

Date sent: Wed, 7 Mar 2001 09:02:41 +0530
From: "Debasis Ray" <debasis.ray@unilever.com>
Subject: **YOUR QUERIES ON THERMOMETER FACTORY**
To: "nity68@vsnl.com" <nity68@vsnl.com>

March 7, 2001

Mr. Nityanand Jayaraman

Dear Mr. Jayaraman,

As I told you on telephone, I once again reiterate that our thermometer unit at Kodaikanal does not send any waste mercury or mercury-contaminated waste outside the factory.

We have an authorisation from the Tamil Nadu PCB to collect and store waste under Rule 3© and 5(5) of the Hazardous Waste (Management and Handling) Rules 1989. It was renewed on April 17, 2000, and is valid upto 2 years.

Mercury-containing broken thermometers and ground glass is stored inside the factory, and we recover mercury from them and recycle this for use in thermometer manufacture. Therefore, the unit does not in any way pollute the adjacent habitation.

We comply with norms laid down by the Tamil Nadu Pollution Control Board, and make full disclosures to the PCB as per regulations laid down by them. The unit is regularly inspected by these independent government agencies, which are completely satisfied with its safety measures. Besides, the unit is ISO-9002 / EN 46002 certified, which includes requirement of stringent Quality and Systems requirements.

Since the factory is export-dedicated and since we import both mercury and glass, a customs official is stationed inside the factory.

The factory is physically divided into two areas: Mercury Area, and Non-Mercury Area. In the Non-Mercury Area, big fresh glass canes are only cut into small thermometer-size pieces and formed into bulbs, which are transferred for further processing in the Mercury Area. The waste generated in the Non-Mercury Area is therefore not contaminated by mercury at all. It is this glass waste from the Non-mercury area, which is completely free from any mercury at all, which we have sold, this too only with necessary permission from Customs and Central Excise officials.

The erstwhile Pond's India Limited imported the factory here from Cheseborough Pond's Limited. This took place before Pond's joined the Unilever fold. It had been done because of Pond's need to expand its exports activity and earn foreign exchange, in line with the national priorities. The plant import was done with full knowledge of and clearance from the Government of India. The imports of mercury, whenever required, also take place only

after necessary clearance from the Ministries of Commerce and Finance of the Government of India.

The factory's operation and its systems for safety and waste handling are completely above board. We do not - neither do we need to -- engage in any clandestine practices, as the allegations seem to suggest. From the information that we have provided, I am confident that you will acknowledge that we honestly run an honest and safe operation.

With kind regards,

Yours sincerely,

Debasis Ray
Corporate Communications Manager
Hindustan Lever Limited