

2025

**SIX MONTHLY COMPLIANCE
REPORT**
(Period ending 31.03.2025)

F

R

For

**“Mahindra & Mahindra Ltd. (FES)
- Swaraj Division Foundry”**

Located at Village Sialba Majri, Tehsil Kharar,
Distt. SAS NAGAR (Mohali), Punjab.

Prepared by:



Eco Paryavaran Laboratories and Consultants Pvt. Ltd.

E-207, Industrial Area, Phase-VIIIB (Sector-74), SAS Nagar (Mohali),
Punjab

ems@ecoparyavaran.org, www.ecoparyavaran.org

Phone: 0172-4616225, 8872043178



CONTENTS

S. No.	DESCRIPTION
1.	Data Sheet
2.	Compliance of Environmental Clearance conditions
ANNEXURES	
3.	A-1: Environment Clearance Letter & Notification
4.	A-2 CTO Grant Certificate
5.	A-3: Test report of Stack emission
6.	A-4: Test reports for ambient air quality
7.	A-5: Test Reports of work zone monitoring
8.	A-6 :Test reports of Ground Water
9.	A-7: Test Reports of Effluent
10.	A-8: Leachate Study Report
11.	A-9: Public Liability Insurance
12.	A-10 (a) Details of the CSR Activities A- 10 (b) CMO copy A-10 (c) Swaraj Foundry Green Initiative
13.	A-11: Seismic and Flood Report
14.	A-12: Acknowledgement of previous submitted six monthly compliance report for period ending on 31.03.2024
15.	A-13: PWRDA approval
16.	A-14: Screenshot of the Website
17.	A-15: PUC Copy
18.	A-16: Completion certificate of ETP & STP
19.	A-17: Receiving by DOF (Onsite emergency Plan)
20.	A-18: Fire NOC

Ministry of Environment, Forest and Climate Change

Northern Region Office

Chandigarh-160030

DATA SHEET

1.	Project Type	Grey Iron Casting Unit
2.	Name of the Project	Mahindra & Mahindra Ltd. (FES) - Swaraj Division Foundry
3.	Clearance letter (s) F. No. & Date	The Environment Clearance has been granted vide letter No. SEIAA/M.S./2014/3189 dated 17.10.2014. EC letter is attached as Annexure - 1 .
4.	Location	Village Majri, Tehsil Kharar
a)	District(s)	SAS Nagar, Mohali
b)	State (s)	Punjab
5.	Address for correspondence	M/s Mahindra & Mahindra Ltd. (Swaraj Division Foundry) Village Majri, Tehsil Kharar, District SAS Nagar (Mohali), Punjab.
6.	Salient features	Expansion of existing steel casting unit from 35,000 TPA to 60,000 TPA.
a)	Of the Project	The total plot area of the project is 72,843.415 sq.mt. However, expansion is carried out in the existing manufacturing unit therefore, no land is required for expansion.
b)	Of the environment	Water Requirement: As per the Environmental Clearance Letter, after expansion the total water requirement of the project will be 250 KLD, which will be met from tube well. Out of which, 100 KLD will be used for domestic purpose, 65 KLD will be used for the process and 85 KLD will be used for cooling purposes. Wastewater Generation: As per the Environmental Clearance Letter, there is no waste effluent from the process. Wastewater from domestic use is to be treated through STP cum ETP and treated waste water to be used within the premises for plantation. Miscellaneous: As per the Environmental Clearance letter, the additional power requirement of 8,000 KW for the proposed expansion will be met from PSEB, total connected load = 14924.35 KW and sanctioned demand = 12951 KVA. Green belt developed within the plant premises.

7.	Break-up of the Project Area	-																								
a)	Submergence area	Not applicable																								
8.	Break up of project affected population with enumeration of those losing houses/dwelling units only, agricultural land only both dwelling units and agricultural land and landless laborers/land landless laborers / artisans.	Not applicable																								
a)	SC/ST/ Adivasi's	Not applicable																								
b)	Others (Please indicate whether these figures are base on any scientific and systematic survey carried out or only provisional figures. if a survey has been carried out give details and year of survey)	Not applicable																								
9.	Financial details																									
a)	Project cost as originally planned and subsequent revised estimates and the year of price reference.	Rs. 66.74 Crores (Originally Planned). The fixed assets as on 31.03.2025 is Rs. 242.61 Cr.																								
b)	Allocations made for environmental management plan with item wise and year of assessment.	<div>As per proposal submitted at the time of Environmental Clearance, proposed expenditure on EMP is below:</div> <table><tr><th>Sl. No.</th><th>Particulars</th><th>Approx. capital cost (Rs. lac)</th><th>Approx. recurring cost (1st october 2024-31st march2025 (Rs. lac)</th></tr><tr><td>1.</td><td>Air pollution control</td><td>200.0</td><td>8.</td></tr><tr><td>2.</td><td>Water Pollution control/STP cum ETP</td><td>60.0</td><td>18</td></tr><tr><td>3.</td><td>Noise pollution control (including cost of landscaping and green belt)</td><td>20.0</td><td>2.8</td></tr><tr><td>4.</td><td>Solid waste management</td><td>20.0</td><td>4.94</td></tr><tr><td>5.</td><td>Environment Monitoring & Management</td><td>30.0</td><td>2.5</td></tr></table>	Sl. No.	Particulars	Approx. capital cost (Rs. lac)	Approx. recurring cost (1 st october 2024-31 st march2025 (Rs. lac)	1.	Air pollution control	200.0	8.	2.	Water Pollution control/STP cum ETP	60.0	18	3.	Noise pollution control (including cost of landscaping and green belt)	20.0	2.8	4.	Solid waste management	20.0	4.94	5.	Environment Monitoring & Management	30.0	2.5
Sl. No.	Particulars	Approx. capital cost (Rs. lac)	Approx. recurring cost (1 st october 2024-31 st march2025 (Rs. lac)																							
1.	Air pollution control	200.0	8.																							
2.	Water Pollution control/STP cum ETP	60.0	18																							
3.	Noise pollution control (including cost of landscaping and green belt)	20.0	2.8																							
4.	Solid waste management	20.0	4.94																							
5.	Environment Monitoring & Management	30.0	2.5																							

		(including laboratory establishment)			
		6.	RWH	20.0	72,000
		7.	Miscellaneous (Appointment of consultant, Management of Environment cell, Consent fees and Monitoring	10.0	3.0
		Total		360	23,72,000/-
c)	Benefit cost ratio/ Internal rate of return and year of assessment.	-			
d)	Whether (c) includes the cost of environmental management as shown in (b) above.	Yes			
e)	Actual expenditure incurred on the project so far.	The fixed assets as on 31.03.2025 is Rs. 242.61 Cr			
f)	Actual expenditure incurred on the environmental management plans so far:	The actual expenditure incurred till 31.03.2025 on EMP is approximately Rs. 23,72,000/-			
10.	Forest lands requirement:	Not applicable			
a)	The status of approval for diversion of forest land for non-forestry use.	Not applicable			
b)	The status of clear felling.	Not applicable			
c)	The status of compensatory afforestation programmer in the light of actual field experience so far.	Not applicable			
11.	The status of clear felling in non-forest areas (such as submergence area of reservoir, approach road) if any, with quantitative information.	Not applicable			
12.	Status of construction	The construction work for expansion project has been completed.			
a)	Date of commencement (actual and /or planned)	Work on proposed expansion was initiated in August 2019.			
b)	Date of completion (actual and/or planned)	December 2021. Copy of the CTO-Renewal is enclosed as Annexure 2 .			
13.	Reasons for the delay if the project is yet to start:	Not applicable			

Compliance report on conditions imposed in Environmental Clearance

PART A - SPECIFIC CONDITIONS

Sl. No.	EC Conditions	Reply
i.	The company shall install separate cyclone. Followed bag filters and fume extraction system etc. to control the particulate emission below 50 mg/Nm ³ as proposed for the induction furnace to be installed.	Agreed, the unit has already installed cyclone and bag house filter to control the particulate emissions. Stack emission test reports are enclosed as Annexure-3 .
ii.	The National Ambient Air Quality Standard issued by the ministry vide G.S.R. No. 826 (E) dated 16 th November, 2009 as amended from time to time should be followed.	Agreed, ambient air quality emissions are being monitored on quarterly basis from NABL accredited laboratory. It is being ensured that the emissions are within the prescribed limits. Test Reports for ambient air quality monitoring are attached along as Annexure-4 . In addition, four ambient air monitoring stations have been installed at site.
iii.	Gaseous emission levels including secondary fugitive emission from all the sources shall be controlled within the latest permissible limits issued by the Ministry and regularly monitored. Guidelines/Codes of practice issued by the CPCB should be followed.	Agreed and complied, secondary fugitive emissions are being monitored and found well within permissible limits. Regular work zone monitoring is being done and test reports are attached along as Annexure-5 .
iv.	Vehicular pollution due to transportation of raw material and finished product should be controlled. Proper arrangements should also be made to control dust emissions during loading and unloading of the raw material and finished product.	Agreed and complied, vehicles involved in transportation of raw material and finished product are being monitored regularly. Copy of PUC is enclosed as Annexure 15 . For loading / unloading of raw material lifting magnets have been installed for controlling dust emissions. In final finished product & finished castings area, pucca floors have been provided, thus dust generation is controlled to the maximum extent possible.

v.	The net water requirement shall not exceed 250 KLD. No effluent shall be discharged, and 'zero' discharge shall be adopted. The domestic effluent will be treated in an STP and used onto land for green area within the premises.	Agreed and complied, net water demand does not exceed 250 KLD. The domestic effluent is being treated in ETP cum STP followed by UF/RO for recycling the water back into the process for cooling and remaining is used onto land for green area within the premises. Copy of completion certificate of STP and ETP is attached as Annexure – 16 .
vi.	The project proponent will construct rainwater harvesting tank for storage of the storm water from areas other than roof top and minimum storage capacity of the tank shall be of 90 percentile of rainfall event. The stored storm water shall be used for firefighting, irrigating green areas and other such purposes instead of using fresh water as agreed upon by the project proponent during the presentation before Committee on 18.09.2014.	Agreed and complied, storm water collection tank (3 in no. i.e. 320+120+110) of 550 KL capacity has already been constructed at site. Excess of storm water is discharged to the PWD drain passing in front of the industry for which permission has already been obtained.
vii.	Rainwater harvesting for roof run-off should be implemented. Before recharging the roof run-off, pre-treatment must be done to remove suspended matter, oil and grease. However, no runoff from gardens/green area/roads/pavements shall be connected with the groundwater recharging system.	Agreed and complied, 3 rainwater harvesting pits have been constructed for roof run-off collection.
viii.	The waste sand generated from the process will be reclaimed and a reclamation plant will be set up for the purpose.	Agreed and complied, we are in the process of giving 80 MT waste sand to the processing supplier has got Consent / permission from PPCB who is in turn giving to smaller foundries after processing. Work is under process for increasing the capacity of supplier for reclamation. It is done after as per consultation with PPCB.

ix.	Regular monitoring of influent and effluent surface, sub-surface and ground water should be ensured and treated wastewater should meet the norms prescribed by the Punjab Pollution Control Board or described under the Environment (Protection) Act, 1986 whichever are more stringent. Leachate study for the effluent generated and analysis should also be regularly carried out and report submitted to the Ministry's Regional Office at Bangalore, PPCB and CPCB.	Agreed and complied, monitoring of effluent and ground water is being done on quarterly basis. It is being ensured that the treated wastewater meets the norms prescribed by the Punjab Pollution Control Board or described under the Environment (Protection) Act, 1986. Test reports of ground water quality and effluent are attached along as Annexure-6 and Annexure-7 . Also, Leachate study has been carried out. Copy is attached as Annexure 8 .
x	Risk and Disaster Management Plan along with the mitigation measures as proposed shall be implemented.	Agreed and complied, onsite emergency plan has already been prepared and is being implemented by the industry. Risk analysis for fire explosion, oil spillage, leakage of LPG, electrocution etc. has been carried out and disaster management plan for the safety of employees and workers covering alarm systems, fire safety measures, first aid as well as emergency response team has also framed. Mock Drills are being scheduled and practiced for better understanding of workers. Copy of onsite emergency plan (received by DOF) is attached as Annexure – 17 .
xi	Green belt shall be developed as proposed. Selection of plant species shall be as per the CPCB guidelines in consultation with the DFO.	Agreed and complied, approximately 2.9 acres of green belt is developed within the premises and industry is doing so in a phased manner as it is a continuous process.

xii	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 at Bangalore.	<p>Status of Public Hearing action plan is given below as:</p> <ol style="list-style-type: none"> 1. Construction of toilets at Government Senior Secondary School, Sialba Majri after spending Rs. 9 Lacs has been completed. 2. Plantation on Sialba Majri road – Plantation has been done. 3. Lights on Sialba Majri road – 25 solar lights have been provided along the road in addition to 8 lights have already been installed. 4. Local employment – Around (60-70) percent employees are already employed from District Mohali. 5. Compensation to affected person – Covered under Public Liability insurance. Insurance is in place and copy is attached as Annexure 9.
xiii	The project proponent shall spend an amount of Rs. 20 Lacs for the activities to be undertaken under the Corporate Social Responsibility programme. This amount will be in addition to the amount to be spent under the provisions of the Companies Act, 2013 and Companies (Corporate social Responsibility Policy) Rules, 2014.	<p>swaraj foundry division has undertaken various CSR activities like:</p> <p>i) Rs 2.36 Lacs has been spent for environmental education cum awareness campaign through audio/video in villages, hoshiarpur, burona, tarian, mainpur and majri and high schools of these villages. (Photographs Attach)</p> <p>ii) Rs 1.37 lacs has been spent for health check-up camps including vision, audiometry, spirometry, respiratory disorders, and free medicines for villages, hoshiarpur, burona, tarian, mainpur and majri</p> <p>iii) Rs 3 lacs will be spent on providing sewing machines, ceiling fans and tricycles to needy poor and handicapped once in five years in village burona, tarian, mainpur and majri.- last distribution done in f22 and due in f27</p>

		<p>iv) rs 5 lacs will be spent for free medical treatment to very poor patients as recommended by hospitals in villages hoshiarpur, burona, mainpur and majri.- status- pending yet –compliance in underway of poor patients in nearby villages. communication regarding same has already been shared. details regarding the same is attached as annexure – 10 (a) and request letter submitted to chief medical officer (cmo) to refer needy patient is attached as annexure – 10 (b). also Swaraj Foundry Green Initiative has been done pictures attached as Annexure - 10 (c)</p>
xiv	<p>The company should provide housing for construction labour within the site with all necessary infrastructure and facilities such as fuel for cooking, mobile toilets, 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.</p>	<p>Agreed and Complied.</p>
xv	<p>The project proponent shall adhere to the commitments made in the Environment Management Plan. The Environment Management Cell will be responsible for implementation of EMP. Rs.350 Lacs will be incurred on account of capital cost and Rs.44 lacs/annum will be incurred as recurring cost for implementation of EMP.</p>	<p>It is to inform that the actual expenditure incurred on EMP is approximately Rs. 460 lacs till 31.03.2025. against proposed Capital Expenditure of Rs. 350 Lacs.</p>
xvi	<p>Seismic hazard & flood hazard history & management plan and trace element analysis for groundwater shall be submitted to the Ministry's Regional Office at Chandigarh, Punjab Pollution Control Board and CPCB within 3 months of issue of environmental clearance letter.</p>	<p>Agreed and complied, the project site has not faced any major seismic hazard and flood hazard. However, as desired in EC letter, seismic hazard & flood hazard management plan is attached as Annexure 11. Trace element analysis for groundwater has been undertaken respectively.</p>

PART B - GENERAL CONDITIONS

Sl. No.	Conditions	Reply
i.	This environmental clearance will be valid for a period of five years from the date of its issue or till the completion of the project, whichever is earlier.	Agreed and complied, the environment clearance granted vide letter No. SEIAA/M.S./2014/3189 dated 17.10.2014. Copy of EC letter is attached as Annexure 1 .
ii.	The environmental safeguards contained in the application of the promoter/ mentioned during the presentation before State Level Environment Impact Assessment Authority/ State Expert Appraisal Committee should be implemented in letter and spirit.	Agreed and complied, the environmental safeguards are being implemented in true letter and spirit.
iii.	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 mail) to the respective Regional office of MoEF, the Zonal Office of CPCB and the SEIAA/Punjab Pollution Control Board.	Agreed and complied, six monthly compliance report is being submitted regularly to Regional Office of MoEF& CC as well as SEIAA, Punjab. Acknowledgement of last submitted six monthly compliance report for period ending 30.09.2024 is attached along as Annexure-12 .
iv.	Officials from the Regional Office of Ministry of Environment & Forests, Chandigarh/ State Level Environment Impact Assessment Authority/ State Level Expert Appraisal Committee/ Punjab Pollution Control Board who would be monitoring the implementation of environmental safeguards should be given full cooperation, facilities and documents/ data by the project proponents during their inspection. A complete set of all the documents submitted to State Environment Impact Assessment Authority should be forwarded to the CCF, Regional Office of Ministry of Environment & Forests, Chandigarh/ State Level Environment Impact Assessment Authority.	Agreed and complied, full co-operation/ facilities and documents/data will be provided to Officials from Regional Office of MoEF&CC/ State Level Environment Impact Assessment Authority/ State Level Expert Appraisal Committee/ Punjab Pollution Control Board during their inspection. A complete set of all the documents was also forwarded to the specified departments.

v.	In the case of any change(s) in the scope of the project, the project would require a fresh appraisal by State Environment Impact Assessment Authority.	Agreed and complied, fresh application will be submitted to State Environment Impact Assessment Authority in case any changes will be done in the scope of the project.
vi.	Separate distribution pipelines be laid down for use of treated effluent/ raw water for horticultural/ gardening purposes with different colour coding.	Agreed and complied, separate pipelines have been provided to utilize the treated water for horticultural/ gardening purposes within the industry which have been color-coded accordingly.
vii.	All other statutory clearances such as the approvals for storage of diesel from Chief Controller of Explosives, Fire Department, Civil Aviation Department, Forest (Conservation) Act, 1980 and Wildlife (Protection) Act, 1972 etc. shall be obtained, by project proponents from the competent authorities including Punjab Pollution Control Board and from other statutory bodies as applicable. The project proponent shall also obtain permission from the NBWL, if applicable.	Agreed and complied, all necessary statutory approvals have been obtained and have been submitted to the esteemed office along with last six-monthly compliance reports. The same is attached as Annexure – 18 .
viii.	The project proponent should advertise in at least two local newspapers widely circulated in the region, one of which shall be in the vernacular language informing that the project has been accorded environmental clearance and copies of clearance letters are available with the Punjab Pollution Control Board. The advertisement should be made within seven days from the day of issue of the clearance letter and a copy of the same should be forwarded to the Regional Office, Ministry of Environment & Forests, Chandigarh and SEIAA, Punjab.	Complied, the advertisements have already been published in the newspaper and copy of same has been submitted already along with previously submitted six monthly compliance reports.
ix.	These stipulations would be enforced among others under the provisions of Water (Prevention & Control of Pollution) Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, Environmental (Protection) Act, 1986, the Public Liability (Insurance) Act, 1991 and EIA Notification, 2006.	Noted and agreed.

x.	Environmental clearance is subject to final order of the Hon'ble Supreme Court of India in the matter of Goa Foundation Vs. Union of India in Writ Petition (Civil) No. 460 of 2004 as may be applicable to this project and decisions of any competent court, to the extent applicable.	Agreed.
xi.	The project proponent shall obtain CLU from the competent authority, if any authority insists.	Agreed, approval under spot zoning has been granted to the industry. Further for expansion, no additional land has been acquired.
xii.	The project proponent shall obtain permission from CGWA for abstraction of 250 KLD groundwater.	Agreed and complied, project proponent has obtained permission from CGWA for abstraction of 250 KLD of ground water. Also, fresh approval for ground water extraction has been obtained from PWRDA. The permission from the PWRDA is attached as Annexure 13 .
xiii.	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zilla 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 website of the Company by the proponent.	Agreed and complied, a copy of environment clearance letter was shared with the concerned panchayat. In addition, website of the industry is developed and EC letter is uploaded on the website i.e. www.swarajtractors.com . New Screenshot uploaded with data is attached as Annexure 14 .
xiv.	The proponent shall upload the status of compliance of the stipulated EC 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 MoEF, the respective Zonal Office of CPCB and the SPCB. The criteria pollutant levels namely; PM _{2.5} , PM ₁₀ , SO ₂ , NO _x , CO, Pb, Ozone (ambient air as well as stack emissions) shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.	Agreed and complied, previously submitted six monthly compliance report along with the test reports has been uploaded on the website of the industry i.e. www.swarajtractors.com . New Screenshot uploaded with data is attached as Annexure 14 . The display board has already been placed at the main gate of the industry.
xv.	The State Environment Impact Assessment Authority reserves the right to add additional safeguards/ measures subsequently, if found necessary, and to take action including	Noted.

	revoking of the environmental clearance under the provisions of the Environmental (Protection) Act, 1986, to ensure effective implementation of the suggested safeguards/ measures in a time bound and satisfactory manner.	
xvi.	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.	No appeal against the environment clearance was raised.