

Minutes of the Environmental Public Hearing regarding the proposed expansion of the Active Pharmaceutical Ingredients (API) and Drug Intermediates manufacturing project in the existing unit of M/s. Besi Drugs Private Limited, Gat No. 200/1, Post-Lakhmapur, Taluka Dindori, District Nashik – 422 202, State of Maharashtra.

The Environmental Public Hearing for the proposed expansion of Active Pharmaceutical Ingredients (API) and Drug Intermediate manufacturing project in the existing unit of M/s. Besi Drugs Private Limited was organized on Wednesday, 22nd April 2026 at 11:30 A.M. at the project site situated at Gat No. 200/1, Post-Lakhmapur, Taluka-Dindori, District-Nashik – 422 202, Maharashtra.

As per the order dated 21/04/2026 issued by the Hon'ble Member Secretary, Maharashtra Pollution Control Board (MPCB), Mumbai, the Environmental Public Hearing Committee was constituted. The following members were present during the hearing:

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| 1. Dr. Appasaheb Shinde, | Chairman |
| Sub-Divisional Magistrate, Dindori, Dist. Nashik | |
| 2. Shri. Vidyasagar V. Killedar, | Member |
| Regional Officer, Maharashtra Pollution Control Board, Nashik | |
| 3. Shri. Pranav Pakhale, | Convener |
| Sub Regional Officer, Maharashtra Pollution Control Board, Nashik | |

Shri. Pranav Pakhale, Sub-Regional Officer, MPCB Nashik first welcomed the dignitaries present and, with the permission of the Chairperson of the Environmental Public Hearing Committee, commenced the proceedings of the public hearing. The Convener noted that the hearing had been convened for the proposed expansion of the existing Active Pharmaceutical Ingredients (API) and Drug Intermediate Manufacturing Unit of M/s. Besi Drugs Private Limited located at Gat No. 200/1, Village: Lakhmapur, Taluka: Dindori, District: Nashik, Maharashtra.

This public hearing has been organized in accordance with the notification issued by the Ministry of Environment, Forest and Climate Change (MoEF&CC), Government of India, Dated: 14th September 2006. This project falls under Category 'B', and projects under this category are required to obtain Environmental Clearance (EC) from the State Level Environment Impact Assessment Authority (SEIAA), Maharashtra; conducting a public hearing is a mandatory part of this process. Accordingly, with the permission of the Hon. Collector, Nashik, the hearing was scheduled for 22nd April 2026 at 11:30 AM.

As per the rules, the public notice regarding the environmental public hearing was published 30 days in advance i.e., on 18/03/2026 in the daily newspapers 'Sakal' and 'Times of India'. In addition, the project information booklet (Draft EIA & Exe. Summary) was made

available for public reading and review at concerned government offices in the district and on the MPCB website.

The locations where the documents were made available are as follows:

1	Regional Office, Ministry of Environment, Forest and Climate Change, Western Central Zone, New Secretariat Building, Ground Floor, East Wing, Civil Lines, Nagpur – 440001.
2	Office of the District Collector, Nashik.
3	General Manager, District Industries Centre, Nashik.
4	Chief Executive Officer, Zilla Parishad, Nashik.
5	Environment and Climate Change Department, New Administrative Building, 15th Floor, Madam Cama Road, Mantralaya, Mumbai – 400032.
6	Maharashtra Pollution Control Board, Kalpataru Point, 3rd Floor, Sion (East), Mumbai – 400022.
7	Regional Office, MPCB, Udyog Bhavan, 1st Floor, Trimbak Road, Near ITI Signal, Satpur, Nashik – 422007.
8	Sub-Divisional Officer, Dindori, District Nashik.
9	Sub-Regional Office, MPCB, Nashik.
10	Tahsildar Office, Dindori, District Nashik.
11	Gram Panchayat Offices of Parmori, Karanjvan, Lakhamapur, Varkheda, Avankhed, Dindori and Ozarkhed.
12	MPCB Website – Marathi and English Executive Summary.

The Convener informed that a period of 30 days was provided for submission of suggestions or objections. However, no written objections or suggestions were received by the MPCB Sub-Regional Office, Nashik either through e-mail or hard copy. Citizens were informed that they could express their suggestions, views, objections, or questions after completion of the project presentation.

Thereafter, with the permission of the Chairman, the Project Proponent was requested to present details of the proposed project.

The Environmental Consultant stated that the Project Proponent proposes expansion of the existing API and Drug Intermediate manufacturing facility. After expansion, the total production capacity will increase from 546.12 TPA to 600.00 TPA, resulting in an increase of 53.88 TPA.

The estimated project expansion cost is Rs. 2.37 Crore. The Environmental Management Plan (EMP) cost is estimated at Rs. 5.62 Lakhs. The Project Proponent has earmarked Rs. 2.37 Lakhs towards Corporate Environment Responsibility (CER).

As per Central Pollution Control Board guidelines, 2,500 trees per hectare are required for greenbelt development. Accordingly, 33% of the total project area will be developed as greenbelt.

Domestic and industrial wastewater generated from the proposed project will be treated and reused within the manufacturing process. Not a single drop of treated wastewater will be discharged outside the premises. The project is proposed as a Zero Liquid Discharge (ZLD) project.

The Environmental Consultant concluded the presentation by stating that the project would contribute to local revenue generation and provide employment opportunities to local people, thereby improving socio-economic conditions. The project is beneficial to the local area, the State of Maharashtra and the country.

Citizens were informed that they could express their suggestions, views, objections, or questions after completion of the project presentation.

The Member of the Public Hearing Committee informed the audience that the proceedings were being video-recorded and that the minutes would be prepared in both Marathi and English. Therefore, those who wish to record any suggestions or objections are requested to raise their hands so that each person may be given an opportunity to come to the microphone and present their views.

During the public hearing, citizens raised several questions/opinions regarding the project. Project representatives/consultants provided responses, detailed as follows:

Sr. No.	Name of the person with village submitting comments, objections, suggestions, etc.	Assurances / Response by Project Representative / Consultant
1)	<u>Mrs. Jyoti Vijay Deshmukh, Former Sarpanch, Lakhmapur, Taluka Dindori, District Nashik.</u> The local people were not aware of the environmental public hearing organized regarding the proposed project expansion. We came to know about it only this morning, and therefore 15–20 local persons have attended today. We are not against development or against any company. However, if companies take care of our village, our land, and our water, and if the farmers in the surrounding area do not suffer any hardship, then we will never oppose any company. Until a company starts operations, many assurances are given, but once the company becomes operational, local people are not consulted. This has been our experience for the last thirty years. Further objection: Our village has never received CSR funds from the company. 1. If you see the road from Lakhmapur Phata to the village, it is completely damaged. Women riding two-wheelers	The Environmental Consultant stated that the purpose of the public hearing is to understand the grievances, suggestions, and objections of people living in the project area and communicate them to the Government. The Central Government has mandated such environmental public hearings for this purpose. The suggestions and objections raised have been duly recorded and will be incorporated in the minutes of the meeting. The Central Government will certainly take cognizance of them. The consultant further stated that the proposed project will implement a Zero Liquid Discharge (ZLD) system. This means that wastewater generated from the production process will be treated and reused within the project premises itself. Not a single drop of treated wastewater will be discharged outside the project. Therefore, no adverse impact on the agricultural lands of surrounding farmers will occur. Air pollution in the project may arise mainly from the boiler. For this purpose, diesel will be used and a 30-meter-high stack will be installed. No solid fuels such as coal or

	suffer greatly, resulting in back-related ailments. 2. Companies operating in our village should utilize their CSR funds for the development of our village. An RO (Reverse Osmosis) plant is already functioning in the Gram Panchayat office; therefore, we do not require another RO plant. 3. If the company guarantees that farmers will never face pollution due to the company and assures preference to local people in employment, then the company should clearly state before the Chairman of the Public Hearing Committee how many local youths will be given priority in employment. Compensation should also be provided for losses suffered by nearby farmers. I am submitting a written representation regarding this matter.	bagasse will be used. Scrubbers will be installed as air pollution control equipment. Compliance with these conditions is mandatory while granting environmental clearance. A demand was made for giving employment preference to local people. The company management stated that giving priority to local persons is beneficial to the company itself. Currently, 6–7 people from Lakhmapur village are employed, and in future also preference will be given to residents of Lakhmapur in employment opportunities.
2)	Mr. Sopan Badade, Resident of Lakhmapur, Taluka Dindori, District Nashik. Congratulations on the expansion project. However, the Gram Panchayat may have issued a No Objection Certificate (NOC) to the company 20–25 years ago. 1. For the present expansion project, obtaining an NOC from the local Gram Panchayat is mandatory, but the company has not obtained it. Therefore, after submitting the proposal to the Gram Panchayat, the matter should be placed before the Gram Sabha, and only after approval by the Gram Sabha should the company be permitted to undertake the expansion. 2. There are 30–35 companies here. The assurances given at the commencement of projects are rarely fulfilled. Although the company has assured preference to local people, the Gram Panchayat will seek a written guarantee and will also recommend names of eligible local youth. 3. CSR funds were mentioned in the presentation, but they have not been utilized for local social works.	The Environmental Consultant clarified that CSR (Corporate Social Responsibility) funds are governed by the Companies Act, 2013, under which companies are required to spend 2% of their net profit on CSR activities. Accordingly, expenditure will be made once profits are generated. The CER (Corporate Environment Responsibility) Fund of ₹2.37 lakh shown in the presentation represents 1% of the project expansion investment and will be utilized during the construction stage until commissioning of the project. The expansion project will create employment opportunities for approximately 25 persons. A demand was made to prioritize employment for residents of Lakhmapur. The project proponent stated that preference will be given to local persons; however, opportunities cannot be restricted only to residents of Lakhmapur, and people residing within the 5 km study area must also be considered. Regarding the objection that the company has not obtained the Gram Panchayat's NOC, the project proponent assured that an

	4. The road condition has already been discussed. The good road has deteriorated mainly due to heavily loaded vehicles of the companies. 5. The company management should discuss road-related issues with the Gram Panchayat. Local health, education, and other issues should also be addressed. Most importantly, prior approval/NOC from the Gram Panchayat must be obtained before undertaking the expansion project.	application would be submitted to the Gram Panchayat office.
3)	Mr. Pramod Dalvi, Resident of Lakhmapur, Taluka Dindori, District Nashik My land is situated opposite Everest Company. Wastewater from that company continuously enters our land. I have been submitting applications since 2006, but the company has not taken any action. Almost all nearby farmers are suffering due to these companies. I frequently visit Nashik to submit complaints. I am tired of filing applications and making verbal complaints. Moreover, the company releases wastewater during the night.	The Member of the Public Hearing Committee stated that the question is not related to the M/s. Besi Drugs Pvt Ltd. However, the complaint in this regard has been recorded. A site inspection of the company will be conducted within the next eight days. If the company is found discharging wastewater, appropriate action will be initiated against it under environmental laws, and the complainant will be informed accordingly.
4)	Mr. Raviraj Sonawane, District Nashik Everyone knows the Chairman of the Public Hearing Committee on the dais, but the other members are not known. Therefore, their introduction should be given.	The Coordinator introduced himself and the other members of the Public Hearing Committee.
5)	Mr. Trimbak Gajare, District Nashik Is there any possibility of chemical leakage in this project?	The Environmental Consultant stated that whenever a chemical project is proposed, the first concern is always the possibility of chemical leakage. The project proponent has proposed a closed-loop system, scrubbers, and advanced sensor-based systems to immediately detect even the slightest possibility of leakage. Adequate precautions and planning have been made to prevent any chemical leakage into the environment.
6)	Mrs. Jyoti Vijay Deshmukh, Former Sarpanch, Lakhmapur There is a company similar to this one, namely Megafine. When its expansion was undertaken, the village was kept completely unaware. Wastewater from Megafine and Hexabond companies is discharged into the	---

	river near our village during the monsoon season. This should be taken on record.	
7)	Mr. Raviraj Sonawane, Resident of Lakhmapur, Taluka Dindori, District Nashik. We have even faced externment proceedings for protesting against companies. We are not against Besi Drugs Private Limited or its expansion. Expansion will require additional manpower and provide employment opportunities to local youth. 1. However, the issue of local unemployment has repeatedly been brought before the Government. In large companies such as Dalmia, the number of local employees is almost zero. Instead of calling only one company, all companies in the area should be called together and instructed to prioritize local employment and control pollution. 2. If employment opportunities are provided to youth from 15–20 surrounding villages and pollution is effectively controlled, our area will prosper. 3. Installation of properly designed stacks can also reduce air pollution. Action should be taken against companies causing pollution. 4. They demanded that the government administration take action against any company found to be causing pollution.	The Coordinator requested the gathering to raise any environmental suggestions or objections specifically related to the proposed project.
8)	Shri Bhausaheb Shivaji Mehtar, Gram Panchayat Member. He stated that there are currently eight illegal companies operating in the village. The local people believe that no action can be taken against them. Therefore, he requested that the authorities take cognizance of this matter and initiate appropriate action against these eight illegal companies. He further stated that while companies operating in compliance with rules are being requested to provide employment to local youth, similar strict action should also be taken against illegal companies in accordance with the law.	---

9)	Shri Rahul Sonawane, District – Nashik. He supported the points raised by Shri Bhausaheb Shivaji Mehtar. He stated that this public hearing for M/s Besi Drugs Pvt. Ltd. has been organized in accordance with the rules to inform local people about the proposed expansion project. He further stated that it would be inappropriate to criticize the company itself, as it has organized this public hearing as per regulatory requirements. He added that all companies which have obtained No Objection Certificates without consulting the Gram Panchayat should be investigated. Their NOCs and all permissions/licenses should be immediately cancelled, and strict action should be taken against such illegal establishments.	---
10)	Smt. Sangita Ravindra Dalvi, Sarpanch, Lakhmapur, Taluka Dindori, District Nashik. She stated that a detailed presentation regarding the environmental management plan of the proposed expansion project has already been made. She appreciated the expansion proposal. She also stated that local people have raised concerns regarding CSR funds, and the demand to utilize CSR funds for village development is justified. She added that many industries operating in the area for the last thirty years are not properly complying with CSR guidelines. She further stated that although companies submit all required documents at the time of obtaining permissions, such as ETPs and chimney height compliance, in practice these systems are often not properly operated, causing inconvenience to local residents. She also stated that company premises are often restricted for local people and elected representatives. She requested that all concerns raised by local people should be addressed properly.	---

	She further stated that there are 4-5 companies in the area which do not have Gram Panchayat No Objection Certificates. She requested police protection from the Chairman of the Environmental Public Hearing Committee, stating that if police protection is provided, they would also take action against companies operating without valid permissions. She added that complaints submitted by local people regarding companies must be resolved. She further stated that M/s Besi Drugs Pvt. Ltd. has not yet submitted any application to the Gram Panchayat, but people still approach the Gram Panchayat for clarification. She stated that CSR funds should be used mainly for schools, and the Gram Panchayat will take decisions regarding environmental issues discussed in the meeting.	
11)	Smt. Jyoti Vijay Deshmukh, Former Sarpanch, Lakhmapur, Taluka Dindori, District Nashik. She asked the Chairman of the Environmental Public Hearing Committee whether Gram Panchayats have been deprived of the authority to issue No Objection Certificates (NOCs) to industries. She further inquired whether obtaining a non-agricultural (NA) permission/NOC is mandatory for the company.	The Chairman, Environmental Public Hearing Committee stated that it is necessary for the company to obtain No Objection Certificates (NOCs) from various Government departments. He also stated that the project proponent is required to inform the Gram Panchayat office, and for that, a resolution of the Gram Sabha is necessary. The Chairman further stated that an NOC for non-agricultural use is no longer required at present. If any business activity is to be undertaken, the authority to issue NOC lies with the MIDC. An NOC from the Labour Department is required to ensure that no child labour below 18 years of age is employed in the company. He further stated that the present Public Hearing is being conducted for obtaining Environmental Clearance (EC). It is mandatory to inform the public about the measures that will be taken to comply with the standards prescribed by the Central Pollution Control Board. Here, Shri Gajare raised an appropriate question regarding the possibility of chemical leakage in the company and the

	mitigation measures proposed for the same. Some individuals also raised queries regarding air pollution control measures. The Chairman stated that this committee does not grant project approval. As per the Environment Impact Assessment (EIA) Notification, 2006 issued by the Ministry of Environment, Forest and Climate Change, Government of India, all environmental suggestions, views, and objections raised by the public are being duly recorded. Accordingly, if required the revised Environmental Impact Assessment Report is submitted to the Central Government. The Expert Committee there examines whether the proposed production process will have any impact on the environment, including water, land, livestock, and vegetation, and only thereafter a final decision is taken. The Chairman of the Environmental Public Hearing Committee also sought information from the Village Officer regarding what type of No Objection Certificate is required to be obtained from the Gram Panchayat. The Village Officer stated that an NOC for conducting business is required to be obtained from the Gram Panchayat. The Chairman observed that such NOC would have already been obtained at the time of commencement of business, and for expansion purposes, the company is instructed to apply for the required NOC. The Gram Sabha will take a decision in this regard.
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The Coordinator, Environmental Public Hearing Committee stated that during the meeting, local citizens raised various environmental-related suggestions and questions, which were appropriately answered by the Environmental Consultant. Similarly, the objections raised by the present Gram Panchayat members and the Sarpanch were clarified by the Hon'ble Chairman of the Environmental Public Hearing Committee, and the elected representatives expressed their satisfaction with the explanations provided.

The Chairman, Environmental Public Hearing Committee, while concluding the meeting, stated that the purpose of the meeting had been explained at the beginning and during

the discussions. The attendees raised various issues, suggestions, and objections, which are summarized as follows:

a) The company should give priority to local youth for employment. The Chairman instructed the project proponent that the concerns of local citizens are valid. Employment opportunities should be provided to local youth based on their educational qualifications and as per the requirements of the company. At this, the project proponent responded that the project has been operational since 1990 and employees from nearby villages are already working in the project. The Chairman further instructed that since the project is located in Lakhmapur village, priority should be given to residents of Lakhmapur, as demanded by the villagers.

b) Under CSR activities of the ongoing project and expansion project, priority should be given to repairing the road issues raised by the villagers of Lakhmapur using CSR funds.

c) The Environmental Consultant explained in detail the Environmental Management Plan of the proposed project. The proposed project is a ZLD (Zero Liquid Discharge) project, and not a single drop of treated wastewater will be discharged outside the premises. It was also stated that due to chimney height and capacity, air pollution will not occur. The Maharashtra Pollution Control Board, Nashik, should monitor this. Necessary care must be taken to ensure that no damage is caused to the agricultural land of nearby farmers due to the project, and proper management of other wastewater/domestic wastewater must also be ensured.

d) For any educational and healthcare-related projects within the Gram Panchayat jurisdiction, CSR support should be provided as per the demands of the Gram Panchayat, and the Environmental Consultant should take the initiative in this regard.

e) Shri Gajare raised a valid concern regarding chemical leakage. As the Chairman of the Environmental Public Hearing Committee, I agree with this concern. To prevent accidents, advanced systems must be installed and properly maintained at regular intervals.

f) It was stated that illegal companies are operating in the area. This matter should be brought to the notice of the Regional Officer, Maharashtra Industrial Development Corporation, Nashik, in writing.

g) The Sarpanch requested police protection for taking action against illegal companies. Accordingly, a written representation should be submitted to the concerned police station having jurisdiction, and the Police Department shall take action as per rules.

h) It was stated that some companies in the area cause pollution during late-night hours. The Member of the Environmental Public Hearing Committee suggested filing a written complaint, and assured that action would be taken within eight days.

The Chairman stated that all suggestions and objections raised during the meeting have been duly recorded. However, if anyone wishes to submit additional written or verbal suggestions/objections regarding the proposed project, they may do so by 6:00 PM today, either in person or via email to the Maharashtra Pollution Control Board. These will be submitted along with the minutes of the meeting and the revised Environmental Impact Assessment report to the Government.

The Hon'ble Chairman thanked all the large number of local attendees and declared that the Environmental Public Hearing proceedings were concluded.

At that time, the Project Environmental Consultant stated that if the Gram Panchayat permits, the reserved CER fund of ₹2.37 lakh may be utilized for road repair work.

Smt. Sangita Ravindra Dalvi, Sarpanch, Lakhmapur, Taluka Dindori, District Nashik, asked the Member of the Environmental Public Hearing Committee whether, when any industry approaches for environmental clearance, it is verified whether it has obtained No Objection Certificate (NOC) from the Gram Panchayat.

The Member of the Environmental Public Hearing Committee replied that as per rules, if a project is to be established within Gram Panchayat limits, an NOC from the Gram Panchayat is first required, and only thereafter clearance is granted. He further stated that since this project has been operational since 1990, it is assumed that a Gram Panchayat NOC exists. As discussed in the meeting, for the expansion, the project proponent will submit an application to the Gram Panchayat, and further action will be taken only after the NOC is granted by the Gram Sabha.

The Coordinator of the Environmental Public Hearing, Shri Pranav Pakhale, Sub-Regional Officer, MPCB, Nashik, stated that all issues raised by the citizens have been duly recorded and will be included in the minutes of the public hearing. Thereafter, with the approval of the Hon'ble Chairman, he thanked all the attendees and declared the public hearing concluded.

It is hereby stated that a total of 01 written suggestions/objections were received during this Environmental Public Hearing and are attached herewith.



(Pranav Pakhale)
Convener &
Sub Regional Officer,
M.P.C Board, Nashik



(Vidyasagar Killedar)
Member &
Regional Officer,
M.P.C Board, Nashik



(Dr. Appasaheb Shinde)
Chairman &
Sub Divisional Magistrate,
Nashik