

Half Yearly Compliance Report**2024****01 Jun(01 Oct - 31 Mar)****Acknowledgement**

Proposal Name		M/s. Raks Pharma Private Limited	
Name of Entity / Corporate Office		M/s. Raks Pharma Private Limited	
Village(s)		N/A	
District		BHARUCH	
Proposal No.	SIA/GJ/IND2/174963/2020	Category	Industrial Projects - 2
Plot / Survey / Khasra No.	N/A	Sub-District	N/A
State	GUJARAT	Entity's PAN	*****6025P
MoEF File No.	SEIAA/GUJ/EC/5(f)/1377/2021	Entity name as per PAN	Raks pharma private limited

Compliance Reporting Details

Reporting Year 2024

Remarks (if any)

Reporting Period 01 Jun(01 Oct - 31 Mar)

Details of Production and Project Area

Name of Entity / Corporate Office M/s. Raks Pharma Private Limited

	Project Area as per EC Granted	Actual Project Area in Possession
Private	0	0
Revenue Land	0	0
Forest	0	0
Others	6.72214	6.72214
Total	6.72214	6.72214

Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Divalproex Sodium	Tons per Annum (TPA)	06/11/2025	180	7.2818 MT	180
2	Pirfenidone	Tons per Annum (TPA)	06/11/2025	2.0	1.8201 MT	2.0
3	Metyrosine	Tons per Annum (TPA)	06/11/2025	0.1	0.02448 MT	0.1
4	Clidinium Bromide	Tons per Annum (TPA)	06/11/2025	0.1	0.02448 MT	0.1
5	Aminocaproic Acid	Tons per Annum (TPA)	06/11/2025	2.0	0.9661 MT	2.0
6	Calcium Gluconate	Tons per Annum (TPA)	06/11/2025	5.0	3.37101 MT	5.0
7	Tramadol HCL	Tons per Annum (TPA)	06/11/2025	115	00	115
8	Metaxalone	Tons per Annum (TPA)	06/11/2025	220	00	220
9	Sildenafil Citrate	Tons per Annum (TPA)	06/11/2025	150	00	150
10	Linezolid	Tons per Annum (TPA)	06/11/2025	80	00	80
11	Citalopram	Tons per Annum (TPA)	06/11/2025	120	00	120
12	Darunavir	Tons per Annum (TPA)	06/11/2025	3	00	3
13	Solifenacin succinate	Tons per Annum (TPA)	06/11/2025	3.5	00	3.5
14	Vardenafil Hydrochloride Trihydrate	Tons per Annum (TPA)	06/11/2025	0.3	00	0.3
15	Eltrombopag Olamine	Tons per Annum (TPA)	06/11/2025	0.5	00	0.5
16	Bosentan	Tons per Annum (TPA)	06/11/2025	0.2	00	0.2
17	Apremilast	Tons per	06/11/2025	0.5	00	0.5

Conditions		
Specific Conditions		
Sr.No.	Condition Type	Condition Details
1	MISCELLANEOUS	Road leading to or at construction site must be paved and blacktopped.
PPs Submission: Being Complied Our unit has constructed RCC-paved road from our unit and within premises.		Date: 17/04/2025
2	Human Health Environment	No excavation of soil shall be carried out without adequate dust mitigation measures in place.
PPs Submission: Being Complied Adequate dust mitigation measures had been taken before excavation of soil.		Date: 17/04/2025
3	Statutory compliance	Main entry and exit shall be separate and clearly marked in the facility.
PPs Submission: Being Complied Our unit has provided a designated main entry, and a separate, clearly marked exit will also be ensured within the facility.		Date: 17/04/2025
4	Risk Mitigation and Disaster Management	Unit shall prepare and implement SOP for safe operation of the works.
PPs Submission: Being Complied Unit is already prepared and implemented SOP for safe operation of the works.		Date: 17/04/2025
5	Human Health Environment	9 a. PP shall obtain PESO permission for the storage of Hazardous chemicals.
PPs Submission: Complied Our unit has obtained the PESO license and copy of the same is enclosed as Annexure 5		Date: 17/04/2025
6	Statutory compliance	PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 30th September 2020, 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 its amendment.
PPs Submission: Being Complied We will comply conditions of any subsequent amendment or expansion or change in product mix.		Date: 17/04/2025
7	Statutory compliance	PP shall carry 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: Being Complied We will be complied all the subsequent amendments.		Date: 17/04/2025
8	Statutory compliance	All measure shall be taken to avoid soil and ground water contamination within premises.

PPs Submission: Complied We strictly adhere to CPCB/GPCB guidelines to prevent soil and groundwater contamination. To support this, we have constructed RCC roads throughout the premises and provided pucca (paved) flooring in the solvent storage area, ensuring effective containment and environmental protection. Photographs for RCC roads and pucca flooring Annexure-36		Date: 17/04/2025
9	Statutory compliance	PP shall submit six monthly compliance report of Environment Clearance without fail and the same shall be critically assessed by the regulatory authority.
PPs Submission: Complied Six monthly compliance report is submitted periodically. Acknowledgement copy of last submitted EC compliance is attached as Annexure-01		Date: 17/04/2025
10	Statutory compliance	Total number of product manufacturing shall not be exceeding twenty at given point of time as per the plant capacity shown in plant layout.
PPs Submission: Being Complied We complied with this condition and ensured that, at any given time, no more than 20 products were manufactured.		Date: 17/04/2025
11	Statutory compliance	Unit shall install CEMS (Continuous Emission Monitoring System) in line to CPCB direction to all SPCB vide letter no. B-29016/04/06PCI-1/5401 dated 05/02/2014 for effluent discharge and air emission as per pollution discharge/emission from respective project and an arrangement shall also be done for reflecting the online monitoring result on the company's server, which can be assessable by the GPCB/CPCB on real time basis. (For small/Large/Medium (Red Category) and whichever (Air emission and effluent discharge) is applicable).
PPs Submission: Being Complied Our unit has installed CEMS (Continuous Emission Monitoring System) for effluent discharge and air emission which is assessable by GPCB/CPCB on real time basis and complied. Photographs of CEMS is attached as Annexure-02		Date: 17/04/2025
12	Statutory compliance	Close loop solvent recovery system with adequate condenser system shall be provided to recover solvent vapours in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process within premises.
PPs Submission: Complied Our unit has provided close loop recovery solvent system with adequate condenser to recover maximum solvents and recovered solvents used in same products and other solvents are disposed to GPCB authorized vendor only. Photographs of close loop recovery system is attached as Annexure-03		Date: 17/04/2025
13	Statutory compliance	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per CPCB guideline. LDAR logbook shall be maintained.
PPs Submission: Complied We have implemented Leak detection system and repair system as per guidelines. LDAR Logbook is attached as Annexure-04		Date: 17/04/2025
14	Human Health Environment	9 b. PP shall provide occupational Health Centre (OHC) as per Provision under the Gujarat Factories Rule 68-U.

PPs Submission: Complied Our unit has provided OHC facility and also appointed a part time doctor Mr. Naresh Gadhvi, MBBS and CIH. One female nurse is appointed to look after OHC. We also have tied up with the nearby Hospital (Shreya Clinic) for occupational Health to ensure the medical treatment within the shortest possible time in case of any adverse condition. Agreement and Photographs of OHC is attached as Annexure-06		Date: 17/04/2025
15	Human Health Environment	9 c. 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.
PPs Submission: Complied Fire no objection certificate is not applicable in industry as per Gujarat Gov. letter no. FAC/142020/456894/M-3. The copy of the letter is attached as Annexure-07		Date: 17/04/2025
16	Human Health Environment	9 d. Unit shall adopt functional operation/process automation system including emergency response to eliminate risk associated with the hazardous Processes.
PPs Submission: Being Complied We have adopted functional operation / process automation system including emergency response to minimise risk.		Date: 17/04/2025
17	Human Health Environment	9 e. PP shall carry out mock drill within the premises as per prevailing guideline of safety and display proper evacuation plan in the manufacturing area in case of any emergency or accident.
PPs Submission: Complied Regular mock drills for the on-site emergency management plan are being carried out. Implementation of changes / improvements in the on-site management plan is being updated time to time. Mock Drill details are attached as Annexure-08		Date: 17/04/2025
18	Human Health Environment	9 f. PP shall install adequate fire hydrant system with foam trolley attachment within premises and separate storage of water for the same shall be ensured by PP.
PPs Submission: Complied Our unit has installed fire hydrant system with foam trolley within premises and separate water storage tank for fire hydrant system provided. Photographs of fire hydrant system is enclosed as Annexure 09		Date: 17/04/2025
19	Human Health Environment	9 g. PP shall take all the necessary steps for control of storage hazardous within premises ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guidelines of the concerned authority.
PPs Submission: Complied We have provided separate chemical storage area, and all hazardous materials stored as per the chemical compatibility. Photographs of the same is attached as Annexure10		Date: 17/04/2025
20	Human Health Environment	9 h. 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 labour within premises.
PPs Submission: Complied Our unit is provided adequate number of PPEs providing to all employees. List of PPE is attached as Annexure-37		Date: 17/04/2025
21	Human Health Environment	9 i. Flame proof electrical fittings shall be provided in the plant

		premises, wherever applicable.
PPs Submission: Complied Flame proof electrical fittings has been provided in the plant premises, wherever applicable. Photographs of the same is attached as Annexure-11		Date: 17/04/2025
22	Human Health Environment	9 j. Unit shall never store drum/barrels/carboys of incompatible material/chemical together.
PPs Submission: Complied Our unit will never store drum/barrels/carboys of incompatible material/ chemical together. Photographs of storage as per the chemical compatibility is attached as Annexure 10		Date: 17/04/2025
23	Human Health Environment	9 k. Unit shall provide effective Isolation for Process area and storage of hazardous chemicals.
PPs Submission: Complied Our unit has provided isolated process area and Hazardous chemicals storage. Annexure 12		Date: 17/04/2025
24	Human Health Environment	9 l. Unit shall provide water sprinkler to the ammonia storage cylinder.
PPs Submission: Being Complied Ammonia cylinder is not used. Liquor ammonia in very small quantities area used and adequate safety measures have been put in place to avoid any untoward incident.		Date: 17/04/2025
25	Human Health Environment	10. Unit shall comply with all the orders passed by the Hon'ble National Green Tribunal (NGT), New Delhi in Original Application No. 1038/2018 dated 10/07/2018.
PPs Submission: Being Complied We will strictly comply NGT order passed in application No. 1038/2018 dated 10/07/2018.		Date: 17/04/2025
26	Human Health Environment	Unit shall stand in compliance to Office Memorandum (OM) vide Letter No. F. No. 22-23/2018 IA III (Pt) dated 31/10/2019 regarding Compliance of Hon'ble National Green Tribunal (NGT) order dated 19.08.2019 (Published on 23/08/2019) in Original Application No. 1038/2018.
PPs Submission: Being Complied We will strictly comply (NGT) order dated 19.08.2019 published on 23.08.2019 in application no. 1038/2018.		Date: 17/04/2025
27	Human Health Environment	No project/activity in contradiction to the orders passed by the Hon'ble National Green Tribunal (NGT), New Delhi in Original Application No. 1038/2018 dated 10/07/2018 shall be carried out else the granted Environment Clearance shall stand cancelled.
PPs Submission: Being Complied We will strictly follow NGT order 1038/2018 dated 10.07.2018.		Date: 17/04/2025
28	Human Health Environment	Close loop solvent recovery system with adequate condenser system shall be provided to recover solvent vapors in such a manner that recovery shall be maximum and recovered solvent shall be reused in the process Within premises. (If there is in-house solvent recovery and in-house distillation).

PPs Submission: Complied Solvents are handled in the closed loop facility in the manufacturing area to prevent the escape of solvent vapours. Spent solvents are disposed to GPCB authorized vendor only. Annexure-3		Date: 17/04/2025
29	Human Health Environment	Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR Logbooks shall be maintained.
PPs Submission: Complied Leak detection and repair followed and strictly monitored. Annexure no 4		Date: 17/04/2025
30	Human Health Environment	Unit shall explore the possibilities for environment friendly method for disposal of incinerable and land fillable wastes before sending to CHWIF/TSDF sites respectively.
PPs Submission: Complied We are sending distillation residue, off Specification product, spent solvent to co-processing industries. The agreement copy of the co-processing facility is attached as Annexure-13		Date: 17/04/2025
31	Human Health Environment	All measures shall be taken to prevent soil and ground water contamination.
PPs Submission: Complied We are strictly followed CPCB/GPCB guideline to avoid soil and ground water contamination. RCC road and pucca flooring Annexure 36		Date: 17/04/2025
32	Human Health Environment	Unit shall install CEMS in line to CPCB directions to all SPCB vide letter no. B-29016/04/06PCI-1/5401 dated 05.02.2014 for effluent discharge and air emission as per pollutants discharge/emission from respective project and an arrangement shall be done for reflecting the online monitoring results on the company's server, which can be assessable by the GPCB/CPCB on real time basis. (Whichever (Air emission and Effluent discharge) is applicable as per the prevailing guideline of GPCB/CPCB)
PPs Submission: Complied Unit has been installed CEMS (Continuous Emission Monitoring System) for effluent discharge and air emission which is assessable to GPCB/CPCB on real time basis. Annexure 02		Date: 17/04/2025
33	WATER QUALITY MONITORING AND PRESERVATION	The industrial effluent generation from the project shall not be exceed 89 KLD after expansion.
PPs Submission: Complied Current CC and A No. AWH-110974 and New Provisional CCA No. AWH 140766 and valid up to 06/11/2025. The Wastewater generation is within consent quantity. Details of wastewater generation is enclosed as Annexure 17. There is no any project related activity is going on.		Date: 17/04/2025
34	WATER QUALITY MONITORING AND PRESERVATION	Industrial effluent shall be segregated into two stream (1) High COD and TDS effluent (2) Low COD and TDS effluent, and it shall be managed as below. High COD and TDS effluent (14 KLD) 14 KLD, High COD and TDS effluent from process shall be treated in ETP-1 consists of Primary Treatment unit followed by solvent stripper. Then treated effluent shall be evaporated in in-house MEE cum ATFD and 37.60 KLD, MEE condensate shall be reuse within Premises. Low COD and TDS (75 KLD) 75 KLD, low COD and TDS effluent from process, utility and scrubber shall be treated in ETP-2 and Ro plant. 60 KLD RO permeates shall be discharged into GIDC Dahej-Vilayat underground pipeline. 24 KLD RO reject shall

		be evaporated in in-house MEE cum ATFD.
PPs Submission: Complied Current CC and A No. AWH-110974 and provisional CC and A No. AWH-140766, Industrial effluent is segregated into two Stream (1) High COD and TDS effluent (2) Low COD and TDS effluent and treated as per the guidelines. Annexure 17. 14 KLD, High COD and TDS effluent from process will be treated in ETP-1 consists of Primary Treatment unit followed by solvent stripper. Then treated effluent will be evaporated in in-house MEE cum ATFD and 37.60 KLD, MEE condensate will be reuse within Premises. Annexure 17. 73.61 KLD, low COD and TDS effluent from process, utility and scrubber will be treated in ETP-2 and RO plant. 58.61 KLD RO permeates will be discharged into GIDC Dahej-Vilayat underground pipeline. 24 KLD RO reject will be evaporated in in-house MEE cum ATFD. Annexure17.		Date: 17/04/2025
35	WATER QUALITY MONITORING AND PRESERVATION	Unit shall feed wastewater to in-house MEEs only after ensuring the content of effluent for COD/VOC so as not to get air borne during evaporation in order to achieve no impact on Environment and Human Health.
PPs Submission: Complied The wastewater containing solvents vapour is first feed to stripper where the traces of volatile liquids are removed. The remaining wastewater is fed to MEE for further treatments. Annexure 18		Date: 17/04/2025
36	WATER QUALITY MONITORING AND PRESERVATION	Domestic wastewater generation shall not be exceed 9 KLD for proposed project and it shall be treated in ETP. It shall not be disposed off through soak pit/septic tank.
PPs Submission: Complied Domestic wastewater generation will not exceed 9 KLD and it is treated in ETP. It is not disposed of through soak pit/septic tank. Annexure-18		Date: 17/04/2025
37	WATER QUALITY MONITORING AND PRESERVATION	Unit shall provide buffer water storage tank of adequate capacity for storage of treated wastewater during any shut down of in-house MEE.
PPs Submission: Being Complied We have provided adequate capacity of treated water storage tank. MEE storage tank capacity is 60 KL and condensate water storage capacity is 30 KL (15 KL X 02)		Date: 17/04/2025
38	Human Health Environment	The National Ambient Air Quality Emission Standards issued by the Ministry vide G. S. R. No. 826 (E) dated 16th November, 2009 shall be complied with.
PPs Submission: Complied M/s. Vasundhara Enterprise (NABL Approved lab) had monitored the ambient air quality as per the national ambient Air quality standard. Copy of last ambient air quality monitoring reports is enclosed as Annexure 14		Date: 17/04/2025
39	Human Health Environment	Third party monitoring of the functioning of the EMS along with its efficiency shall be carried out once in a year through a GPCB recognized auditors.
PPs Submission: Complied Third party EMS monitoring has been carried out by GPCB recognized auditor and report is enclosed herewith as Annexure 16.		Date: 17/04/2025
40	WATER QUALITY MONITORING AND PRESERVATION	Treated wastewater shall be discharged into GIDC dahej-Vilayat underground pipeline leading to deep sea only after complying with the norms prescribe by GPCB to ensure no adverse impact on human Health and Environment.

PPs Submission: Complied The treated wastewater is discharged into the GIDC dahej-Vilayat underground pipeline which goes into the deep sea and conforming the discharge parameters with GPCB norms to ensure no adverse impact on human Health and Environment. Annexure 17		Date: 17/04/2025
41	Human Health Environment	National Emission Standards for Organic Chemical Manufacturing Industry issued by the Ministry vide G. S. R. 608 (E) dated 21/07/2010 and amended from time to time shall be followed.
PPs Submission: Being Complied M/s. Vasundhara Enterprise (NABL Approved Lab) had monitored process stack, and the results are within the limit. The copy of monitoring report is attached as Annexure-14 (stack monitoring report)		Date: 17/04/2025
42	Human Health Environment	Unit shall have to adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants and shall carry out the project development in accordance and consistence with the same.
PPs Submission: Being Complied We will adhere to the prevailing area specific policies of GPCB with respect to the discharge of pollutants and project development.		Date: 17/04/2025
43	Human Health Environment	Unit shall provide CCTV camera at strategic location within premises with web link facility for the continuous monitoring and recording to ensure that there is no discharge from the premises. (As per the prevailing guidelines of GPCB).
PPs Submission: Complied Our unit has installed CCTV cameras within premises for the continuous monitoring and recording to ensure that there is no discharge from the premises. Photographs of CCTV is attached as Annexure 15.		Date: 17/04/2025
44	WATER QUALITY MONITORING AND PRESERVATION	Total water requirement for the project shall not exceed 227 KLD. Unit shall reuse 37.60 KLD of treated industrial effluent within premises. Hence, freshwater requirement shall not be exceed 189.40 KLD and it shall be met through GIDC water supply only. Prior permission from concerned authority shall be obtained for withdrawal of water.
PPs Submission: Complied Current CC and A No. AWH-110974 and New Provisional CCA No. AWH 140766 and valid up to 06/11/2025. The water consumption is within consent quantity. Last six moth water consumption data is attached as Annexure 17. Copy of GIDC letter for withdrawal of water, Effluent generation and production details is enclosed as Annexure 17.		Date: 17/04/2025
45	WATER QUALITY MONITORING AND PRESERVATION	Unit shall provide buffer water storage tank of adequate capacity for storage of treated wastewater during any shut down of in-house MEE.
PPs Submission: Being Complied We have provided adequate capacity of treated water storage tank. MEE storage tank capacity is 60 KL and condensate water storage capacity is 30 KL (15 KL X 02)		Date: 17/04/2025
46	WATER QUALITY MONITORING AND PRESERVATION	The unit shall provide metering facility at the inlet and outlets of ETP, MEE and maintain records for the same.
PPs Submission: Complied We have provided flow meter at at the inlet and outlets of ETP, MEE and maintaining the record in logbook, Photographs and logbook are attached as Annexure-19		Date: 17/04/2025

47	WATER QUALITY MONITORING AND PRESERVATION	Proper Logbook of ETP, chemical consumption in effluent treatment, quantity and quality of effluent discharge to MEE and GIDC pipeline, quantity and quality of recycle back in process; Power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time.
PPs Submission: Complied Separate electrical meter is provided for ETP, Logbooks are maintained for operation of ETP showing chemical consumption, power consumption, quantity of effluent evaporated, quantity of condensate water, quantity of salt generation, maintenance. Annexure-19		Date: 17/04/2025
48	AIR QUALITY MONITORING AND PRESERVATION	Unit shall not exceed fuel consumption for steam boiler, thermopack, incinerator and D.G set as mentioned below: Sr. No. Source of emission with capacity Stack Height (meter) type of Fuel MT/Day Quantity of Fuel MT/ Day Type of emission i.e. Air Pollutants Air Pollution Control Measures (APCM) Existing: 1 Steam Boiler-(ton/hrsa0-2.0X 2 nos. 30 Bio Coal/Agrowaste 750.00 Kgs/hrs. PM, SO ₂ , NO _x Bag Filter and Adequate stack height 2 D.G.Set-500 KVA (1 Nos.) 11 HSD/LDO 70.00 and 250.00 Lit/Hr. Adequate stack height 3 Incinerator 30 Natural Gas/LDO 375 SCM/Hr. PM, HCL, SO ₂ , CO, TOC, HF, Nox, TDF, Cd, Th, Their compounds Hg and its compounds Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V, Their compounds Two stage Alkali scrubber Proposed: 1 Steam Boiler- (Ton/Hrs.)- 3.0X1 nos. 32 Bio Coal/Agrowaste 750.00 and 1500.00 Kgs/hrs. PM SO ₂ Nox Multi Cyclone Separator with Bag Filter and Adequate stack height 2 Thermic fluid heater-(Lack K.Cal/hr.) 2.0X 1 nos. and 4.0 X1 nos. 32 HSD/LDO 75.00 Lit./Hr. Adequate stack height 3 D.G. Set-750 KVA (1 Nos.) and 1500 KVA (1 Nos.) 11 Natural Gas/LDO 250.00 and 500.00 Lit/hrs. Adequate stack height Note: The Existing Boiler and Existing D.G. Set will be used as a standby
PPs Submission: Being Complied Unit does not exceed fuel consumption for steam boiler, thermopack, incinerator and D. G. Set. (we had removed incineration facility because of we dispose our waste to CHWIF, BEIL Dahej, preprocessing/ coprocessing to RSPL/ Banas Resources LLP), Ref. Current CC and A No. AWH-110974 and provisional CC and A No. AWH-140766,		Date: 17/04/2025
49	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide adequate APCM with flue gas generation source as mentioned above.
PPs Submission: Being Complied Bag filter system has been installed in the boiler and acoustic enclosure has been provided with DG set as an Air pollution Control Measure, Same is enclosed as Annexure 21. We have removed incineration facility from premises.		Date: 17/04/2025
50	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide adequate APCM with process gas generation source as mentioned below: Sr. No Specific Source of Emission (Name of the Product and process) Type of Emission Stack/Vent Height (Mt.) Air Pollution Control Measure (APCM) Existing 1 Process Reactor 1 HCL 11 Two Stage Alkali Scrubber 2 Process Reactor 2 NH ₃ 11 Phosphoric acid scrubber
PPs Submission: Complied Two stage caustic scrubber and two stage phosphoric acid scrubber are provided as Air Pollution Control measures to control the process emission of HCL and NH ₃ respectively. Details of APCD is enclosed as Annexure 21.		Date: 17/04/2025
51	AIR QUALITY MONITORING AND	The fugitive emission in work zone environment shall be monitored. The emission shall conform to the standards prescribe by

	PRESERVATION	the concerned authority from time to time (e.g. Directors of Industrial Safety and health). Following indicative guideline shall also be followed to reduce the fugitive emission. Internal road shall be concreted or asphalted or paved properly to reduce fugitive emission during vehicular movement. Air born dust shall be controlled with water sprinkler at suitable location in the plant. A green belt shall be developed all around the plant boundary and also along the road to mitigate fugitive and transport dust emission.
PPs Submission: Complied Workplace monitoring is conducted annually, and reports are available with us. Please see Annexure 14 Internal road made with RCC to reduce fugitive emission during vehicular movement. Implemented a closed loop process to avoid airborne dust control. Green belt is developed around the boundary wall.		Date: 17/04/2025
52	AIR QUALITY MONITORING AND PRESERVATION	Regular monitoring of volatile organic compound (VOCs) shall be carried out in the work zone area and ambient air.
PPs Submission: Complied volatile organic compound (VOCs) in the workplace area is monitored. Record is available see Annexure 14		Date: 17/04/2025
53	AIR QUALITY MONITORING AND PRESERVATION	For control of fugitive emission, VOCs, following steps shall be followed a. Closed handling and charging system shall be provided for chemicals b. Reflux condenser shall be provided over reactor/vessels. c. Pumps shall be provided with mechanical seals to prevent leakages. d. Air bourn dust at all transfers operation/ points shall be controlled either by spraying water or providing enclosure.
PPs Submission: Complied a. Closed handling and charging facility are provided for chemicals. b. Reflux condenser installed for reactor/vessels c. Pumps with mechanical seal are provided to prevent leakages. d. HVAC system with filters is provided to control air born dust at all operation/point. Annexure 25		Date: 17/04/2025
54	AIR QUALITY MONITORING AND PRESERVATION	Solvent management shall be carried out as follows: Measure shall be taken to reuse the process vapours emission as far as possible. Use of Toxic solvent 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 seal to prevent leakages. The condensers shall be provided with sufficient HTA and residence time so as to achieve maximum solvent recovery. Solvent shall be stored in a separate space specified with all safety measures. Proper earthing shall be provided in all the electrical equipment whenever 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 We have installed double condenser with cooling and chilling facility. Annexure 3 Reactor is connected with double condenser with cooling and chilling system. Annexure 3 Mechanical seal pump installed to prevent leakages. Annexure 3 Double Condenser with cooling and chilling supply installed to recover maximum solvents. See Annexure 3 Solvent storage area separately made with adequate safety measures. Double earthing is providing to all electrical equipment. Solvent storage tank having flame arrestor with breather valve to prevent losses.		Date: 17/04/2025
55	AIR QUALITY MONITORING AND PRESERVATION	Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCL and VOC shall be carried out in the impact zone and its record shall be maintained. Ambient air quality level shall not be exceed the standard stipulated by the GPCB. If any stage these levels

		are found to exceed the prescribe limits, necessary additional control measure shall be taken immediately. The location of the station and frequency of monitoring shall be decided in consultation with the GPCB.
PPs Submission: Complied Ambient Air quality level is monitored on monthly basis and do not exceed the standards stipulated by the GPCB. A Monthly report along with the location of station is maintained. Annexure 14		Date: 17/04/2025
56	WASTE MANAGEMENT	All the hazardous waste management shall be taken care as mentioned below Sr. No. Type / Name of Hazardous waste Specific Source of generation (Name of the Activity, Product etc.) Category and Schedule as per HW Rules Quantity (MT/Annum) Mode of disposal facility Existing Proposed Total 1. ETP Waste ETP Operation Sch. I: 35.3 24.00 20.00 44.00 Collection, Storage, Transportation and Disposal at TSDF site of BEIL/ Safe Enviro Pvt Ltd, Magnad. 2. Used Oil Plant and Machinery Sch. I: 5.1 300.00 0.00 300 Collection, Storage, Transportation, Disposal by selling to GPCB Approved refiners. 3. Discarded Carboys/ Drum / Containers/ Liners/ Bags Raw Materials Sch. I: 33.1 2400 2600.00 5000 Collection, Storage, decontamination, Transportation and disposal by selling to authorized vendor. 4. Process Residue and Waste Distillation and manufacturing process of all products Sch. I: 28.1 20.00 106.00 126.00 Collection, Storage, Transportation, Disposal by GPCB Approved preprocessing, coprocessing or CHWIF. 5. Spent Carbon Manufacturing Process Sch. I: 28.3 0.00 100.00 100.00 Collection, Storage, Transportation, Disposal at Co-processing to GPCB Approved facility. 6. Off specification products Manufacturing Process Sch. I: 28.4 10.00 0.00 10.00 Collection, Storage, Transportation and disposal at CHWIF. 7. Date-expired products Manufacturing Process Sch. I: 28.5 10.00 0.00 100.00 8. Spent Solvent From solvent recovery plant Sch. I: 28.6 25.00 1500 1525.00 Collection, Storage, Transportation and Disposal either by send it to co-processing or by common incineration facility or sell out to authorized end-users who is having Rule-9 permission and after making MoU with industries. 9. Spent Acid (Inorganic Acid) Manufacturing Process Sch. II: B,15 0.00 100.00 100.00 10. Used Filter Cloth Manufacturing Process (From most of the products) Sch. I: 33.2 0.00 1.00 1.00 Collection, Storage, Transportation and disposal at CHWIF. 11. Scrubber Bleed off From Scrubber Sch. I: 28.1 2920.00 0.00 2920.00 Collection, Storage, To In house ETP-2 for further treatment. 12. Mixed Solvents From Solvent Stripper Sch. I: 28.6 0.00 73.00 73.00 Collection, Storage, Transportation and disposal at GPCB approved facility /co-processing or by common incineration facility. 13. MEE Salt From MEE-ATFD Plant Sch. I: 37.3 0.00 100.00 100.00 Collection, Storage, Transportation and disposal at GPCB approved TSDF facility.
PPs Submission: Complied We are required to dispose of hazardous waste categories in accordance with CCA No. AWH-110974 and the new provisional CCA No. AWH-140766, which is valid until November 2025. We ensure full compliance with all applicable conditions and dispose of all hazardous waste categories through TSDF, in line with the Hazardous Waste and Transboundary Movement Rules, using manifests and with GPCB-approved Rule 09 permissions only.		Date: 17/04/2025
57	WASTE MANAGEMENT	Authorized end-user shall have permission from the concerned authorities under the rule 9 of the Hazardous and other wastes (Management and Transboundary Movement) Rules 2016.
PPs Submission: Complied We have to dispose our hazardous and other waste to Rule 9 authorized end users only. Annexure 13		Date:

		17/04/2025
58	WASTE MANAGEMENT	Unit shall explore the possibility of environment friendly method like co-processing of hazardous waste for disposal of incinerable and land fillable wastes before sending to CHWIF and TSDF sites respectively.
PPs Submission: Complied Before sending to CHWIF and TSDF we explore possibility to environment friendly method for further disposal. CHWIF and TSDF MOU Copy find Annexure-13		Date: 17/04/2025
59	WASTE MANAGEMENT	The unit shall submit the list of authorized end-users of hazardous waste along with MoU signed with them at least two month 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 Unit has submitted the end user of hazardous waste along with MoU signed copy to GPCB office. Follow rule strictly. The list of End users and MOU is attached as Annexure 38		Date: 17/04/2025
60	Corporate Environmental Responsibility	Project Proponent shall allocate the separate fund of Rs. 109.60 lakhs as committed before SEAC. The entire activities proposed under CSR shall be part of the Environment Management Plan (EMP) as per the MoEF and CCs OM no. F no. 22-65/2017-IA.III dated 30.09.2020. This shall be monitored, and monitoring report shall be submitted to regional office of MoEF and CCs as 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 We have complied with this point, and the CSR activity has been completed. The report details are available in Annexure 22.		Date: 17/04/2025
61	Human Health Environment	All the environmental protection measures and safeguards proposed in the Form-1 and PFR submitted by the project proponent and commitment made in their application shall be strictly adhered to in letter and spirit.
PPs Submission: Being Complied Environment protection measures and safeguard is provided as per the application.		Date: 17/04/2025
62	MISCELLANEOUS	Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices.
PPs Submission: Being Complied We have use best construction practice to reduce water demand during construction activity., we used RMC material and curing agent used in RMC.		Date: 17/04/2025
63	Human Health Environment	First Aid box shall be readily available in adequate quantity at all times.
PPs Submission: Complied First aid box is readily available with adequate quantity at all the time. First aid box Annexure 06		Date: 17/04/2025
64	MISCELLANEOUS	Project Proponent shall ensure that surrounding environment shall be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be

		done in valuable areas for controlling fugitive emission.
PPs Submission: Being Complied Construction material covered in the factory premises and best practice to control the fugitive emissions.		Date: 17/04/2025
65	Human Health Environment	All required sanitary and hygienic measures shall be provided before starting construction activities and to be maintained throughout the construction phase.
PPs Submission: Being Complied All required sanitary and hygienic measures is provided and maintained throughout construction phase.		Date: 17/04/2025
66	Statutory compliance	The Project proponent shall strictly comply with the building and other construction workers (Regulation of Employment and condition of service) Act 1996 and Gujarat rules made their under and their subsequent amendment. Local byelaws of concern authority shall be complied in letter and spirit.
PPs Submission: Being Complied We have strictly complied with the Building and Other Construction Workers Act, 1996, and its subsequent amendments in the Gujarat rules.		Date: 17/04/2025
67	WASTE MANAGEMENT	Safe disposal of wastewater and municipal solid wastes generated during the construction phase shall be ensured.
PPs Submission: Being Complied The generated wastewater and solid waste were safely disposed of during the construction phase.		Date: 17/04/2025
68	MISCELLANEOUS	Project Proponent shall ensure use of Eco-friendly building material including fly ash bricks, fly ash paver blocks, ready mix concrete (RMC) and leaf free paints in the project.
PPs Submission: Complied We used eco-friendly building material including fly ash bricks, fly ash paver block and ready mix concrete. Annexure 23		Date: 17/04/2025
69	MISCELLANEOUS	The Project proponent shall strictly comply with the building and other construction workers (Regulation of Employment and condition of service) Act 1996 and Gujarat rules made their under and their subsequent amendment. Local byelaws of concern authority shall be complied in letter and spirit.
PPs Submission: Being Complied We have strictly complied with the Building and Other Construction Workers Act, 1996, and its subsequent amendments in the Gujarat rules.		Date: 17/04/2025
70	Human Health Environment	Project Proponent shall ensure that surrounding environment shall be affected due to construction activity. Construction materials shall be covered during transportation and regular water sprinkling shall be done in valuable areas for controlling fugitive emission.
PPs Submission: Being Complied Construction material covered in the factory premises and best practice to control the fugitive emissions.		Date: 17/04/2025
71	Noise Monitoring & Prevention	Use of diesel generator (DG) sets during construction phase shall be strictly equipped with acoustic enclosure and shall conform to the

		EPA rules for air and noise emission standards.
PPs Submission: Complied Acoustic enclosure provided to DG set. And D.G. Set photograph Annexure-27		Date: 17/04/2025
72	MISCELLANEOUS	All topsoil excavated during construction activity shall be used in horticulture/landscape development within the project site.
PPs Submission: Being Complied Topsoil excavated during construction activity is used in with in project site for levelling.		Date: 17/04/2025
73	Human Health Environment	Excavated earth to be generated during construction phase shall be utilized within 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 necessary precaution for general safety and health aspect. Disposal of excavated earth during construction phase shall not create adverse effect on neighbouring communities.
PPs Submission: Being Complied Excavated earth generated during construction phase which is used in project site for levelling.		Date: 17/04/2025
74	Human Health Environment	Windbreaker 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: Being Complied Wind breaker of appropriate height i.e. 1/3rd of the building project site barricaded provided.		Date: 17/04/2025
75	Human Health Environment	No uncovered vehicles carrying construction material and waste shall be permitted.
PPs Submission: Being Complied Construction materials were received only in covered vehicles, uncovered vehicles are strictly prohibited.		Date: 17/04/2025
76	Noise Monitoring & Prevention	Ambient noise level shall conform to residential standard 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 Ambient noise level is maintained with in residential standard during day and night. Ambient noise monitoring report (NABL Accredited laboratory, Vasundhara Enterprise) available in Annexure 14.		Date: 17/04/2025
77	Statutory compliance	Fly ash shall be used in construction whenever applicable as per provision of fly ash notification under the E.P. Act 1986 and its subsequent amendment from time to time.
PPs Submission: Being Complied We will use fly ash in construction whenever applicable, as per the provisions of the Fly Ash Notification under the E.P. Act, 1986.		Date: 17/04/2025
78	Human Health Environment	No loose soil or and or construction and demolition waste or any other construction material that cause dust shall be left uncovered. Uniform piling and proper storage of sand to avoid fugitive emission shall be ensured

PPs Submission: Being Complied No loose soil, construction and demolition waste, or any other dust-generating materials were left uncovered. Uniform piling and proper storage of sand were ensured to prevent fugitive emissions.		Date: 17/04/2025
79	Human Health Environment	Dust mitigation measures shall be displayed prominently at the construction site for easy public viewing.
PPs Submission: Being Complied Dust mitigation measures were displayed prominently at the construction site for easy public viewing.		Date: 17/04/2025
80	WASTE MANAGEMENT	Construction material and waste should be stored only within earmarked area and roadside storage of construction material and waste shall be prohibited.
PPs Submission: Being Complied Construction materials and waste were stored only in the designated areas, and roadside storage was strictly prohibited.		Date: 17/04/2025
81	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: Being Complied Not Applicable as there was no construction and demolition waste processing and disposal site at the site.		Date: 17/04/2025
82	WATER QUALITY MONITORING AND PRESERVATION	Industry should provide separate dedicated washing area for hand washing/bathing of worker and the wastewater generated from the same should be taken into ETP.
PPs Submission: Being Complied A separate dedicated washing area for hand washing of workers is provided, and the wastewater generated is being treated in the ETP.		Date: 17/04/2025
83	WATER QUALITY MONITORING AND PRESERVATION	The water meter shall be installed, and record of daily and monthly water consumption shall be maintained.
PPs Submission: Complied Water meter installed and record maintained regularly. Annexure 24		Date: 17/04/2025
84	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 We implement best practices to minimize freshwater consumption by using and recycling treated water by following RO plant. please find Annexure-26		Date: 17/04/2025
85	AIR QUALITY MONITORING AND PRESERVATION	In case of use of spray dryer, the unit shall provide the adequate and efficient APCMs with spray dryer so that there should not be any adverse impact on human health and environment. Unit shall carry out third party monitoring of the proposed spray dryer and its APCM through the credible institute and study report of impacts on Environment and Human Health shall be submitted to GPCB every year along with half yearly compliance report.

PPs Submission: Complied Spray Dryer is not using for our industrial activity hence this condition is not applicable to our unit.		Date: 17/04/2025
86	AIR QUALITY MONITORING AND PRESERVATION	Acoustic enclosure shall be provided to D.G set (if applicable) to mitigate the noise pollution and shall conform to the EPA rules for air and noise emission standards.
PPs Submission: Complied Acoustic enclosure provided to D. G. set to mitigate the noise pollution. See Annexure 27		Date: 17/04/2025
87	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 Stack/vents of adequate height are provided as per the prevailing norms for flue gas emission/process gas emission. Annexure 20		Date: 17/04/2025
88	AIR QUALITY MONITORING AND PRESERVATION	Flue gas emission and Process gas emission (if any) shall conform to the standard prescribed by the GPCB/CPCB/MoEF and CCs. At no time, emission level should go beyond the stipulated standards.
PPs Submission: Complied Flue gas emissions and Process gas emissions (if any) are monitored on monthly basis by NABL accredited laboratory and record is maintained. Copy of Flue Gas Stack monitoring and analysis report is enclosed as Annexure 14. The all emissions parameters are maintained within the prescribed limits.		Date: 17/04/2025
89	AIR QUALITY MONITORING AND PRESERVATION	All the reactor/vessels used in the manufacturing process shall be closed to reduce the fugitive emission.
PPs Submission: Being Complied During manufacturing, we close all reactors and process vessels to prevent fugitive emissions.		Date: 17/04/2025
90	AIR QUALITY MONITORING AND PRESERVATION	Adequate Air Pollution Control Measures (APCM) shall be provided.
PPs Submission: Complied We have provided Bag Filter as APCM to Steam Boiler. Two stage alkali scrubber system is provided as APCM to Process Reactor I. Phosphoric acid scrubber is provided as APCM to Process Reactor II. Annexure 20		Date: 17/04/2025
91	AIR QUALITY MONITORING AND PRESERVATION	The unit shall adhere to sector specific guidelines/ SOP published by GPCB/CPCB from time to time for effective fugitive emission control. The project proponent shall monitor fugitive emission in the plant premises at least once in every quarter through labs recognized under Environment (Protection) Act, 1986.
PPs Submission: Complied We measure and record fugitive emissions within the plant premises every month, and workplace area monitoring is also conducted monthly. See Annexure 14		Date: 17/04/2025
92	AIR QUALITY MONITORING AND PRESERVATION	Unit shall take adequate measure to control odor nuisance from industrial activity which may include measures like- use of masking agent with atomizer system (water curtain), closed/ automatic

		material handling system, containment of the odor vulnerable areas etc.
PPs Submission: Being Complied Raks has implemented closed reactors/vessels and a scrubber system in the manufacturing process to control odour. Additionally, chemical tanker loading and unloading are carried out in a closed system to prevent odour exposure in vulnerable areas.		Date: 17/04/2025
93	WASTE MANAGEMENT	Hazardous waste 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 Hazardous wastes are stored in designated Hazardous waste storage facility with impervious bottom and leachate collection facility, before its disposal. Annexure 28		Date: 17/04/2025
94	WASTE MANAGEMENT	The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (whichever is applicable)
PPs Submission: Complied Raks has obtained the membership of TSDF for ETP Sludge and other waste the validity is for lifetime. Annexure 29		Date: 17/04/2025
95	WASTE MANAGEMENT	Truck/tankers used for transportation of hazardous waste shall be in accordance with the provision under the motor vehicle act, 1988 and rules made their under.
PPs Submission: Being Complied "All hazardous chemicals are transported in compliance with the Motor Vehicles Act (MVA), 1989, and the rules framed thereunder. A common infrastructure vehicle and a GPCB-approved transporter are used for this purpose.		Date: 17/04/2025
96	WASTE MANAGEMENT	The design of truck/tanker shall be such that there is no spillage during transportation.
PPs Submission: Being Complied A dedicated vehicle is used for transportation to prevent spillage, and only GPCB-approved transporter vehicles are employed for the movement of hazardous materials.		Date: 17/04/2025
97	WASTE MANAGEMENT	All possible effort shall be made for Co-processing of the hazardous waste prior to disposal into TSDF/CHWIF.
PPs Submission: Being Complied All possible efforts has been made to co-process hazardous waste before its disposal at TSDF/CHWIF facilities.		Date: 17/04/2025
98	WASTE MANAGEMENT	Management of fly ash (if any) shall be as per the fly as notification 2009 and its amendment time to time and it shall be ensured that there is 100 percent utilization of fly ash to be generated from the unit.
PPs Submission: Being Complied Management of fly ash (if any) will be as per the fly as notification 2009 and its amendment time to time and it will be ensured that there is 100 percent utilization of fly ash to be generated from the unit.		Date: 17/04/2025
99	WASTE MANAGEMENT	Unit shall carry out transportation of hazardous wastes through GPS mounted vehicles only for disposal at TSDF/CHWIF, co-processing and end-users having Rule-9 permission.

PPs Submission: Being Complied The unit transports hazardous waste exclusively through GPS-enabled vehicles for disposal at TSDF/CHWIF, co-processing, or to end-users authorized under Rule 9.		Date: 17/04/2025
100	WASTE MANAGEMENT	Unit shall submit the list of authorized end user of above-mentioned wastes along with MoU signed with them at least two months in advance prior to commencement of production. In absence of potential buyers of these items, the unit shall restrict the production of respective item.
PPs Submission: Complied We have established MoUs with Rule-9 authorized buyers, and prior intimation is given to them to ensure timely disposal of waste, avoiding any impact on production. These conditions will be followed strictly. Annexure 13		Date: 17/04/2025
101	AIR QUALITY MONITORING AND PRESERVATION	Unit shall provide Wall to Wall carpeting in vehicle movement areas within premises to avoid dusting.
PPs Submission: Being Complied Constructed with RCC-paved carpet road.		Date: 17/04/2025
102	WASTE MANAGEMENT	The by-product which fall under the purview of the hazardous and other wastes (Management and transboundary Movement) rules 2016 shall be handled as per the said rules and necessary permission from the concern authority shall be obtained.
PPs Submission: Being Complied Not applicable as there is no by-product is generated.		Date: 17/04/2025
103	Statutory compliance	The occupier/manager shall strictly comply the provision under the factory act 1948 and the Gujarat Factories Rules 1963.
PPs Submission: Complied We will strictly follow this condition and made and follow factory act 1948 and Gujarat factories Rules 1963. See Annexure 30		Date: 17/04/2025
104	WASTE MANAGEMENT	The company shall strictly comply with the rules and regulation with regards to handling and disposal of hazardous waste in accordance with the hazardous and others wastes (Management and Transboundary 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: Being Complied The company is obtained CC and A from GPCB - Gandhinagar vide letter No. AWH 110974, and valid till 06/11/2025. Provision CCA no AWH 140766 Dated 11/03/2025 and valid up to 06/11/2025		Date: 17/04/2025
105	WASTE MANAGEMENT	Industry shall dispose its hazardous wastes through co-processing, pre-processing to the extent possible prior to disposal to incineration/landfill as per provision of hazardous and other wastes (Management and transboundary movement) rules, 2016.
PPs Submission: Being Complied All possible efforts have been made to co-process hazardous waste before its disposal at TSDF/CHWIF facilities.		Date: 17/04/2025

106	Risk Mitigation and Disaster Management	All necessary precautionary measure shall be taken to avoid any kind of accident during storage and handling of toxic/hazardous chemicals.
PPs Submission: Being Complied All necessary precautionary measure already takes to avoid any kind of accident during storage and handling of toxic/hazardous chemicals.		Date: 17/04/2025
107	Statutory compliance	The Project proponent authority shall strictly comply with the provisions made in Manufacturing, Storage and Import of Hazardous chemicals Rules (MSIHC) 1989, as amended time to time and public liability insurance act for handling of hazardous chemicals etc. Necessary approvals from the chief controller of explosives and concerned Govt. Authority shall be obtained before commissioning of the project. Requisite On-site and off-site disaster management plans have to be prepared and implemented.
PPs Submission: Complied Raks Pharma does not fall under the purview of the MSIHC Rules, 1989. We maintain a valid Public Liability Insurance policy, which is regularly updated. Prior to commissioning the project, all necessary approvals for solvent storage were obtained from the Chief Controller of Explosives and relevant government authorities. we have on-site emergency plan is in place and is reviewed and updated from time to time. Annexure-31		Date: 17/04/2025
108	Statutory compliance	Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/emergency vehicle around the premises.
PPs Submission: Being Complied Sufficient peripheral open passage is kept in the margin area for free movement of fire tender/emergency vehicle around the premises.		Date: 17/04/2025
109	Statutory compliance	Storage of flammable chemicals shall be sufficiently away from the production area.
PPs Submission: Being Complied Storage of flammable chemicals is already sufficiently away from the production area.		Date: 17/04/2025
110	Risk Mitigation and Disaster Management	All the toxic/hazardous chemicals shall be stored in optimum quantity and all necessary permission in this regard shall be obtained before commencing the expansion activities.
PPs Submission: Complied All the toxic/hazardous chemicals will be stored in optimum quantity and all necessary permission in this regard will be obtained before commencing the expansion activities. For PESO license Annexure 31		Date: 17/04/2025
111	Risk Mitigation and Disaster Management	Sufficient number of fire extinguishers shall be provided near the plant and storage area.
PPs Submission: Complied Sufficient number of fire extinguishers is provided near the plant and storage area. Annexure 32		Date: 17/04/2025
112	Risk Mitigation and Disaster Management	The project management shall ensure to comply with all the environment protection measure, risk mitigation measures and safeguards mentioned in the risk assessment report.
PPs Submission: Being Complied		Date:

Raks will ensure to comply with all the environment protection measure, risk mitigation measures and safeguards mentioned in the risk assessment report.		17/04/2025
113	Risk Mitigation and Disaster Management	Only flame proof electrical fitting shall be provided in the plant premises.
PPs Submission: Being Complied Only flame proof electrical fitting has been provided in the plant premises.		Date: 17/04/2025
114	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 tanks/containers.
PPs Submission: Being Complied The storage of hazardous chemicals will be minimized by maintaining only the necessary quantities on-site. Instead of using a single large-capacity tank or container, multiple smaller-capacity tanks/containers will be used to reduce potential risks. Materials will be procured on an as-needed basis to further limit on-site storage and ensure safe handling practices.		Date: 17/04/2025
115	Risk Mitigation and Disaster Management	All storage tanks shall be fitted with appropriate control to avoid any leakages. Bund/dyke walls shall be provided for storage tanks for hazardous chemicals.
PPs Submission: Being Complied All storage tanks are equipped with appropriate control systems to prevent any leakage. Bunds/dyke walls are constructed around tanks storing hazardous chemicals to contain potential spills. Additionally, earthing and bonding are implemented to prevent static charge accumulation, and earthing relays are provided to ensure electrical safety compliance.		Date: 17/04/2025
116	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.
PPs Submission: Being Complied Handling and charging of the chemicals is done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.		Date: 17/04/2025
117	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.
PPs Submission: Being Complied Handling and charging of the chemicals is done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs.		Date: 17/04/2025
118	Risk Mitigation and Disaster Management	Tie up shall be done with nearby health care Centre / doctor for seeking immediate medical attention in the case of emergency.
PPs Submission: Complied The unit have tied up with the nearby Health care Centre / Doctor for seeking medical treatment within the shortest possible time in case of any adverse condition/emergency. Annexure 06		Date: 17/04/2025
119	Human Health Environment	Personal protective equipment (PPEs) shall be provided to workers and its usage shall be ensured and supervised.
PPs Submission: Being Complied All necessary PPE s is provided to workers, and regular monitoring is done to check usage of PPEs by workers, and Emergency PPE kit also available at respective area.		Date: 17/04/2025

120	Human Health Environment	Firs Aid box and required Antidotes for the workers on safety and health aspects of chemicals handling.
PPs Submission: Complied First aid boxes have been provided at designated locations across the facility. Adequate quantities of applicable antidotes for the chemicals used in the unit are maintained on-site. These are regularly monitored and replenished as necessary, with inspections conducted on a monthly basis to ensure readiness and compliance. See Annexure-06		Date: 17/04/2025
121	Human Health Environment	Training shall be imparted to all the workers on safety and health aspects of chemicals handling.
PPs Submission: Being Complied Regular training is imparted to all workers on safety and health aspect of chemicals handling.		Date: 17/04/2025
122	Human Health Environment	Occupational health surveillance of the workers shall be done and its records shall be maintained. Pre-employment and periodic medical examination for all workers shall be undertaken as per the Factories Act and Rules.
PPs Submission: Complied Pre-employment and Periodical medical check-up is carried out and records is maintained as per Factory Act and rules. Annexure-33		Date: 17/04/2025
123	Statutory compliance	Transportation of hazardous chemicals shall be done as per the provision of the motor vehicle act and rules.
PPs Submission: Being Complied Transportation of hazardous chemicals is done as per the provision of the motor vehicle act and rules.		Date: 17/04/2025
124	Statutory compliance	The company shall implement all prevention and mitigation measure suggested in the Risk assessment report.
PPs Submission: Being Complied The company has implemented all recommended prevention and mitigation measures outlined in the Risk Assessment Report to ensure safe operations and minimize potential hazards.		Date: 17/04/2025
125	Statutory compliance	Necessary permission from various statutory authorities like PESO, Factory Inspectorate and others shall be obtained prior to commissioning of the project.
PPs Submission: Complied Necessary permission from various statutory authorities like PESO, Factory Inspectorate and others is obtained prior to commissioning of the project. Annexure 41		Date: 17/04/2025
126	Human Health Environment	Pre-employment and routine periodic medical examinations for all employees shall be undertaken on regular basis.
PPs Submission: Complied Pre-employment and routine periodic medical examinations for all employees are undertaken on regular basis. See Annexure-33		Date: 17/04/2025
127	Risk Mitigation and Disaster Management	Effective safety precaution shall be taken for chemical storage, process handling and transportation hazard.
PPs Submission: Being Complied Effective safety precautions are being implemented for chemical storage, process handling, and		Date: 17/04/2025

transportation to mitigate potential hazards and ensure safe operations throughout the facility.		
128	Statutory compliance	Comply the statutory provision of safety audit and its compliance report.
PPs Submission: Complied Safety audit conducted every two year and compliance report submitted to Factory inspector office. Safety audit compliance report Annexure-39		Date: 17/04/2025
129	Noise Monitoring & Prevention	The overall noise level in and around the plant area shall be kept within the prescribe standard by providing noise control measures including engineering controls like acoustic insulation hood, silencers, enclosures etc. on all sources of noise generation. The ambient noise level shall conform to the standards prescribe under the Environment (Protection) Act, 1986 and Rules.
PPs Submission: Complied Noise levels are monitored monthly, and records are systematically maintained. To minimize noise exposure, acoustic enclosures have been installed around high-noise equipment. For detailed monitoring data, refer to Annexure-14, which includes reports from the NABL-accredited laboratory, Vasundhara Enterprise.		Date: 17/04/2025
130	Statutory compliance	The unit shall undertake the cleaner production assessment study through a reputed institute/organization and shall form a CP team in the company. The recommendation thereof along with the compliance shall be furnished to the GPCB.
PPs Submission: Complied The adequacy of the Effluent Treatment Plant (ETP) is evaluated annually by the LJ Institute of Engineering College, Ahmedabad. Recommendations provided in the evaluation are implemented to ensure continued compliance and operational efficiency. Refer to Annexure-16 for detailed reports.		Date: 17/04/2025
131	Human Health Environment	The company shall undertake various waste minimization measures such as a. Metering and control of quantities of active ingredients to minimize waste. b. Reuse of by-products from the process as raw materials or as raw material substitute. c. Use of automated and close filling to minimize spillage. d. Use of close feed system into batch reactor. e. Venting equipment through vapour recovery system. f. Use of high-pressure hoses for cleaning to reduce wastewater generation. g. Recycling of washes to subsequent batches. h. Recycling of steam condensate. i. Sweeping/mopping of floor instead of floor washing to avoid effluent generation. j. Regular preventive maintenance for avoiding leakages, spillages etc.
PPs Submission: Being Complied a. We have a checklist for raw materials issuance as required for all active ingredient manufacturing processes to minimize waste. b. Not applicable c. follow strict instructions for material charging through close loop system to avoid spillage. d. Close feed system is being used into batch reactor. e. Double condenser with cooling and chilling system installed for to recover maximum vapour. f. We have used high pressure hose and pumps for cleaning to reduce wastewater generation. g. Washes is being utilized until it reaches poor quality. h. We recycle steam condensate water and have installed a PPPU pump for the vapor condensate recovery system. i. We sweep and mop the floors instead of washing them to avoid generating effluent. j. We have prepared a preventive maintenance schedule for the calendar year to prevent leakages, spillages, and other issues.		Date: 17/04/2025
132	Human Health Environment	The company shall undertake various waste minimization measures such as a. Metering and control of quantities of active ingredients to minimize waste. b. Reuse of by-products from the process as raw materials or as raw material substitute. c. Use of automated and close filling to minimize spillage. d. Use of close feed system into batch

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133	Risk Mitigation and Disaster Management	Effective step shall be taken for prevention of fire, explosion and toxic release.	
PPs Submission: Complied On site emergency plan is prepared and implemented for prevention of fire, explosion and Toxic release. See Annexure-31B		Date: 17/04/2025	
134	GREENBELT	The PP shall develop green belt (24153 Sq. m (36 percent) of total plot area) as committed before SEAC. Green belt shall be developed with native plant species that are significant and used for the pollution abetment as per CPCB guidelines. It shall be implemented within 3 years of operation phase in consultation with GPCB.	
PPs Submission: Being Complied Our unit has developed the greenbelt in 24153 square meter area with 1012 Trees. We will shortly plant remaining trees.		Date: 17/04/2025	
135	Statutory compliance	Unit shall comply all the practicable standard condition prescribed in office Memorandum (OM) published by MoEF and 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: Being Complied We will follow this strictly.		Date: 17/04/2025	
136	Statutory compliance	The provision 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: Being Complied We will follow this strictly.		Date: 17/04/2025	
137	MISCELLANEOUS	Rainwater harvesting (off site) shall be undertaken to conserve fresh water as well as recharge ground water. Before recharging the surface runoff, pre-treatment must be done to remove suspended matter. (applicable for units consuming ground water greater than or equal to 50 KLD in line with the prevailing guidelines of SPCB)	
PPs Submission: Being Complied Our unit is situated at seashore area so, that it should not be possible for rainwater harvesting.		Date:	

		17/04/2025
138	Corporate Environmental Responsibility	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: Being Complied Our unit will 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.		Date: 17/04/2025
139	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: Being Complied 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 will be provided.		Date: 17/04/2025
140	GREENBELT	The area ear marked as green area shall be used only for plantation and shall not be altered for any purpose.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
141	Statutory compliance	All the commitments/ undertaken given to the SEAC during the appraisal process for the purpose of environmental protection and management shall be strictly adhered to.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
142	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 environment protection and management.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
143	Risk Mitigation and Disaster Management	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: Being Complied We will follow this strictly.		Date: 17/04/2025
144	Statutory compliance	The project authority must strictly adhere to the stipulations made by the Gujarat pollution control board (GPCB), state government and any statutory authority.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025

145	WASTE MANAGEMENT	During material transfer there shall be no spillage and garland drain shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water.
PPs Submission: Being Complied Material transfer operations are carried out under strict monitoring to prevent any spillage. A preventive maintenance schedule is followed diligently to ensure equipment reliability. Measures are in place to prevent accidental spillages from mixing with domestic wastewater or storm water systems, thereby minimizing environmental risk.		Date: 17/04/2025
146	WASTE MANAGEMENT	Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.
PPs Submission: Being Complied Pucca flooring / impervious layer is provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination.		Date: 17/04/2025
147	WASTE MANAGEMENT	Leakages from pipes, pumps shall be minimal and if occur, shall be arrested promptly.
PPs Submission: Being Complied Spill control kit is provided for spillages and Double mechanical seal pump is provided to prevent leakages.		Date: 17/04/2025
148	Statutory compliance	No further expansion or modification in the plant likely to cause environmental impacts shall be carried out without obtaining prior environment clearance from the concerned authority.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
149	Statutory compliance	The above condition will enforced, inter-alia under the provision of the water Prevention and Control of Pollution) Act, 1974, Air (Prevention and 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 amendment and rules.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
150	Statutory compliance	The project proponent shall comply all the condition mentioned in The Companies (corporate social responsibility policy) rules, 2014 and its amendments from time to time in a spirit.
PPs Submission: Being Complied The project proponent will comply all the condition mentioned in The Companies (corporate social responsibility policy) rules, 2014 and its amendments from time to time in a spirit.		Date: 17/04/2025
151	Human Health Environment	The project management shall ensure that unit complies with all the environment protection measure, risk mitigation measures, and safeguards recommended in the EMP report and Risk Assessment study report as well as proposed by project proponent.
PPs Submission: Being Complied We will ensure that the unit complies with all environmental protection measures, risk mitigation protocols, and safeguards recommended in the EMP report and Risk Assessment study, as well as		Date: 17/04/2025

those proposed by the project proponent.		
152	Statutory compliance	The project authority shall earmark adequate funds to implement the condition stipulated by SEIAA as well as GPCB along with the implementation schedule for all the condition stipulated herein. The funds so provided shall not diverted for any other purpose.
PPs Submission: Being Complied Adequate funds are earmarked to implement the condition stipulated by SEIAA as well as GPCB along with the implementation schedule for all the condition stipulated herein. The funds so provided will not diverted for any other purpose.		Date: 17/04/2025
153	Statutory compliance	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 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 Advertisement is given in English newspaper Gujarat Samachar on 21/07/2021 and Business Standard on 22/07/2021, within seven days from the date of issue of EC. Copy of newspaper cutting is enclosed as Annexure 34.		Date: 17/04/2025
154	Statutory compliance	It shall be mandatory for the project management to submit half yearly compliance report in respect of the stipulated prior environmental clearance terms and condition in a soft copy to the regulatory authority concerned, on 1st June and 1st December of each calendar year.
PPs Submission: Being Complied We are submitting half yearly compliance reports in respect of the stipulated prior environment clearance terms and conditions in soft copies to the IRO Office.		Date: 17/04/2025
155	Statutory compliance	Concealing factual data or submission of false/fabricated data and failure to comply with any condition mentioned above may result in withdrawal of this clearance and attract action under the provision of environment (Protection) Act, 1986.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
156	Statutory compliance	The project authority shall also be adhere to the stipulation made by the Gujarat pollution control board.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
157	Statutory compliance	The SEIAA may revoke or suspend the clearance, if implementation of any of the above condition is not found satisfactory.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025

158	Statutory compliance	The company in a time bound manner shall implement this condition. The SEIAA reserve the right to stipulate additional condition, if the same is found necessary.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
159	Statutory compliance	The project authority 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: Being Complied We will follow this strictly.		Date: 17/04/2025
160	Statutory compliance	This environment clearance is valid for seven years from the date of issue.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
161	Statutory compliance	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: Being Complied We will follow this strictly.		Date: 17/04/2025
162	Statutory compliance	Submission of any false or misleading information or data which is material to screening or scooping or appraisal or decision on the application makes this environmental clearance cancelled.
PPs Submission: Being Complied We will follow this strictly.		Date: 17/04/2025
Visit Remarks		
Last Site Visit Report Date:		N/A
Additional Remarks:		i am submitting herewith EC (Environment Compliance) compliance report from M/s. Raks Pharma Private Limited.
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.		