



GV LAW CHAMBER
LLP

Haryana Environmental Compliance

A Practitioner Checklist · 2026 Edition

A CLIENT DELIVERABLE

Prepared for industrial and commercial enterprises operating in Haryana



— HOW TO USE THIS CHECKLIST

A working framework, *not a generic compliance memo.*

This document is a practitioner's checklist for environmental compliance in Haryana — covering the principal Acts, rules, and regulatory authorities that govern industrial operations. It is the same framework our team uses when auditing units across the state.

Haryana's environmental compliance landscape is shaped by central legislation — the Water Act, 1974, the Air Act, 1981, the Environment (Protection) Act, 1986, and the waste-management rules issued thereunder — administered by two principal authorities: the **Haryana State Pollution Control Board (HSPCB)** at the state level, and the **Central Pollution Control Board (CPCB)** at the central level. The Ministry of Environment, Forest and Climate Change (MoEFCC) and the State Environment Impact Assessment Authority (SEIAA) handle project-level environmental clearances under the EIA Notification, 2006.



— PILLAR 1

Industrial Categorisation

Every industrial activity in Haryana is classified by HSPCB into one of four categories — Red, Orange, Green, or White — based on a Pollution Index reflecting its potential to pollute air, water, and land. Categorisation drives almost everything that follows: the consents required, the validity period, the fees, the inspection regime, and the level of scrutiny applied.

Category	Pollution Index	CTO Validity	Examples
Red	PI > 60	5 years	Pesticides, pharma, cement, distilleries, oil refineries
Orange	PI 41 to 59	10 years	Foundries, food processing, dye intermediates, brick kilns
Green	PI 21 to 40	15 years	Cold storage, hotels, packaging, light engineering
White	PI ≤ 20	Exempt (intimation only)	IT/ITES, biscuit-cutting, tailoring, milk chilling

The categorisation is not chosen by the unit — it is determined by HSPCB on the basis of the CPCB's consolidated list (most recently updated September 2025). Categorisation is also dynamic: when a unit expands, changes its process, or adds a hazardous activity, the category may shift upward. **White category units are exempt from consent to operate**, but must file an intimation with HSPCB and remain subject to other applicable rules.

— PILLAR 2

Consent to Establish (CTE)

Before any factory, expansion, or modification can be constructed in Haryana, the project proponent must obtain prior CTE from HSPCB under both the Water Act, 1974 and the Air Act, 1981. The CTE confirms that the proposed site, layout, process, effluent treatment, and air pollution control arrangements are compliant. **No CTE means the unit cannot be lawfully constructed.**

Filing platform

Applications are filed online through the Invest Haryana portal: investharyana.in. The application includes the project description, capacity, water and power requirements, raw materials, manufacturing process, effluent and emission calculations, ETP/STP design, and the prescribed fee.

Processing timeline

Green category: 30 to 45 days · Orange and Red category: 60 to 120 days, plus inter-departmental consultations. For Red category and EIA-applicable projects, the application typically goes for examination at HSPCB headquarters in Panchkula and may require a site visit by the regional office.

— PILLAR 3

Consent to Operate (CTO)



After construction is complete and the unit is ready for trial production, the proponent must apply for CTO. The CTO authorises operation of the unit under both the Water Act and the Air Act, subject to standards prescribed by HSPCB/CPCB. The validity period depends on category: Red - 5 years, Orange - 10 years, Green - 15 years.

Renewal deadlines and the late-fee trap

CTO renewal must be applied for **at least 120 days before expiry**. If applied between 120 and 60 days before expiry, normal fee applies. **Between 60 and 30 days before expiry: 100% additional fee. Less than 30 days before expiry: 200% additional fee.** After expiry: HSPCB initiates closure action under Section 33A of the Water Act / Section 31A of the Air Act. We have seen units pay double-fee penalties simply because the renewal calendar was not tracked.

— PILLAR 4

Environmental Clearance (EIA Notification, 2006)

Projects listed in the Schedule to the EIA Notification, 2006 require prior environmental clearance — over and above the HSPCB consent. **Category A** projects (typically larger or located in ecologically sensitive areas) are appraised by the central MoEFCC. **Category B** projects are appraised by the State Environment Impact Assessment Authority (SEIAA), Haryana. Most industrial projects in Haryana's industrial corridors fall into Category B.

The four-stage process

(1) Screening — SEIAA determines whether full EIA is required (B1) or whether the project can proceed on the basis of Form 1 (B2). **(2) Scoping** — for B1 projects, Terms of Reference (ToR) are prescribed. **(3) Public Consultation** — public hearing conducted by HSPCB at the project site. **(4) Appraisal** — Expert Appraisal Committee evaluates the application, and the EIA Authority issues environmental clearance with conditions.

Compliance reporting after EC

EC is not a one-time approval. Project proponents must submit **half-yearly compliance reports** to the MoEFCC/SEIAA on the implementation of EC conditions. Non-submission, or submission of incomplete or false reports, has been the basis of NGT proceedings and directions for closure.

— PILLAR 5

Hazardous and Other Waste Management

Every unit generating, handling, storing, transporting, or disposing of hazardous waste must obtain authorisation under the **Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016**. Hazardous waste is defined in Schedule I and II of the Rules — including spent oils, used solvents, sludges from ETP, batteries, paint sludge, asbestos waste, and many other industrial residues.

Manifest system — Form 10

Every movement of hazardous waste from the generator to the authorised treatment, storage, and disposal facility (TSDF) must be accompanied by a **Form 10 manifest** — an eight-copy document tracking the consignment. Maintaining the manifest trail is one of the most-inspected aspects of hazardous-waste compliance in Haryana.

Annual return — Form 4

Every hazardous waste generator must file **Form 4** with HSPCB by **30 June** each year, reporting the previous financial year's waste generation, storage, treatment, and disposal. Late filing attracts notice and may trigger consent renewal complications.



— PILLAR 6

Extended Producer Responsibility (EPR)

Producers, importers, and brand owners of plastic packaging, electronic items, and batteries must register on the CPCB EPR portal and meet annual collection and recycling targets. Three principal EPR regimes apply:

Plastic Waste Management Rules, 2016 (as amended in 2022 and 2024) — covers rigid plastic, flexible plastic, multi-layered plastic, and compostable plastic packaging. EPR targets escalate annually and must be discharged through purchase of certificates from registered recyclers.

E-Waste (Management) Rules, 2022 — covers electrical and electronic equipment listed in Schedule I. Producers must register, declare EPR targets, and meet them through CPCB's online portal.

Battery Waste Management Rules, 2022 — covers all battery types. Producers must register on the CPCB portal and meet recycling and refurbishing targets that escalate over time.

— PILLAR 7

Public Liability Insurance

Units handling hazardous substances above threshold quantities listed in the Public Liability Insurance Act, 1991 must obtain insurance against third-party liability for accidents arising out of such handling. The premium is computed by reference to paid-up capital. The certificate must be renewed annually and remain in force throughout operations.



— THE ANNUAL CALENDAR

Environmental filing year, *at a glance.*

Item	Filed With	Due By
Hazardous Waste annual return (Form 4)	HSPCB	30 June
Environment statement (Form V)	HSPCB	30 September
EC half-yearly compliance report	SEIAA / MoEFCC	1 Jun & 1 Dec
Plastic EPR annual return	CPCB	30 June
E-Waste EPR annual return	CPCB	30 June
Battery EPR annual return	CPCB	30 June
Bio-medical Waste annual report (Form IV)	HSPCB	30 June
CTO renewal application	HSPCB	120 days before expiry
Public Liability Insurance renewal	Insurer	Annually
Online Continuous Emission Monitoring (OCEMS) data	CPCB & HSPCB	Continuous

— TEN COMMON PITFALLS

Where Haryana units *most often fall short.*

- 01. CTO renewal applied late.** Renewal applied less than 60 days before expiry, triggering 100% or 200% additional fee. The cost compounds across multiple consent cycles.
- 02. Effluent standards exceeded.** ETP outlet parameters exceed prescribed limits in routine HSPCB monitoring. Often traced to insufficient ETP capacity or poor maintenance, not malice.
- 03. Hazardous waste manifest gaps.** Form 10 manifests missing for some consignments, or generator/transporter copies not reconciled. Discovered during inspection by HSPCB.
- 04. EC condition non-compliance.** EC issued with 25-40 conditions; half-yearly compliance reports submit summary statements rather than evidence of actual implementation. Vulnerable to NGT proceedings.
- 05. EPR registration missed.** Producers, importers, and brand owners unaware that EPR registration applies to them. Common in MSME and importer categories.
- 06. Form V environment statement missed.** Annual environment statement (Form V) under EP Rules not filed by 30 September. The least-known of the major filings.
- 07. Categorisation challenges unaddressed.** Unit's categorisation changes upward when a new process is added; old consent continues without amendment, creating a documentation mismatch.
- 08. OCEMS data gaps.** Online continuous emission monitoring system installed but data transmission to CPCB server has gaps. Data gaps treated as exceedances.
- 09. Bio-medical waste authorisation lapsed.** Healthcare establishments operating without current BMW authorisation; common in smaller clinics and diagnostic centres.
- 10. Public Liability Insurance lapsed.** Hazardous-handling units fail to renew PLI annually; gap discovered during inspection or at the time of an incident, when cover becomes critical.



— ENGAGE COUNSEL

Complex matters, *resolved precisely.*

GV Law Chamber LLP advises industrial and commercial enterprises across India on environmental clearances, regulatory permissions, statutory compliance, occupational safety, and the contentious matters that arise when any of these go wrong. We routinely prepare consent applications, EIA submissions, factory licence dossiers, hazardous-waste authorisations, and represent clients before the HSPCB, the State Environment Impact Assessment Authority, the NGT, and the regular courts.

If any form in this document raises a question for your unit, or if you are uncertain whether a particular filing applies to you, please reach out. The first consultation is confidential and without obligation.

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