



परिवेश
PARIVESH
(CPC GREEN)

पयविरण, वन और जलवायु परिवर्तन मंत्रालय
Ministry of Environment, Forest and Climate Change

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View Half Yearly Compliance Report at Project Proponent

Proposal Details

Proposal No

IA/MH/IND2/61382/2016

Category

Industrial Projects - 2

Name of Project

Setting up Molasses based Distillery at Sonawade, Taluka Shahuwadi, District Kolhapur (Maharashtra) by M/s Athani Sugars Ltd

Plot / Survey/ Khasra No.

976, 977, 986, 987, 988, 989, 991, 993, 998 & 990

Village(s)

Sonavade

Sub-District(s)

Shahuwadi

State

MAHARASHTRA

District

KOLHAPUR

MoEF File No

IA/MH/IND2/61382/2016

Name of the Entity/**Corporate Office**

Athani Sugars Ltd

Entity's PAN

*****7092A

Entity Name as per PAN

ATHANI SUGARS LIMITED

Entity details mentioned above is correct ?

Agree

Covering Letter

Covering Letter

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Compliance Reporting Details

Reporting Year

2025

Reporting Period

01 Jun(01 Oct - 31 Mar)

Remark(if any)

Details of Production and Project Area

Date of Commencement of Project/Activity

20-11-2018

	Project Area as per EC Granted(ha.)	Actual Project Area in Possession(ha.)
Private	6.2	6.2
Revenue Land	0	0
Forest	0	0
Others	0	0
Total	6.2	6.2

Land Documents

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Sr.No.	Name of the Product	Units	As per EC Granted	As per CTO Granted	CTO ID	Valid Up To	Production during last financial year
1	ENA/RS/Ethanol	Kilo liters per Day (KLD)	90	90	90	null	90 klpd

Conditions

Specific Conditions

Sr.No.	Condition Heading	Condition Details	Status of Compliance,Remarks / Reason and Supporting Documents
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1	Statutory compliance	Consent to Establish or Operate for the project shall be obtained from the State Pollution Control Board as required under the Air Prevention and Control of Pollution Act 1981 and the Water Prevention and Control of Pollution Act, 1974.	PPs Submission	<p>Complied Industry has already received Consent to establishment dated 29.11.2018 from MPCB. The consent is granted for a period up to commissioning of the unit for 5 year (90 KLPD Molasses based Distillery unit). 1St Consent to Operate 90 KLPD Molasses Based Distillery period up to 31.07.2019. Industry has obtained Renewal of Consent to Operate w.r.t. 90 KLPD Molasses based Distillery vide letter No.: Format1.0/CAC/UAN No.MPCBCONSENT-0000216484/CR/2411001673 dated 27.11.2024 which is valid up to 31.08.2025. Consent copy is enclosed at Annexure - I.</p> <p>Complied 30-05-2025 Attachment: Click to View</p>
2	WASTE MANAGEMENT	As already committed by the project proponent, Zero Liquid Discharge shall be ensured and no waste /treated water shall be discharged outside the premises.	PPs Submission	<p>Complied Industrial effluent generated from existing 90 KLPD distillery activities in the form of spent lees 123 M3/Day, condensate from MEE 540 M3/Day, Boiler Blow Down 8 M3/Day, cooling blow down 20 M3/Day and effluent from lab and washing and scrubber 5 M3/Day. This entire effluent is treated in Condensate Polishing Unit (CPU). Treated effluent is reuse in to process for dilution of molasses and cooling tower make-up. Raw Spentwash to the tune of 720 M3/Day is forwarded to evaporation and</p>

				<p>concentration in Multiple (Five) Effect Evaporator (MEE). Further, concentrated Spentwash of 180 M3/Day is incinerated in 35 TPH incineration boiler. Achieve ZLD of process effluent. Total domestic effluent from ASL campus 18 M3/Day. Same treated separately in septic tanks.</p> <p>Complied 30-05-2025 Attachment:NA</p>
3	WASTE MANAGEMENT	Necessary authorization required under the Hazardous and other Wastes Management and Trans Movement Rules 2016, Solid Waste Management Rules 2016 shall be obtained and the provisions contained in the Rules shall be strictly adhered to.	PPs Submission	<p>Condition is not Applicable because is agro based industry. No any Hazardous waste generated from distillery.</p> <p>Complied 30-05-2025 Attachment:NA</p>
4	AIR QUALITY MONITORING AND PRESERVATION	To control Source and the fugitive emissions, suitable pollution control devices shall be installed to meet the prescribed norms and/or the NAAQS. The gaseous emissions shall be dispersed through stack of adequate height as per CPCB/SPCB guidelines	PPs Submission	<p>Complied To control fugitive emissions and to control pollution level, ESP (Electrostatic precipitator) is used as APC equipment followed by 80 M stack for 35 TPH incineration boiler. In case of failure of ESP due to adequate stack height (80 M) there will be proper and sufficient dispersion of particulate matter so that the impact on ground due to deposition of particulates will be minimal and non-</p>

				<p>significant.</p> <p>Photographs of APC equipments are enclosed at Annexure-II.</p> <p>Monitoring reports are enclosed at Annexure-III.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>
5	MISCELLANEOUS	Total fresh water requirement shall not exceed 535 cum/day, and will be met from Kadvi and Warana River prior permission shall be obtained from the concerned regulatory authority in this regard.	PPs Submission	<p>Complied Total fresh water requirement for existing unit is 535 CMD from Kadvi- Warana river. Which does not exceed 535 m3/day. Prior permission is obtained from Irrigation Department. Copy of Water lifting permission is enclosed at Annexure-IV.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>
6	WASTE MANAGEMENT	Process effluent/any wastewater shall not be allowed to mix with storm water. Storm water drain shall be passed through guard pond.	PPs Submission	<p>Complied The compliance is already followed by the industry. Storm water collection and conveyance arrangement through closed RCC pipeline has been provided in the premises. The storm water is discharged at lowest point in the premises of industry and through percolation and infiltration it enriches the ground water table. Therefore, mixing of water do not take place on site.</p>

				<p>Requisite arrangements are provided by the Industry as per designed.</p> <p>Photographs of drain system is enclosed at Annexure -V.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>
7	WASTE MANAGEMENT	<p>Hazardous chemicals, if any, shall be stored in tanks, tank farms, drums, carboys etc. Flame arresters shall be provided on tank farm and the solvent transfer through pumps.</p>	PPs Submission	<p>Complied Ethanol are produced which are highly flammable liquids. Same are stored in storage tanks installed at tank farm area where storage capacities are provided as: 6 nos x 74782.36 Ltrs. The tanks farm area is provided with dyke walls, lightening arrestor, firefighting arrangement etc. as per rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989. Further, for RS and Ethanol OISD 117 Rules are also followed. Under existing unit, Provision of PESO license is Procured vide letter no AIPM / C / MHI15 / 3193 (P417239) dated 23.02.2018. Under expansion same practice will be followed. PESO license is enclosed at Annexure VI.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>

8	WASTE MANAGEMENT	Process organic residue and spent carbon, if any, shall be sent to cement industries. ETP sludge, process inorganic and evaporation salt shall be disposed off to the TSDF.	PPs Submission	Distillery is an agro-based industry. Therefore, no any hazardous chemicals are used in manufacturing process. The solid in process generate only as Yeast sludge, boiler ash, and CPU sludge. Sludge used as Soil Conditioner and Boiler Ash is sold to the Brick Manufacture or farmer. Complied 30-05-2025 Attachment:NA
9	Statutory compliance	The Company shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals MSIHC Rules, 1989 as amended time to time. All transportation of Hazardous Chemicals shall be as per the Motor Vehicle Act MVA 1989.	PPs Submission	Complied Ethanol are produced which are highly flammable liquids. Same are stored in storage tanks installed at tank farm area where storage tank capacities are provided as: 6 nos x 74782.36 Ltrs. The tanks farm area is provided with dyke walls, lightening arrestor, firefighting arrangement etc. as per rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989. Further, for RS and Ethanol OISD 117 Rules are also followed. Under existing unit, Provision of PESO license is Procured vide letter no AIPM / C / MHI15 / 3193 (P417239) dated 23.02.2018. Under expansion same practice will be

					<div>followed. PESO license is enclosed at Annexure VI. Complied 30-05-2025 Attachment: Click to View</div>
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10	Statutory compliance	<p>The company shall undertake waste minimization measures as below:-</p> <p>(a) Metering and control of quantities of active ingredients to minimize waste.</p> <p>(b) Reuse of by-product from the process as raw materials substitutes in order processes.</p> <p>(c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors.</p> <p>(e) Venting equipment through vapour recovery system. (f) Use of high pressures hoses for equipment clearing to reduce wastewater generation.</p>	PPs Submission	<p>Complied The company is undertaking waste minimization measures as follows -</p> <p>(a) To reduce the spentwash generation, a yeast culture <i>Saccharomyces cerevisiae</i> will be used. By using this culture there will be reduction in spentwash generation (8 KL/KL of alcohol) shall be achieved. (b) By products generation in existing distillery unit are in form CO₂ and fusel oil which is bottled and supplied to manufacturers of beverages /secondary uses and Fusel oil use as raw material for extraction of other alcohol and solvent for paint bases. (c) Automated filling to minimize spillage system is followed. (d) Industry use batch process to manufacturing alcohol. (e) Not applicable (f) Provided to the equipment which resulting minimize waste water generation.</p> <p>Complied 30-05-2025 Attachment:NA</p>
11	GREENBELT	<p>The green belt of 5-10 m width shall be developed in more than 33 percent of the total project area, mainly along the plant periphery,</p>	PPs Submission	<p>Being complied Total land of ASL is 6.2 Ha. Existing Green Belt Area Industry has developed 6227.10 M area. The green belt development is a</p>

		in downward wind direction, and along roadsides etc. Selection of plant species shall be as per the CPCB guidelines in consultations with the State Forest Department.		continuous process and we are doing it with so as to achieve the target of more than 33percent. Nurseries and experts in the field have been consulted to identify the exact species to be planted. Photographs of Green belt plant enclosed at Annexure VII. Being Complied 30-05-2025 Attachment: Click to View	
12	PUBLIC HEARING	All the commitment made regarding issues Raised during the Public Hearing/consultation meeting held on 27th January 2016 shall be satisfactorily implemented.	PPs Submission	Complied The public hearing was conducted as per EIA notification of MoEF government of India 2006 and amendment notification. Under 90 KLPD molasses distillery the Public Hearing/consultation meeting held on 27th January 2016. All issues raised during Public Hearing or consultation are satisfactorily implemented by industry is shortly. Copy of public hearing minutes of meeting and compliance status is enclosed at Annexure-VIII. Complied 30-05-2025 Attachment: Click to View	
13	Corporate Environmental Responsibility	At least 2.5 percent of the total project cost shall be allocated for Enterprise Social Commitment based	PPs Submission	Complied A plan is carried out in consultation with local bodies to understand their	

		on Public Hearing issues. The item wise details along with time bound action in this regard shall be prepared and submitted to the Ministry's Regional Office.		local needs and accordingly ESC plan will implement. We are also promoting for drip irrigation to nearby villages. The Company will spend Rs 115.5 Lacs for the CSR activities in the upcoming five year. Complied 30-05-2025 Attachment:NA
14	AIR QUALITY MONITORING AND PRESERVATION	For the DG sets, emission limits and the stack height shall be in conformity with the extant regulations and the CPCB guidelines. Acoustic enclosure shall be provided to DG set for controlling the noise pollution.	PPs Submission	Complied Two D.G. Sets of capacity 720 KVA are provided under existing set up. Diesel 100 lit/hr is required. DG sets are provided with silencer and stack of 9 M height. Diesel is used as fuel for DG sets. DG sets are operated only during power failure situations. Separate arrangements are made to store containers of fuel used for D.G. Sets and is surrounded by firefighting arrangements. The overall noise levels in and around the plant area are kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise control generation. Latest Monitoring reports are enclosed at Annexure-III. Complied 30-05-2025 Attachment: Click to View

15	Statutory compliance	<p>The unit shall make the arrangement for protection of possible fire hazards during manufacturing process in material handling.</p> <p>Firefighting system shall be as per the norms.</p>	PPs Submission	<p>Complied</p> <p>Firefighting arrangements have been provided on site as per Factories Act. The same comprises of fire extinguishers like CO and DCP cylinders, fire hydrant box, fire hydrant hose nozzles, monitor, fire buckets, safety showers, Foam, water etc. Regular firefighting mock drills are conducted to trained workers for fire hazards. Detailed information regarding fire Firefighting report, Safety audit and photographs enclosed at Annexure-IX.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>
16	MISCELLANEOUS	<p>Occupational health surveillance of the workers shall be done on a regular basis and records maintained as per the Factories Act.</p>	PPs Submission	<p>Complied</p> <p>Regular health checkup of all employees is being carried out once in the year. Records of health check is also maintained on site. Workers entering inside the plant area are provided Personal Protective Equipments (PPEs) like ear plug, ear muffs etc. A sample copy of latest health check-up report is enclosed at Annexure-X.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>

17	AIR QUALITY MONITORING AND PRESERVATION	Continuous online (24X7) monitoring system for stack emissions shall be installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent, the unit shall install web camera with night vision capability and flow meters in the channel / drain carrying effluent within the premises.	PPs Submission	<p>Complied</p> <p>Continuous online (24x7) monitoring system for stack emissions has been installed for measurement of flue gas discharge and the pollutants concentration, and the data to be transmitted to the CPCB and SPCB server. For online continuous monitoring of effluent the unit has install web camera with night vision capability and flow meters in the channel carrying effluent within the premises. Photographs of Continuous online monitoring system is enclosed at Annexure-XI.</p> <p>Complied</p> <p>30-05-2025</p> <p>Attachment: Click to View</p>
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General Conditions

Sr.No.	Condition Heading	Condition Details	Status of Compliance,Remarks / Reason and Supporting Documents
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1	Statutory compliance	The project authorities must strictly adhere to stipulations made by the State pollution Control Boards, Central Pollution Control Boards, State Government and any other statutory authority.	PPs Submission	Complied Industry is strictly following all the stipulations made by the Maharashtra Pollution Control Board (MPCB) and State Government. Therein, renewal of consent, submission of Environmental Statement (E.S.), Returns, etc. are being done regularly. Complied 30-05-2025 Attachment:NA
2	Statutory compliance	No further expansion or modifications in the plant shall be carried out without prior approval of the Ministry of Environment, Forests and Climate Change. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.	PPs Submission	Agreed No expansion or modifications in the plant will be carried out without prior approval of the Ministry of Environment Forests and Climate Change (MoEFCC). Whenever there is any plan of expansion/modifications, the protocol as per EIA Notification, 2006 and latest amendments will be followed. Complied 30-05-2025 Attachment:NA
3	AIR QUALITY MONITORING AND PRESERVATION	The locations of ambient air quality monitoring stations shall be decided in consultation with the State Pollution Control Board (SPCB) and it shall	PPs Submission	Complied Regular monitoring is done on site. The monitoring station locations are decided as per wind rose pattern and as per SPCB norms. Ambient Air Quality Monitoring Stations should be set up

		be ensured that at least one station each is installed in the upwind and downwind directions as well as where maximum ground level concentrations are anticipated.		in the down wind direction and upwind direction as well as where maximum ground level concentration of PM, SO ₂ , and NO _x . Two Ambient Air Quality monitor stations are provided. One AAQ station is located near Store and another station is provided near main gate. Complied 30-05-2025 Attachment:NA	
4	AIR QUALITY MONITORING AND PRESERVATION	The National Ambient Air Quality Emission Standards issued by the Ministry vide G.S.R.No. 826 (E) dated 16th November 2009 shall be followed.	PPs Submission	Complied The Condition is being followed. As per NAAQS standards for ambient air quality vide No. B29016/20/90 PCI-I dated 18th November 2009, we have to measure PM ₁₀ and PM _{2.5} instead of SPM for ambient air. Hence, we have regularly monitored PM ₁₀ and PM _{2.5} , SO _x , and NO _x . Monitored report are Enclosed at Annexure-III. Complied 30-05-2025 Attachment: Click to View	
5	Noise Monitoring & Prevention	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hood, silencers, enclosures etc. on all source of noise generation. The ambient noise levels shall confirm to the standards prescribed under	PPs Submission	Complied Major noise generating source at integrated project complex are Boiler, Distillation section, turbine, blowers, D.G. set. etc. The overall noise levels in and around the plant area are maintained within the standards prescribed under Environment (Protection) Act, 1986, 1989 Rules. Workers working in noisy area are provided with personal protective equipments	

		Environment protection Act. 1986 Rules, 1989 viz.75dBA day time and dBA night time.		such as earplug, earmuffs etc. Noise monitoring reports are enclosed at Annexure-III. Complied 30-05-2025 Attachment: Click to View
6	Statutory compliance	The company shall harvest rainwater from the rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the process activities of the project to conserve fresh water.	PPs Submission	Complied Rain Water Harvesting is done on site. 1 pit are provided at site. Storm water is collected in this pits. Roof top water harvesting system is under progress. Photograph of RHW pit is enclosed at Annexure-XII. Complied 30-05-2025 Attachment: Click to View
7	Human Health Environment	Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examinations for all employees shall be undertaken on regular basis. Training to all employees on handling of chemicals shall be imparted.	PPs Submission	Training and Mock drills are conducted for employees on safety and health aspects of chemical handling. Periodical medical examinations for all employees are taken on regular basis. Onsite record is also maintained. Pre-employment medical examination done for all employees. Complied 30-05-2025 Attachment:NA
8	Statutory compliance	The company shall also comply with all the environmental protection measures and safeguards proposed in the documents	PPs Submission	Compliance strictly followed. ASL has a capital investment of Rs.860 Lacs and a recurring cost of Rs. 43.65 lacs per annum for environmental protection measures. The

		submitted to the Ministry. All the recommendations made in the EIA/EMP in respect of environmental management, and risk mitigation measures relating to the project shall be implemented.		details of investment for procuring the equipment for efficient control and monitoring of pollution along with annual recurring cost are presented in Annexure-XIII Complied 30-05-2025 Attachment: Click to View
9	Statutory compliance	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. ESC activities shall be undertaken by involving local villages and administration.	PPs Submission	Complied Industry is actively involved in socio-economic development of the region through contributions and donations through CSR activities. ASL shall continue to undertake social welfare programs for the betterment of the Quality of life of villages around in collaboration with the local bodies. Some basic amenities, viz. education, safe drinking water supply to the nearby villages may be taken up. Regular medical checkup shall be continued at times in the villages around the facility. Focus shall be on to educate villagers regarding safety measure provided in the plant. Complied 30-05-2025 Attachment:NA
10	Statutory compliance	The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.	PPs Submission	Industry has undertaken time to time eco development programmes like tree plantation, awareness programmes for local farmers, manure at subsidized rate etc. in nearby areas. Complied

				30-05-2025 Attachment:NA
11	Corporate Environmental Responsibility	The company shall remark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management / pollution control measures shall not to be diverted for any other purpose.	PPs Submission	Complied The Company is complying with all the environmental protection measures and safeguards and implement all the recommendations made in EIA / EMP. Details are given in Annexure-XIII Complied 30-05-2025 Attachment: Click to View
12	Statutory compliance	A copy of clearance letter shall be sent by the project proponent to concerned Panchayat, Zila Parishad / Municipal Corporation, Urban local Body and the Local NGO, if any, from whom suggestions / representations, if any, were received while processing the proposal.	PPs Submission	Complied The condition is complied. Copy of Environment Clearance Letter submitted to Sonawade Panchayat dated 10.05.2018. Copy acknowledgement of local body w.r.t. EC granted is enclosed in Annexure- XIV. Complied 30-05-2025 Attachment: Click to View
13	Statutory compliance	The project proponent shall also submit six monthly reports	PPs Submission	Complied Six Monthly Report is regularly being submitted to RO Office;

		on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data (both in hard copies as well as by e- mail) to the respective Regional Office of MoEFCC, the respective Zonal Office of CPCB and SPCB. A copy of Environment Clearance and six-monthly compliance status report shall be posted on the website of the company.		MoEFCC w.r.t. 90 KLPD Distillery. Latest report was submitted for a period from April 2023 to September 2023 by mail dated on 04.11.2023 and uploaded Six monthly compliance status report on the website of the company. Acknowledgement of Six-monthly report w.r.t to grant of EC is enclosed at Annexure- XV. Complied 30-05-2025 Attachment: Click to View
14	Statutory compliance	The Environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Regional Offices of MoEFCC by e-mail.	PPs Submission	Complied The environmental statement for each financial year ending 31st March in Form V will be submitted to State Pollution Control Board as prescribed under the Environment (Protection) Rules 1986, and amended subsequently. Environmental Statement submitted on MPCB web portal is enclosed at Annexure XVI. The company will also put the status of compliance of environmental clearance conditions on its website and forward it to the Regional Offices of MoEF. Complied 30-05-2025 Attachment: Click to View

15	Statutory compliance	<p>The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may be seen at Website of the Ministry at http://moef.nic.in. This shall be advertised within 7 days from the date of issues of the clearance letter, at least in the two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.</p>	<p>PPs Submission</p> <p>Complied Condition is complied. As per EIA notification within 7 days from the date of issues of the clearance letter, at least in the two local newspapers. An advertisement of accord of EC to our 90 KLPD Molasses Distillery unit has been published in two local newspapers one is local language (Dainik Lokmat) and English newspaper (Times of India) is dated 13.06.2018. Advertisement copy is enclosed at Annexure-XVII.</p> <p>Complied 30-05-2025 Attachment: Click to View</p>
16	Statutory compliance	<p>The Project Authorities should inform the Regional Office as well as the Ministry, the date of financial closure and approval of the project by the concerned authorities and the date of start of the project.</p>	<p>PPs Submission</p> <p>Date of financial closure in connection with the Industry is 31st March of every year.</p> <p>Complied 30-05-2025 Attachment:NA</p>

Document uploaded by the PP**Last Site Visit Report (if available)**

NA

Last Site Visit Report Date (if available)**Additional Attachment (if any)**

NA

Additional Remarks (if any)

- ☒ I 'Athani Sugars Ltd' hereby give undertaking that the data and information given in the filed compliance and enclosures are true to be best of my knowledge and belief and I am aware that if any part of the data and information found to be false or misleading at any stage, the clearance given to the project will be revoked at our risk and cost. In addition to above, I hereby give undertaking that no activity such as change in project layout, construction, expansion, etc. has been taken up without due approval.

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