status**
1	The project proponent should install 24x7 air and water monitoring devices to monitor air emission and effluent discharge, as provided by CPCB and submit report to Ministry and its Regional Office.	• All the boiler stacks (fitted with individual ESP's) and treated effluent discharge connected online (24x7) with Care Air Centre of TNPCB, Chennai and CPCB • Reports have been submitted to MoEF&CC and its Regional Office, Chennai regularly. **(Annexure – 1).** Status-**Complied.**
2	The project authority should install multi cyclones, wet scrubbers with the boilers to achieve the particulate emission below 50 mg/Nm^3, The emissions from chemical recovery section should be controlled through primary and secondary venturi scrubbers.	• Industry has installed ESP's in all the stacks and is connected to TNPCB/CPCB through a Real-time data monitoring system. The emission values are within the stipulated standards prescribed. • Also, the Advanced Environmental Laboratory, TNPCB, Salem is conducting AAQ/Stack Survey twice in a year and their analysis reports confirm compliance with stipulated standards. Status-**Complied.**
3	In case of treatment process disturbances / failure of pollution control equipment adopted by the unit, the respective unit should be shut down and should not be restarted until the control measures are rectified to achieve the desired efficiency.	• Being a continuous process industry, uninterrupted power supply to pollution control equipment, are maintained through captive power generation backed by the TNEB supply. Status- **Being followed.**

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<table>
<tr><th>Sl.No</th><th>EC Condition</th><th>Compliance Status</th></tr>
<tr><td>4</td><td>The industry should ensure the compliance of the standards for discharge of the treated effluent from the unit as stipulated under the EPA rules or SPCB. Adequate steps including use of modern RO/UF based technologies should be used to increase recycling and reduce water consumption.</td><td>• Various in plant water conservation measures were implemented at the source for collection, treatment and recycle replacing fresh water and the process water consumption was reduced substantially.
About 40% of pre-treated wastewater is recycled in the process underwater conservation - report enclosed
(Annexure- 2).
Recycled wastewater details:
<table>
<tr><th>Months</th><th>Percentage of WW recycled</th></tr>
<tr><td>Apr 21 - Mar 22</td><td>37.9%</td></tr>
<tr><td>Apr 22 - Mar 23</td><td>38.3%</td></tr>
<tr><td>Apr 23 - Mar 24</td><td>37.4%</td></tr>
<tr><td>Apr 24 – Mar 25</td><td>40.0%</td></tr>
</table>
• The effluent after final treatment in the effluent treatment plant meets the standards prescribed by the SPCB (Inland surface water discharge standards). This is monitored by TNAU / SPCB / CPCB (Online)
(Annexure – 3).</td></tr>
<tr><td></td><td></td><td></td></tr>
<tr><td>5</td><td>Regular monitoring of ground water quality should be carried out in and around the project site by establishing a network of existing wells and installing new piezometers during the operation. The periodic monitoring [(at least four times in a year- pre-monsoon (April-May), monsoon (August), post-monsoon (November) and winter (January); once in each season)] should be carried out in consultation with the State Ground Water Board/Central Ground Water Authority and the data thus collected may be sent regularly to the Ministry of Environment, Forest and Climate Change and its Regional Office, the Central Ground Water Authority and the Regional Director, Central Ground Water Board. If at any stage, it is observed that the groundwater quality is affected due to the project activity,</td><td>• Monitoring the ground water quality of existing wells and piezometers in and around the site through TNAU / TNPCB / in-house for all four seasons of the year and data collected are submitted to the to MoEF&CC and Regional Office
• The ground water quality of existing wells and piezometers water quality report are submitted to MoEF&CC, Regional Office, Chennai.
• Biannual Report enclosed as Annexure – 4)
Status - Complied.</td></tr>
</table>

	necessary corrective measures should be carried out.	
6	The company should submit the comprehensive water management plan along with monitoring plan for the ground water quality and the level, within three months from date of issue of this letter.	• The company has a comprehensive water management plan along with monitoring of groundwater quality and the details of the reports are submitted in the half-yearly compliance report regularly. **(Annexure – 5).** • The groundwater quality is checked once a quarter and reported biannually to MoEF&CC, RO, Chennai. **(Annexure – 4)** Status-**Complied.**
7	The project authority should dispose of hazardous waste as per the provision of Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008.	• We have obtained Hazardous Wastes Authorization from TNPCB (No. 22HFC36355066 dated 7/7/2022) with a validity of five years from the date of issue and the Hazardous wastes are disposed as per authorization only. • Form 4 for Filling Annual Returns Submitted on 15/05/2025 **(Copy is at Annexure – 6)** Status: **Complied**
8	The company should develop green belt in 33% of the total land as per the CPCB guidelines to mitigate the effect of fugitive emissions.	• Green Belt has been developed in 33% of the total land area -In the factory premises planted with native trees like Teak, Neem Pongamia, Banian Feltoform, etc to mitigate fugitive emissions. In addition, more trees were planted in the vacant areas available at the site. **(Geotagged green belt development photographs enclosed as Annexure – 7)** Status: **Complied.**

Sl.No	EC Condition	Compliance Status
9	Pre-placement medical examination and periodical medical examination of the workers engaged in the project should be carried out and records maintained. For the purpose, schedule of health examination of the workers should be drawn and followed accordingly. Occupational health surveillance of the workers should be done on a regular basis and records maintained as per the Factories Act.	The project is already completed. • Industry is carrying out health surveillance programme and annual medical check-up for their employees. • Industry has established full-fledged Occupational Health Centre (OHC) with full time Medical Officer and round the clock nursing staff. • Records are maintained as per the Factories Act. • OHC details are at **Annexure - 8** Status - **Complied.**
10	The company should make the arrangement for protection of possible fire hazards during manufacturing process in material handling.	• Adequate Fire Protection System is in place to mitigate the fire hazards during manufacturing in material handling. Status-**Complied.**
11	All the recommendations made in the Charter on Corporate Responsibility for Environment Protection (CREP) for the pulp and paper sector should be strictly implemented.	• All the CREP requirements are implemented and complied. **(Annexure – 9)**
12	All the commitments made to the public during the Public Hearing / Public Consultation meeting should be satisfactorily implemented and a separate budget for implementing the same should be allocated and information submitted to the Ministry's Regional Office.	This is being followed • Public hearing was conducted by TNPCB on 22nd January, 2015 at Lakshmi Thirumanamandapam, No.4, Kumarapalayam, Main Road, Pallipalayam, Namakkal District. The major issue raised inter-alia include impact of air pollution in Ayakattur, Odapalli and Pudhupalayam, odour nuisance caused by the industry, scarcity of drinking water supply to the villages, etc., **Distribution of Drinking Water:** • We have provided treated drinking water through a Network of 400 Drinking Water Taps under the Rural Drinking Water Scheme, launched by the Company in the neighbouring villages.

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- Also, in addition to the drinking water distribution through 400 water taps the company has supplied 2.5lakh litres of treated drinking water through 5 overhead tanks constructed by TWAD board and maintained by local panchayats, for distribution to public.

Odour:

- We have installed the Blow Heat Recovery system in the Digestion Plant. Under the recently implemented Mill Development Plan-I (MDP-I), Rapid Displacement Heating (RDH) system of cooking has been installed in place of conventional stationary digester and blow tank system. With this digestion technology and with low consistency pump- out system, the discharge of NCG, is minimum.
- Also, installed a new Multiple Effect, Energy Efficient, Free Flow Falling Film Evaporation System in Chemical Recovery Boiler.
- We have additionally installed a Wet Scrubbing System with sodium hydroxide solution and recycle the same back into chemical recovery cycle to contain the odour which is below the specified standards.

Dust Emission:

- We have installed ESP's in all the stacks of Boiler, Chemical recovery and lime kiln to control Stack Emissions and connected online to TNPCB/CPCB
- To contain the fugitive emissions the fuel is unloaded and stored in the closed storage sheds. Water Sprinklers are provided in strategic places to mitigate fugitive dust emission during transport in addition to trailer mounted water sprinkling system. The fuel and the fly ash are transported through closed systems.

Treated Effluent Distribution to Irrigation

- The company has treated its waste water to the inland surface water discharge standards and discharge it to the lift irrigation societies to use as irrigation water in around 2140 acres.

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		• This unique and innovative irrigation scheme using our treated waste water is being continuously monitored for soil and ground water by Department of Environmental Sciences, Tamil Nadu Agricultural University, Coimbatore (TNAU). This pioneering irrigation model of using treated waste water for irrigation is being emulated by other industrial units in the country. The results by TNAU show that there is no adverse effect on soil as well as in ground water. • Both treated effluent and stack emissions are being monitored online by Care Air Centre TNPCB / CPCB (24x7). Also, the advanced environmental Laboratory is monitoring the quality of Air in the factory and the values reported are within the standards limits. - details enclosed **as Annexure – 3 &10**
13	Provision should be made for the housing of construction labour with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, mobile STP, Safe drinking water, medical health care, crèche etc. The housing may be in the form of temporary structures to be removed after the completion of the project.	• Complied and the project has been completed.
14	At least 5% of the total cost of the project shall be earmarked towards Enterprise Social Commitment (ESC) based on locals' needs and the activity-wise details and village-wise details along with time-schedule for implementation shall be prepared in consultation with village panchayats and district administration and submitted to the Ministry's Regional Office. Implementation of such programme shall be ensured accordingly in a time-bound manner.	Being Complied with. The details of funds spent for Enterprise Social Commitment (ESC) for the last 5 years. FY 2020 - 21 - Rs 4.77 Crores FY 2021 - 22 - Rs 4.21 Crores FY 2022 - 23 - Rs 3.41 Crores FY 2023 – 24 - Rs 4.21 Crores FY 2024 – 25 – Rs 6.75 Crores The CSR policy has been posted on the website of the Company - www.spbltd.com **(Annexure - 11)** Status- **Complied**

B	General Conditions:	Compliance Status
1	The project authorities must strictly adhere to the stipulations made by the Tamilnadu Pollution Control Board and the State Government.	• The stipulations made by TNPCB and Govt. of Tamilnadu are adhered. • The current CTO is valid upto 31.03.2027 (Air Act – Consent Order No.2208242224684 dated 10.08.2022 Water Act – Consent Order No.2208142224684 dated 10.08.2022. Status-**Complied**
2	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change (MoEF&CC).	SPB mill abide with this condition. No further expansion or modifications in the plant shall be carried out without prior approval of the MoEF & CC.
3	At least four ambient air quality monitoring stations should be established in the downward direction as well as where maximum ground level concentration of PM_{10}, $PM_{2.5}$, SO_2 and NO_X are anticipated in consultation with the SPCB. Data on ambient air quality and stack emission shall be regularly submitted to this Ministry including its Regional Office at Chennai and the SPCB / CPCB once in six months.	• In consultation with TNPCB, we have established four ambient air quality monitoring stations in the downward direction as well as in the upwind direction to monitor PM10, PM2.5, SO2 and NOx. • Data on ambient air quality and stack emission are regularly submitted to MoEF&CC / MoEF&CC-RO / TNPCB / CPCB once in six months. • Ambient and Stack monitoring have been regularly conducted AEL, TNPCB, Salem biannually. Results are conforming with the standards. • TNPCB survey has been conducted on 24/01/2025 and 25/01/2025 reports are enclosed **as Annexure -10** Status- **Complied**
4	Industrial wastewater shall be properly collected, treated so as to conform to the standards prescribed under GSR 422 (E) dated 19th May, 1993 and 31st December, 1993 or as amended from time to time. The treated wastewater shall be utilized for plantation purpose.	• The Wastewater is treated to the Inland Surface Water Discharge Standards after extensive recycling within the plant and further used for irrigation. **(Annexure -12)** Status- **Complied**

<table>
<tr><td>5</td><td>The overall noise-levels in and around the plant area shall be kept well within the standards (85 dBA) by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels should conform to the standards prescribed under EPA Rules, 1989 viz. 75 dBA (daytime) and 70 dBA (nighttime).</td><td>• This is being monitored regularly by TNPCB Advanced Environmental Laboratory, Salem is conducting overall noise levels survey twice in a year and their analysis report confirm compliance of stipulated standards in this regard.
<table><tr><th>Location</th><th>Sound Level – dB(A)</th></tr><tr><td>Boundary Line</td><td>75dBA (daytime)</td></tr><tr><td>At the main gate (Admin)</td><td>54.7</td></tr><tr><td>Time office Gate</td><td>54.8</td></tr><tr><td>Diesel Bunk area</td><td>53.6</td></tr><tr><td>Odapalli Village area</td><td>53.6</td></tr><tr><td>SPB Gust House premises</td><td>54.8</td></tr><tr><td>Intake well premises</td><td>53.7</td></tr><tr><td>Bagasse Zone area</td><td>52.4</td></tr><tr><td>Vinayagar Temple premises</td><td>54.7</td></tr><tr><td>Inside the Plant</td><td>85 dBA</td></tr><tr><td>New Recovery Boiler Area (Odapalli gate)</td><td>54.9</td></tr><tr><td>CPP – coal yard</td><td>52.3</td></tr></table>Extracted from Analysis Report of Advanced Environmental Lab, TNPCB, Salem for the period Oct 2024 – March 2025. - Annexure -10
Status - Complied.</td></tr>
<tr><td>6</td><td>Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.</td><td>Being followed.
• Company is carrying out health surveillance programme and annual medical check-up for their employees.
• Industry has established full-fledged OHC with full time Medical Officer and round the clock nursing staff.
• Company has obtained accreditation under OHSMS 45001 (Occupational Health & Safety Management Systems), by M/s Det Norske Veritas, The Netherlands.
(Details is at Annexure -13)
Status - Complied.</td></tr>
</table>

Sl.No	General EC Conditions:	Compliance Status
7	The company shall develop rain water harvesting structures to harvest the rain water for utilization in the lean season besides recharging the ground water table.	• RWH Structures are constructed inside the mill for recharge and for reuse. In all the quarters RWH were installed numbering 1032 for groundwater recharge. **(Annexure -14)** Status - **Complied.**
8	The project proponent shall also comply with all the environmental protection measures and safeguards recommended in the EIA/EMP report. Further, the company must undertake socio-economic development activities in the surrounding villages like community development programmes, educational programmes, drinking water supply and health care etc.	• The following activities regarding Socio-economic development: 1. Supply of protected potable drinking water to all the villages and neighbouring community through network of pipelines 400 numbers of drinking water taps were installed in strategic places. 2. Supply of treated wastewater after meeting inland surface water discharge standards for irrigation. 3. Desilting of community check dams for collection of rain water during monsoon for the recharge of ground water. 4. Education facility for the rural community in three schools run by the Company. 5. Donated land for the Government school Running of Community Health Centres for the benefit of the downtrodden. 6. Regular sports activities like Cricket, Tennis, Volleyball, Kabaddi, Shuttle etc are carried out to improve the skills of the rural folk. 7. Contribution to supply of drinking water to nearby villages as a cost of Rs;118.02 lakh (April 24 – March 2025)
9	Requisite funds shall be earmarked towards capital cost and recurring cost/annum for environment pollution control measures to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change (MoEFCC) as well as the State Government. An implementation schedule for implementing all the conditions stipulated herein shall be	Details of the allocation made for Environmental Management Plants are given in the table below: Recovery Boiler, Evaporator and Other Accessories — 33.12 Online Monitoring — 0.58 PCC Plant — 5.00 Green Cover Development — 1.00 ETP Augmentation — 0.26

	submitted to the Regional Office of the Ministry at Chennai, The funds so provided shall not be diverted for any other purpose.	**Total in Crores** **39.66** The funds provided are not diverted to any other purpose.
10	A copy of clearance letter shall be sent by the proponent to concerned Panchayat, Zila Parishad / Municipal Corporation, Urban Local Body and the local NGO, if any, from whom suggestions/representations, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.	• Copy of EC letter had been sent to the Commissioner, Pallipalayam Panchayat Union, Erode on 05/02/2016 **(Annexure -15)** • Environmental Clearance letter has been placed on the company's website- Complied. **(Annexure-16).** Status - **Complied**
11	The project proponent shall upload the status of compliance of the stipulated environment clearance conditions, including results of monitored data on their website and shall update the same periodically. It shall simultaneously be sent to the Regional Office of the MOEFCC at Chennai, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; PM_{10}, SO_2, NOx (ambient levels as well as stack emissions) or critical sectoral parameters, indicated for the projects shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	• Industry has uploaded the status of compliances of the stipulated environmental clearance conditions, including results of monitoring data on the company website - Complied. • CAAQMS & OCEMS Real time data monitoring system Connected to TNPCB Care Air Centre and CPCB. • Online Display Board is installed in the main gate for the public domain. • Geo tagged Photos enclosed as **Annexure -17** Status- **Complied.**
12	The project proponent shall also submit six monthly reports on the status of the compliance of the stipulated environmental conditions including results of monitored data (both in hard copies as well	Being submitted regularly. EC Six monthly compliance report for the last 4 years were submitted as detailed below; **Year** **Submitted on**

	as by e-mail) to the Regional Office of MOEFCC. the respective Zonal Office of CPCB and the SPCB. The Regional Office of this Ministry at Chennai / CPCB / SPCB shall monitor the stipulated conditions.	<table><tr><td>Oct 20 - Mar 21</td><td>12 04 2021</td></tr><tr><td>Apr 21 - Sep 21</td><td>13 10 2021</td></tr><tr><td>Oct 21 - Mar 22</td><td>09 05 2022</td></tr><tr><td>Apr 22 - Sep 22</td><td>31 10 2022</td></tr><tr><td>Oct 22 - Mar 23</td><td>25 05 2023</td></tr><tr><td>April 23-Sep 23</td><td>21 10 2023</td></tr><tr><td>Oct 24 – Mar 24</td><td>20 05 2024</td></tr><tr><td>Apr 24 – Sep 24</td><td>18 10 2024</td></tr></table> Status- **Complied.**
13	The environmental statement for each financial year ending 31st March in Form- V as is mandated to be submitted by the project proponent to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental conditions and shall also be sent to the respective Regional Office of the MoEF&CC at Chennai by e-mail.	Being Submitted regularly. Environmental Statement (Form - V) for the last six years were submitted as detailed below: <table><tr><td>Year</td><td>Submitted on</td></tr><tr><td>2018-19</td><td>26 09 2019</td></tr><tr><td>2019-20</td><td>26 09 2020</td></tr><tr><td>2020-21</td><td>25 09 2021</td></tr><tr><td>2021-22</td><td>19 09 2022</td></tr><tr><td>2022-23</td><td>25 09 2023</td></tr><tr><td>2023-24</td><td>11 09 2024</td></tr></table> Status - **Complied.**
14	The Project Proponent shall inform the public that the project has been accorded Environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB and may also be seen at Website of the Ministry of Environment, Forests and Climate Change (MoEFCC) at http://envfor.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 should be forwarded to the Regional office at Chennai.	• Advertisements were given in two local newspapers namely, The New Indian Express (English) dated 05/02/2016 and Maalai Malar (Tamil) dated 05/02/2016 **(Annexure -18)** Status - **Complied.**

15	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 commencing the land development work.	• Date of formal financial closure of MDP- III is 24/12/2021

Environment Clearance F.No. J-11011/194/2013-IA II (I) dated 18.11.2019

Sl.No	EC Condition	Compliance Status
15 A	There shall be no increase in chemical utilization and water consumption while maintaining the production of paper as approved.	No increase in chemical utilization and water consumption. Status - **Complied.** Specific water consumption last two FY as detailed below; Financial Year / Water Con., use -m3/ton of products 2022 -2023 / 44.58 2023-2024 / 42.20 2024- 2025 / 40.08