

Appendix-A: CFE-CFO fees for apartments in Bangalore

Consent fee for Bangalore apartments

Sl	Category	Capacity of STP	Equivalent houses	CFE	CFO*	
				Standalone and integrated projects ¹	Standalone Residences	Integrated projects
1	Green	>10 KLD	<14	5,000	2,000	5,000
2	Orange	>10 - 50 KLD	15-71	25,000	10,000	25,000
3		>50 - 100 KLD	72-140	50,000	20,000	50,000
4	Red	>100 - 300 KLD	141-429	1,25,000	50,000	1,25,000
5		>300 - 500 KLD	430-710	2,00,000	80,000	2,00,000
6		>500 KLD - 1 MLD	711-1429	3,75,000	1,50,000	3,75,000
7		>1 - 25 MLD	1430-35714	6,25,000	2,50,000	6,25,000
8		>25 MLD	>35715	10,00,000	5,00,000	10,00,000

* If the CFO is rejected by KSPCB, the proponent has to pay the CFO once again when he re-applies.

Examples:

Capacity of STP Type of project	First-time approval			Annual fees
	CFE	CFO	Total	CFO
120 KLD STP for stand-alone apartment	1,25,000	50,000	1,75,000	50,000
120 KLD STP for Apartment+office complex	1,25,000	1,25,000	2,50,000	1,25,000

1 “Integrated Projects” means the project comprising two or more of the components viz. residential, commercial, hotel, education institution, hospital, club, mall and such others.

Appendix-B: The apartments are categorized unfairly

The following table shows how apartments are compared unfairly with far more polluting industries.

Category	STP effluent (KLD)	Code	Representative examples
Red	>100 (>140 houses)	1181	Nuclear power plant Oil Refinery Ship Breaking Industries Power generation plant Ports and harbour, jetties and dredging Tanneries Iron & Steel factories Manufacturing of glass with lead Airports and commercial air strips Distillery Fertilizer smelters (Cu, Al, Zn) Hazardous material recycling Explosives, detonators, fuses Township and residential projects > 10 Acres
Orange	11-100 (16-140 houses)	1400	Coal washeries Formulation of Pesticide, insecticide, & fungicide Coffee / Tea manufacturing Hot mix plants Recycling of hazardous waste Sago/starch factory Stone crushing Highway construction Dry coal processing, mineral processing, industries involving ore sintering, pelletisating, grinding & pulverization
Green	>10 (<14 houses)	1638	LPG cylinder refilling, repairing+painting, testing Piggery, poultry, hatchery >1 Lakh Birds Tyre/tube moulding Marble/granite cutting Fiber glass molding
White			Bio fertilizer and bio-pesticides without using inorganic chemicals Diesel pump repairing and servicing Engineering and fabrication units Fly ash bricks/ block manufacturing Organic manure (manual mixing) Atta chakkies, chilly & masala powder, powdering of spices Body building of wooden boats & trawlers Pickel manufacturing Sports goods

Compared to these industries, apartments create a miniscule amount of pollution, of a far more benign nature. They also do not have a possibility of a failure that can endanger the environment and human life.

Here is an illustration of the comparison: An apartment having 160 units equated with-

- A refinery (compare the present-day pollution)
- A nuclear plant (compare the threat to life in case of a failure)



Refinery @Santa Rosa, California, USA



Fukushima reactor, Japan

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160 unit apartment

Appendix-C: Finding the nature of CFE-CFO fees

The following table shows the logic for applying fee, fines, taxes and funds; and then compares that with how CFE and CFO charges are applied by KSPCB.

Clearly, CFE-CFO fees do not follow any of the applicability logic at all.

Term	How applied...	Applicability to different types of dwellings...		
		Houses that dump raw sewage	Houses with BWSSB connection	Apartments with their own STP
Fee	A FEE is demanded against a service rendered. (Fee = cost incurred + profit margin).	Yes	Yes	Yes
Fine	A FINE is slapped against a crime as a punishment or social revenge. The idea is to make it unprofitable for the offender to continue the activity; or to force him to abandon that activity. A regulator may also apply a FINE to curb the use of a scarce and/or non-regenerative resource (such as ground water), to induce people to use it frugally.	Maximum	Medium	Minimum
Tax	A TAX is proportional to some characteristic. (e.g. income tax, property value tax, gain tax).	Yes	Yes	Yes
Fund	A FUND is set up for betterment of environment. The contribution should come from the entire population of the state; but proportionally MORE from those who are actively damaging the environment. Conversely, those who are spending directly for preserving the environment would get a compensation from this common fund.	Maximum	Medium	Negative (Refund/Rebate)
How KSPCB applies its charge		Nil	Medium	Maximum

Conclusion: The CFE-CFO are not structured like a fee, fine, tax or fund.

Appendix-D: How apartments get a step-motherly treatment

The following table shows how apartments are forced to bear an unfair share of financial burden, and yet they are persecuted.

Cost head	How it applies to different types of dwellings...		
	Houses that dump raw sewage	Houses with BWSSB connection	Apartments with their own STP
Annual CFO fee	Nil	Nil	Maximum
Running costs for STP operation	Nil	Nil	Huge
Costs of repairs/replacement	Nil	Nil	Huge
Periodic inspection	No	No	Yes
For non-payment of CFO fee	Nil	Nil	Eviction
Overall impact	Encouraged Protected	Protected	Persecuted