

Environmental Regulatory Compliance Mapping and Assurance Services



Cholamandalam MS Risk Services Limited

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"Transforming Facilities from
Environmental Compliance to Stewardship"



Changing Regulatory Scenario – Self Governing Mechanism

The concept of environmental protection (EP) has become wider and more expanded its articles from just managing the pollution related challenges to prevention of pollution in the recent years due to rapidly transforming environmental regulatory scenario in India from policing to self-governance model. Environmental regulations are modified or amended more than 25 times during the past five years and more than 10 new environmental regulations are added to the comprehensive environmental protection laws/rules.

Implementation of online emissions and air quality monitoring program in 17 highly polluting industry category by Ministry of Environment and Forests & Climate Change (MoEF&CC) in 2017-18 has enabled the general public and NGO's to access the data and express their views on the environmental performance of the respective industries. Due to the increase in awareness among the public on the palpable outcomes of the environmental outbreaks, both industry and regulators are facing severe scrutiny of the environmental management performance and actions under the RTO and NGT act. Based in the statistics published by GoI, more than 20,000 cases are heard and disposed by NGT during 2011-2018. More than 3500 cases are under review as on date.

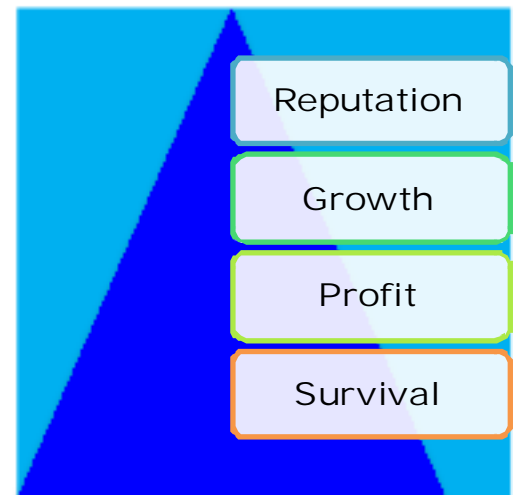
While the MoEF&CC has made several modifications to environmental permitting processes to ease the clearance mechanism, stringent environmental conditions are imposed on emissions and wastewater discharges from industries. Due to increase in urban clusters and population density in the industrialized cities and also to reduce the pressure on the natural resources and waste disposal facilities, resource conservation such as reduction in specific water consumption, wastewater generation, solid and hazardous waste generation and energy consumption have taken lion's share of the environmental permits issued by MoEF&CC and respective state pollution control boards.

All relevant business sectors are now facing an enormous volume of increasingly stringent and complex environmental legislation and the prospect of contending with penalties in the event of transgression, due to the recent order by the Honourable NGT. Environmental assurance is hence assumed of greater importance for organizations of all types and has placed the management under great moral and legal pressure to be environmentally active.



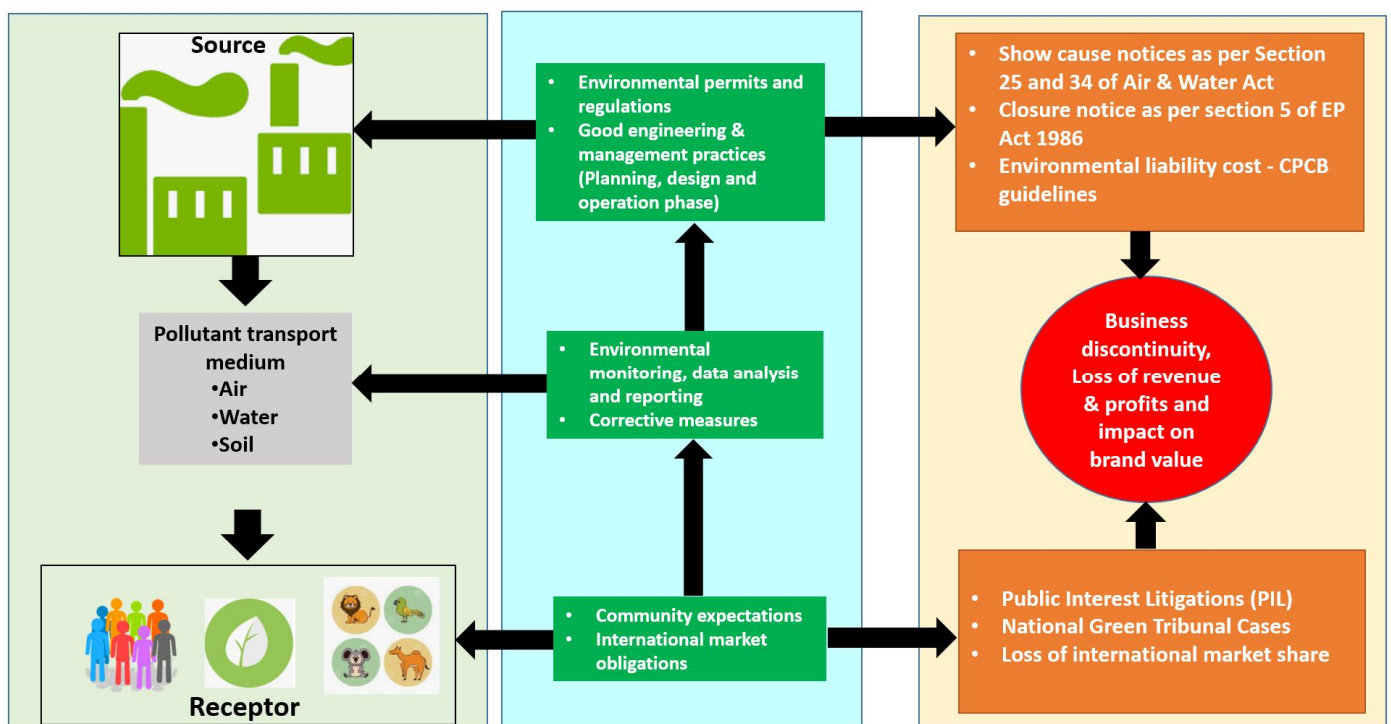
Environmental compliance – A business continuity strategy

Increasingly corporate are adopting environmental risk management tools as a critical for evaluating the business continuity risks for adopting robust and sustainable environmental management programs. According to the ISO 14001:2015, environmental compliance is extended beyond the regulations and advocates mapping of all environmental obligations from interested parties such as stakeholders and



Implementing compliance taking into account all the key legislation in the facility is a combination of various activities such as legal, compliance, risk management and internal audit. These activities form a strong line of defence for the organisation to be "compliant". Need of the hour is moving towards, Environmental Stewardship.

Chola MS Risk being a part of an international alliance, Inogen USA (inogenet.com), have developed comprehensive environmental regulation and obligations mapping tools to identify the business risks and also have successfully demonstrated such tools in several facilities in the recent past. The multidisciplinary environmental engineering team having a wider experience in addressing environmental regulatory aspects for more than 10 plus sectors, are abreast with environmental, economical and social dynamics of businesses in India.



Components of Environmental Regulatory Mapping and Gap Analysis

Facility Regulatory permitting

- Coverage - Historical records of environmental clearances issued as per EIA Notification 1994, 2006 and its amendments, consented to establish, consent to operate issued by PCBs, hazardous waste mapping and authorization
- Show-cause notices issued under EP Act, Air (Prevention and Control Pollution) Act and Water (Prevention and Control Pollution) Act.
- Form V Annual environmental audit statement records and associated data review for the last three years,
- Any pending NGT orders or PILs and associated environmental responses,
- Public grievances and redressal mechanism

Natural resources use permits

- Fuel allocation, quality and compliance with CEA and BEE guidelines, EC and local regulations,
- Mandatory use of renewable energy as per EC and CTE conditions and current scenario, carbon offsets,
- Ground water drawl permits from state and central ground water board,
- Ground water quality and level monitoring requirements, trends and observations as per guidelines issued by Ministry of Water Resources
- Fresh water allocation from rivers and other common sources, compliance and associated climate change related risks,
- Residual ecological and social impacts due to drawl of fresh water.

Environmental quality monitoring and reporting

- Justification and appropriateness of environmental monitoring program as per regulations and guidelines,
- Continuous emissions and wastewater quality monitoring programs, data quality, reporting procedures and air quality risk mapping,
- Noise levels and compliance with national standards,
- Continuous air quality monitoring programs, data analysis and reporting procedures, compliance with NAAQs 105 readings per year criteria,
- Current environmental monitoring QA/QC and data validation procedures adopted,
- Auditing and evaluating third party environmental monitoring programs,
- Review of monthly and annual environmental monitoring indicators reporting formats and long-term data trends and inferences.

Environmental risks and liabilities

- Emissions vs, air quality episodes based on meteorological data and evaluating the health impact on the nearby settlements.
- Odour emissions and associated nuisance among the local communities as per EN/ISO guidelines on odour,
- Evaluating soil and ground water quality impacts due to storage and discharges of runoffs and hazardous wastes from process buildings and UTS etc as per CPCB Guidelines and Dutch standards.
- Vehicular traffic impact on the nearby communities based on IRC guidelines,
- Evaluating the overall social risks based on cultural, political and geographical aspects within the vicinity of the facility.

Environmental management systems

Environment Services of Chola MS Risk services

M/s.Cholamandalam MS Risk Services Limited, is a joint venture between the Murugappa group, India and Mitsui Sumitomo Insurance Group, Japan. CMSRSL has a technical collaboration with InterRisk, a group company of Mitsui Sumitomo Insurance group that offers risk services in Asia. CMSRS has been constantly innovating its services to suit the changing Asian scenario and in keeping with this focus, has launched a specialized risk management tool to assist businesses assess their various risks. Cholamandalam MS Risk Services Limited, a NABET approved EIA consulting organization (Certificate no. NABET/EIA/1619/SA076) qualified to take up EIA studies for paper and pulp sector and also thermal power plant and other 10 sectors, is prompted to submitted this techno-commercial offer undertaking the pollution mapping study. Chola MS Risk team consisting of In-house ecological and biodiversity experts, socio economic experts for conducting Social impact assessment studies, hydro geologist for ground water potential assessment, modelling studies and technical feasibility studies for restoration has presented more than 50 EIA studies at various SEIAA and MoEF&CC committees in the past few years.

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Environmental audits

Environmental Impact Assessment

Environmental legal advisory services

ESG Risk mapping

Environmental and social impact assessment studies

Water and wastewater audits

ETP/ZLD Technical studies

Need based CSR studies

Pollution prevention and waste minimization studies

Environmental risk assessment and modelling

EDD and Remediation assistance services

A Member of a Global Environment Alliance

Inogen is a global corporation providing multinational organisations with consistent, high quality and cost effective environmental, health and safety solutions. It assists our multinational clients by resolving liabilities from the past, addressing today's requirements and delivering solutions for the future. With offices located on every continent, more than 4,330 staff worldwide, and projects completed in more than 120 countries, Inogen provides for a geographic reach unparalleled in the industry. Just as important is the breadth of our service offerings, with the diversity of our membership, we are able to deliver a broad spectrum of environmental, health and safety related services in areas where our competition falls short.



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Chola MS Risk is a member of International Environmental Alliance (Inogen, USA). Inogen® assists multi-national clients by resolving liabilities from the past, addressing today's requirements and delivering solutions for the future. Being a member of Inogen, Chola MS Risk amasses the vast experience of Inogen® associates covering more than 200 offices located on every continent, 6,430 staff worldwide, will be able to offer accurate, innovative, swift and economically meaningful solutions for environmental remediation requirements in India. Our ERAS covers comprehensive approach encompassing the complete corporate risk management needs such as identification of potential soil and ground water contamination hazards to evaluating the magnitude of environmental risks and remediation support.



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