

24 November 2015

**Dr. A.B. Akolkar**

Member Secretary,  
Central Pollution Control Board  
CBD-cum-Office Complex  
New Delhi.

**Re: Draft Notification of Ministry of Environment, Forest & Climatic Change  
regarding establishment of Zero Liquid Discharge in Textile Industry**

Dear Sir,

We understand from the subject draft notification put up in the public domain in the month of October 2015 that the Government expects textile processing industries having treated waste water discharge of more than 25 KLD to recycle 100% of such discharge for reuse within their units by installing Zero Liquid Discharge (ZLD) facilities.

This move of Govt. appears to be on the presumption that the textile industry is currently discharging untreated processing effluent which is harming / damaging the environment. There is seemingly another assumption that there is no technology available to treat the textile effluent to meet the desired standards of discharge water and the industry is in defiance of the mandatory guidelines.

It is respectfully submitted that this is actually not the case as the textile industry has already made sizeable investment in the most modern technology through which textile waste water is currently being treated and discharged in full compliance to the standards laid down by CPCB.

Despite the above, the draft notification aims to suddenly change the direction of handling textile waste water by installing ZLD systems. As stated in the succeeding paragraphs, such a change would in fact, threaten the survival of Indian Textile industry which is already struggling to stay afloat and compete in the Global market.

It is therefore, respectfully submitted as follows:-

1. The Indian Textile Industry is comprised of approx. ---- large textiles mills manufacturing yarn and fabrics supplemented by downstream hundreds and thousands of SME's engaged in knitting, weaving, dyeing, finishing and apparel/hosiery production.
2. The Indian Textile Industry has historically evolved and concentrated in places like Mumbai, Bhiwandi, Ahmedabad, Surat, Tamil Nadu, NCR, Kanpur, Bhilwara, Ludhiana, Amritsar, Kolkata, Indore etc. A large number of old units in these centers are located in city areas having very serious constraint of any vacant land being available with them. These units draw water either from the Municipal or

underground resource and discharge treated waste water in the Municipal sewer in complete compliance to the laid down guidelines. Some of the new mills however, that were established later in states like Madhya Pradesh, Andhra Pradesh, Punjab, Himachal Pradesh and Gujarat are housed in relatively open spaces.

3. The Government through CPCB has already prescribed standards with respect to treatment and discharge of waste water which the Industry has been following in letter and spirit either through in-house waste water treatment plants or CETP's. In case of one or two States, however, the Hon'ble High Courts while handling matters related to non-compliance of the laid down guidelines had prescribed 100% recycling and reuse of waste water or alternatively by way of marine discharge wherever feasible.
4. It deserves to be appreciated that the Global textile industry is fiercely competitive, operates on wafer thin margins and is therefore highly cost sensitive. Due to manifold reasons, India's share in world trade in textile and clothing is less than 5% as against more than 35% in case of China.
5. Bangladesh, Vietnam and Cambodia are some of the most competitive apparel exporters in the world as they enjoy preferential market access to the leading textile consuming markets besides their being low cost producers on account of low wage and logistics costs. Bangladesh's clothing exports are more than \$25 bn. and that of Vietnam are in the range of \$ 20 bn. While Bangladesh & Cambodia (having LDC status) get preferential access to EU markets; Vietnam too is well poised to get duty free exports in USA under TPP. Besides these countries, India is facing strong competition from Pakistan as well as it enjoys GSP plus advantage with EU.
6. In fact currently, the Indian Textile Industry is passing through a highly critical stage making all out efforts to get higher global share of textiles trade due to the increasing production costs in China and this window is available only for a limited period till the other competing countries in Asia grow adequately to match the required size and scale. It is therefore, utmost important for the Indian textile industry to stay competitive in terms of cost of production for manufacturing clothing and made-ups for domestic as well as export markets as otherwise it would jeopardize its growth and efforts to enhance share of business in the global market.
7. It is important to note that in none of Asian countries which are competing with India, there is a mandatory requirement of 100% recycling of the waste water through ZLD's. These Govt 's are of course constantly improving on the degree of compliance to the laid down standards of treated discharge water.
8. It is further submitted that 100% ZLD has not been specified even by any of the developed countries like Europe, US and Japan where the Textile Industry was historically nurtured but business volume moved to Asian countries because of lack of competitiveness. In many of these countries, the treated waste water from Textile operations after mixing with domestic sewerage as per the laid down standards is being successfully used for irrigation of agriculture and agro-forestry.



9. The technology and equipment's for ZLD requires huge space, investment and very high recurring cost in the form of steam and electricity. In case of many SME's, the cost of ZLD equipment may actually turn out to be more than the cost of plant and machinery itself. Besides that, the operating cost of ZLD at approx. INR 150/KLD is simply unaffordable.
10. The sudden change from present standards of discharging of waste water to 100% recycling will not only affect the performance of this Industry significantly but also limit its growth in the global trade. More so, as mentioned earlier, many of the Industrial Units do not have sufficient space to install the facilities for installing ZLD's.
11. It is therefore our strong view that stipulation of Zero Liquid Discharge (ZLD) at such a critical stage will cause enormous pressure and damage to the growth of Indian textile industry which is struggling to compete in the global market. Since most modern technology is already available to treat waste water up to such specifications, the treated water can be very well used for various purposes. There is thus a strong case for revisiting the mandatory requirement of ZLD for textile industry.
12. While the industry on its part is fully committed to protect the environment from degradation and would be more than willing to fully cooperate with the Govt., yet it is strongly suggested not to jump to one single solution of installing ZLD by every unit irrespective of its location and whether or not it is causing any harm to the environment.

It would be highly desirable to aim for a win-win solution wherein Industry is encouraged to survive and maintain its competitiveness in the global market and at the same time Govt. allows each textile industrial unit to choose the best possible option / solution based upon its process, location, nature of treated waste water discharge and available re-use options. Fortunately, suitable technology is available to treat water to meet various kinds of re-use / discharge options.

For example:

- a) The Textile processing units located in city areas are allowed to treat process waste water up to the required specifications and mix it with Municipal sewer water which is of much inferior quality. This will actually improve the overall quality of municipal discharge which after further treatment by Municipal Corporation can be used for various purposes including irrigation.
- b) The textile processing units located in open areas (having sufficient land bank) where no Municipal sewerage exists are allowed to treat water up to the required specifications for reuse in in-house forestry / plantations etc. Such a step would in fact, save fresh ground water as watering will be done with treated waste water which is good for watering plants / trees instead of fresh ground water and there is zero discharge outside.
- c) The textile units located in coastal areas are allowed to treat water up to the required specifications for marine discharge.

The above are only few examples and there could be many other ways to reach a workable solution wherein both the objectives are achieved i.e. causing no harm to the environment and at the same time allowing industry to sustain and grow in the national interest.

13. It is estimated that irrigation with sewage or sewage mixed with treated industrial effluents results in saving of 25 to 50 per cent of N and P fertilizer and leads to 15-27 % higher crop productivity. India has about 73,000 ha of such agriculture land that can be subjected to treated wastewater irrigation.
14. It would be undesirable to dry up treated water in Evaporators which can be otherwise used for various purposes as this would lead to unnecessary load on the ground water resource. Further, drying up water in evaporators requires energy which would have the counter effect of increasing carbon emissions in the environment.
15. The ZLD stipulation if implemented shall in fact lead to closure of already struggling garments, fabric processing, weaving and spinning Industry and being labor oriented lead to huge unemployment.

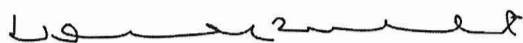
It would be therefore highly just and appropriate to follow the global best practices, finding out alternate usage of treated waste water and allow industrial units to choose the best possible environment friendly option.

And till this is done, it would desirable that the draft notification is kept in abeyance.

It is reiterated that the Indian Textile Industry is fully committed to maintain the environment standards of the country and very well understands its importance for the ecology. The Textile Industry would surely like to work with the Government to evolve an acceptable solution in the interest of sustainable economic development.

We sincerely hope that our above submissions would find your favorable consideration. We would request for allowing us an opportunity of a personal meeting enabling us to put forth our submissions in greater details.

Yours sincerely,



**(Naishadh Parikh)**  
Chairman

CC:

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