



GV LAW CHAMBER
LLP

Environmental Compliance Reference Manual

*A Working Guide to Statutory Forms under Haryana Environmental
Compliance · 2026 Edition*

A CLIENT DELIVERABLE

A practitioner companion to the Haryana Environmental Compliance Checklist 2026



— HOW TO USE THIS MANUAL

A working guide, *not a stationery cupboard.*

This manual is designed as a working reference for environment officers, EHS heads, and compliance officers at industrial and commercial enterprises operating in Haryana. For each major statutory form, we have set out a complete guidance card: what the form is for, who completes it, what information must be gathered before opening it, when it must be filed, the common errors we encounter, and where to download the authoritative version.

A note on form availability

The legally valid version of any statutory form is the one currently published by the Government on its official portal. Forms change through gazette notification, often without wide announcement. We therefore do not reproduce blank form templates in this manual. Instead, each card directs you to the exact location of the latest official version. For any actual statutory filing, that is the source you must use.



— SECTION 1

Consent under the Water Act, 1974 and Air Act, 1981

The two foundational environmental consents that every industrial unit in Haryana must obtain. In practice, HSPCB processes water-act and air-act consents together as a combined application, since the same establishment is invariably subject to both. The Consent to Establish (CTE) is the pre-construction permission; the Consent to Operate (CTO) is the authority under which the unit lawfully operates after construction.

CTE *Consent to Establish (Form I, Water + Air combined)*

PURPOSE

The pre-establishment consent under Section 25 of the Water Act, 1974 and Section 21 of the Air Act, 1981. Confirms that the proposed site, layout, manufacturing process, water and air pollution control arrangements, and effluent/emission management plans are compliant. Without CTE, no construction or expansion can lawfully commence.

WHO COMPLETES

The occupier of the proposed unit (typically the MD or authorised director).

WHO RETAINS / RECEIVES

Filed with HSPCB through the Invest Haryana portal. CTE is issued under the seal of the Member Secretary, HSPCB.

INFORMATION REQUIRED

Project name, location, plot details (with HSIIDC/HSVP allotment letter); category of industry; capital investment; manufacturing process flowchart; raw materials and their quantities; water requirement (sources and quantum); power requirement; effluent characteristics and treatment scheme (ETP design); air emission sources and APCD design; solid waste streams; hazardous waste declarations; site plan and layout drawings; CFE/NOC from HSIIDC; prescribed fee as per HSPCB schedule.

TIMELINE

Filed before commencement of construction. Processing time: 30 to 45 days for Green category, 60 to 120 days for Orange/Red category. CTE validity is typically 5 years for the project to be commissioned.

COMMON ERRORS WE SEE

Categorisation taken as Green when the process actually falls into Orange (sometimes Red) — eventually challenged during inspection; ETP design submitted with generic capacities not matched to actual effluent characteristics; site plan not signed by an architect or engineer registered with the Council; the Bank Guarantee requirement (applicable for Red and Orange) overlooked.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in · Filing portal: investharyana.in

How GV Law Chamber LLP can help. We coordinate CTE applications with the architect, ETP/APCD consultant, and HSIIDC documentation so the application arrives at HSPCB in a complete, internally consistent package — the single biggest factor in cutting approval time from months to weeks.

CTO

Consent to Operate (Form XIII, Water + Form II, Air)

PURPOSE

The operating consent issued by HSPCB after construction is complete and the unit is ready for production. CTO authorises operation of the unit subject to standards prescribed by HSPCB/CPCB. Validity depends on category: Red 5 years, Orange 10 years, Green 15 years. White category is exempt from CTO and requires only intimation.

WHO COMPLETES

The occupier of the unit.

WHO RETAINS / RECEIVES

Filed with HSPCB through Invest Haryana portal. CTO issued under HSPCB seal.

INFORMATION REQUIRED

CTE reference and copy; commissioning report; trial run results; ETP/APCD installation report with photographs; actual water consumption and discharge data; actual emission data; hazardous waste authorisation status; ULB occupancy certificate; fire safety certificate; fee as per HSPCB schedule (depending on capital investment).

TIMELINE

After construction completion and trial run. The unit must operate on the CTE alone during trial run; full operation requires CTO. Renewal must be applied 120 days before expiry (see late-fee schedule).

COMMON ERRORS WE SEE

CTO renewal applied less than 60 days before expiry (100% additional fee) or less than 30 days (200% additional fee); actual capacity exceeds CTO-authorized capacity, requiring amendment which is often overlooked; OCEMS data gaps; ETP outlet parameters exceeding prescribed limits during HSPCB random monitoring.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in · Auto-renewal facility available for compliant units through Invest Haryana portal.

How GV Law Chamber LLP can help. For our retainer clients, CTO renewals are tracked in our compliance calendar with a 180-day advance reminder, ensuring renewal is filed well within the no-penalty window. During inspections we coordinate the unit's response with HSPCB.

Form V *Environment Statement (annual)*

PURPOSE

The annual environmental performance statement filed under Rule 14 of the Environment (Protection) Rules, 1986. Covers water consumption, raw material consumption, waste generation, pollution discharge data, and environmental management initiatives for the preceding financial year. **The least-known of the major environmental filings** — and frequently missed.

WHO COMPLETES

The occupier of the unit.

WHO RETAINS / RECEIVES

Filed with HSPCB by 30 September each year.

INFORMATION REQUIRED

Production data for the year; water consumption; effluent quantity and quality; raw material consumption; air emissions data; hazardous waste generation; non-hazardous solid waste; investments in pollution control; environmental management initiatives; impact of pollution abatement measures on the conservation of natural resources.

TIMELINE

Filed annually by 30 September for the preceding financial year (April to March).

COMMON ERRORS WE SEE

Form V not filed at all (very common in smaller and mid-sized units); production data inconsistent with the unit's GST returns and electricity consumption; waste generation data inconsistent with the hazardous waste annual return (Form 4); environmental management initiatives section left blank or filled with platitudes.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in · Form V is included in Schedule III of the Environment (Protection) Rules, 1986. Available through MoEFCC at moef.gov.in

How GV Law Chamber LLP can help. *We prepare Form V for our retainer clients each year, drawing data from production records, PF/ESIC filings, electricity bills, and the hazardous waste records — ensuring the data reconciles across filings.*

— SECTION 2

Hazardous and Other Wastes Management Rules, 2016

Applies to every unit generating, storing, transporting, treating, or disposing of hazardous waste listed in Schedule I and II of the Rules. Spent solvents, used oils, paint sludge, ETP sludge, battery waste, asbestos waste, and many other industrial residues fall within these Rules. Authorisation from HSPCB is mandatory.

Form 1 *Application for Authorisation / Renewal*

PURPOSE

The principal authorisation under the Hazardous Waste Rules. Required before any generation, storage, treatment, transport, recycling, or disposal of hazardous waste commences. The authorisation specifies the permitted activities, quantities, and conditions.

WHO COMPLETES

The occupier of the unit, or the authorised waste handler.

WHO RETAINS / RECEIVES

Submitted to HSPCB. Authorisation issued in Form 2.

INFORMATION REQUIRED

Categorisation of waste with reference to Schedule I/II; expected quantities (annual); storage arrangements; transport arrangements (in-house or through registered transporter); treatment/disposal route (to authorised TSDF or in-house treatment); accident contingency plan; emergency response plan; CTE/CTO references; fee as per HSPCB schedule.

TIMELINE

Pre-handling. Authorisation is typically valid for 5 years. Renewal must be applied for before expiry.

COMMON ERRORS WE SEE

Authorisation obtained for some waste streams but not others (units often forget that each new waste stream from a process change needs amendment); ETP sludge classified as non-hazardous when it is hazardous; manifest trail (Form 10) does not match Form 4 annual return data; renewal applied after expiry, leading to a period of unauthorised handling.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in · Filed through Invest Haryana portal alongside other environmental consents.

How GV Law Chamber LLP can help. We audit our retainer clients' hazardous waste streams annually against the authorisation, identifying gaps before HSPCB does. For new units, we file the consolidated CTE + CTO + HW authorisation application as a single coordinated package.



Form 4 *Annual Return of Hazardous Waste*

PURPOSE

The annual report of hazardous waste generated, stored, treated, transported, recycled, or disposed of during the preceding financial year. Reconciles against Form 10 manifests and against the unit's authorisation. **One of the three most-inspected returns** in Haryana environmental compliance.

WHO COMPLETES

The hazardous waste generator (occupier of the unit).

WHO RETAINS / RECEIVES

Filed with HSPCB.

INFORMATION REQUIRED

Quantity of each waste category generated during the year; opening and closing inventory; quantity sent to TSDF (with manifest references); quantity recycled or co-processed; quantity treated in-house; details of accidents, if any.

TIMELINE

Filed by **30 June** each year for the preceding financial year (April to March).

COMMON ERRORS WE SEE

Form 4 not filed (despite the unit holding active HW authorisation); quantities reported inconsistent with the manifests; opening inventory does not match previous year's closing inventory; quantities reported in tonnes when the authorisation is in kilograms (or vice versa), creating gross variance that triggers HSPCB queries.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in

How GV Law Chamber LLP can help. For our retainer clients, Form 4 is reconciled against monthly manifests as part of rolling compliance management — ready for HSPCB filing by 30 May each year.

Form 10 *Manifest for Movement of Hazardous Waste*

PURPOSE

The eight-copy manifest that must accompany every consignment of hazardous waste from the generator's premises to the authorised TSDF (Treatment, Storage and Disposal Facility) or registered recycler. The generator, transporter, and TSDF each retain copies, and HSPCB receives copies during inspections.

WHO COMPLETES

The generator (filled in advance), the transporter (at pickup), and the TSDF (on receipt).

WHO RETAINS / RECEIVES

Eight copies distributed: generator (3 copies), transporter (2 copies), TSDF (2 copies), and HSPCB (1 copy). The generator's acknowledgement copy must come back from the TSDF.

INFORMATION REQUIRED

Generator details and HW authorisation number; waste category and Schedule reference; quantity (with packaging description); transporter details and vehicle number; TSDF/recycler details; date of dispatch; time of dispatch; route plan; declaration by generator that the waste matches the description; signature of generator's authorised person.

TIMELINE

Every consignment, contemporaneous with dispatch.

COMMON ERRORS WE SEE

Form 10 not generated for some consignments (treated as in-house movement, when actually going off-site to a TSDF in the same industrial area); acknowledgement copy from TSDF not received back, leaving the generator with unmatched dispatches; manifest references not recorded in the manifest register required to be maintained at the unit.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in

How GV Law Chamber LLP can help. During quarterly audits we reconcile Form 10 manifests against the manifest register and against the Form 4 annual return data — identifying gaps that would otherwise surface during inspection.

— SECTION 3

Extended Producer Responsibility (EPR) — Plastic, E-Waste, Battery

EPR imposes a continuing obligation on producers, importers, and brand owners of specified packaging and products to take back, recycle, or co-process equivalent quantities of post-consumer waste. Three principal EPR regimes are now active: plastic packaging, e-waste, and batteries. Registration on the CPCB EPR portals is mandatory.

Plastic EPR *Form I — Producer/Importer/Brand Owner (PIBO) Registration*

PURPOSE

The foundational registration under the Plastic Waste Management Rules, 2016 (as amended 2022 and 2024). Required for every producer, importer, and brand owner of plastic packaging. Once registered, the PIBO must declare its previous year's plastic packaging introduction and commit to escalating annual EPR targets.

WHO COMPLETES

The producer, importer, or brand owner (or their authorised representative).

WHO RETAINS / RECEIVES

CPCB EPR Portal (Plastic): eprplastic.cpcb.gov.in

INFORMATION REQUIRED

Company details (CIN, PAN, GST); product details and categories; previous year's plastic packaging introduction (with category-wise breakup: rigid, flexible, multi-layered, compostable); state-wise distribution; declaration of EPR target; supporting documents (GST returns, audited statements).

TIMELINE

Pre-operation, or on becoming a PIBO. Annual EPR target compliance demonstrated through certificate purchase from registered recyclers.

COMMON ERRORS WE SEE

Registration deferred or not done (very common for MSME importers and small brand owners); previous year's introduction quantum understated to reduce EPR liability (subject to verification against GST/Customs data); certificate purchase pattern does not match declared target.

OFFICIAL SOURCE

CPCB EPR Portal (Plastic): eprplastic.cpcb.gov.in

How GV Law Chamber LLP can help. We register PIBO clients on the CPCB portal and manage annual EPR compliance, including sourcing of EPR certificates from registered recyclers at competitive rates.



E-Waste EPR Registration *Form 1 — Producer Registration under E-Waste Rules, 2022*

PURPOSE

Required for every producer of electrical and electronic equipment listed in Schedule I of the E-Waste Rules, 2022. Producers must register on the CPCB EPR Portal, declare historical and projected sales, and commit to escalating EPR targets for collection and recycling.

WHO COMPLETES

The producer (or importer / authorised representative).

WHO RETAINS / RECEIVES

CPCB EPR Portal (E-Waste): eprewastecpcb.in

INFORMATION REQUIRED

Company details; product categories from Schedule I; historical sales (last 3 years) with quantities; projected sales; declared EPR target; supporting documents.

TIMELINE

Pre-operation. Annual EPR compliance demonstrated through certificate purchase from registered recyclers/refurbishers.

COMMON ERRORS WE SEE

Registration delayed or not done for products that the producer believes are not electronic items (when they actually are listed in Schedule I); historical sales data reconstructed from incomplete records, leading to under- or over-declaration; certificates purchased from unregistered recyclers (not valid for EPR compliance).

OFFICIAL SOURCE

CPCB EPR Portal (E-Waste): eprewastecpcb.in

How GV Law Chamber LLP can help. We advise on Schedule I applicability, register producers on the CPCB portal, and manage annual EPR compliance.

Battery EPR Registration *Form 1A — Producer Registration under Battery Waste Rules, 2022*

PURPOSE

Required for every producer of batteries — automotive, industrial, portable, and electric vehicle batteries. Producers must register on the CPCB EPR Portal and meet escalating recycling and refurbishing targets.

WHO COMPLETES

The producer (or importer / authorised representative).

WHO RETAINS / RECEIVES

CPCB EPR Portal (Battery): eprbattery.cpcb.in

INFORMATION REQUIRED

Company details; battery type, chemistry, and capacity; historical sales data; projected sales; declared EPR target.

TIMELINE

Pre-operation. EPR target compliance assessed annually.

COMMON ERRORS WE SEE

Registration not done for batteries embedded in equipment (the equipment producer is liable for the battery EPR); EV battery EPR misunderstood (the regime applies to all batteries, not just consumer cells).

OFFICIAL SOURCE

CPCB EPR Portal (Battery): eprbattery.cpcb.in

How GV Law Chamber LLP can help. We advise on battery EPR applicability for embedded batteries, EV batteries, and industrial batteries, and manage registration and annual compliance.

— SECTION 4

Environmental Clearance (EIA Notification, 2006)

For projects listed in the Schedule to the EIA Notification, 2006, environmental clearance (EC) is required prior to construction. EC is over and above the HSPCB consent. The four-stage process — screening, scoping, public consultation, appraisal — is rigorous and time-intensive, but is the foundational permission for most large industrial projects in Haryana.

Form 1 *Application for Prior Environmental Clearance*

PURPOSE

The foundational application under the EIA Notification, 2006. Identifies the project, its category (A or B), its location, capacity, and the potential environmental impacts. Filed through the MoEFCC PARIVESH portal.

WHO COMPLETES

The project proponent.

WHO RETAINS / RECEIVES

MoEFCC (Category A) or SEIAA Haryana (Category B), through PARIVESH portal.

INFORMATION REQUIRED

Project details (name, type, capacity, capital cost); site details (latitude, longitude, land use, proximity to ecologically sensitive areas); list of environmental aspects; background of project proponent; pre-feasibility report; layout drawings; copies of land documents.

TIMELINE

Pre-construction. Screening typically within 30 days; scoping (for B1/A) takes 60 days; public consultation 30-60 days; appraisal varies by project.

COMMON ERRORS WE SEE

Project classified as B2 when characteristics suggest B1 (full EIA required) — leading to refusal at screening; pre-feasibility report inconsistent with the actual project plan; site details not matching land records.

OFFICIAL SOURCE

MoEFCC PARIVESH portal: parivesh.nic.in · **SEIAA Haryana** applications also through PARIVESH.

How GV Law Chamber LLP can help. We prepare Form 1 with our EIA consultant network, ensuring all references — project boundaries, capacity, water and power requirements, raw material categorisation — are internally consistent and align with HSPCB consent declarations.

EIA / EMP *Environmental Impact Assessment / Environmental Management Plan* Report

PURPOSE

The full impact assessment required for Category A and B1 projects. Includes baseline environmental studies (typically one full season — 90 days minimum), impact prediction modelling, alternatives analysis, environmental management plan, monitoring programme, and budgetary commitment for environmental measures.

WHO COMPLETES

NABET-accredited EIA consultant, with the project proponent.

WHO RETAINS / RECEIVES

Submitted to the Expert Appraisal Committee through PARIVESH.

INFORMATION REQUIRED

Project description; alternatives considered; baseline study (air, water, soil, noise, biological); impact prediction; environmental management plan; monitoring plan; emergency response plan; corporate environmental policy; CSR commitments; commitment letters from authorities (irrigation, forest, etc.); ToR compliance.

TIMELINE

Once ToR is finalised, typically 6-9 months for completion (90 days baseline + drafting + review). Public consultation follows EIA submission.

COMMON ERRORS WE SEE

EIA prepared by non-NABET accredited consultant (not acceptable); baseline data older than 6 months at the time of EAC consideration; commitments in EMP not measurable or verifiable; CSR commitments vague.

OFFICIAL SOURCE

MoEFCC PARIVESH portal: parivesh.nic.in · NABET accreditation list: qc.in.org

How GV Law Chamber LLP can help. We advise on selection of NABET consultant, review the draft EIA for legal and procedural soundness, and represent the proponent at the EAC.

EC Compliance Report

Half-Yearly Compliance Report

PURPOSE

After environmental clearance is granted, the proponent must file a compliance report every six months demonstrating implementation of the EC conditions. **The single most frequent enforcement issue under the EIA regime is non-compliance with these reports.**

WHO COMPLETES

The project proponent.

WHO RETAINS / RECEIVES

Filed with MoEFCC/SEIAA through PARIVESH portal.

INFORMATION REQUIRED

Each EC condition (numbered) addressed individually; status of implementation (complied/partially/not complied); evidence of compliance (photographs, monitoring data, commitments); explanations for non-compliance; revised implementation timeline if applicable.

TIMELINE

Twice a year — by 1 June (for October to March period) and 1 December (for April to September period).

COMMON ERRORS WE SEE

Generic summary statements provided instead of condition-wise responses; photographs older than 6 months reused; environmental monitoring data missing or inconsistent; CSR/community commitments left unaddressed.

OFFICIAL SOURCE

MoEFCC PARIVESH portal: parivesh.nic.in

How GV Law Chamber LLP can help. *We prepare condition-wise EC compliance reports for our retainer clients, gathering evidence and monitoring data through the year so the half-yearly submission is fully substantiated.*

— SECTION 5

Other Waste Management Regimes — BMW, C&D, Plastic Operational

Beyond hazardous waste and the EPR programmes, healthcare establishments operate under the Bio-Medical Waste Rules, construction sites under the C&D Waste Rules, and unit operations of plastic come under operational provisions of the PWM Rules. Each regime has its own forms and authorities.

Form II *BMW Authorisation Application*

PURPOSE

The authorisation under the Bio-Medical Waste Management Rules, 2016. Required for every hospital, nursing home, clinic, diagnostic centre, blood bank, dental clinic, veterinary institution, research lab, or any other facility generating bio-medical waste.

WHO COMPLETES

The occupier of the healthcare establishment.

WHO RETAINS / RECEIVES

Submitted to HSPCB. Authorisation granted in Form III.

INFORMATION REQUIRED

Establishment details (registration, beds, services); estimated waste generation by category (yellow, red, white, blue); storage arrangements (segregation, colour-coding); transport arrangements; treatment route (CBMWTF or in-house); accident management plan; training programme details; staff PPE arrangements.

TIMELINE

Pre-operation. Authorisation typically valid for 5 years.

COMMON ERRORS WE SEE

Authorisation not obtained at all by smaller clinics and labs (most common omission in BMW compliance); deemed authorisation under transitional provisions misunderstood as permanent; engagement with non-authorised CBMWTF (the most serious operational error).

OFFICIAL SOURCE

HSPCB — hspcb.gov.in

How GV Law Chamber LLP can help. We register healthcare clients with HSPCB, identify the appropriate CBMWTF for their area, and manage the annual reporting under Form IV.



Form IV *Annual Report on Bio-Medical Waste* (BMW)

PURPOSE

The annual report of bio-medical waste generated, segregated by category, and disposed of through the CBMWTF. Cross-verified against the CBMWTF's own records.

WHO COMPLETES

The healthcare establishment.

WHO RETAINS / RECEIVES

Filed with HSPCB.

INFORMATION REQUIRED

Category-wise generation (yellow, red, white, blue); quantities sent to CBMWTF; declaration of segregation compliance; staff training records; details of any incidents.

TIMELINE

Filed annually by 30 June for the preceding calendar year.

COMMON ERRORS WE SEE

Report not filed (most common); quantities inconsistent with CBMWTF's acceptance records.

OFFICIAL SOURCE

HSPCB — hspcb.gov.in

How GV Law Chamber LLP can help. We prepare Form IV from the establishment's daily logs, reconciled against CBMWTF invoices, ensuring the data is defensible.

— SECTION 6

Public Liability Insurance Act, 1991

Mandatory insurance for units handling hazardous substances above threshold quantities. Provides for no-fault compensation to victims of accidents involving such handling. Premium is computed by reference to paid-up capital, with the insurer contributing an equal amount to the Environment Relief Fund.

PLI Certificate *Public Liability Insurance Policy*

PURPOSE

The mandatory insurance policy held by any unit handling hazardous substances above threshold. The policy provides for compensation under the no-fault liability regime — meaning the victim need not prove negligence; the very fact of an accident triggers compensation up to prescribed limits.

WHO COMPLETES

Issued by a general insurer (national or private).

WHO RETAINS / RECEIVES

Retained by the unit; copy filed with HSPCB at the time of CTE/CTO application.

INFORMATION REQUIRED

Paid-up capital of the unit; description of hazardous substances handled (with reference to the threshold quantities under the Act); annual premium calculation; coverage limits.

TIMELINE

Annual. Must remain in force throughout operations. Renewal before expiry.

COMMON ERRORS WE SEE

PLI obtained at initial CTE stage but not renewed annually; coverage limits not updated when handling quantities increase; Environment Relief Fund contribution overlooked (usually included with the premium).

OFFICIAL SOURCE

General insurers issue PLI cover · **MoEFCC:** moef.gov.in

How GV Law Chamber LLP can help. We track PLI renewals for our retainer clients alongside the consent renewal calendar, and review coverage adequacy annually.



— 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.

Telephone +91 76009 01700

Correspondence Info@gvlawchamber.com

Chamber Office No. 112, 2nd Floor, SS Omnia Mall, Sector 86, Gurugram, Haryana 122004

Online gvlawchamber.com

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