

# Environmental compliance



Issues and opportunities



**SUSTENT**

Helping enterprises become  
more Resource Efficient

# Indian environmental scenario



- Industrial growth and urbanisation
- Constitution and national policy
- Key institutions
  - MoEFCC
  - CPCB
  - SPCB
  - *Judiciary, NGT*

# Pollution Index of Industry sectors



Pollution Index	Category	Sectors
Above 60	Red	60 (oil, dyes, paint thinner..)
41 to 59	Orange	83 (ice cream, vegetable oil...)
21 to 40	Green	63 (tea processing, cement products ...)
Below 20	White	36 (paper clips, fountain pen...)

# Environment related legislations in India



- The National Green Tribunal Act, 2010
- The Air (Prevention and Control of Pollution) Act, 1981
- The Water (Prevention and Control of Pollution) Act, 1974
- The Environment Protection Act, 1986
- The Hazardous Waste Management Regulations, etc.

# Common Environmental Compliance Gaps Observed



- Lack of Valid Environmental Permits
  - Environmental Clearance (EC), Consent to Establish (CTE), or Consent to Operate (CTO)
  - Hazardous Wastes Authorisation and Bio-medical Wastes Authorisation
- Omission of Details of Site Operations in Applications, Statutory Records & Returns
  - Record of Hazardous Wastes (Form-3), Hazardous Waste Labels (Form-12), Hazardous Wastes Manifests (Form-13), Returns under Batteries Rules, 2001 (Form-I)

# Common Environmental Compliance Gaps Observed



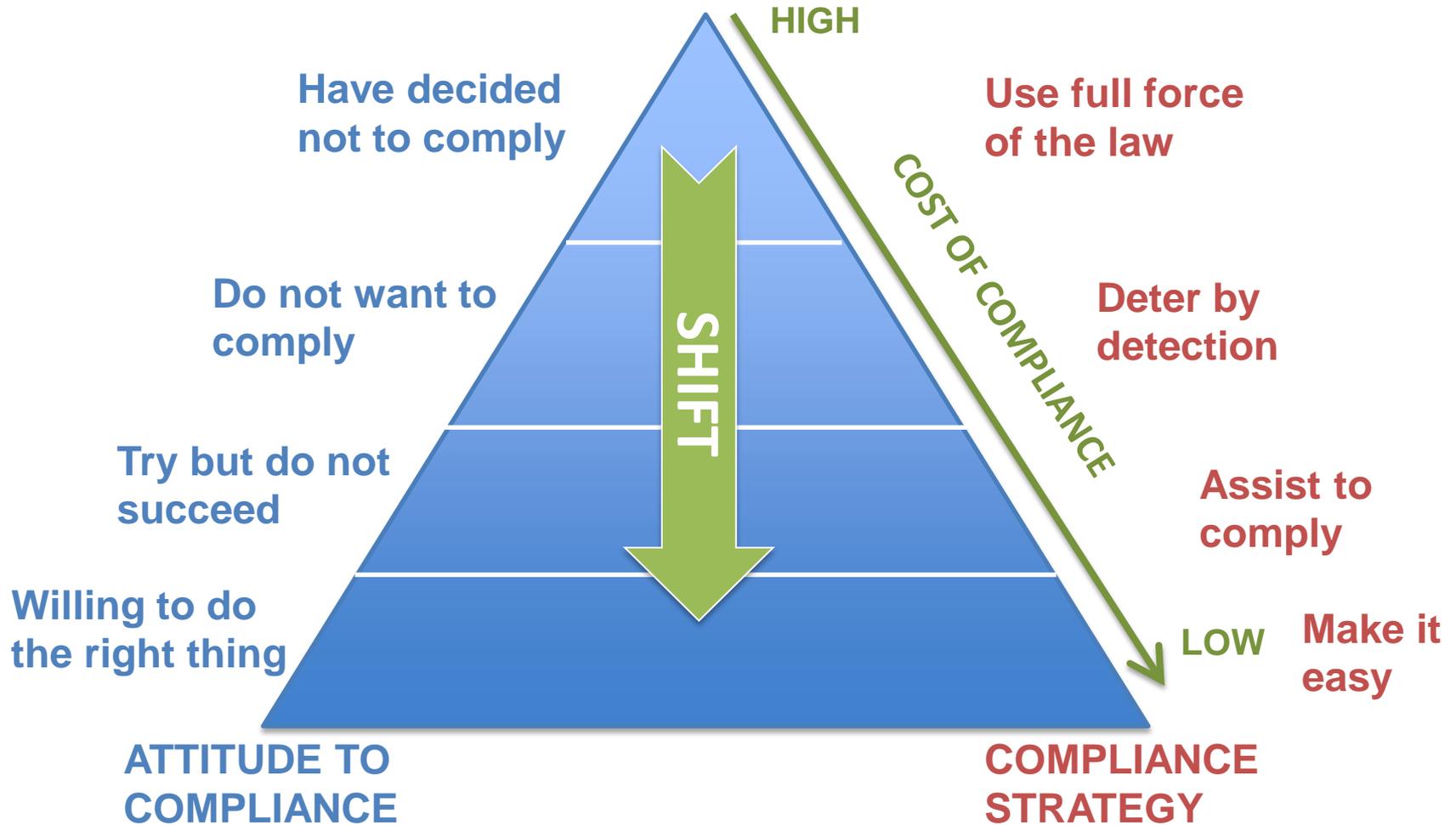
- Lack of proper Waste Management
  - Inadequate segregation of wastes
  - Lack of documented records of waste characterisation and inventory
  - Lack of prescribed labels on containers of hazardous chemicals and hazardous wastes
- Lack of Spill Response Plans and Equipment
- Lack of appropriate training, equipment, and information to workers and neighbouring communities
- Effluent discharge without treatment

# Why is compliance poor

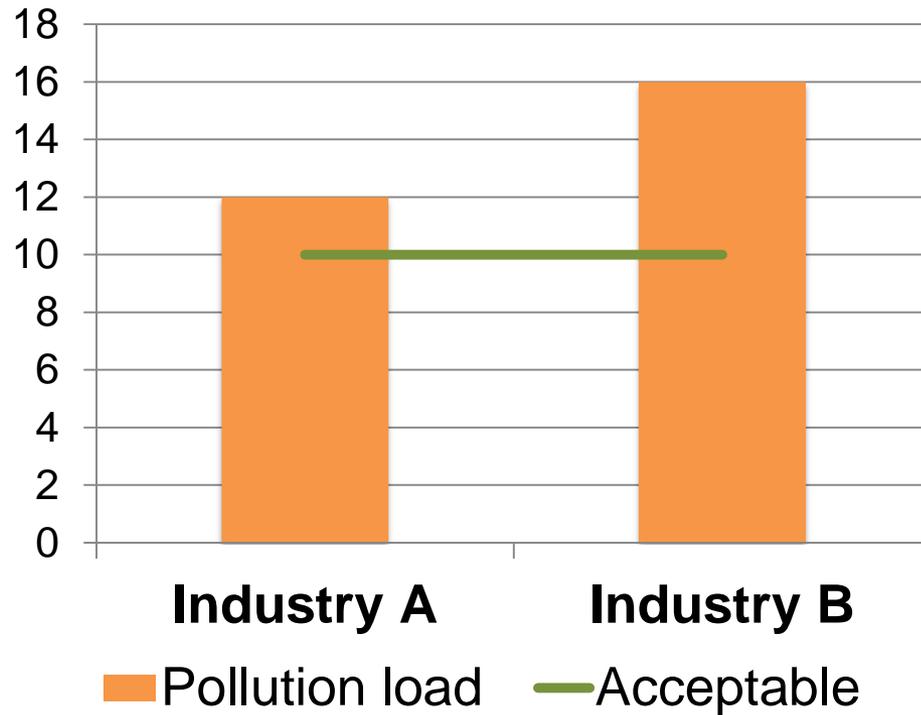


- Lack of management commitment
- Lack of adequate knowledge of the applicable regulations
- Lack of understanding of actions required to demonstrate compliance
- A culture of ‘casual compliance’
- Lack of adequate resources
- Lack of adequate resources for regulators

# Approach to compliance

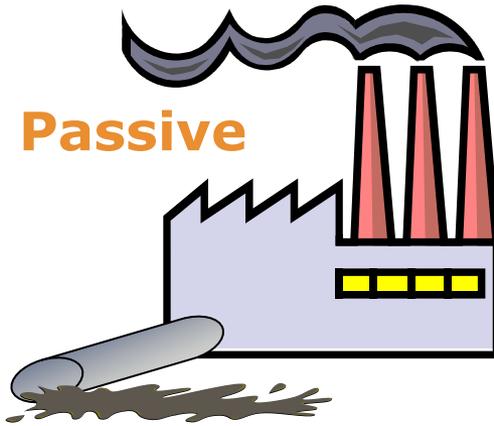


# Levels of compliance and response

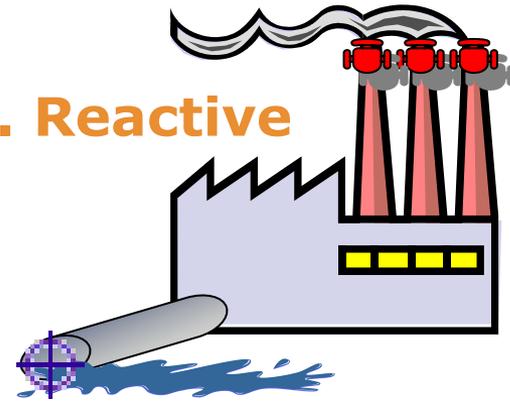


# How companies respond to pollution

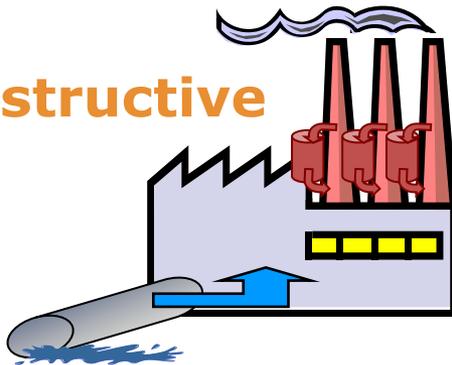
1. Passive



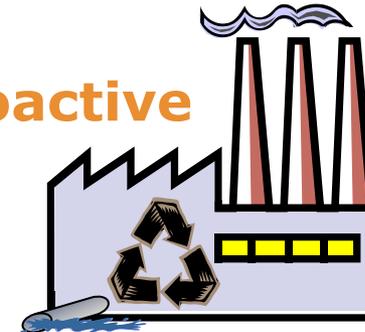
2. Reactive



3. Constructive



4. Proactive



# An integrated approach to environmental compliance