

May 23, 2016

**Shri Arun Kumar Mehta**

Chairman  
Standards Committee  
Central Pollution Control Board  
Ministry of Environment, Forest & Climate Change  
Government of India  
New Delhi

**Subject: Standards for Water Treatment for Textile Industry**

Dear Sir,

This is further to our submission dated 24<sup>th</sup> Novemeber'15 made to Member Secretary, CPCB regarding adoption of ZLD in Textile Industry. This was followed up by a technical meeting cum workshop with various stakeholders for Textile sector arranged by CPCB on 9<sup>th</sup> February, 2016. We have made detailed presentations and in conclusion of the workshop it was informed that CPCB will organize another meeting with few representatives of the Industry to address this issue.

We now understand that CPCB held a meeting for the finalization of water treatment standard for various industries including textiles on 10<sup>th</sup> May' 2016. CITI being largest organization representing Textile Industry could not get invitation to be present in this meeting. However, some of the technical members from the Industry shared with us the discussions on the subject issue. We were also informed that a draft notification proposed for the amendment of the Environment, (Protection) Rules, 1986, Schedule-I was circulated for discussions amongst the members. In the proposed amendment, the standards for various parameters of treated effluents are being specified. In addition, there are certain footnotes mentioned from No.1 to No.4. In this regard, we have to make further submission with regard to draft notifications as follows:-

- a) It should be clarified that the discharge of the treated effluent into inland surface water, Public sewerage and for irrigation meeting the norms prescribed in the (schedule-VI) General standards for discharge of environmental pollutants part A – effluents should be permitted.
- b) The discharge of treated effluent into municipal sewerage or natural drains or in any other way ie. for use in irrigation but without discharge in any major river may be treated as discharge in ambient environment.

c) The condition of “Fresh water intake or abstraction shall only be allowed for makeup water or for drinking purpose” should be imposed only in those cases where the CPCB/PCB’s mandate for Zero Liquid Discharge (ZLD).

d) The textile industry is prepared to achieve the specified standards as per the draft notification but some of the footnotes mentioned in the notification are giving rise to certain confusion for discharging into inland surface water, public sewerage and land for irrigation. Particularly making a mention in the footnote that “fresh water intake or abstractions shall only be allowed for make-up water or for drinking purpose”. We may request that this condition of fresh water intake for make-up water can be made applicable in the situations where the CPCB/PCB’s is directing those Units to adopt ZLD considering the site specific conditions or persistent violations of standards. We may re-emphasize that we have made our submission and presentations in the past to CPCB and the Ministry of Environment as mentioned above that ZLD is not a techno-commercial viable solution and the same should be left with State Government to consider based upon the specific condition of the State.

We will therefore request for a personal hearing before the finalization and publication of the draft notification.

Yours sincerely,



**(Naishadh Parikh)**

Chairman