Executive Summary for the Environment and Social Assessment of 1400 MW coal based thermal power plant at Kamalanga, Odisha, India
ERM India Private Limited (ERM) was commissioned by GMR Kamalanga Energy Limited (henceforth referred to as ‘the client’ or ‘GKEL’) to undertake an independent Environmental, Occupational Health & Safety and Social Compliance Audit for their 1400 MW captive coal based thermal power plant located at village Kamalanga, Dhenkanal District in the state of Odisha (henceforth referred to as the ‘GKEL TPP’ or the ‘Project’).

The purpose of the Environmental, Occupational, Health and Safety (OHS) and Social Compliance Audit was to identify gaps in the existing compliances and systems/practices against national/state regulatory requirements as well as against the Fund’s Performance Standards and related EHS guidelines. The compliance audit is at the behest of the investors (IIF and IDFC) in order to evaluate ongoing environmental, health and safety and social performance of the project and to provide recommendations to close the gaps through a time bound action plan.

This report covers the Environment and Social aspects and provides a gap assessment with respect to the above mentioned applicable reference framework describing areas of conformance and non-conformance and highlighting the key issues of non-conformance along with proposed recommendations and suggested Corrective Action Plan (CAP) for the gaps identified.

**Background**

GKEL is an Special Purpose Vehicle (SPV) for a 1,400 MW captive coal based thermal power plant (‘Project’) being built by GMR Energy Limited (‘GEL’) in the state of Odisha over two phases. GMR Energy Limited has 85.99% stake in the SPV along with the balance stake being held by India Infrastructure Fund (IIF) having 11.37% and IDFC as 2.64 %.

Phase I of the project achieved financial closure in 2009 with total installed capacity of 1,050 MW and with the first, second and third unit commissioned on April 2013, November 2013 and March 2014 respectively.

Phase II of 350 MW capacity has secured all related regulatory approvals and work on the same has to commence after the contract is awarded. The plant has been awarded Mega Power Status by the Ministry of Power.

The Project has an existing fuel linkage with Mahanadi Coalfields Limited (MCL) for 500 MW capacity and also has tapering linkage for 550 MW. ERM understands that the balance coal requirement will be met from Rampia Coal Mines, Odisha, which has been allocated for joint development to 6 companies including GMR. GKEL has executed a Power purchase agreement (PPA) with
GRIDCO (Odisha) and DHBVN& UHBVN (Haryana) as well as the Bihar State Electricity Board.

**Applicable Reference Framework**

The Environmental and Social compliance audit was carried out and evaluated against the following criteria:

- Applicable National and Local legislations on environmental and social aspects;
- Equator Principles, 2013
- The Fund’s environmental and social policies and guidelines, particularly:
  - Funds and IFC Performance Standards on Social and Environmental Sustainability (January, 2006);
  - IFC/WB Environmental Health & Safety Guidelines – General and for Thermal Power Plants; and
- All requirements and mitigating or monitoring measures specified in the Environmental Impact Assessment.

**Methodology**

The approach and methodology for the assignment is based on information made available from GKEL, ERM’s previous experience of working on similar projects and understanding of key environmental and social sensitivities related to the thermal power sector in general. The approach for the assignment focuses on the core activities as described below.

The scope of the assessment included the components of the plant and other associated facilities within the project boundary of the GKEL Thermal Power Project.

ERM organized a kick-off discussion with GKEL team at the first day of site visit at their Kamalanga complex to obtain an overview about the present status of the Kamalanga Power plant project and discuss their expectations, request for documents and finalize timelines for the site investigation and the deliverables.

This was followed by a desk-based review of information of the thermal power plant and its ancillary components along with a review of documentation on corporate-level systems and procedures for Social and Environmental Management aspects.

ERM team comprising of a social and an environmental expert visited the GMR Kamalanga Energy Plant from 21st April to 25th April 2014.

Subsequent to the site assessments, ERM had a meeting with GKEL team at the GKEL administrative building on 25th April 2014 to discuss the
observations of the compliance audit. The issues and gaps were discussed and clarifications and perspectives of the GKEL team were sought.

This report has taken note of the clarifications and evidences submitted by GKEL against some of the observations. The report has been compiled based on the findings and observations from the site assessments; review of documentation provided by the client and selected stakeholder interactions held during the auditing process.

As part of the auditing process, a number of stakeholders were consulted during the site assessment. The stakeholders comprised of internal stakeholders including company workers, managers, site engineers, EHS officers, etc. as well as external stakeholders including the community representatives, contractors and workers. The consultation process intended to understand their roles, responsibility, participation levels as well as their awareness about EHS.

A closing meeting was held with GKEL management, where ERM presented their observations. The issues and gaps were broadly discussed and clarifications and perspectives of the GKEL team were sought.

**Limitations**

Professional judgements expressed herein are based on facts and information provided by GKEL and other stakeholders. Wherever, ERM has not been able to make a judgement or assess any process, it has highlighted that as an information gap and suggested a way forward. This report is strictly based on the review of the documents provided by the client and the site assessment undertaken in April 2014. This report does not cover the assessment of the following components:

- MCL coal fields in Talcher;
- Imported coal from coal fields in Indonesia; and
- Suppliers of coal in the open market.

ERM would also like to mention that the review was based on readily available information/documentation, visual reconnaissance, and management interviews in course of the site visit. The scope of work did not include any sampling, analysis of environmental media, collection of primary data, engineering design or development of technical specifications or cost estimates among others.

**Assessment of Environment and Social Risks**

The findings of the audit are organized into two broad categories, i.e. the gaps assessed with respect to IIF performance standards (including WB-IFC General EHS Guidelines, and gaps with respect to key regulatory compliance.
An Environmental Impact Assessment (EIA) study for Phase 1 (1050 MW including Unit 1, 2 and 3) was carried out by NEERI in 2007 based on which the Environmental Clearance (EC) was obtained in 2008. EIA for Unit 4 was carried out by S.S. Environics in 2009 and based on which EC for Unit 4 was obtained in 2011.

GKEL has an integrated Management system Manual for Environment as well as Occupational Health and Safety which includes detailed Standard Operating Procedures (SOPs) as well as operational control procedures. GKEL has obtained ISO – 9001, ISO- 14001 and ISO – 18001 for unit – 1 and ISO – 14001 AND ISO – 18001 for unit - 2 & 3.

GMR has its own Corporate EHSQ Policy, HR Policy, Whistle Blower Policy as well as CSR Policy. GKEL does not have any project specific Policy and follows the corporate policies and the same have been implemented at the project level.

GKEL also has an Environment Management Plan for the following aspects:
- Air Environment;
- Noise Environment;
- Waste Water Management;
- Ash pond Management
- Solid and Hazardous Management
- Green Belt development
- Biological Environment; and
- Environment management System.


**Gap Analysis against Performance Standards and Corrective Actions:**

The gaps against the General EHS Guidelines, IFC/WB EHS Guidelines for Thermal Power Plants, and IIF performance standards were assessed. The corrective actions and mitigation measures recommended are provided below.
### Table 1.1  Environment and Social Corrective Action Plan

<table>
<thead>
<tr>
<th>Item No.</th>
<th>Corrective Actions</th>
<th>Priority (Low/Med./ High)*</th>
<th>Responsibility</th>
<th>Expected Deliverables (Report/Measurements)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Obtain Consent to Operate from Orissa State Pollution control Board for the 30-bedded Vivekananda Hospital</td>
<td>High</td>
<td>EHS Department</td>
<td>Application form</td>
</tr>
<tr>
<td>2.</td>
<td>Leakage of fly ash from the pneumatic conveying system of Unit 1 (conveying fly ash from boiler to ESP) needs to be rectified. Further it is to be ensured that all connections such as hoods, pipes, valves, stacks and chimneys are made leak proof. Regular inspection should be carried out to identify leaks if any and maintenance activities should be carried out to rectify the same. Also the coal composition testing should be done thoroughly to identify the ash content and the nature of the ash which enables in designing the conveyor system accurately.</td>
<td>High</td>
<td>EHS Department</td>
<td>Physical Verification</td>
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<tr>
<td>3.</td>
<td>Water spraying arrangements at coal stock piles</td>
<td>High</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
<tr>
<td>4.</td>
<td>Leakage of coal dust from connection between coal bunker and coal mill of Unit 1 needs to be rectified. Further it is to be ensured that all connections such as hoods, pipes, valves, stacks and chimneys are made leak proof. Regular inspection should be carried out to identify leaks if any and maintenance activities should be carried out to rectify the same.</td>
<td>High</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
<tr>
<td>5.</td>
<td>Tree plantation near the dust prone areas within the project area.</td>
<td>High</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
<tr>
<td>6.</td>
<td>Data logger supported with multi-port connectivity output preferably 4-20mA for transmission of online data of stack monitoring and AAQ monitoring stations through Y cable and GPRS network to the server of OSPCB should be installed and prior consent should be taken from OSPCB.</td>
<td>High</td>
<td>Electrical Department, EHS Department</td>
<td>Internal Documents of the Data Logger with OSPCB</td>
</tr>
<tr>
<td>7.</td>
<td>GKEL should conduct AQ dispersion modelling for all the seasons and depending upon the outcome of the same, GKEL should also conduct AAQ monitoring at sensitive/ high impact receptors falling in the impact zone of power plant outside the site.</td>
<td>High</td>
<td>EHS Department</td>
<td>Monitoring reports</td>
</tr>
<tr>
<td>8.</td>
<td>GHG Emission inventory should be prepared by GKEL and the Amount of CO2 equivalents should be calculated based on the amount of coal consumption as well as transportation vehicles. GKEL should follow IFC Carbon Emissions Estimator Tool (CEET) and USEPA scope of greenhouse emissions calculator tool to estimate the GHG emissions generated from its operations. Depending on the outcome of the study, arrangement of emissions offsets (including the Kyoto Protocol’s flexible mechanisms and the voluntary carbon market), including reforestation, afforestation, or capture and storage of CO2 options should be adopted.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>GHG Emission Inventory</td>
</tr>
<tr>
<td>9.</td>
<td>GKEL should ensure that the vehicles used for transportation of materials are checked for valid “Pollution Under Control” certificate.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Physical Verification of PUC</td>
</tr>
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<tr>
<td>10.</td>
<td>Mercury emissions from stacks attached to the Boiler Units should be monitored.</td>
<td>Low</td>
<td>EHS Department, Operation Department</td>
<td>Emission Analysis Report</td>
</tr>
<tr>
<td>11.</td>
<td>The industrial wastewater should not be released into the garland drains and should not be discharged outside the plant boundary. The waste water generated from the Ash handling plant and the Cooling water blow down should be directed to the Effluent Treatment Plant, treated and reused in the HCSD system and used as cooling water makeup water respectively. The drains should be cleaned regularly and the oil mixed surface runoff should be sent to oily wastewater system.</td>
<td>High</td>
<td>EHS Department, Operation Department</td>
<td>Operational change/Physical Verification Water Balance should be thoroughly checked.</td>
</tr>
<tr>
<td>12.</td>
<td>GKEL should carryout surface run off study of the whole plant through expert institution/organization/ third party agency. Surface Water Quality Monitoring shall be carried out by GKEL in the area and records should be maintained and the same should be submitted to OSPCB regularly.</td>
<td>High</td>
<td>Electrical Department, EHS Department, HR Department</td>
<td>Surface Runoff Study &amp; Surface Water Monitoring report</td>
</tr>
<tr>
<td>13.</td>
<td>• The locations of water sampling points for monitoring of water quality needs to be reworked to comply with EC conditions and included in the monitoring plan.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Monitoring reports</td>
</tr>
<tr>
<td>14.</td>
<td>• GKEL should maintain records of the recycled water quantities and have an accounting system for it; • GKEL should have a benchmarking system for comparison to establish the relative level of water conservation efficiency.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Revised Water Balance Diagram</td>
</tr>
<tr>
<td>15.</td>
<td>• EMP to be updated to include water consumption and conservation measures considering all construction as well as operational activities; • GKEL to ensure that water metering devices are provided for incoming and outgoing water at various water usage locations within the site.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
<tr>
<td>16.</td>
<td>All the storm water drains should be cleaned and maintained. Concrete parapet wall of adequate height should be provided all along the concreted drains on its both the sides with rain cuts at regular intervals to prevent entry of dust/ash from the road and work zone into the drainage system.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
<tr>
<td>17.</td>
<td>Fly ash should not be stored in open and should be provided with a belt conveying system from storage silos to transfer to the low lying filling areas by trucks inside the plant boundary.</td>
<td>High</td>
<td>Operation Department, EHS</td>
<td>Operational change/Physical Verification</td>
</tr>
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<tr>
<td>18.</td>
<td>Fly Ash composition study for leaching test, heavy metals testing etc. should be carried out by the site management prior to supplying it to brick manufacturers and the document should be submitted to the Regional office of the Ministry.</td>
<td>High</td>
<td>EHS Department, Operation Department</td>
<td>Fly Ash composition study Report</td>
</tr>
</tbody>
</table>
| 19.     | • Bio Medical Wastes shall be collected and stored at a designated Bio-Medical Waste room as described under the Bio-Medical Waste Rules, 2003 and as amended.   
• Standard operating procedures for waste management during operation phase need to be properly implemented and monitored.                                               | High                       | EHS Department | Physical Verification SOPS for waste Management |
| 20.     | • GKEL should ensure that hazardous waste is collected, stored and disposed off as per Hazardous Wastes Rules, 2008;                                                                                                          
• A periodical assessment and monitoring program specifically focused on contamination issues will mitigate the potential risk to GKEL in the long term.                                                                                               
• GKEL should ensure that all the hazardous materials are stored as per MHISC Rules, 1989;                                                                                                                   
• The Diesel storage areas should be provided with proper secondary containment.                                                                                                                               | High                       | EHS Department | Physical Verification                      |
<p>| 21.     | • The Diesel barrel storage areas should be provided with proper secondary containment and concrete area with side drains and pits for collection of spilled diesel, if any                                                                 | High                       | EHS Department | Physical Verification                      |
| 22.     | • ETP sludge and Oily Sludge should be quantified and recorded by GKEL                                                                                                                                                        | Medium                     | EHS Department | Estimation Records                        |
| 23.     | Solid waste bins should be provided across all waste generating areas inside the plant premises and good regular housekeeping should be maintained. Construction debris should be regularly collected from the dumped areas and stored in a designated closed area. Regular monitoring should be carried out by the EHS team to ensure that cleanliness is maintained within the plant premises. | Medium                     | EHS Department, Operation Department | Physical Verification                      |
| 24.     | Personal protection devices should be provided to the workers in the TG Floor area. Regular Maintenance of the equipment should be undertaken.                                                                                                                                                  | Medium                     | EHS Department, Operation Department | Physical Verification &amp; Noise Monitoring reports |
| 25.     | The existing Emergency response Plan should also include the response mechanism for ash dyke breach and failure.                                                                                                                                                                           | High                       | EHS Department, HR Department, Operation Department | Revised Onsite Emergency Plan             |
| 26.     | GKEL’s EHS team should strengthen the internal monitoring and auditing procedures on monthly basis till the project is                                                                                                                                                                      | High                       | EHS Department | Inspection checklist                       |</p>
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<td>complete with its all is construction activities. GKEI’s Corporate should further undertake external auditing of the plant activities quarterly to ensure the implementation of the environmental and social mitigation measures.</td>
<td></td>
<td>EHS Department</td>
<td>Revised IMS Manual</td>
</tr>
</tbody>
</table>
| 27.     | • IMS Manual to be upgraded and revised based on the existing operations and the social, labor, land and CSR related aspects and management strategies along with monitoring procedures should be incorporated and integrated in the manual.  
          | • The organogram should reflect an integrated structure of the Plant Operations head with the EHS department.  
          | • IMS Manual should have specific internal auditing checklists to undertake quarterly monitoring across its production activities.                                                                                                         | Medium                     |                                            |
| 28.     | • Undertake a cumulative impact assessment for the project along with all its components to identify the E&S issues and furthermore, prepare a suitable management Plan for handling such issues.      | Medium                      | EHS Department | Cumulative Impact Assessment Study        |
| 29.     | • SOPs for control of fuel and chemical spillages to be prepared and communicated to related staff and workers;  
          | • The project should develop an Offsite Emergency response Plan that should integrate the aspects of the project sites and nearby communities.  | Medium                      | EHS Department | SOPs for Control of Fuel and Chemical Spillages; Offsite Emergency Plan |
| 30.     | GKEI should develop an integrated internal and external communication procedure to be implemented at the sub-contractor level for the ongoing construction and implementation activities and documentation of such records should be maintained at site.     | Medium                      | EHS Department | Records of communications                 |
| 31.     | The grievance redress mechanism should be disclosed to the community and should be displayed at community places such as Panchayat office or community halls.                                                                 | Medium                      | Land and Corporate Relations | Display boards and written communication |
| 32.     | The statement (in The code of conduct in para 5.14.6) to be amended as follows: 'No employee shall involve in any political activity directly or indirectly while on duty'                                                                 | Low                         | HR Department  | Revision of the HR document              |
| 33.     | GKEI should extend its supervision to the grievance redress mechanism available to its non-employee workers. GKEI should ask grievance registers to be maintained by its sub-contractors and quarterly statement on grievance redress to be submitted to it. | Low                         | HR Department  | Quarterly Report on Grievance Redress from Sub-contractors |
| 34.     | GKEI will need to update the risk assessment, disaster management plan and Onsite emergency response plan into a consolidated document with:  
          | • Identification of offsite risks, hazards, disasters and mitigation measures taken thereof;  
          | • Key community and environmental sensitivities (such as village settlements, reservoirs, etc.) and the potential of offsite consequences along with mitigation measures;  
<pre><code>      | • A common communication and emergency response process flow for onsite emergencies as well as their                                                                                                         | Medium                      | EHS Department | Offsite Emergency Plan and Revised Onsite Emergency Plan |
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<td>35.</td>
<td>• GKEL can consider undertaking baseline health monitoring in villages in the immediate vicinity and those at a certain distance from the plant for future reference. Adequate sanitary systems should be provided to the labour camps. Septic tanks should be renovated and made functional to avoid direct discharge on land.</td>
<td>Medium</td>
<td>EHS Department</td>
<td>Physical Verification</td>
</tr>
</tbody>
</table>
| 36.     | • GKEL should compare the emergency response plan and risk assessment/disaster management plan to document a clear and stated communication procedure for any hazards/situations with offsite consequences;  
• GKEL must inform the communities' offsite in Senapatiderana, Bhagabatpur, Kamalanga, Budhapanka, Tentulihata about their internal emergency preparedness plan, resources and responsibilities.  
• The existing Emergency response Plan should also include the response mechanism for ash dyke breach and failure.                                                                                     | Medium                      | EHS Department | Physical Verification Offsite Emergency Plan and Revised Onsite Emergency Plan |
| 37.     | GKEL to provide basic training to security staff for managing community.                                                                                                                                                                                                                                     | Medium                      | EHS Department | Training records                            |
| 38.     | A livelihood restoration plan review by an independent agency should be undertaken to assess which of the project affected families have restored their income and which ones need additional support. Targeted and time-bound interventions to restore the livelihoods of such families be undertaken.                                                                                          | High                        | Land and Corporate Relations | Report of Livelihood loss and Restoration activities. |
| 39.     | Information disclosure and a grievance redress mechanism should be prepared and implemented.                                                                                                                                                                                                               | High                        | Land and Corporate Relations | Information Disclosure and Grievance Redress Plan |
| 40.     | GKEL should follow the theoretical model of developing Greenbelt based on the Agro-climatic zone of the Plant and refer the Guidelines for developing Greenbelts by CPCB, March 2010. Based on this, a Comprehensive Green Belt Development plan should be prepared by GKEL.                                                                                   | Medium                      | EHS Department | Revised Green belt Development plan         |
| 41.     | • Performance on green belt management should also be included in monthly EHSS performance report;  
• GKEL should explore the possibilities of developing green belt around the CHP, ash pond so as to develop as barriers for air and noise pollution into the nearby settlements.                                                                                           | Medium                      | EHS Department | Physical Verification                       |
| 42.     | • GKEL should ensure that no invasive alien species are planted onsite.                                                                                                                                                                                                                                      | Medium                      | EHS Department | Physical Verification                       |
| 43.     | Maintain MSDS’s and ensure all containers containing hazardous chemicals are labelled properly with details from the manufacturer such as the content, physical, and chemical properties and toxicological data. It is recommended to ensure a provision of adequate warning signage in storage areas regarding the potential hazards associated with chemicals through the usage of signs, labels and instructions. It is recommended to ensure disclosure of information pertaining to |

ERM  
PROJECT # 110175/0246308  
REPORT: E&S AUDIT, GKEL  
JULY 2014  

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<td>handling of hazardous chemicals, to all the personnel of the facility.</td>
<td></td>
<td>EHS Department</td>
<td>Physical Verification</td>
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</tbody>
</table>
| 44.     | • GKEI should ensure mandatory use of noise protection PPE while working in high noise zone;  
• Personal protection devices should be provided to the workers in the TG Floor area.  
• Site staff should encourage workers for using PPEs at site.                                                                                                                                                                                                                   | Medium                      | EHS Department                              | Physical Verification                        |
| 45.     | A resource sustainability study for the impacted one should be carried out by GKEI.                                                                                                                                                                                                            | Medium                      | EHS Department                              | Resource sustainability study               |
| 46.     | GKEI should ensure that impacts associated with the decommissioning phase are assessed and addressed at least 1 to 2 years prior to eventual decommissioning. A Project Decommissioning plan should be prepared.                                                                                                          | Medium                      | EHS Department                              | Physical Verification                        |
| 47.     | • Pest control should be carried out at the facility and pest management strategies should be formulated on regular basis. A subcontractor should be hired to deploy dedicated personnel for the Pest management services within the facility and also undertake periodic internal audits to facilitate proper functioning of the control system.  
• Record keeping should be done on regular basis for the type of pest chemicals applied and respective infested areas. Any accumulation of stagnant water within the construction area should be immediately drained off.  
• GKEI should formulate and implement an integrated pest management (IPM) and/or integrated vector management (IVM) approach targeting economically significant pest infestations and disease vectors of public health significance. | High                        | EHS Department                              | Pest control Records                        |
| 48.     | Solar Power systems should be installed on the rooftops within the plant premises and the status of implementation shall be submitted to the Regional office of the Ministry from time to time.                                                                 | Low                         | EHS Department, Operation Department        | Physical Verification                        |
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ERM India Private Limited

Building 10, 4th Floor
Tower A, DLF Cyber City
Gurgaon – 122 002, NCR , India
Tel: 91 124 417 0300
Fax: 91 124 417 0301

Regional Office – West
102, Boston House,
Suren Road, Chakala
Andheri Kurla Road, Andheri (East)
Mumbai- 400093 India
Office Board Telephone: 91- 22 -4210 7373 (30 lines)
Fax: 91- 022- 4210 7474

Regional Office – West
702 Abhishree Avenue,
Near Nehru Nagar Circle, Ambawadi
Ahmedabad -380006 India
Tel: +91 79 66214300
Fax: +91 79 66214301

Regional Office -South
Ground Floor, Delta Block
Sigma Soft Tech Park
Whitefield, Main Road
Bangalore- 560 066, India
Tel: +91 80 49366 300 (Board)

Regional Office –East
4th Floor, Asyst Park,
GN-37/1, Sector-V,
Salt Lake City,
Kolkata 700 091
Tel : 033-40450300

www.erm.com