

**Half Yearly Compliance Report
2025
01 Dec(01 Apr - 30 Sep)**

Acknowledgement

Proposal Name	Expansion in manufacturing plant of synthetic organic chemicals [API and API intermediate]		
Name of Entity / Corporate Office	Atul Bioscience Ltd		
Village(s)	N/A		
District	VALSAD		
Proposal No.	SIA/GJ/Ind2/172396/2020	Category	Industrial Projects - 3
Plot / Survey / Khasra No.	N/A	Sub-District	N/A
State	GUJARAT	Entity's PAN	*****0331P
MoEF File No.	SEIAA GUJ EC 5(f) 965 2021	Entity name as per PAN	ATUL BIOSCIENCE LIMITED

Compliance Reporting Details

Reporting Year	2025
Remarks (if any)	Report Period: April 2025 to September 2025
Reporting Period	01 Dec(01 Apr - 30 Sep)

Details of Production and Project Area

Name of Entity / Corporate Office Atul Bioscience Ltd

	Project Area as per EC Granted	Actual Project Area in Possession
Private	3.8953	3.8953
Revenue Land	0	0
Forest	0	0
Others	N/A	N/A
Total	3.8953	3.8953

Others Area

Sr. no	Other Name	Area Granted	Area Actual
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Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	1-Chloro Ethyl Isopropyl Carbonate (1-CEIC)	Tons per Annum (TPA)	N/A	2160	259.025	
2	Chloro Ethyl Cyclohexyl Carbonate (CECC)	Tons per Annum (TPA)	N/A	2160	3.175	
3	Z-Valine (N-(Benzyloxycarbonyl)-L-valine (CBZ-L-VALINE))	Tons per Annum (TPA)	N/A	720	230.404	
4	Guanine diacetate	Tons per Annum (TPA)	N/A	180	1.145	
5	Diacetyl acyclovir	Tons per Annum (TPA)	N/A	180	0.600	
6	2-(4-nitrophenyl)ethanamine Hydrochloride (NPEA.HCl)	Tons per Annum (TPA)	N/A	60	0.8187	
7	10-Methoxy Iminostilbene	Tons per Annum (TPA)	N/A	525	0	
8	1-Hydroxycyclohexyl(4-methoxyphenyl) acetonitrile (Venla-1)	Tons per Annum (TPA)	N/A	300	240.304	
9	1-(2-amino-1-(4-methoxyphenyl)ethyl cyclohexyl) acetate (Venla-II acetate / hydrochloride)	Tons per Annum (TPA)	N/A	300	16.180	
10	Venlafaxine	Tons per Annum (TPA)	N/A	180	0	
11	Dibenzyl Azodicarboxylate (DBAD)	Tons per Annum (TPA)	N/A	60	0	
12	4-Methoxy Acetophenone (4 MAP)	Tons per Annum (TPA)	N/A	1200	0	
13	4-(2-methoxyethyl) phenol (4- MEP)	Tons per Annum	N/A	300	0	

Conditions		
Specific Conditions		
Sr.No.	Condition Type	Condition Details
1	Statutory compliance	PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 30th March 2021, considered as per the provisions in force at that time as mentioned in the Notification vide S.O. 1223 (E) dated 27/03/2020 and S.O. 3636 (E) dated 15/10/2020.
PPs Submission: Complied Noted and compliance assured.		Date: 24/04/2026
2	Statutory compliance	PP shall carried out proposed project/activities in respect of Active Pharmaceutical Ingredients (API) as per the amended EIA Notification vide S.O. 1223 (E) dated 27/03/2020 and any subsequent amendments.
PPs Submission: Complied Noted and compliance assured.		Date: 24/04/2026
3	MISCELLANEOUS	PP shall submit six monthly compliance report of Environmental Clearance without fail and the same shall be critically assessed by the regulatory authority.
PPs Submission: Complied Complied. We assure to regularly submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions.		Date: 24/04/2026
4	WATER QUALITY MONITORING AND PRESERVATION	Waste water shall be fed in-house MEE only after providing adequate treatment in such a way that no pollutant get air borne during evaporation to avoid adverse impact on Human Health & Environment.
PPs Submission: Complied Complied. The MEE is commissioned and in regular operation during the report period.		Date: 24/04/2026
5	MISCELLANEOUS	Close loop solvent recovery system with adequate condenser system shall be provide to recover vapors in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.
PPs Submission: Complied Complied. Solvent recovery system has been already installed for existing project. All the reactors are equipped with vents/stacks, which are connected to either vapor recovery system consisting of condensers to get the maximum recovery, ejector/vacuum pumps and/or scrubbers. Recovered solvent is being reused in the process within premises.		Date: 24/04/2026
6	Risk Mitigation and Disaster Management	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines, LDAR Logbook shall be maintained.
PPs Submission: Complied Complied. Solvent recovery system has been already installed for existing project. All the reactors are equipped with vents/stacks, which are connected to either vapor recovery system consisting of		Date: 24/04/2026

condensers to get the maximum recovery, ejector/vacuum pumps and/or scrubbers. Recovered solvent is being reused in the process within premises.		
7	WATER QUALITY MONITORING AND PRESERVATION	PP shall maintain Complete Zero Liquid Discharge (ZLD) status all the time after expansion and there shall be no drainage connection from the premises and no waste water discharge outside premises by any means.
PPs Submission: Complied Complied. We have installed ETP, RO and MEE to achieve ZLD. The system is working smoothly and thus ZLD is achieved. There is no wastewater discharge during report period.		Date: 24/04/2026
8	WASTE MANAGEMENT	The unit shall submit the list of authorized end users of hazardous wastes along with MoU signed with them at least two months in advance prior to the commencement of production. In the absence of potential buyers of these items, the unit shall restrict the production of the respective items.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
9	WATER QUALITY MONITORING AND PRESERVATION	PP shall obtain raw water permission for explanation project from competent authority before start expansion production activity.
PPs Submission: Complied Complied.		Date: 24/04/2026
10	WATER QUALITY MONITORING AND PRESERVATION	PP shall not dig bore well within premises as per details submitted by PP and shall abstract raw water from ground water source, I.e. bore well within premises after obtain permission from CGWA.
PPs Submission: Complied Complied. There is no ground water source (bore well or any) within industry premises.		Date: 24/04/2026
11	MISCELLANEOUS	PP shall strictly adhere and complying agreement made by PP for power and steam requirement for proposed project, form nearby sister concern unit M/s Atul Ltd as per agreement submitted by PP.
PPs Submission: Complied Complied.		Date: 24/04/2026
12	GREENBELT	The PP shall developed green belt within premises (12855 m2 i.e. 33% of the total plot area) as per the undertaking submitted before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abatement as per the CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
13	Statutory compliance	Unit shall obtained all required permissions from the Narcotics Control Bureau for manufacturing, storage and handling of Acetic Anhydride & any such chemicals.

PPs Submission: Complied Complied. We have obtained required permission from the Narcotics Control Bureau for manufacturing, storage and handling of Acetic Anhydride.		Date: 24/04/2026
14	Risk Mitigation and Disaster Management	<p>PP shall provide Occupational Health Center (OHC) as per the provisions under the Gujarat Factories Rule 68-U. PP shall obtain fire safety certificate / Fire No-Objection certificate (NOC) from the concern authority as per the prevailing Rules / Gujarat Fire Prevention and Life Safety Measures Act, 2016. Unit shall adopt functional operations/process automation system including emergency response to eliminate risk associated with the hazardous processes. PP shall carry out mock drill within the premises as per the prevailing guidelines of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident. PP shall obtain PESO permission for the storage and handling of hazardous chemicals. (if applicable) Flame proof electrical fittings shall be provided in the plant premises, wherever applicable. PP shall install adequate fire hydrant system within premises and separate storage of water for the same shall be ensured by PP. PP shall take all the necessary steps for control of storage hazards within premises ensuring incompatibility storage raw material and ensure the storage keeping safe distance as per the prevailing guideline of the concerned authority. PP shall, take all the necessary steps for human safety within premises to ensure that no any harm is caused to any worker/employee or labor within premises. Unit shall provide water sprinkler to the ammonia storage cylinder Uni shall provide safety valve and rupture disc, as well as auto dump or autos quench/, suppress system for exothermic reaction vessel safety. Unit shall provide safety valve & rupture disc to the Hydrogenation vessel. Unit shall provide chlorine leakage control emergency kit and FRP hood with scrubber system for chlorine safety. Unit shall provide effective isolation for process area and storage of hazardous chemicals. Unit shall provide adequate safety system such as water sprinklers, water curtains, foam pouring system etc. To restrict cascade fire emergency in solvent tank farm.</p>
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
15	WATER QUALITY MONITORING AND PRESERVATION	<p>Total water requirement for the project shall not exceed 598 KLD. Unit shall reuse 399.20 KLD treated waste water. Hence fresh water shall not exceed 198.80 KLD. It shall be met through from River water (Par River) and from nearby municipal STPs. Prior permission from the concerned authority shall be obtained for withdrawal of water.</p>
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
16	WATER QUALITY MONITORING AND PRESERVATION	<p>The industrial effluent generation from the project shall not exceed 450.50 KLD after expansion.</p>
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
17	WATER QUALITY MONITORING AND PRESERVATION	<p>Industrial effluent shall be segregated into two streams (1) High COD and TDS effluent (2) Low COD and TDS effluent and it shall be managed as below. High COD and TDS effluent (147 KLD): 147</p>

		KLD, high COD effluent from process shall be treated in primary ETP followed by solvent stripper and then it shall be evaporated in in-house MEE cum ATFD.137 KLD, MEE condensate shall be further treated in Low COD Stream ETP. Low COD and TDS effluent (303.50 KLD) : > 303.50 KLD, Low COD and TDS effluent from utility along with 137 KLD, MEE condensate shall be treated in ETP consist of primary, secondary and tertiary ETP units. Treated effluent shall be further passed through ultra filtration/RO plant and 399.20 KLD, RO permeate shall be reused back in process while 44.30 KLD, RO reject shall be evaporated in in-house MEE.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
18	WATER QUALITY MONITORING AND PRESERVATION	Domestic waste water generation shall not exceed 10 KL/Day for proposed project and it shall be treated in STP. Treated sewage shall be utilized for gardening and plantation purpose within premises after achieving on-land discharge norms prescribed by the GPCB.
PPs Submission: Complied Complied. Domestic wastewater generated from existing as well as proposed project is being disposed off through a septic tank/ ETP.		Date: 24/04/2026
19	WATER QUALITY MONITORING AND PRESERVATION	During monsoon season when treated sewage may not be required for the plantation / Gardening / Green belt purpose, it shall be stored within premises. There shall be no discharge of waste water outside the premises in any case.
PPs Submission: Complied Complied. Domestic wastewater is being disposed off through a septic tank/ ETP.		Date: 24/04/2026
20	WATER QUALITY MONITORING AND PRESERVATION	Unit shall feed waste water to in-house MEE only after ensuring content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no adverse impacts on Environment and Human Health.
PPs Submission: Complied Complied.		Date: 24/04/2026
21	WATER QUALITY MONITORING AND PRESERVATION	The unit shall provide metering facility at the inlet and outlets of ETP, RO, MEE and maintain records for the same.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
22	WATER QUALITY MONITORING AND PRESERVATION	Proper logbooks of ETP, chemical consumption in Effluent treatment, quantity & quality of effluent sent to MEE, quantity & quality of effluent recycle back in process, power consumption etc shall be maintained and shall be furnished to the GPCB from time to time.
PPs Submission: Complied Complied. Proper logbooks are maintained for ETP - ABL (quantity and quality) and chemical consumption on daily basis. Logbook for RO and MEE is maintained.		Date: 24/04/2026
23	AIR QUALITY MONITORING AND	Unit shall not exceed fuel consumption for DG set as mentioned

	PRESERVATION	
PPs Submission: Complied Complied. DG set is being used only as a power backup only.		Date: 24/04/2026
24	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide adequate APCM with flue gas generation sources as mentioned
PPs Submission: Complied Not applicable as steam is supplied by parent company Atul Ltd. Hence, no flue gas stack is installed in the premises. Adequate stack height is provided for stack attached to DG set.		Date: 24/04/2026
25	AIR QUALITY MONITORING AND PRESERVATION	The fugitive emission in the work zone environment shall be monitored. The emission shall conform to the standards prescribed by the concerned authorities from time to time (e.g. Directors of Industrial Safety & Health). Following indicative guidelines shall also be followed to reduce the fugitive emission. Internal roads shall be either concreted or asphalted or paved properly to reduce the fugitive emission during vehicular movement. Air borne dust shall be controlled with water sprinklers at suitable locations in the plant. A green belt shall be developed all around the plant boundary and also along the roads to mitigate fugitive & transport dust emission.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
26	AIR QUALITY MONITORING AND PRESERVATION	Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air.
PPs Submission: Complied Complied. Work zone environment and ambient air monitoring is carried out monthly by NABL accredited laboratory and records are maintained.		Date: 24/04/2026
27	AIR QUALITY MONITORING AND PRESERVATION	For control of fugitive emission, VOCs, following steps shall be followed: Closed handling and charging system shall be provided for chemicals Reflux condenser shall be provided over Reactors/Vessels Pumps shall be provided with mechanical seals to prevent leakages Air borne dust at all transfers operations points shall be controlled either by spraying water or providing enclosures
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
28	MISCELLANEOUS	Solvent management shall be carried out as follows: Measures shall be taken to reduce the process vapours emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapour recovery system Reactor shall be connected to adequate chilling system to condensate solvent vapours and reduce solvent losses Reactor and solvent handling pump shall have mechanical seals to prevent leakages. The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery. Solvents shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. Solvent storage and handling area shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.

PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
29	AIR QUALITY MONITORING AND PRESERVATION	Regular monitoring of level concentration of PM10, PM2.5, SO2, NOX, HC, NH3 and VOC shall be carried out in the impact zone and its records shall be maintained. Ambient air quality levels shall not exceed the standards stipulated by the GPCB. If at any stage these levels are found to exceed the prescribed limits, necessary additional control measures shall be taken immediately. The location of the stations and frequency of monitoring shall be decided in consultation with the GPCB.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
30	WASTE MANAGEMENT	All the hazardous waste management shall be taken care as mentioned
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
31	WASTE MANAGEMENT	Authorized end-users shall have permissions from the concerned authorities under the Rule 9 of the Hazardous and Other wastes (Management and Transboundary Movement) Rules 2016.
PPs Submission: Complied Complied. Presently, we are not generating any waste that needs to be disposed off under the Rule 9 of the Hazardous and Other wastes (Management and Trans boundary Movement) Rules 2016 according to valid GPCB consent.		Date: 24/04/2026
32	WASTE MANAGEMENT	Unit shall explore the possibilities for environment friendly methods like co-processing of hazardous waste for disposal of Incinerable & land fillable wastes before sending to CHWIF & TSDF sites respectively.
PPs Submission: Complied Noted.		Date: 24/04/2026
33	Corporate Environmental Responsibility	The project proponent shall allocate the separate fund of Rs. 76.50 Lakhs as committed before SEAC. The entire activities proposed under CER shall be part of the Environment Management Plan (EMP) as per the MoEF& CC's OM no. F. No. 22-65/2017-IA III dated 30.09.2020. This shall be monitored and the monitoring report shall be submitted to the regional office of MoEF&CC as a part of half-yearly compliance report and to the District Collector. The monitoring report shall be posted on the website of the project proponent.
PPs Submission: Complied Noted and compliance assured.		Date: 24/04/2026
34	MISCELLANEOUS	All the environmental protection measures and safeguards proposed in the Form-1 & PFR submitted by the project proponent and commitments made in their application shall be strictly adhered to in letter and spirit.

PPs Submission: Complied Complied. We have taken and will continue to implement all the environmental protection measures and safeguards proposed in the Form-1 and PFR and are strictly adhering to them in true spirit.		Date: 24/04/2026
35	WATER QUALITY MONITORING AND PRESERVATION	Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water in case of any shut down of MEE.
PPs Submission: Complied Complied.		Date: 24/04/2026
36	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide adequate APCM with Process gas generation sources as mentioned
PPs Submission: Complied Complied. Water and alkaline scrubber are installed as Air Pollution Control Measures (APCM) having stack height of 12 meters.		Date: 24/04/2026
General Conditions		
Sr.No.	Condition Type	Condition Details
1	MISCELLANEOUS	Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly.
PPs Submission: Complied Complied. Unit is using only mechanical seal pumps in order to avoid the leakages.		Date: 24/04/2026
2	MISCELLANEOUS	The company in a time bound manner shall implement these conditions. The SEIAA reserves the right to stipulate additional conditions, if the same is found necessary.
PPs Submission: Complied Complied. Company is implementing these conditions in a time bound manner.		Date: 24/04/2026
3	MISCELLANEOUS	Grinding and cutting of building materials in open area shall be prohibited.
PPs Submission: Complied Complied.		Date: 24/04/2026
4	MISCELLANEOUS	The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963.
PPs Submission: Complied Complied. We are complying with the stated condition and submitting required compliance to DISH.		Date: 24/04/2026
5	Risk Mitigation and Disaster Management	Sufficient number of fire extinguishers shall be provided near the plant and storage area.
PPs Submission: Complied Complied. We have provided approx. 100 Nos of fire extinguishers (Foam type, CO2 type, ABC		Date: 24/04/2026

		type) across the site to cover all area.	
6	MISCELLANEOUS	Project proponent shall ensure use of eco-friendly building materials including fly ash bricks, fly ash paver blocks, Ready Mix Concrete [RMC] and lead free paints in the project.	
PPs Submission: Complied Complied. Fly Ash bricks is being used along with Ready Mix Concrete (RMC) and fly ash paver blocks for the construction.			Date: 24/04/2026
7	AIR QUALITY MONITORING AND PRESERVATION	Only flame proof electrical fittings shall be provided in the plant premises.	
PPs Submission: Complied Complied. Electrical Flame Proof fittings has been provided as per hazard area classification.			Date: 24/04/2026
8	AIR QUALITY MONITORING AND PRESERVATION	Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads).	
PPs Submission: Complied Complied.			Date: 24/04/2026
9	AIR QUALITY MONITORING AND PRESERVATION	No excavation of soil shall be carried out without adequate dust mitigation measures in place.	
PPs Submission: Complied Noted. Utmost measures are being adopted to prevent dust at our construction sites before carrying out any excavation activity.			Date: 24/04/2026
10	AIR QUALITY MONITORING AND PRESERVATION	Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/Process gas emission.	
PPs Submission: Complied Complied. Adequate height of stack provided as per prevailing norms.			Date: 24/04/2026
11	AIR QUALITY MONITORING AND PRESERVATION	All the reactors/vessels used in the manufacturing process shall be closed to reduce the fugitive emission.	
PPs Submission: Complied Complied. All reactors are in close loop and connected with condensers having cooling tower water, Chilled water or Brine water supply for control of fugitive emission.			Date: 24/04/2026
12	AIR QUALITY MONITORING AND PRESERVATION	Ambient noise levels shall conforms to residential standards both during day and night. Incremental pollution load on the ambient air and noise quality shall be closely monitored during construction phase.	
PPs Submission: Complied Complied. Details Attached.			Date: 24/04/2026
13	AIR QUALITY MONITORING AND PRESERVATION	Use of Diesel Generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the	

	PRESERVATION	EPA Rules for air and noise emission standards.
PPs Submission: Complied Complied. We have not use Diesel Generator (DG) set during construction phase.		Date: 24/04/2026
14	AIR QUALITY MONITORING AND PRESERVATION	No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emissions shall be ensured
PPs Submission: Complied Complied.		Date: 24/04/2026
15	AIR QUALITY MONITORING AND PRESERVATION	In case of use of spray dryer, the unit shall provide the adequate & efficient APCMs with spray dryer so that there should not be any adverse impact on human health & environment. Unit shall carry out third party monitoring of the proposed Spray dryer & it's APCM through the credible institutes and study report for impacts on Environment and Human Health shall be submitted to GPCB every year along with half yearly compliance reports
PPs Submission: Complied It may be please noted that the unit is not having spray dryer as APCM.		Date: 24/04/2026
16	AIR QUALITY MONITORING AND PRESERVATION	Flue gas emission & Process gas emission (If any) shall conform to the standards prescribed by the GPCB/CPCB/MoEF&CC. At no time, emission level should go beyond the stipulated standards.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
17	AIR QUALITY MONITORING AND PRESERVATION	Storage of flammable chemicals shall be sufficiently away from the production area.
PPs Submission: Complied Complied. Dedicated storage facility of flammable chemicals provided at safer distance from production area as per PESO approval.		Date: 24/04/2026
18	ENERGY PRESERVATION MEASURES	Application of solar energy shall be incorporated for illumination of common areas, lighting for gardens and street lighting in addition the provision for solar water heating system shall also be provided.
PPs Submission: Complied Noted and will be complied.		Date: 24/04/2026
19	GREENBELT	Drip Irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises.
PPs Submission: Complied Complied. We are using low-volume, low-angle sprinkler system for the green belt development within the premises.		Date: 24/04/2026
20	GREENBELT	The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose.

PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
21	GREENBELT	The unit shall develop green belt within premises as per the CPCB guidelines. However, if the adequate land is not available within the premises, the unit shall take up adequate plantation on road sides and suitable open areas in GIDC estate or any other open areas in consultation with the GIDC/ GPCB and submit an action plan of plantation for next three years to the GPCB.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
22	Human Health Environment	First Aid Box shall be made readily available in adequate quantity at all the times.
PPs Submission: Complied Complied. First Aid boxes have been provided in adequate quantity.		Date: 24/04/2026
23	MISCELLANEOUS	Project proponent shall ensure that surrounding environment shall not be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in vulnerable areas for controlling fugitive emission.
PPs Submission: Complied Complied. Regular water sprinkling is being done near construction site to controlling fugitive emission of dust.		Date: 24/04/2026
24	MISCELLANEOUS	Fly ash shall be used in construction wherever applicable as per provisions of Fly Ash Notification under the E.P. Act, 1986 and its subsequent amendments from time to time.
PPs Submission: Complied Noted.		Date: 24/04/2026
25	MISCELLANEOUS	All topsoil excavated during construction activity shall be used in horticultural landscape development within the project site.
PPs Submission: Complied Complied. All the top soil excavated during construction work is utilized in horticulture/ landscape development within the premises.		Date: 24/04/2026
26	MISCELLANEOUS	Wind - breaker of appropriate height i.e. 1/3rd of the building height and maximum up to 10 meters shall be provided. Individual building within the project site shall also be provided with barricades.
PPs Submission: Complied Complied. Temporary wind shielding had been provided and barricades of adequate height also had been provided along the periphery of the project site.		Date: 24/04/2026
27	MISCELLANEOUS	Excavated earth to be generated during the construction phase shall be utilized within the premises to the maximum extent possible and balance quantity of excavated earth shall be disposed off with the approval of the competent authority after taking the necessary precautions for general safety and health aspects. Disposal of the excavated earth during construction phase shall not create adverse effect on neighbouring communities.

PPs Submission: Complied Complied. All the top soil excavated during construction work is utilized in horticulture/ landscape development within the premises.		Date: 24/04/2026
28	MISCELLANEOUS	Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing.
PPs Submission: Complied Complied.		Date: 24/04/2026
29	MISCELLANEOUS	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.
PPs Submission: Complied Complied. Use of curing agents and super plasticizers are being practiced during the construction.		Date: 24/04/2026
30	MISCELLANEOUS	The project proponent shall strictly comply with the building and other construction workers (Regulation of employment & conditions of service) Act 1996 and Gujarat rules made there under and their subsequent amendments. Local bye-laws of concern authority shall be letter ans spirit.
PPs Submission: Complied Complied. We abide to comply by the Building and other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996 and Gujarat rules made there under and their subsequent amendments.		Date: 24/04/2026
31	MISCELLANEOUS	All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase.
PPs Submission: Complied Complied. Adequate sanitary and hygienic measures has been provided at the site and will be maintained throughout the construction phase as below: - Clean up of jobsite after major tasks or at least daily; - Avoiding the build-up of hazardous, flammable, or combustible materials. - Keeping walkways, stairs, and work areas clear. - Separate bathroom facilities are provided for male and female workers on a job site. Washing facilities on the site is provided for workers to wash their hands and avoid cross-contamination before eating, drinking or heading home for the day. Hence, workers can wash away harmful substances and use the washing area to service and decontaminate personal protective equipment (PPE).		Date: 24/04/2026
32	MISCELLANEOUS	No uncovered vehicles carrying construction material and waste shall be permitted.
PPs Submission: Complied Complied.		Date: 24/04/2026
33	MISCELLANEOUS	Main entry and exit shall be separate and clearly marked in the facility
PPs Submission: Complied Complied. Adequate width of road (excluding greenbelt) is provided for ease in transportation. Separate entry and exit is provided.		Date: 24/04/2026
34	MISCELLANEOUS	The project proponent shall comply all the conditions mentioned in The Companies (Corporate Social Responsibility Policy) Rules, 2014 and its amendments from time to time in a letter and spirit.

PPs Submission: Complied Noted.		Date: 24/04/2026
35	MISCELLANEOUS	The project management shall ensure that unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.
PPs Submission: Complied Complied. Unit complies with all the environment protection measures, risk mitigation measures and safeguards recommended in the EMP report and Risk Assessment study report.		Date: 24/04/2026
36	MISCELLANEOUS	It shall be mandatory for the project management to submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions in soft copies to the regulatory authority concerned, on 1st June and 1st December of each calendar year.
PPs Submission: Complied Complied. We regularly submit half-yearly compliance report in respect of the stipulated prior environmental clearance terms and conditions through E-mail to the concerned regulatory authority.		Date: 24/04/2026
37	MISCELLANEOUS	Submission of any false or misleading information or data which is material to screening or scoping or appraisal or decision on the application makes this environment clearance cancelled.
PPs Submission: Complied Noted.		Date: 24/04/2026
38	MISCELLANEOUS	Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC vide no. F. No. 22-34/2018-IA III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no XX).
PPs Submission: Complied Noted and compliance assured.		Date: 24/04/2026
39	MISCELLANEOUS	Rain water harvesting (Off-site) shall be undertaken to conserve fresh water as well as to recharge ground water. Before recharging the surface run off, pre-treatment must be done to remove suspended matter. (Applicable for units consuming ground water 250 KLD in line with the prevailing guidelines of SPCB).
PPs Submission: Complied Not applicable. Unit is not consuming ground water.		Date: 24/04/2026
40	MISCELLANEOUS	The unit shall join and participate financially and technically for any common environmental facility / infrastructure as and when the same is taken up either by the Industrial Association or GIDC or GPCB or any such authority created for this purpose by the Govt. / GIDC.
PPs Submission: Complied Noted.		Date: 24/04/2026
41	MISCELLANEOUS	All the commitments / undertakings given to the SEAC during the appraisal process for the purpose of environmental protection and

		management shall be strictly adhered to.
PPs Submission: Complied Complied. All the recommendations / commitments made during the appraisal of the project has been implemented for EC project.		Date: 24/04/2026
42	MISCELLANEOUS	In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall not be restarted until the desired efficiency of the control equipment has been achieved.
PPs Submission: Complied Noted. Unit has provided the system to close down the operation in the event of failure of any pollution control equipment.		Date: 24/04/2026
43	MISCELLANEOUS	The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority.
PPs Submission: Complied Noted and compliance assured. We have been following all the conditions given by GPCB. The GPCB's Schedule 1 environment auditor also verifies compliance with specified conditions on a regular basis.		Date: 24/04/2026
44	MISCELLANEOUS	The project authorities shall inform the GPCB, Regional Office of MoEF and SEIAA about the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
PPs Submission: Complied Complied.		Date: 24/04/2026
45	MISCELLANEOUS	This environmental clearance is valid for seven years from the date of issue.
PPs Submission: Complied Noted.		Date: 24/04/2026
46	MISCELLANEOUS	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.
PPs Submission: Complied Complied. Pucca flooring/ impervious layer is provided in the work areas, chemical storage areas and chemical handling areas to prohibit soil contamination.		Date: 24/04/2026
47	MISCELLANEOUS	No further expansion or modifications in the plant likely to cause environmental impacts shall be carried out without obtaining prior Environment Clearance from the concerned authority.
PPs Submission: Complied Noted. No further expansion or modifications will be carried out in the plant without obtaining prior Environment clearance from the concerned authority.		Date: 24/04/2026
48	MISCELLANEOUS	The above conditions will be enforced, inter-alla under the provisions of the Water (Prevention & Control of Pollution Act, 1974, Air (Prevention & Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986, Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008

		and the Public Liability Insurance Act, 1991 along with their amendments and rules.
PPs Submission: Complied Complied.		Date: 24/04/2026
49	MISCELLANEOUS	Concealing factual data or submission of false/fabricated data and failure to comply with any of the conditions mentioned above may result in withdrawal of this clearance and attract action under the provisions of Environment (Protection) Act, 1986.
PPs Submission: Complied Noted.		Date: 24/04/2026
50	MISCELLANEOUS	The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory.
PPs Submission: Complied Noted.		Date: 24/04/2026
51	MISCELLANEOUS	Any appeal against this environmental clearance shall lie with the National Green Tribunal, if preferred, within a period of 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
PPs Submission: Complied Noted.		Date: 24/04/2026
52	MISCELLANEOUS	The project authorities shall earmark adequate funds to implement the conditions stipulated by SEIAA as well as GPCB along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purpose.
PPs Submission: Complied Complied. Details Attached.		Date: 24/04/2026
53	MISCELLANEOUS	The applicant shall inform the public that the project has been accorded environmental clearance by the SEIAA and that the copies of the clearance letter are available with the GPCB and may also be seen at the Website of SEIAA/ SEAC/ GPCB. This shall be advertised within seven days from the date of the clearance letter, in at least two local newspapers that are widely circulated in the region, one of which shall be in the Gujarati language and the other in English. A copy each of the same shall be forwarded to the concerned Regional Office of the Ministry.
PPs Submission: Complied Complied. Unit has informed public by publishing advertisement about the grant of EC in following two leading newspapers. Copy of the same was submitted to local Government authorities (i.e. Atul gram panchayat, DIC (Valsad), and Jilla parishad (Valsad)) on July 5, 2021, and to regional office of MoEFCC on July 27, 2021.		Date: 24/04/2026
54	Noise Monitoring & Prevention	Acoustic enclosure shall be provided to the DG sets (if applicable) to mitigate the noise pollution and shall conform to the EPA Rules for air and noise emission standards.

<p>PPs Submission: Complied Complied. We have not proposed any new DG set. Existing DG set are being used in case of power failure only. Noise Abatement: Enclosed with acoustic enclosure type DG set are installed. Fuel: Fuel used in DG set conforms to Environment (Protection) rules prescribed for air and noise emission standards.</p>		<p>Date: 24/04/2026</p>
55	Noise Monitoring & Prevention	The overall noise level in and around the plant area shall be kept well within the standards by providing noise control measures including engineering controls like acoustic insulation hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall confirm to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.
<p>PPs Submission: Complied Complied. We are regularly doing noise monitoring through NABL approved agency. Details of noise monitoring is attached.</p>		<p>Date: 24/04/2026</p>
56	Risk Mitigation and Disaster Management	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises.
<p>PPs Submission: Complied Complied. A clear margin excluding greenbelt has been provided for free movement of fire tender / emergency vehicle around the premises.</p>		<p>Date: 24/04/2026</p>
57	Risk Mitigation and Disaster Management	Training shall be imparted to all the workers on safety and health aspects of chemicals handling.
<p>PPs Submission: Complied Complied. Regular training is being provided on handling of chemicals to all workers. Induction / Refresher / specific topic related training is being regularly conducted on various topics. Last six month topics covered i.e.: - Emergency siren testing - Work place safety - SCBA donning procedure - Process safety</p>		<p>Date: 24/04/2026</p>
58	Risk Mitigation and Disaster Management	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre-employment and periodical medical examination for all the workers shall be undertaken as per the Factories Act & Rules.
<p>PPs Submission: Complied Complied. Pre-employment and periodic medical examinations as per statutory requirement are regularly conducted and records of the same are maintained in Form No. 32 and 33 as per Gujarat Factory Rules, 1962 respectively.</p>		<p>Date: 24/04/2026</p>
59	Risk Mitigation and Disaster Management	Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs
<p>PPs Submission: Complied Complied. Filling is done on weighing balance manually but in controlled manner to minimize spillage. All reactors are in close loop and connected with condensers having cooling tower water, Chilled water or brine water supply for control of fugitive emission.</p>		<p>Date: 24/04/2026</p>
60	Risk Mitigation and Disaster Management	All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permissions in this regard shall be obtained before commencing the expansion activities
<p>PPs Submission: Complied Complied. All the toxic/hazardous chemicals are stored in optimum quantity and all necessary</p>		<p>Date:</p>

		permissions are obtained with regards to the storage and handling of the same.	24/04/2026
61	Risk Mitigation and Disaster Management	Storage of hazardous chemicals shall be minimized and it shall be in multiple small capacity tanks/ containers instead of one single large capacity tank / containers.	
		PPs Submission: Complied Complied. We have already identified the toxic chemicals and following proper handling and control procedure during handling of the same. We are using required chemicals in very optimum quantity.	Date: 24/04/2026
62	Risk Mitigation and Disaster Management	First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity.	
		PPs Submission: Complied Complied. First aid box and required antidotes for the chemicals used in the unit area are available in adequate quantity.	Date: 24/04/2026
63	Risk Mitigation and Disaster Management	Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules.	
		PPs Submission: Complied Complied. We have agreement with authorized vendors which complies with the provisions under the Motor Vehicle Act, 1988, and rules made there under for transportation of Hazardous Waste.	Date: 24/04/2026
64	Risk Mitigation and Disaster Management	All the storage tanks shall be fitted with appropriate controls to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for Hazardous Chemicals.	
		PPs Submission: Complied Complied. A dyke is provided to contained spill to all the existing storage tanks. Mechanical seals are installed on existing pumps, mixers, and reactors.	Date: 24/04/2026
65	Risk Mitigation and Disaster Management	All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic / hazardous chemicals.	
		PPs Submission: Complied Complied. All necessary precautionary measures are taken to avoid any kind of accident during storage and handling of toxic/hazardous chemicals. HAZOP and Risk assessment system is in place. Induction/Refresher/specific training system is carried out on regular basis for all employees.	Date: 24/04/2026
66	Risk Mitigation and Disaster Management	Necessary permissions from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.	
		PPs Submission: Complied Complied. We have obtained necessary permission from various statutory authorities as applicable.	Date: 24/04/2026
67	Risk Mitigation and Disaster Management	The project authorities shall strictly comply with the provisions made in Manufacture, Storage and Import of Hazardous Chemicals Rules (MSIHC) 1989, as amended time to time and the Public Liability Insurance Act for handling of hazardous chemicals etc. Necessary approvals from the Chief Controller of Explosives and concerned Govt. Authorities shall be obtained before commissioning of the project. Requisite On-site and Off-site Disaster Management Plans have to be prepared and implemented	

<p>PPs Submission: Complied Complied. Following measures are taken. - MSDS for all chemicals. - Licenses for petroleum product, gas cylinders, poison/toxic chemical. - Plan approval from DISH. - Factory license from DISH. - A mutual aid agreement with neighboring parent company Atul Ltd to render all emergency services. - On site emergency plan and offsite mutual aid. Etc.</p>		<p>Date: 24/04/2026</p>
68	Risk Mitigation and Disaster Management	Personal Protective Equipments (PPEs) shall be provided to workers and its usage shall be ensured and supervised.
<p>PPs Submission: Complied Complied. We are providing necessary PPE's, respiratory systems to all the employees of the company. We have prepared the SOP for the use of PPE's and training for the same is being given to all the employee regularly.</p>		<p>Date: 24/04/2026</p>
69	Risk Mitigation and Disaster Management	The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report.
<p>PPs Submission: Complied Complied. Risk assessment and mitigation is a part of plant design.</p>		<p>Date: 24/04/2026</p>
70	Risk Mitigation and Disaster Management	The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report.
<p>PPs Submission: Complied Complied. HAZOP/HIRA/ Audit is the tool used for carrying out risk assessment and mitigation measures. Safety as well as Environment audit is also being carried out.</p>		<p>Date: 24/04/2026</p>
71	Risk Mitigation and Disaster Management	Tie up shall be done with nearby health care unit/ doctor for seeking immediate medical attention in the case of emergency.
<p>PPs Submission: Complied Complied. As the M/s. Atul Bio- Science Ltd. is situated in the Atul Complex, a mutual aid agreement with neighboring parent company Atul Ltd is already done who is having well qualified resident doctors, whenever required instantly apart from nearby renowned hospitals.</p>		<p>Date: 24/04/2026</p>
72	Statutory compliance	The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board.
<p>PPs Submission: Complied Noted. We are complying with all the stipulations made by the Gujarat Pollution Control Board.</p>		<p>Date: 24/04/2026</p>
73	Statutory compliance	The project proponent shall also comply with any additional condition that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose for the environmental protection and management.
<p>PPs Submission: Complied Noted. Unit assures to comply with any additional conditions that may be imposed by the SEAC or the SEIAA or any other competent authority for the purpose of environmental protection and management.</p>		<p>Date: 24/04/2026</p>
74	WASTE MANAGEMENT	All possible efforts shall be made for Co-Processing of the Hazardous waste prior to disposal into TSDF/CHWIF
<p>PPs Submission: Complied Noted.</p>		<p>Date: 24/04/2026</p>

75	WASTE MANAGEMENT	Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures be notified at the site. (If applicable).
PPs Submission: Complied Complied.		Date: 24/04/2026
76	WASTE MANAGEMENT	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable)
PPs Submission: Complied Complied. Presently, we are using captive facilities of Atul Ltd as per point 5 of EC F. No. J - 11011/84/2009-IA II (I) dated April 9, 2009. We have also obtained membership of SEPL and ANAS Green Environment Pvt. Ltd. Hazardous waste management are attached for your ready reference.		Date: 24/04/2026
77	WASTE MANAGEMENT	Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited.
PPs Submission: Complied Complied.		Date: 24/04/2026
78	WASTE MANAGEMENT	Hazardous wastes shall be dried, packed and stored in separate designated hazardous waste storage facility with pucca bottom and leachate collection facility, before its disposal.
PPs Submission: Complied Complied. We have provided dedicated facility for treatment/ packing and storage of Hazardous waste as per Hazardous Waste Rules, 2016 as may be amended from time to time.		Date: 24/04/2026
79	WASTE MANAGEMENT	The company shall strictly comply with the rules and regulations with regards to handling and disposal of Hazardous waste in accordance with the Hazardous and Other Wastes (Management and Trans boundary Movement) Rules 2016, as may be amended from time to time. Authorization of the GPCB shall be obtained for collection / treatment /storage/ disposal of hazardous wastes
PPs Submission: Complied Complied.		Date: 24/04/2026
80	WASTE MANAGEMENT	Trucks/Tankers used for transportation of hazardous waste shall be in accordance with the provisions under the Motor Vehicle Act, 1988, and rules made there under.
PPs Submission: Complied Complied. We have agreement with authorized vendors which complies with the provisions under the Motor Vehicle Act, 1988, and rules made there under for transportation of Hazardous Waste.		Date: 24/04/2026
81	WASTE MANAGEMENT	Management of fly ash (If any) shall be as per the Fly ash Notification 2009 & its amendment time to time and it shall be ensured that there is 100% utilization of fly ash to be generated from the unit.
PPs Submission: Complied It may be please noted that there is no fly ash generation from unit.		Date: 24/04/2026
82	WASTE MANAGEMENT	The design of the Trucks/tankers shall be such that there is no

		spillage during transportation	
PPs Submission: Complied Complied.			Date: 24/04/2026
83	WASTE MANAGEMENT	The unit shall undertake the Cleaner Production Assessment study through a reputed institute / organization and shall form a CP team in the company. The recommendations thereof along with the compliance shall be furnished to the GPCB.	
PPs Submission: Complied Complied. We have state of art R and D centre with latest research facility. A qualified team is continuously working on such concept. Drug is developed with such basic philosophy as below: - Optimisation of use of water in place of solvent in manufacturing activity. - Replacement of hazardous raw material with less hazardous raw material. - Avoid use of toxic material. - Optimisation of exothermic reaction. Control on material mass balance with maximum reaction conversion. This will improve yield.			Date: 24/04/2026
84	WASTE MANAGEMENT	The provisions of the Solid Waste Management Rules, 2016, e-Waste (Management) Rules, 2016, the Construction and Demolition Waste Management Rules, 2016 and the Plastics Waste Management Rules, 2016 shall be followed.	
PPs Submission: Complied Noted and Compliance assured.			Date: 24/04/2026
85	WATER QUALITY MONITORING AND PRESERVATION	The company shall undertake various waste minimization measures such as: Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw materials substitutes. Use of automated and close filling to minimize spillages Use of close feed system into batch reactors. Venting equipment through vapour recovery system. Use of high pressure hoses for cleaning to reduce wastewater generation. Recycling of washes to subsequent batches. Recycling of steam condensate. Sweeping/mopping of floor instead of floor washing to avoid effluent generation. Regular preventive maintenance for avoiding leakage, spillage etc.	
PPs Submission: Complied Complied. - All the liquid ingredients are being charged through measure vessels and/or flow meters to control on quantity as per the stoichiometry. All the solid ingredients are charged after proper weighment only. All these meters and weighing machines are calibrated and records are maintained. - Recovered solvents are being used as raw material in further steps. - Filling is done on weighing balance manually but in controlled manner to minimize spillage. - All reactors are in close loop and connected with condensers having cooling tower water, Chilled water or Brine water supply for control of fugitive emission. - All the reactors are equipped with vents/stacks, which are connected to either vapor recovery system consisting of condensers, ejector/vacuum pumps and/or scrubbers. - Many equipment like reactors, spray dryers, condenser wherever necessary are being cleaned with high pressure sparger / jet to reduce waste water generation. - Preventive Maintenance of Equipment is being carried out as per Standard Operating Procedure.			Date: 24/04/2026
86	WATER QUALITY MONITORING AND PRESERVATION	All efforts shall be made to optimize water consumption by exploring Best Available Technology (BAT). The unit shall continuously strive to reduce, recycle and reuse the treated effluent.	
PPs Submission: Complied Complied.			Date: 24/04/2026
87	WATER QUALITY	The water meter shall be installed and records of daily and monthly	

	MONITORING AND PRESERVATION	water consumption shall be maintained.
PPs Submission: Complied Complied. Monthly water consumption reports are submitted onto GPCB XGN portal on regular basis.		Date: 24/04/2026
88	WATER QUALITY MONITORING AND PRESERVATION	Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured.
PPs Submission: Complied Complied. The wastewater generated is being disposed off through a septic tank/ETP and solid waste generated is being properly collected, segregated and disposed on regular frequency.		Date: 24/04/2026
89	WATER QUALITY MONITORING AND PRESERVATION	During material transfer there shall be no spillages and garland drain shall be constructed to avoid mixing of accidental spillages with domestic waste water or storm water.
PPs Submission: Complied Complied. Liquid material transfer is done in closed system (pipelines) or closed containers/ barrels. There are separate drain constructed for domestic waste water/storm water and waste water to avoid mixing of accidental spillages with domestic wastewater or storm water.		Date: 24/04/2026
Visit Remarks		
Last Site Visit Report Date:		N/A
Additional Remarks:		Report Period: April 2025 to September 2025
<p>Note: This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.</p>		

**Half Yearly Compliance Report
2025
01 Dec(01 Apr - 30 Sep)**

Acknowledgement

Proposal Name	Change in product mix of organic chemicals		
Name of Entity / Corporate Office	Atul Bioscience Ltd		
Village(s)	N/A		
District	VALSAD		
Proposal No.	J-11011/84/2009-IA II (I)	Category	Industrial Projects - 3
Plot / Survey / Khasra No.	N/A	Sub-District	N/A
State	GUJARAT	Entity's PAN	*****0331P
MoEF File No.	J-11011/84/2009-IA II (I)	Entity name as per PAN	ATUL BIOSCIENCE LIMITED

Compliance Reporting Details

Reporting Year	2025
Remarks (if any)	Report Period: April 2025 to September 2025
Reporting Period	01 Dec(01 Apr - 30 Sep)

Details of Production and Project Area

Name of Entity / Corporate Office	Atul Bioscience Ltd	
	Project Area as per EC Granted	Actual Project Area in Possession
Private	3.8953	3.8953
Revenue Land	0	0
Forest	0	0
Others	N/A	N/A
Total	3.8953	3.8953

Others Area

Sr. no	Other Name	Area Granted	Area Actual
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Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	4 MAP	Tons per Annum (TPA)	N/A	1200	0	
2	4-(2,3-Epoxypropoxy)-9H-carbazole	Tons per Annum (TPA)	N/A	222	0	
3	R (+) -2 -(Diphenyl hydroxymethyle) – Pyrolidine (RADPP)	Tons per Annum (TPA)	N/A	12	0	
4	DIPHENOLPROLINOL CBS catalyst	Tons per Annum (TPA)	N/A	6	0	
5	Chloro Methyl Isopropyl Carbonate	Tons per Annum (TPA)	N/A	240	0	
6	DBED Diacetate	Tons per Annum (TPA)	N/A	1320	0	
7	L-Valine Methyl Ester	Tons per Annum (TPA)	N/A	120	0	
8	DBAD	Tons per Annum (TPA)	N/A	60	0	
9	Vanlafaxine	Tons per Annum (TPA)	N/A	180	0	
10	2-cyano 4-methylbiphenyl, Z-Valine	Tons per Annum (TPA)	N/A	720	230.404	
11	1-Chloroethyl Isopropyl Carbonate, Chloroethyl Cyclohexyl Carbonate, Chloroethyl ethyl Carbonate	Tons per Annum (TPA)	N/A	1560	262.2	

Conditions

Specific Conditions

Sr.No.	Condition Type	Condition Details
1	WATER QUALITY MONITORING AND PRESERVATION	The industrial effluent generation shall not exceed 326.8 m3/d. (Total process effluent generation after expansion will be 588.6 m3/d-ref. point 4 of EC) Out of 326.8 m3/d, 24 m3/d of high COD effluent shall be incinerated in the incinerator (of Atul Ltd as stated in point 4 of EC) Remaining 302.8 m3/d of normal effluent stream after mixing with other effluent like cooling tower (111.8 m3/d) shall be treated in ETP for primary and secondary treatment. The treated effluent after confirming to the prescribed standards shall be discharged into estuary of river Par through a 4km long pipe line.

PPs Submission: Complied Complied. details Attached.		Date: 28/04/2026
2	AIR QUALITY MONITORING AND PRESERVATION	Process emissions in the form of HCI shall be scrubbed with water and caustic scrubber and HCI recovered as by product. The emissions shall be dispersed through stack of adequate height as per CPCB standards. The gaseous emissions from the DG sets shall be dispersed through stack of adequate height as per CPCB standards. Acoustic enclosures shall be provided to the DG set to control the noise pollution.
PPs Submission: Complied Complied. Details Attached.		Date: 28/04/2026
3	AIR QUALITY MONITORING AND PRESERVATION	The company shall upload the status of compliance of the stipulated environmental clearance conditions, including results of monitored data on its website and shall update the same periodically. It shall simultaneously be sent to the Regional office of MOEF, the respective Zonal office of CPCB and the State Pollution Control Board. The criteria pollutant levels namely: SPM, RSPM, SO ₂ , NO _x (ambient levels as well as stack emissions) or critical sectorial parameters like VOC indicated for the project shall be monitored and displayed at a convenient location near the main gate of the company in the public domain.
PPs Submission: Complied Complied. Details Attached.		Date: 28/04/2026
4	WATER QUALITY MONITORING AND PRESERVATION	The company shall adopt cleaner production technology to minimize the quantity of fresh water requirement and process effluent generation.
PPs Submission: Complied Complied. Steam condensate is being collected and used in place of raw water. Various wash water streams are being utilized in the further steps of the process.		Date: 28/04/2026
5	WASTE MANAGEMENT	The Company shall obtain Authorization for collection, storage and disposal of hazardous waste under the Hazardous Waste (Management, Handling and Trans boundary movement) Rules. 2008 for management of hazardous wastes and prior permission from GPCB shall be obtained for disposal of solid / hazardous waste in the TSDF. The concerned company shall undertake measures for firefighting facilities in case of emergency.
PPs Submission: Complied Complied. Details Attached.		Date: 28/04/2026
6	WASTE MANAGEMENT	The project authorities shall strictly comply with the rules and guidelines under Manufacture, Storage and Import of Hazardous Chemicals Rules. 1989 as amended in October, 1994 and January, 2000 All Transportation of Hazardous Chemicals shall be as per the MVA. 1989.
PPs Submission: Complied Complied. We are complying with all the requirement of MSIHC rule 1989 as amended in October, 1994 and January, 2000 and having proper storage and handling system, Onsite emergency plan, Licenses, reporting, etc. The company complies with all stipulated norms mentioned in CCA by		Date: 28/04/2026

<p>GPCB in this regard. This has been certified by our Environmental auditors, an authorized agency and nominated by GPCB; through Environmental audit every year. Transportation of Hazardous chemicals are being done as per the MVA 1989.</p>		
7	WASTE MANAGEMENT	<p>The company shall undertake following Waste Minimization measures :- Metering and control of quantities of active ingredients to minimize waste. Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. Use of automated filling to minimize spillage. Use of "Close Feed" system into batch reactors. Venting equipment through vapor recovery system. Use of high pressure hoses for equipment clearing to reduce wastewater generation.</p>
<p>PPs Submission: Complied Complied. Details Attached.</p>		<p>Date: 28/04/2026</p>
8	AIR QUALITY MONITORING AND PRESERVATION	<p>Fugitive emissions in the work zone environment, product, raw material storage area shall be regularly monitored. The emissions shall conform to the limits imposed by SPCB.</p>
<p>PPs Submission: Complied Complied. Fugitive emissions in the work zone environment and raw material storage area is being regularly monitored by GPCB approved third party. The emission is always being confirmed to the limits. The emissions confirms the limits. The maximum values during the compliance period confirms that at no time the emission level went beyond the stipulated standards.</p>		<p>Date: 28/04/2026</p>
9	AIR QUALITY MONITORING AND PRESERVATION	<p>The project authorities shall provide the chilled brine solution in secondary condenser for condensation of the VOCs. The project authority shall ensure that the solvent recovery shall not be less than 95%. The VOC monitoring shall be carried in the solvent storage area and data submitted to the Ministry.</p>
<p>PPs Submission: Complied Complied. Chilled brine solution is provided in secondary condenser for condensation of the VOCs. Solvent recovery is greater 95 percentage.</p>		<p>Date: 28/04/2026</p>
10	MISCELLANEOUS	<p>Solvent management shall be as follows : Reactor shall be connected to chilled brine condenser system Reactor and solvent handling pump shall have mechanical seals to prevent leakages. The condensers shall be provided with sufficient HTA and residence time so as to achieve more than 95% recovery. Solvents shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses.</p>
<p>PPs Submission: Complied Complied. Details Attached.</p>		<p>Date: 28/04/2026</p>
11	GREENBELT	<p>Hazardous chemicals shall be stored in tanks in tank farms, drums, carboys, etc. An area of 33% green belt and selection of plant species shall be as per the guideline of CPCB.</p>
<p>PPs Submission: Complied Complied. Hazardous chemicals are being stored in tanks, drums and carboys considering the storage quantity and chemical stored. Company is having green belt in 33 percentage area of plant and doing plantation every year.</p>		<p>Date: 28/04/2026</p>
12	WATER QUALITY	<p>The Company shall harvest surface as well as rainwater from the</p>

	MONITORING AND PRESERVATION	rooftops of the buildings and storm water drains to recharge the ground water and use the same water for the various activities of the project to conserve fresh water.
PPs Submission: Complied Complied. We have installed 120 KL underground tank and 2 nos of 30 KL overhead tank to collect rain water from roof tops.		Date: 28/04/2026
13	Human Health Environment	Occupational health surveillance of the workers shall be carried out on a regular basis and records shall be maintained as per the Factories Act.
PPs Submission: Complied Complied. Occupational health surveillance of the workers being carried out on regular basis.		Date: 28/04/2026
General Conditions		
Sr.No.	Condition Type	Condition Details
1	Statutory compliance	The project authorities shall strictly adhere to the stipulations made by the GPCB.
PPs Submission: Complied Complied. The company adheres to the compliances and has not exceeded the stipulation. This has been certified by our Environmental auditors, an authorized agency and nominated by GPCB; through Environmental audit every year.		Date: 28/04/2026
2	MISCELLANEOUS	No further expansion or modification in the plant shall be carried out without prior approval of the Ministry of Environment and Forests. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
PPs Submission: Complied Complied. Any expansion will be carried out after prior approval of MoEF and CC only.		Date: 28/04/2026
3	MISCELLANEOUS	At no time, the emissions shall exceed the prescribed limits. In the event of failure of any pollution control system adopted by the units, the unit shall be immediately put out of operation and shall not be restarted until the desired efficiency has been achieved.
PPs Submission: Complied Complied. Monthly monitoring is being done by GPCB approved, NABL approved agencies. At no time, the emissions exceeded the prescribed limits during report period.		Date: 28/04/2026
4	AIR QUALITY MONITORING AND PRESERVATION	The Gaseous emission (NO _x , HCl, SO ₂ and SPM) and Particulate matter along with RSPM levels from various process units shall conform to the standards prescribed by the concerned authorities from time to time. At no time, the emission levels shall go beyond the stipulated standards. In the event of failure of pollution control system(s) adopted by the unit, the respective unit shall not be restricted until the control measures are rectified to achieve the desired efficiency. Stack monitoring for SO ₂ , No _x and SPM shall be carried.

<p>PPs Submission: Complied Complied. Details Attached.</p>		<p>Date: 28/04/2026</p>
5	<p>AIR QUALITY MONITORING AND PRESERVATION</p>	<p>The Location of ambient air quality monitoring stations shall be decided in consultation with sated pollution control Board and it shall be ensured that at least one station is installed in the up wind and downwind direction as well as where maximum ground level concentration are anticipated.</p>
<p>PPs Submission: Complied Complied. There are two locations have been decided in consultation with GPCB so that at least one station is installed in the upwind and downwind direction as well as where maximum ground level concentration are anticipated for ambient air monitoring. The same had been shown to authority like SPCB, CPCB and MoEFCC during their visit to our factory. Apart from this, 10 ambient air stations of Atul Ltd also monitors the surrounding of ABL.</p>		<p>Date: 28/04/2026</p>
6	<p>AIR QUALITY MONITORING AND PRESERVATION</p>	<p>Dedicated Scrubbers and stacks of appropriate height as per the central pollution control board guideline shall be provided to control the emission from various vents. The scrubber water shall be sent to ETP for further treatment or sell to actual end users.</p>
<p>PPs Submission: Complied Complied. Dedicated Scrubbers and stacks of appropriate height as per the central pollution control board guideline have been provided to control the emission from various vents.</p>		<p>Date: 28/04/2026</p>
7	<p>Noise Monitoring & Prevention</p>	<p>The overall noise level in and around the plant area shall be kept well within the standard by providing noise control measures including acoustic hoods silencers, enclosures etc. on all source of noise generation. The ambient noise level shall confirm to the standards prescribed under Environment(Protection) Act-1986 Rules,1989 viz 75 dBA (day time) and 70 dBA (night time).</p>
<p>PPs Submission: Complied Complied. Details Attached.</p>		<p>Date: 28/04/2026</p>
8	<p>MISCELLANEOUS</p>	<p>Training shall be imparted to all employees on safety and health aspects of chemicals handling. Pre-employment and routine periodical medical examination for all employees shall be undertaken on regular basis.</p>
<p>PPs Submission: Complied Complied. Company is imparting training to all new employees as well as regular employees at regular intervals. Safety precautions and hazards are also being communicated through display boards at appropriate places in the plants. Company is doing all the new employment with pre medical checkup and routine medical checkup for on role employee has been done on regular frequency.</p>		<p>Date: 28/04/2026</p>
9	<p>Risk Mitigation and Disaster Management</p>	<p>Usage of PPE's by employee/ workers shall be ensured.</p>
<p>PPs Submission: Complied Complied. Company have PPE policy in place and strictly follow for all level of employee.</p>		<p>Date: 28/04/2026</p>
10	<p>MISCELLANEOUS</p>	<p>The project proponent shall also comply with all the environmental protection measures and safeguards proposed in project report submitted to the ministry. All the recommendation made in respect of environmental management and risk mitigation measures relating to the project shall be implemented.</p>

<p>PPs Submission: Complied Complied. Company has complied with all the environmental protection measures and safeguards proposed in the report apart from the recommendations made their in. Since the project did not require EIA or public hearing, no such recommendations mentioned. However, we are committed for healthy work environment and safe work practices.</p>		<p>Date: 28/04/2026</p>
11	MISCELLANEOUS	The company will undertake all relevant measures for improving the socio economic condition for the surrounding area, CSR activities will be undertaken by involving local villages and administration.
<p>PPs Submission: Complied Complied. Company is doing CSR activities for upgradation of surrounding area and well fare of nearby localities.</p>		<p>Date: 28/04/2026</p>
12	MISCELLANEOUS	The company shall undertake eco developmental measures including community welfare measures in the project area for the overall improvement of the environment.
<p>PPs Submission: Complied Complied.</p>		<p>Date: 28/04/2026</p>
13	MISCELLANEOUS	A Separate environmental management cell equipped with full flagged laboratory facility shall be set up to carry out the environmental management and monitoring function.
<p>PPs Submission: Complied Complied. Company has tie up with its parent company Atul Limited where separate Environmental Management Cell equipped with full-fledged laboratory facilities to carry out the environment management and monitoring functions.</p>		<p>Date: 28/04/2026</p>
14	MISCELLANEOUS	The project authorities shall provide adequate funds both recurring and non-recurring to implement the conditions stipulated by the Ministry of Environment and Forest as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so provided shall not be diverted for any other purposes.
<p>PPs Submission: Complied Complied. Details Attached.</p>		<p>Date: 28/04/2026</p>
15	MISCELLANEOUS	A copy of the clearance letter shall be sent by the proponent to concerned Panchayat, Zila parishad/Municipal Corporation. Urban local body and the local NGO, if any, from who suggestions/representation, if any, were received while processing the proposal. The clearance letter shall also be put on the web site of the company by the proponent.
<p>PPs Submission: Complied Complied. Latest submission to the Panchayat, Zila parishad, District Industrial Centre was distributed on November 11, 2016. Copy of the same was submitted to Ministry vide our letter Atul/SHE/MoEF/Visit/3 dated April 4, 2017 Clearance lette is available at company website.</p>		<p>Date: 28/04/2026</p>
16	MISCELLANEOUS	The implementation of the project vis-à-vis environmental action plan shall be monitored by Ministry's Regional office at Bhopal / SPCB / CPCB.
<p>PPs Submission: Complied Complied. SPCB and MoEFCC is monitoring through their regular visits.</p>		<p>Date:</p>

		28/04/2026
17	MISCELLANEOUS	The Project Proponent shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at website of the Ministry of Environment and Forest at http://www.envfor.ni.in . This shall be advertised within seven days from the date of issue of the clearance letter at least in two local newspaper that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Ministry's Regional office at Bhopal.
PPs Submission: Complied Complied. We informed the public through advertisement and by sending our EC to local Panchayat, Zila parishad, District Industrial Centre for further actions at their end.		Date: 28/04/2026
18	MISCELLANEOUS	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closures and final approval of the project by the concerned authorities and the date of start of the project.
PPs Submission: Complied Complied. Start date : April 2009 Completion date : March 2010 Final approval: We have obtained NOC and CCA from GPCB. Company has funded the project internally and hence not submitted the financial closure details.		Date: 28/04/2026
Visit Remarks		
Last Site Visit Report Date:		N/A
Additional Remarks:		Report Period: April 2025 to September 2025
<p>Note: This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.</p>		