

Date : 05th April 2024

The Integrated Regional Office (IRO),
Ministry of Environment & Forest and Climate Change,
Room No. 407, Aranya Bhawan,
Near CH-3 Circle, Sector – 10 A,
Gandhinagar, Gujarat,
(email-iro.gandhingr-mefcc@gov.in)

GPCB ID: 18441
CPCB ID: temp_12GJ238

Sub: Monitoring & Status Report as per EC No.- SEIAA/GUJ/EC/5(f)/1533/2021 dated 14.10.21 for our project of Expansion of Bulk drug manufacturing capacity at Village Indrad, Kadi, in District Mehsana. Reporting period **October'23- March'24**

- Ref.:** 1. EC granted vide letter no. SEIAA/GUJ/EC/5(f)/1533/2021 dated 14.10.2021.
2. MoEF Notification dtd 26.11.2018 regarding e-submission of EC compliance.
3. MoEF Notification dtd 14.06.2022 regarding submission of EC compliance report through module in Parivesh. Flash Message appearing on Parivesh website for submission of compliance Report for EC (Category B) through Old Process.
4. Our last submission of EC compliance report (April'23 – September'23) dtd.31.10.2023 by email

Dear Sir,

We have been granted Environment Clearance from State Level Environment Impact Assessment Authority (SEIAA), Gujarat, GoG in Oct'21. As per Specific condition no. A.1(4), General condition no.B.3(102), B.3(123) of EC we are hereby submitting the half yearly compliance report to your good office.

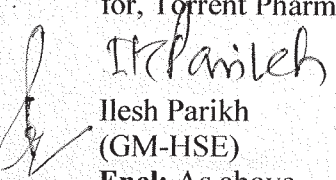
Pls refer our pointwise compliance report as enclosed for period **October'23 to March' 24.**

1. MoEF Data sheet – Annexure – I
2. MoEF EC Condition compliance status report – Annexure – II

As per MoEF OM dated 26.11.18 we are hereby submitting six monthly EC compliance report through Email. Pls note that submission of half yearly EC compliance of Category B Project is not started on Parivesh portal yet.

We hope that you will find above in order and in line of compliance.

Yours faithfully
for, Torrent Pharmaceuticals Ltd.


Ilesh Parikh
(GM-HSE)

Encl: As above.

- cc: 1) The SEIAA, Gujarat (seiaa.gujarat@gmail.com)
2) The State Level Expert Appraisal Committee (SEAC), Gandhinagar (seac2ind@gmail.com)
3) The Zonal Officer, CPCB, Vadodara-23 (ec-rdw.cpcb@gov.in)
4) The Member Secretary, GPCB, Gandhinagar-10. (ms-gpcb@gujarat.gov.in)
5) The Regional Officer, GPCB, Mehsana. (ro-gpcb-mehs@gujarat.gov.in).

TORRENT PHARMACEUTICALS LIMITED

CIN : L24230GJ1972PLC002126

Ahmedabad-Mehsana Highway, Indrad, Tal. Kadi, Dist. Mehsana, India. Phone: +91 2764 233671-75,

Reg. Office : Torrent House, Off Ashram Road, Ahmedabad - 380 009, India. Phone: +91 79 26599000 www.torrentpharma.com

**Monitoring the Implementation of Environmental Safeguards
Ministry of Environment & Forests and Climate Change
Integrated Regional Office (IRO), Gandhinagar, Gujarat**


Monitoring Report (October'23 to March'24)

DATA SHEET

1. Project Type : River – Valley / Mining / Industry / Thermal / Nuclear / Others(specify) : Industry: Expansion of Bulk Drug Unit
2. Name of the Project : Expansion of Bulk Drug Unit within the premises from 58 MTA to 68MTA. (10 MTA API as a single category).
3. Clearance Letter (s) / OM no and date : SEIAA/GUJ/EC/5(f)/1533/2021 Dtd 14.10.2021
4. Location : Torrent Pharmaceuticals Ltd.
Ahmedabad-Mehsana Highway , Village - Indrad, Tal. - Kadi,
 - a) District (s) : Mehsana - 382721
 - b) State (s) : Gujarat
 - c) Location Latitude / Longitude : 23°18'51.08"N 72°26'9.02"E
5. Address for Correspondence :
 - a) Address of the Concerned Chief Engineer (with pin code & Telephone/Telex /Fax Numbers) : Ashish Hajarnis (VP- Works)
Torrent Pharmaceuticals Ltd.
Block/Survey No. 424, 425, 426
Village Indrad, Tal. Kadi,
Ahmedabad-Mehsana Highway,
Dist. Mehsana,
: North Gujarat. Pin – 382 721.
: 02764-233671 to 75
02764-233676
6. Salient Features :
 - a) of the Project : ➤ Capacity expansion of bulk drug production-from 58 MTA to 68MTA.(10MTA API as single category).
 - b) of the Environment Management Plans : ➤ Dedicated ETP for the bulk drug production. Capacity 685 KLD with ZLD.
➤ All process stacks are equipped with suitable scrubber.
➤ Recycled water being used for in-house utilities.
➤ >40% area covered under green belt.

7. Break up of the project area :
- a) Submergence Area : forest & non-forest : N.A.
- b) Others : This expansion is carried out within existing premises in 2,68,000 M² Area. No Additional Land acquired for expansion.
8. Break up of the project affected population with enumeration of those losing houses / dwelling units only agricultural land only, both dwelling units and agricultural land & landless labourers / artisan :
- a) SC, ST / Adivasis : N.A.
- b) Others : N.A.
- (Please indicate whether these figures are based on any scientific and systematic survey carried out or only provisional figures, if a survey is carried out give details and years of survey)
9. **Financial details :** :
- a) Project cost as originally planned and subsequent revised estimates and the year of price reference. : For this expansion. Rs.389.5 Lacs (Basis of price reference year 2021)
- b) Allocation made for environmental management plans with item wise and year wise break-up. : For this expansion new investment for EMP is Rs 267.91 Lacs
- c) Benefit cost ratio / Internal Rate of Return and the year of assessment : -
- d) Whether © includes the cost of environmental management as shown in the above. : --
- e) Actual expenditure incurred on the project so far. : Rs. 389.5 Lacs
- f) Actual expenditure incurred on the environmental management plans so far. : Expenditure incurred in EMP is 267.91 Lacs

10. Forest land requirement : Nil
- a) The status of approval for diversion of forest land for non-forestry use. : N.A.
- b) The status of clearing felling. : N.A.
- c) The status of compensatory afforestation, if any comments on the viability & sustainability of compensatory afforestation programme in the light of actual field experience so far. : N.A.
11. The status of clear felling in non-forest areas (such as submergence area of reservoir, approach roads), if any with quantitative information : N.A.
12. Status of construction : No Additional Construction required for expansion. For expansion existing facility will use.
- (Actual and / or planned)
- a) Date of commencement (Actual and / or planned) : CC& A post EC granted by GPCB on 07.01.2022. Renewal of CCA granted by GPCB on 25/05/22 and amendment to CC &A (for 10 TPH Briquette fired boiler) granted on 25/07/23 and valid upto 31/12/2027.
- b) Date of completion (Actual and / or planned) : CC& A post EC granted by GPCB on 07.01.2022. Renewal of CCA granted by GPCB on 25/05/22 and amendment to CC &A (for 10 TPH Briquette fired boiler) granted on 25/07/23 and valid upto 31/12/2027. Installation of equipment's completed in Dec'21.
13. Reasons for the delay if the project is yet to start : NA
14. Dates of site visits :
- a) The dates on which the project was monitored by the Regional Office on previous occasions, if any. : Visit by Regional Office, GPCB on , 29/11/2023 & 04/03/2024


Ilesh Parikh
(GM-HSE)

EC Compliance Report (October'23 –March'24)

Environment Clearance No. SEIAA/GUJ/EC/5(f)/1533/2021 Dtd 14.10.2021
 (Expansion of Capacity from 58 MTPA to 68 MTPA for Bulk Drug Manufacturing
 as a single Category – Reference MOEF& CC O.M dtd 22-33/2019-IA.III dtd 28.01.21)

| Cond. | Description of Condition | Compliance Status as on 05/04/24 |
|------------|---|---|
| A.1 | Specific Condition | |
| 1 | The Environment Clearance is recommended for the API and Intermediates as a single category instead of an individual category, in line to the MOEF & CC's OM vide file no. 22-33/2019-IA. III dated 28 TH January 2021 as requested by the Project proponent (PP). However, PP shall not exceed the permissible pollution load i.e. Quantity and quality, including composition, of emissions discharges, and solid waste generation from such activity for inclusion in the Prior Environmental Clearance as submitted and committed during presentation. | The pollution load (quantity and quality) will not increase beyond permissible limits. We have obtained CCA renewal from GPCB post EC grant and 10 TPH briquetted fire boiler, dtd 26/05/2022 valid upto 31/12/2027. |
| 2 | PP shall comply conditions of any subsequent amendment or expansion or change in product mix, after the 30 TH 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. | This point is noted for records. |
| 3 | 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. | This point is noted for records |
| 4 | PP shall submit six monthly compliance report of Environmental Clearance without fail and the same shall be critically assessed by regulatory authority. | We have been submitting compliance report six monthly for the period. Last EC compliance report for April 23 to September 23 has been submitted to Regulatory authority through email dtd 31/10/2023. As per MoEF O.M dated 14.06.22 this EC compliance report for said period will upload on Parivesh Website once B category project compliance will active on Parivesh portal . Hence we are submitting to concern regulatory authority through email. As per MoEF Notification 26.11.2018 and on parivesh portal period of compliance is April– Sep and Oct to March Hence we are hereby submitting EC compliance for period of October'23 – March'24. |
| 5 | Total number of products manufacturing shall not exceeding five to six at a given point of time as per the plant capacity shown in plant layout. | We have noted it and it is being followed. |

Torrent Pharmaceuticals Ltd. Indrad

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| <p>(a) R & D products shall be of similar chemistry in line with the EIA Notification vide S. O. 1223 (E) dated 27/03/2020 and the pollution load shall remain the same as committed</p> <p>(b) Project proponent shall not take continuous/commercial production of the R & D materials. Necessary approvals shall be obtained from the concern authorities prior to commercial production of R & D materials.</p> <p>(c) Unit shall submit relevant details of R & D products like raw materials, its safety measures to the regulatory authority before R & D activity.</p> <p>(d) Unit shall submit relevant details of R & D products like different wastes generated (Quantity & Quality) and its management to the regulatory authority within a month of R & D activity.</p> | <p>We have not produced any R & D Products yet.</p> <p>(a) This point is noted</p> <p>(b) This point is noted</p> <p>(c) This point is noted</p> <p>(d) This point is noted</p> <p>Till now there is no production of R & D Products.</p> |
| <p>Unit shall install CEMS [Continuous Emission Monitoring System] 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 also 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. [For Small/Large/Medium (Red Category) & Whichever (Air emission & Effluent discharge) is applicable].</p> | <p>We have Zero Discharge system for API. Treated effluent from API is reuse in Utility. As per CPCB direction dtd 05/02/2014, we have installed online effluent monitoring system along with camera.</p> <p>This is accessible to CPCB/GPCB. The URL is - http://saksham.unitechinstrument.com/</p> <p>Complied.</p> |
| <p>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.</p> | <p>Recovery of the solvent is meeting the condition by arrangement of all well designed hardware and efficient operation. Solvent is handled in closed loop system, Vacuum based operation, leak proof pumps and joints. Operation is supported by latest available and feasible technology.</p> <p>The above arrangement ensures that solvent losses are minimum.</p> <p>Recovered solvent is reused where possible and remaining non reusable qty of recovered solvent is sold to Registered recycler as per EC condition no. 33 with online manifest at GPCB XGN Portal.</p> <p>Complied.</p> |
| <p>Leak Detection and Repair (LDAR) program shall be prepared and implemented as per the CPCB guidelines. LDAR Logbooks shall be maintained.</p> | <p>We have preventive maintenance program in place. Records of it is maintained.</p> <p>Complied.</p> |

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| 10 | <p>The PP shall develop green belt within premises (1,20,000 sq. m i.e. 44.60% of the total plot area) as committed 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.</p> | <p>We have already developed 120000 sq mt area as green belt. Various species of trees are planted and maintained. Complied.</p> |
| 11 | <p>Safety & Health:</p> <p>(a) Unit shall obtain all required permissions from the Narcotics Control Bureau for storage and handling of Acetic Anhydride & any such chemicals.</p> <p>(b) PP shall obtain PESO permission for the storage and handling of hazardous chemicals.</p> <p>(c) PP shall provide Occupational Health Centre (OHC) as per the provisions under the Gujarat Factories Rule 68-U.</p> <p>(d) 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</p> <p>(e) Unit shall adopt functional of operation/ process automation system including emergency response to eliminate risk associated with hazardous process</p> <p>(f) 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.</p> <p>(g) PP shall install adequate fire hydrant system within premises and separate storage of water for the same shall be ensured by PP</p> <p>(h) PP shall take all the necessary steps for control of storage hazards within premises ensuring incompatibility of storage raw material and ensure the storage keeping safe distance as per the prevailing guideline of the concerned authority.</p> <p>(i) 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</p> | <p>(a) Permission from NCB obtained. NCB Copy submitted.</p> <p>(b) We have obtained PESO permission for storage and handling of various hazardous chemicals like Petroleum Class- A, B and C</p> <p>(c) OHC available in plant premise in line with Gujarat Factories rules - 68-U.</p> <p>(d) Fire NOC was obtained as per prevailing Govt of Gujarat Notification. Presently industries are not covered in notification. NOC is not issued to industries.</p> <p>(e) Process Automations like operation of various process equipment through HMI (Human Machine Interface) are provided to avoid human intervention. / PLC and SCADA system is also in place.</p> <p>(f) On site emergency mock drill conducted every six months. Last mock drill conducted on 26/11/23. Copy of Mock drill report is attached as Annexure 3</p> <p>(g) Fire Hydrant system is installed all across the premises with dedicated fire water storage tanks of 04 Hours supply rating</p> <p>(h) Chemical compatibility is ensured while storing raw materials / storages. Compatibility chart is also displayed at prominent location for better understanding.</p> <p>(i) Various necessary steps for human safety within premises are taken like Work Permit System/ Tool Box talk / Area Authorization / On the job training / Process interlocks / Job specific PPEs provision etc</p> <p>Documents/license/permissions copies of above all have been submitted in earlier compliance report for records.</p> |

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| <p>(j) Flame proof electrical fittings shall be provided in the plant premises, wherever applicable.</p> <p>(k) Unit shall never store drum/barrels/carboys of incompatible material/chemical together.</p> <p>(l) Unit shall provide effective isolation for process area and storage of hazardous chemicals.</p> <p>(m) Unit shall provide safety valve & rupture disc to the hydrogenation vessel.</p> <p>(n) Unit shall provide water sprinkler to the ammonia storage area.</p> <p>(o) (1) Unit shall provide effective fire hydrants, water monitors & foam application system at solvent storage tank farm area (2) 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> | <p>(j)Flame Proof electrical fittings are provided inside the plant where hazardous / flammable chemicals are stored / processed.</p> <p>Flame Proof electrical fittings are provided inside the plant where hazardous / flammable chemicals are stored / processed.</p> <p>(k)Only compatible materials are stored together. Chemical compatibility chart is displayed at various locations for safety reasons.</p> <p>(l) There is separate Raw Materials storage facilities (RM Store) and solvent storage area. Both of these areas are provided at separate locations and away from Plants.</p> <p>(m) Safety Valves and rupture discs are provided on process reactors. Breather valves are provided on solvent storage tanks.</p> <p>(n) Ammonia gas cylinders storage area is equipped with water sprinkler system.</p> <p>(o) (1) Solvent storage sheds are provided with foam bladder tanks with sprinkling system inside the shed. Also, such solvent storage shed are surrounded by water monitor and foam monitor as well.</p> <p>(o)(2) Solvent tank farm area is furnished with fire water sprinkling system / Mayura Curtains / Foam trolleys are also provided across the solvent storage tanks.</p> | |
| <p>2</p> | <p>Water</p> | |
| <p>Total water requirement for the project shall not exceed 2134 KLD. Unit shall reuse 522 KLD of treated industrial effluent within premises. Hence. Fresh water requirement shall not exceed 1612 KLD and it shall be met through Sardar Sarovar Narmada Nigam Limited or borewell only.</p> | <p>We are using water within prescribed limits only. Consumption is recorded. Presently we are using surface water available from SSNNL Complied.</p> | |
| <p>PP shall obtain CGWA permission for ground water source i.e. bore well within premises before start production activity for proposed project.</p> | <p>Presently we are using surface water available from SSNNL. Sufficient Quantity of Water is available. We are not using borewells. Complied.</p> | |
| <p>The industrial effluent generation from the project shall not exceed 1015 KLD.</p> | <p>Effluent qty are monitored and recorded. This will not increase above prescribed limits. Complied.</p> | |

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| 15 | <p>Industrial effluent shall be segregated in to two streams (1) Formulation unit effluent (2) API unit effluent and it shall be managed as below.</p> <ul style="list-style-type: none"> • Formulation unit effluent (700 KLD) <ul style="list-style-type: none"> ➤ 525 KLD effluent from formulation unit and 175 KLD, domestic effluent shall be treated in ETP consist of primary, secondary & tertiary treatment unit 700 KLD, treated effluent shall be reused for gardening and plantation purpose within premises after achieving on land discharge norms prescribed by the GPCB • API Unit effluent <ul style="list-style-type: none"> ➤ 490 KLD, effluent from API unit and 90 KLD, domestic effluent shall be in ETP consist of primary, secondary & tertiary treatment units followed by RO 522 KLD , RO permeate shall be reused within premises and 58 KLD. RO reject shall be treated in in-house MEE & ATFD. 41 KLD MEE condensate shall be further treated in ETP. | <p>Effluent generation and discharge/reuse quantity are monitored and recorded.</p> <p>Disposal of the treated effluent is done as per prescribed condition.</p> <p>We have been meeting norms set by GPCB and will continue to follow. Sampling of treated effluent done by GPCB official during their visit.</p> <p>Data are submitted on GPCB Portal (XGN) on monthly basis. Copy of report submitted for February'24 attached as Annexure 4.</p> <p>Complied</p> |
| 16 | <p>Complete Zero Liquid (ZLD) status shall be maintained all the time and there shall be no drainage connection from the premises.</p> | <p>It is complied.</p> |
| 17 | <p>Domestic wastewater generation shall not exceed 265 KL/day for proposed project and it shall be treated in ETP. It shall not be disposed off through soak pit/ septic tank.</p> | <p>Domestic effluent is being treated in ETP and Effluent generation quantity is monitored and record.</p> <p>Data are submitted on GPCB Portal (XGN) on monthly basis. Copy of report submitted for February'24 is attached as Annexure 4.</p> <p>Complied.</p> |
| 18 | <p>During monsoon season when treated effluent of formulation unit 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.</p> | <p>Noted.</p> <p>There is adequate storage for Formulation ETP treated water during heavy rains.</p> <p>We don't discharge treated effluent outside in any case.</p> <p>Complied.</p> |
| 19 | <p>Unit shall provide buffer water storage tank of adequate capacity for storage of treated effluent of formulation unit during rainy days</p> | <p>We have adequate buffer water storage tank for the period of heavy rain.</p> <p>Complied.</p> |
| 20 | <p>Unit shall provide buffer water storage tank of adequate capacity for storage of treated waste water during any shut down of in-house MEE</p> | <p>We have stand by MEE plant.</p> <p>We are having adequate capacity of effluent storage tank.</p> <p>Complied.</p> |

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| 21 | The unit shall provide metering facility at the inlet and outlet of ETP, RO, MEE & ATFD and maintain records for the same. | Yes, ETP, RO, MEE & ATFD qty of all are metered/monitored/quantified to control. It is verified by GPCB officials during their visits. Complied. |
| 22 | Proper logbooks of ETP, RO, MEE & ATFD; reuse/recycle of treated/ untreated effluent; chemical consumption in effluent treatment; quantity & quality of treated effluent; power consumption etc. shall be maintained and shall be furnished to the GPCB from time to time. | Effluent quantity and quality, power, chemical consumption details are updated, recorded and maintained for ETP, RO, MEE & ATFD. Data are submitted to GPCB as and when required. Copy of report submitted for February'24 is attached as Annexure 4 Complied. |
| A.3 | AIR | |
| 23 | 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. | Flue gas and Process gas emission are within prescribed limit. Stack monitoring is done by GPCB officials during their visits. This point is noted and compliance. |
| 24 | Unit shall not exceed fuel consumption for boilers and D G Sets as mentioned in below | We shall ensure that the following fuel consumption limits is not exceeded. Briquette, LSHS, HSD, Natural Gas Data are submitted on GPCB Portal (XGN) on monthly basis. Copy of report submitted for February'24 is attached as Annexure 4 . This point is noted and complied. |
| 25 | Unit shall use approved fuels only as fuel in boilers. | Presently we are using Briquette, LSHS and Natural gas as fuel. CCA amendment for briquette based fuel obtained from GPCB in July'23. Complied. |
| 26 | Unit shall provide adequate APCM with flue gas generation sources as mentioned above | ESP and scrubber is provided as APCM to Briquette fired boiler. Adequate Stack height is provided to boiler Complied. |
| 27 | Unit shall provide adequate APCM with process gas generation sources as mentioned below | Alkali /Water scrubbers are provided with process gas generation source/reactor. Complied. |

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| 28 | <p>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</p> <ul style="list-style-type: none"> • 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. | <ul style="list-style-type: none"> • Work zone monitoring of Dust, Solvent etc parameters are being carried out regularly. Copy of Last report is attached as Annexure – 5. • Further ambient air parameters are monitored monthly by NABL Approved laboratory and reports are being to submitted to GPCB on monthly basis. Copy of February 24 report submitted to GPCB is attached Annexure – 6. • Around 44% of total premises is covered with green belt. Premises is covered with paver blocks and asphalted road hence fugitive emission due to vehicle movement is less. Complied. |
| 29 | <p>Regular monitoring of Volatile Organic Compounds (VOCs) shall be carried out in the work zone area and ambient air</p> | <p>Environmental Monitoring done by NABL/MoEF approved Laboratory and reports are being submitted to GPCB. Copy of report is attached as Annexure – 6. Complied.</p> |
| 30 | <p>For control of fugitive emission, VOCs, following steps shall be followed</p> <ul style="list-style-type: none"> • 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. | <p>Following measures are taken for fugitive emission VOC</p> <ul style="list-style-type: none"> • existing systems are close loop • Existing system have adequate engineering control measures • Existing pumps with mechanical seals • The reactors are provided with reflex condenser. Complied. |

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| <p>Solvent management shall be carried out as follows:</p> <ul style="list-style-type: none"> ✓ Measures shall be taken to reduce the process vapors emissions as far as possible. Use of toxic solvents shall be minimum. All venting equipment shall have vapor recovery system ✓ Reactor shall be connected to adequate chilling system to condensate solvent vapors 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 | <p>Following measures are taken for effective solvent management</p> <ul style="list-style-type: none"> • Primary condenser is having water recirculation and Secondary condenser is having chilled brine as utility. • Mechanical seal pumps are provided. • Well designed with sufficient heat transfer condensers are provided. • Dedicated storage areas are there for all PESO approved solvents with implementation of all safety control measure with flameproof electrical fittings for fire prevention and control • Breather valves are provided on tanks to prevent the vapor loses. • Flame arresters are provided for safety measures. <p>Complied</p> |
| <p>Regular monitoring of ground level concentration of PM10, PM2.5, SO2, NOx, HCl, Cl2, NH3 and VOCs 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.</p> | <p>Ambient air quality is within the standards stipulated by GPCB. Monthly Environmental Monitoring done by NABL/MoEF approved Laboratory and reports are being submitted to GPCB on monthly basis.</p> <p>Copy of report submitted to GPCB as Annexure - 6. Complied</p> |
| <p>SOLID/HAZARDOUS WASTE</p> | |
| <p>All the hazardous/ solid waste management shall be taken care as mentioned in EC.</p> | <p>This point is noted will be complied.</p> |
| <p>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</p> | <p>We ensure that the recyclers of the hazardous having the permission under the rule 09.</p> <p>This point is noted. Its complied.</p> |

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| 35 | 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. | Around > 60 % of total Incinerable/Landfilable/Coprocessing hazardous waste is being sent for Co-processing. We have obtained necessary approval from GPCB. Complied. |
| 36 | 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 | Hazardous waste is disposed to GPCB authorized disposal facility. M/s. Safe Enviro pvt Ltd. For landfill ;M/s. Saurashtra Enviro Project Pvt. Ltd Kutch,, M/s. Ambuja Cement ;M/s. Shree Cement, M/s. Asian Enviro; M/s. Wonder Cement , M/s. Shree Cement; M/s. Detox , M/s. Recycling Solution Pvt. Ltd (RSPL) ; M/s. GEPIL; M/s. Nrupeck; M/s. Roopdhara Industries; The names of the disposal facility are included in CCA granted by GPCB |
| A.5 | OTHER | |
| 37 | The project proponent shall allocate the separate fund of Rs. 4.00 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 | Under CER activity we have chosen to carry out collection of plastic waste from nearby 5 villages. Report submitted to GPCB /MoEF & CC and District collector on 28.03.22. This point is complied. |
| 38 | 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. | Noted and being complied the commitments mentioned in application. |
| B | GENERAL CONDITIONS | |
| B.1 | CONSTRUCTION PHASE | |
| 39 | Water demand during construction shall be reduced by use of curing agents, super plasticizers and other best construction practices. | There is no new construction. Existing building being used. No construction activity is required. |
| 40 | 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. | There is no new construction. Existing building being used. No construction activity is required. |

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| All required sanitary and hygienic measures shall be provided before starting the construction activities and to be maintained throughout the construction phase. | There is no new construction. Existing building being used. No construction activity is required. |
| First Aid Box shall be made readily available in adequate quantity at all the times | There is no new construction. Existing building being used. No construction activity is required. |
| 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 complied in letter and spirit. | There is no new construction. Existing building being used. No construction activity is required. |
| Ambient noise levels shall conform 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. | There is no new construction. Existing building being used. No construction activity is required. |
| 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. | There is no new construction. Existing building being used. No construction activity is required. |
| Safe disposal of waste water and municipal solid wastes generated during the construction phase shall be ensured. | There is no new construction. Existing building being used. No construction activity is required. |
| All topsoil excavated during construction activity shall be used in horticultural / landscape development within the project site. | There is no new construction. Existing building being used. No construction activity is required. |
| 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 neighboring communities. | There is no new construction. Existing building being used. No construction activity is required. |
| 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. | There is no new construction. Existing building being used. No construction activity is required. |
| 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. | There is no new construction. Existing building being used. No construction activity is required. |

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| 51 | "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. | There is no new construction. Existing building being used. No construction activity is required. |
| 52 | "No uncovered vehicles carrying construction material and waste shall be permitted." | There is no new construction. Existing building being used. No construction activity is required. |
| 53 | "No loose soil or sand or construction & demolition waste or any other construction material that cause dust shall be left uncovered. Uniform pilin and proper storage of sand to avoid fugitive emissions shall be ensured." | There is no new construction. Existing building being used. No construction activity is required. |
| 54 | Roads leading to or at construction site must be paved and blacktopped (i.e. - metallic roads). | There is no new construction. Existing building being used. No construction activity is required. |
| 55 | No excavation of soil shall be carried out without adequate dust mitigation measures in place. | There is no new construction. Existing building being used. No construction activity is required. |
| 56 | Dust mitigation measure shall be displayed prominently at the construction site for easy public viewing. | There is no new construction. Existing building being used. No construction activity is required. |
| 57 | Grinding and cutting of building materials in open area shall be prohibited. | There is no new construction. Existing building being used. No construction activity is required. |
| 58 | Construction material and waste should be stored only within earmarked area and road side storage of construction material and waste shall be prohibited. | There is no new construction. Existing building being used. No construction activity is required. |
| 59 | Construction and demolition waste processing and disposal site shall be identified and required dust mitigation measures be notified at the site. (If applicable). | There is no new construction and demolition. Existing building being used. No construction activity is required. |
| B.2 | OPERATION PHASE | |
| B.2.1 | WATER | |
| 60 | The water meter shall be installed and records of daily and monthly water consumption shall be maintained. | Required water meters are installed. Water consumption is being recorded. Data are submitted on GPCB Portal (XGN) on monthly basis. Copy of report submitted to GPCB is attached as Annexure 4 Complied. |
| 61 | 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. | Formulation ETP treated water is being reused in gardening. API treated effluent is recycled and used in utility. ZLD is maintained for the API plant. Complied. |
| B.2.2 | AIR | |

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| | 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 report. | Not applicable. No Spray dryer installed in premises. |
| | 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. | Power outage is rare and hence DG operations are very limited. Air and noise emission are monitored and emission standards are within limit. Complied. |
| | Stack/Vents (Whichever is applicable) of adequate height shall be provided as per the prevailing norms for flue gas emission/Process gas emission. | Adequate height is provided as per the prevailing norms for flue gas emission/Process gas emission. Complied. |
| | All the reactors / vessels used in the manufacturing process shall be closed to reduce the fugitive emission. | All the reactors and vessels are in close loop system for better safety standards and scrubbers are connected to reactors to control of fugitive emission. Complied. |
| R.2.3. | HAZARDOUS / SOLID WASTE | |
| | 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 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. | Noted. Renewal of CCA granted by GPCB on 25/05/22 and valid upto 31/12/2027. All hazardous waste are being handled and disposed off in compliant manner as per Haz Waste Rules 2019. All online records of disposal of haz waste is being maintained in XGN portal of GPCB. Complied. |
| | 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. | Dedicated hazardous waste area with "pucca" and leachate collection system and with shed is constructed at ETP area. Complied. |
| | The unit shall obtain necessary permission from the nearby TSDF site and CHWIF. (Whichever is applicable) | As per existing practice land fillable waste is being send to Coprocessing & TSDF site and incinerable waste is being sent to CHWIF. Necessary permission is available in CCA. Complied. |

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| 69 | 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. | It is noted and complied. Vehicles are fitted with ASI 140 GPS systems. |
| 70 | The design of the Trucks/tankers shall be such that there is no spillage during transportation. | Vehicle is fitted with roll-on /roll-off covers. Trucks/tankers are such there is no spillage during transportation. Only Acceptable and empaneled transportation at HW is hired. This point is noted and being complied. |
| 71 | All possible efforts shall be made for Co- Processing of the Hazardous waste prior to disposal into TSDF/CHWIF. | Around > 60 % of total Incinerable/Landfilable/Coprocessing hazardous waste is being sent for Co-processing. We have obtained necessary approval from GPCB. Complied |
| 72 | 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. | Not applicable. |
| B.2.4 | SAFETY: | |
| 73 | The occupier/manager shall strictly comply the provisions under the Factories Act 1948 and the Gujarat Factories Rules 1963. | The point is noted and complied. |
| 74 | 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. | We are storing hazardous chemicals as per their properties/ characteristics with due safety precautions. On site DMP already prepared, submitted to DISH and implemented. The point is noted and complied. |
| 75 | Main entry and exit shall be separate and clearly marked in the facility. | Separate gate for entry and exit provided in the plant. Noted and complied. |
| 76 | Sufficient peripheral open passage shall be kept in the margin area for free movement of fire tender/ emergency vehicle around the premises. | Motorable roads / Paver blocks are provided across the plan premise for easy movement of fire tender and emergency vehicle as well. Complied. |

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| 77 | Storage of flammable chemicals shall be sufficiently away from the production area. | Production Blocks and Chemical Storages building (Hazardous /flammable chemicals) are separate facility and well away from each other action area. Complied. |
| 78 | Sufficient number of fire extinguishers shall be provided near the plant and storage area. | Sufficient Nos of Fire Extinguishers are installed across the plant premises in line with IS: 2190. Every nooks and corner of entire plant is with fire extinguisher. Complied. |
| 79 | All necessary precautionary measures shall be taken to avoid any kind of accident during storage and handling of toxic/ hazardous chemicals. | Storage and Handling of toxic and hazardous chemicals are being governed through standard operating procedures. Only authorized / well experienced personnel are deployed for such activities. We are certified for ISO 45001 as Occupational Health and Safety. Complied. |
| 80 | 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. | Toxic / Hazardous chemicals are stored as per production planning. Necessary permissions from respective authorities such as PESO, DISH, and District Collector are taken for usage / handling and storage of such chemicals. Complied. |
| | The project management shall ensure to comply with all the environment protection measures, risk mitigation measures and safeguards mentioned in the Risk Assessment report. | This point is noted and complied the measure required for safety as mentioned in RA report. |
| | Only flame proof electrical fittings shall be provided in the plant premises. | Flameproof fittings are provided inside the plant premises wherever required (Like API Production Block / Solvent and other chemicals storage area etc). Complied. |
| | 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. | We have various capacities tanks / containers for various chemicals / solvents etc. The storage is planned to keep inventory level at minimal. Complied. |
| | 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. | Tank Body isolation valves are provided for Above ground solvent storage tanks. Internal dyke valves and secondary containment valves with dykes are provided to contain and control the spillage leakages. Breather valves are installed on tanks Complied. |

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| 85 | Handling and charging of the chemicals shall be done in closed manner by pumping or by vacuum transfer so that minimal human exposure occurs. | Handling and charging of solvents are being executed through closed system (Piping and Pumping system). Complied. |
| 86 | Tie up shall be done with nearby health care unit/ doctor for seeking immediate medical attention in the case of emergency. | We have Occupational Health Central with Doctor/Nurse available 24 x 7, Ambulance van with well-equipped medical facility. Further Tie up with Nearby hospitals (Shraddha – Distance 14 km) is in place for any medical assistance in case of emergency. Complied. |
| 87 | Personal Protective Equipment's (PPEs) shall be provided to workers and its usage shall be ensured and supervised. | Personal Protective Equipment are provided to all working staff and contact worker across the plant. The proper usage of PPEs are being monitored through work permits / safety round etc. Complied |
| 88 | First Aid Box and required Antidotes for the chemicals used in the unit shall be made readily available in adequate quantity. | Well equipped first aid boxes are provided at strategic locations of plant. Antidotes are also kept at OHC for emergency usage. Complied. |
| 89 | Training shall be imparted to all the workers on safety and health aspects of chemicals handling. | All workers have been undergone class room/on job/Virtual training on safety and health aspects of chemicals handling. Complied |
| 90 | 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. | Pre-employment and Periodic employment medical check up of workers are carried out in line with Gujarat Factories Rules and records are maintained by our OHC Dept. Complied. |
| 91 | Transportation of hazardous chemicals shall be done as per the provisions of the Motor Vehicle Act & Rules. | Hazardous chemicals are transported in tankers / vehicles in line with provisions given in Motor vehicle act/rules. Complied. |
| 92 | The company shall implement all preventive and mitigation measures suggested in the Risk Assessment Report. | This point is noted and will comply the measure required for safety as mentioned in RA report. Complied. |
| 93 | Necessary permissions from various statutory authorities like PESO, Factory inspectorate and others shall be obtained prior to commissioning of the project. | Necessary approvals from relevant authorities are obtained (PESO / GPCB / Factories Dept/ C& DM Office etc). Copy of PESO permission is submitted along with previous EC compliance report. Complied. |
| B.2.5 | NOISE: | |

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| <p>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 conform to the standards prescribed under The Environment (Protection) Act, 1986 & Rules.</p> | <p>Ambient Noise level is under control. Monitoring is regularly carried out as per standard operating procedure & records of the same are maintained. Engineering controls are provided for reduction of noise from machines. Complied.</p> |
| <p>2.6 CLEANER PRODUCTION AND WASTE MINIMISATION:</p> | |
| <p>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</p> | <p>Noted. We have full fledged R& D center at Gandhinagar and qualified scientists are there to carry out the CP study. All modern facilities are available there to study carry out for cleaner and waste minimization.</p> |
| <p>The company shall undertake various waste minimization measures such as</p> <ol style="list-style-type: none"> 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 materials substitutes c. Use of automated and close filling to minimize spillages d. Use of close feed system into batch reactors 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 leakage, spillage etc. | <p>This point is being complied</p> <ol style="list-style-type: none"> a) Yes, qty of all active ingredients are metered/monitored/quantified to control. b) Process improvement is ongoing activity and there is no by products in our process c) It is implemented for better safety and spillage control. d) It is implemented for better safety and spillage control. e) Double condensers are provided in reactors. f) Spray jet system is being utilized for equipment cleaning & floor cleaning. g) Implemented at feasible level. h) Steam condensate is utilized in utility. i) Noted and implemented j) Noted and implemented. |
| <p>2.7 GREEN BELT AND OTHER PLANTATION:</p> | |
| <p>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.</p> | <p>As CSR activity our Group has redeveloped 07 gardens in Ahmedabad city. Green belt developed in 1,20,000 m² area as per CPCB guidelines. Around 44% of total premises is used for green belt development. Complied.</p> |

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| 98 | Drip irrigation / low-volume, low-angle sprinkler system shall be used for the green belt development within the premises. | Formulation Treated effluent is reused for Green belt/gardening through efficient sprinkler system. Complied. |
| B.3 | OTHER CONDITION: | |
| 99 | Project proponent shall have to install adequate environment management system as per the CPCB/GPCB directives regarding effluent discharge and air emission. | WE have valid ISO 14001 (Environment Management system) and valid upto 19.12.2025. We have dedicate Effluent Treatment plant and also installed online effluent monitoring system alongwith camera. OCEMS system are calibrated and data are being submitted to CPCB portal quarterly. ESP + Scrubber is provided as APCM with Solid fuel (Briquette) fired boiler. Water/Alkali scrubber are attached to process vent. Complied. |
| 100 | The project proponent shall obtain all required permissions regarding safety and fire and shall report to SEIAA. | Fire protection & detection system have been installed across entire premises. We have approval for firefighting facility from Regional fire brigade Gandhinagar. Fire NOC Copy is being submitted on 01.02.22 along with previous EC compliance report. Complied. |
| 101 | Project proponent shall carry out mock drill as per the guidelines with proper evacuation plan. | Half yearly mock drill carried out and report to be submit to DISH. Last Mock Drill carried out on 26/05/2023. Copy of Last Mock drill report is attached as Annexure-3 . Complied. |
| 102 | The project proponent shall submit six monthly compliance reports to SEIAA & SEAC. | We have been submitting compliance report six monthly for the period. Last EC compliance report for April'23 to September 23 has been submitted to Regulatory authority through email dtd 31/10/2023. As per MoEF O.M dated 14.06.22 this EC compliance report for said period will upload on Parivesh Website once B category project compliance will active on Parivesh portal . Hence we are submitting to concern regulatory authority though email. As per MoEF Notification 26.11.2018 and on parivesh portal period of compliance is April–Sep and Oct to March. Hence we are hereby submitting EC compliance for period of Oct'23 to March'24. |

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| 103 | Integrated Regional Office Gandhinagar of MoEF&CC and GPCB shall monitor all environment, safety & health norms as per the prevailing rules. | Noted. |
| 104 | Unit shall comply all the applicable standard conditions prescribed in Office Memorandum (OM) published by MoEF&CC vide no. F. ko. 22-34/2018-IA.III dated 09/08/2018 for Pharmaceutical and Chemical industries mentioned at (Sr. no. XX). | This point is noted and complied. |
| 105 | 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. | This point is noted and complied. |
| 106 | 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 \geq 50 KLD in line with the prevailing guidelines of SPCB). | Not applicable. We don't use ground water. However at onsite Rain water harvesting wells were developed with 26 Nos Injection wells with large catchment area and inverted umbrella within premises. To conserve the fresh water and recharge ground water level. Storm water drain and recharge well before monsoon are cleaned. |
| 107 | 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. | This is point is noted. We extend our support to local bodies and industries. |
| 108 | Application of solar energy shall be incorporated for illumination of common areas, hitting for gardens and street lighting in addition the provision for solar water heating system shall also be provided. | 1 MW Solar panel system installed at terrace area of premises and solar water heater installed at Canteen terrace. Installed and in operation from July two numbers of 2.7 MW each wind mills and 5.0 MW AC solar power plant at Kalavad of Jamnagar district, Gujarat. The annual renewable generation would be 2.88 crores KWH. Complied |
| | The area earmarked as green area shall be used only for plantation and shall not be altered for any other purpose. | Around 44% of total premises is covered as green area. Area is earmarked for plantation and not used for any other purpose. Noted and complied. |

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| 110 | 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. | This point is noted and complied. |
| 111 | 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. | This point is noted. |
| 112 | In the event of failure of any pollution control system adopted by the unit, the unit shall be safely closed down and shall be restarted until the desired efficiency of the control equipment has been achieved. | This point is noted. |
| 113 | The project authorities must strictly adhere to the stipulations made by the Gujarat Pollution Control Board (GPCB), State Government and any statutory authority. | This point is noted. |
| 114 | During material transfer there shall be no spillages and gullies shall be constructed to avoid mixing of accidental spillages with domestic wastewater or storm water. | We have separate line for effluent and storm water collection. Hence there is no mixing of effluent and storm water. Complied. |
| 115 | Pucca flooring / impervious layer shall be provided in the work areas, chemical storage areas and chemical handling areas to minimize soil contamination. | All areas where process, chemical storage and handling of chemicals carried out is provided with pucca flooring and proper shed. Hence no contact with soil and there is no soil contamination. Complied. |
| 116 | Leakages from pipes, pumps shall be minimal and if occurs, shall be arrested promptly. | Regular preventive maintenance is carried out to prevent leakages. Noted and Complied. |
| 117 | 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. | This point is noted and will follow. |
| 118 | The above conditions will be enforced, inter-alia 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. | This point is noted and complied. |

Torrent Pharmaceuticals Ltd. Indrad


EC Compliance Report (October'23 –March'24)

Environment Clearance No. SEIAA/GUJ/EC/5(f)/1533/2021 Dtd 14.10.2021
(Expansion of Capacity from 58 MTPA to 68 MTPA for Bulk Drug Manufacturing
as a single Category – Reference MOEF& CC O.M dtd 22-33/2019-IA.III dtd 28.01.21)

| | | |
|-----|--|--|
| 119 | 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. | Follow the condition for CSR activity. CSR activity are published in our Annual report and as well as update on our website. URL:https://torrentpharma.com/index.php/site/info/beyondbusiness Complied. |
| 120 | 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. | All committed and recommended actions are complied. |
| 121 | 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. | Dedicated CAPEX and Revenue budget is allocated for implementation of conditions stipulated by SEIAA for EMP every year. Complied. |
| 122 | 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. | Received the EC form SEIAA on dated 14/10/21 (uploaded on Parivesh website on 18/10/21). Advertisement has been published in Gujarat newspaper Sandesh and in Times of India in English language on 21/10/21. Copy is has been submitted through email dtd 01/02/2022 along with EC compliance report for period July'21 –Dec'21. We have sent the information to MoEF IRO office and GPCB vide letter dated 19.11.21. Copy of advertisement and letter has been submitted during previous half yearly compliance report Complied. |
| 123 | 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. | We have been submitting compliance report six monthly for the period. Last EC compliance report for April'23 to September'23 has been submitted to Regulatory authority through email dtd 31/10/2023. As per MoEF O.M dated 14.06.22 this EC compliance report for said period will upload on Parivesh Website once B category project compliance will active on Parivesh portal . Hence we are submitting to concern regulatory authority though email. As per MoEF Notification 26.11.2018 and on parivesh portal period of compliance is April–Sep and Oct to March Hence we are hereby submitting EC compliance for period of Oct'23 to March'24. |

Torrent Pharmaceuticals Ltd. Indrad
EC Compliance Report (October'23 –March'24)
 Environment Clearance No. SEIAA/GUJ/EC/5(f)/1533/2021 Dtd 14.10.2021
 (Expansion of Capacity from 58 MTPA to 68 MTPA for Bulk Drug Manufacturing
 as a single Category – Reference MOEF& CC O.M dtd 22-33/2019-IA.III dtd 28.01.21)

| | | |
|-----|---|--|
| 124 | 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. | We have noted this point. |
| 125 | The project authorities shall also adhere to the stipulations made by the Gujarat Pollution Control Board. | We have been following all conditions given by GPCB. |
| 126 | The SEIAA may revoke or suspend the clearance, if implementation of any of the above conditions is not found satisfactory. | We have noted this point. |
| 127 | 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. | We have noted this point and already taken action for implementation. |
| 128 | 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. | EC received on 14/10/21 (upload MoEF Parivesh portal on 18/10/21) CCA has been granted by GPCB valid upto 31/12/27. Procurement and installation of equipment's are completed. Project started in Jan'22. This report is being sent to MOEF IRO office, CPCB, GPCB, SEIAA. Hence this condition is complied. |
| 129 | This environmental clearance is valid for seven years from the date of issue. | Noted. EC is valid for 7 years. i.e 13/10/2028 CCA obtained based on EC. |
| 130 | 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. | We have noted this point. |
| 131 | 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. | We have noted this point. |


Ilesh Parikh
 (GM-HSE)

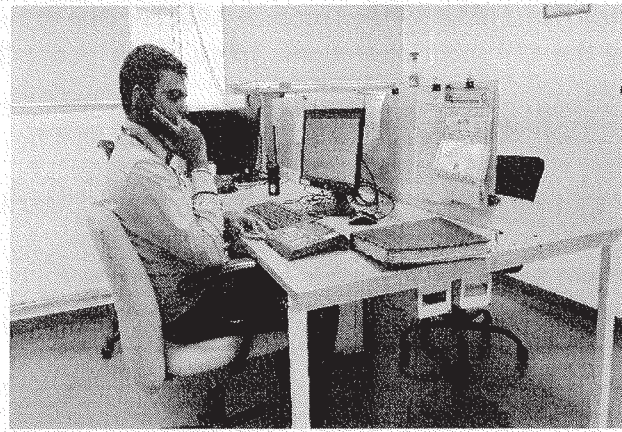


TORRENT PHARMACEUTICALS LIMITED – INDRAD

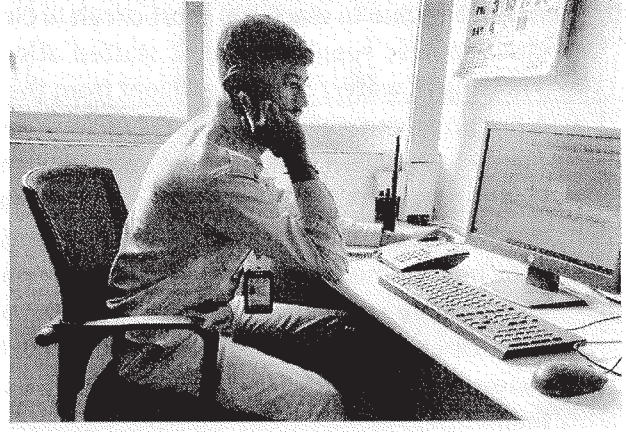
PICTORIAL REPORT OF ONSITE EMERGENCY MOCK DRILL

| | | | |
|--|----------------------|-------------------------|-----------------------|
| Date: 25/11/23 | Day: Saturday | Time: 10:15 Hrs. | Shift: A Shift |
| Location: API-ETP | | | |
| <p>Scenario: Fire due to electrical short circuit in Electrical Panel of MCC Panel room at API-ETP. Due to sudden electrical power supply failure, it started affecting the ETP plant operations. There was a possibility of overflowing of water/ sludge/ effluent from the tanks.</p> | | | |
| <ul style="list-style-type: none"> • A fire broke out due to a short circuit in the electric panel at MCC Panel (Which caters the power supply to Aeration tank blowers and other ancillary equipment) room of API - ETP. • Plant operator (Vishal Zala) and an electrician (Nisarg Patel) were passing by MCC Room and heard the abnormal sound and also had some burning sensation from MCC Panel room. • They both immediately entered the MCC Panel room & saw the fire inside electrical panel. • Immediately an electrician switched off the power supply. • Plant Operator informed about the fire to ETP in charge. ETP in-charge (Shailesh Suthar) acted as Incident Controller (IC) informed this to the safety team and immediately rushed to the spot with his team. • An electrician immediately reported it to the electrical department. He informed about this to the fireman who was performing the maintenance activities of fire extinguisher installed in nearby area. • On receiving the information about this, immediately the team of Electrical and HSE reached the place of the incident. • HSE In charge (Divyesh Mori) with Fire crew rushed to the incident spot. HSE in charge ordered to fireman for fire-fighting. The fireman (Avinash) took CO₂ Fire extinguisher installed near MCC Panel room and operated to extinguish the fire. • At the same time, the Site Main Controller-SMC (Mayur Rawal) and other teams also reached there. • SMC provided guidance to IC, HSE & engineering team. • In case the need for further fighting arose, SMC ordered HSE in charge to keep the Hydrant Hose ready for further fire-fighting. • He instructed engineering in charge (Pankaj Jagani) to stop the power supply and repair the fault immediately and restore the power soon. • As soon as the electrical power supply stopped, it started affecting the ETP plant operations. There was a possibility of overflowing of water/ sludge/ effluent from the tanks and may impact the operation of aeration tank. • SMC instructed IC and other members of the ETP team to check the affected areas in the plant due to sudden power failure including all Effluent collection pit and aeration tank. • Under guidance of IC, various teams of ETP members rushed to the ETP plant and closed all relevant valves (Eg: Steam supply to MEE / Dryer etc) and supplies of tanks & other utilities as required. • SMC along with IC ensured that the valves and supply of the entire plant were closed. • HSE in charge (Divyesh Mori) gave final signal of extinguish the fire completely & situation under control to SMC. SMC raised the all clear signal to all and instructed Engineering team to start overhauling of affected panel. • On extinguishing the fire, Team Engineering (Elect) started the overhauling of panel which took 1.5 Hours and meanwhile, IC kept closed watch on aeration tank performance in absence of compressed air owing to affected panel. • The electrical team sought permission from SMC to restore the power supply after repairing. | | | |

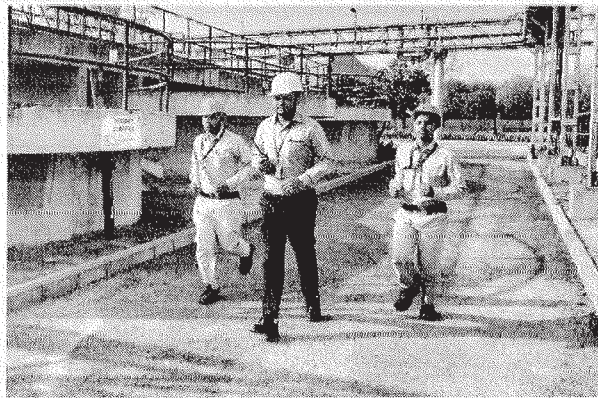
- After checking that the whole situation is under control, SMC allowed engineering in charge to restore the power supply. The electrical team turned the power back on.
- Under guidance of HSE in charge, Fire crew also came out after checking the entire area carefully.
- SMC ordered Incident controller to verify the area and resuming of work followed by Post drill review.



Divyesh Mori (HSE In-charge) receiving the call and arranging fire crew for fire-fighting



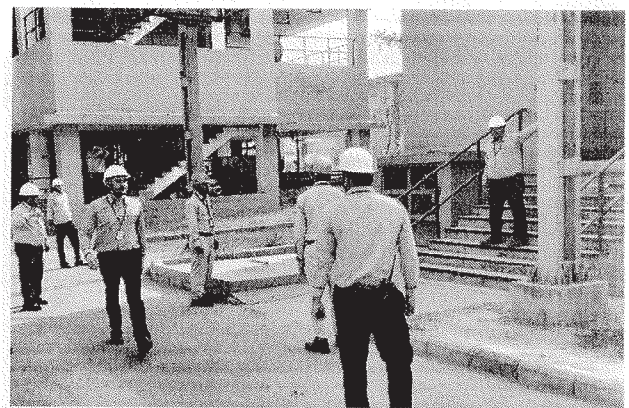
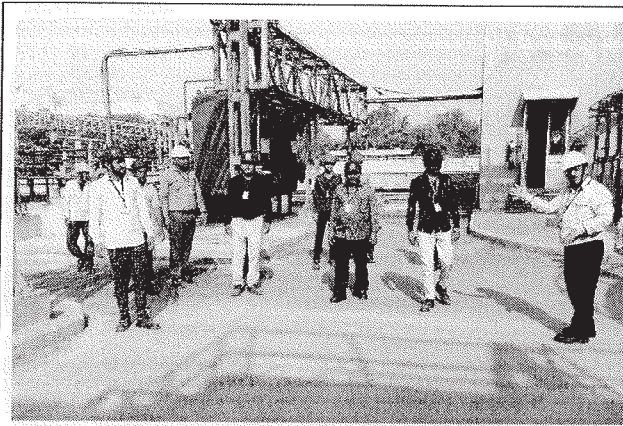
Fire man receiving call on incident from HSE I/c and mobilizing Fire Crew for fire-fighting.



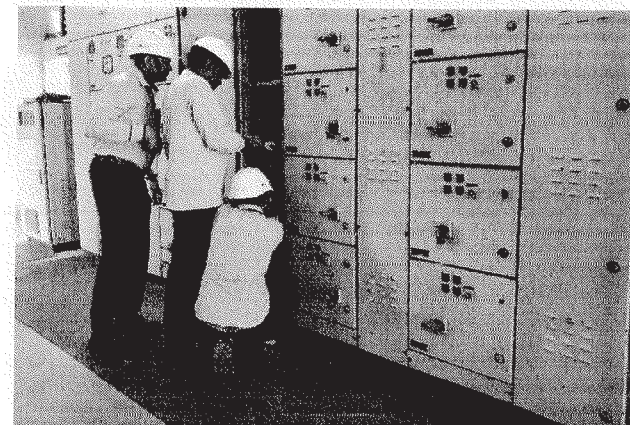
On receiving the information about the incident, immediately the team of Electrical and HSE rushed to the place of the incident



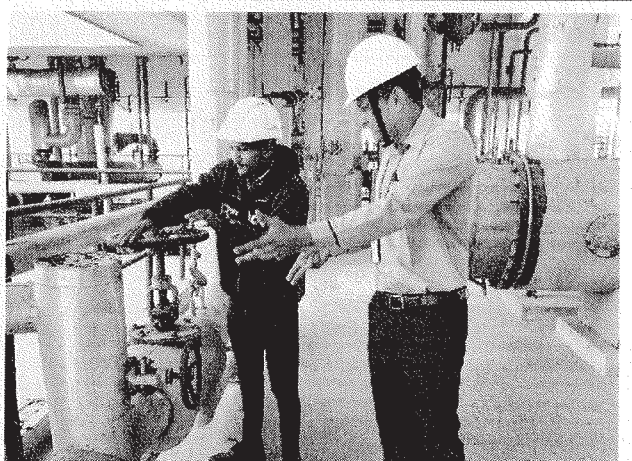
HSE in charge (Divyesh Mori) with Fire crew rushed to the incident spot. He ordered to fireman for fire-fighting. The fireman took CO2 type of fire extinguisher installed near MCC Panel room and tried to extinguish the fire



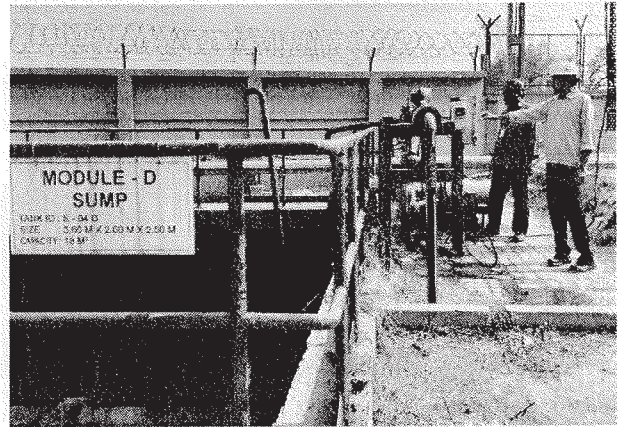
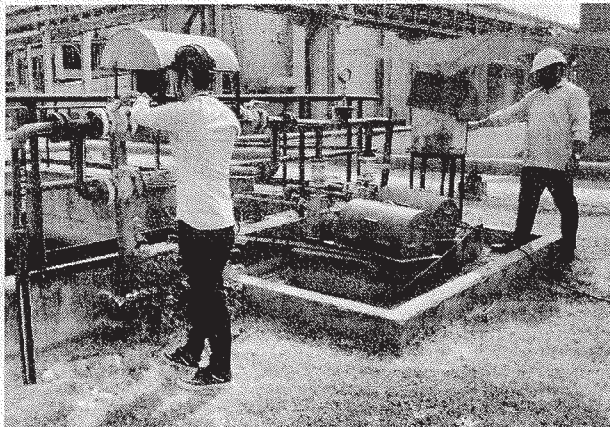
Site Main Controller (Mayur Rawal) and Incident Controller (Shailesh Suthar) with other teams also reached to the spot. SMC provided guidance to the team & also informed to evacuate the area.



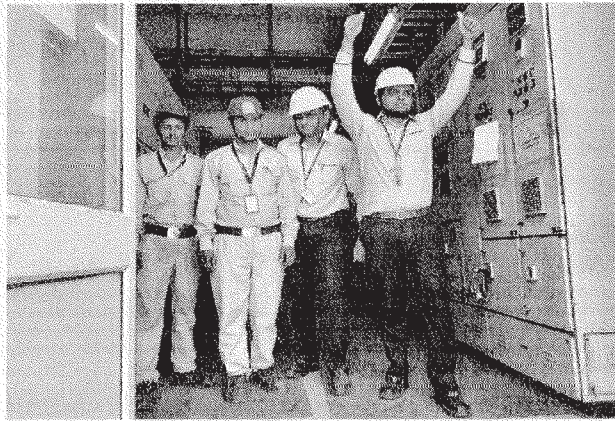
SMC instructed engineering in charge (Pankaj Jagani) to switch off the power supply and repair the fault immediately and restore the power soon. Also SMC ordered HSE in charge to keep the Fire Hydrant Hose ready for further fire-fighting as standby.



SMC instructed IC and other members of the ETP team to check the affected areas in the plant due to sudden power failure.



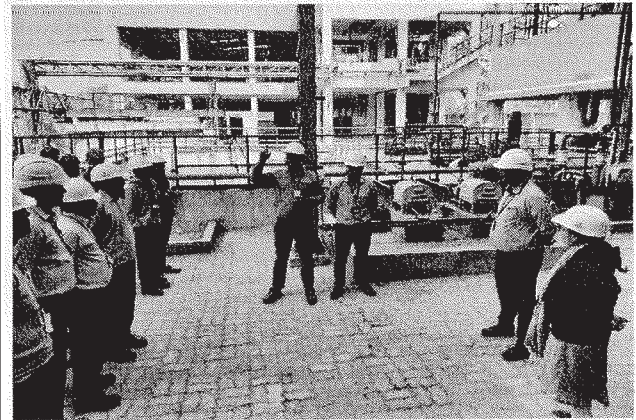
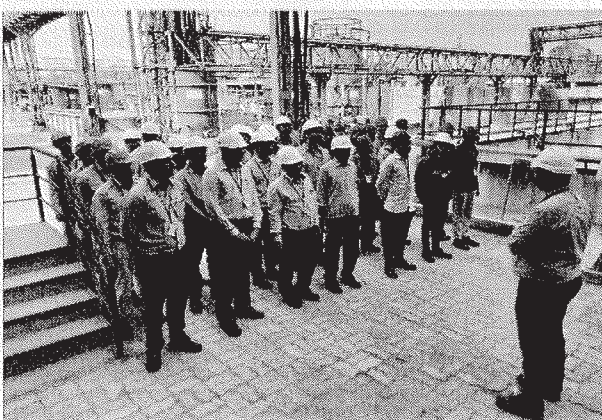
Under guidance of IC, various teams of ETP members went to the ETP plant and closed all relevant valves and supplies of tanks & other utilities as required.



HSE in charge gave final signal of extinguish the fire completely & situation under control to SMC.

Post message from IC and HSE I/c, All Site clearance given by SMC.

POST DRILL REVIEW

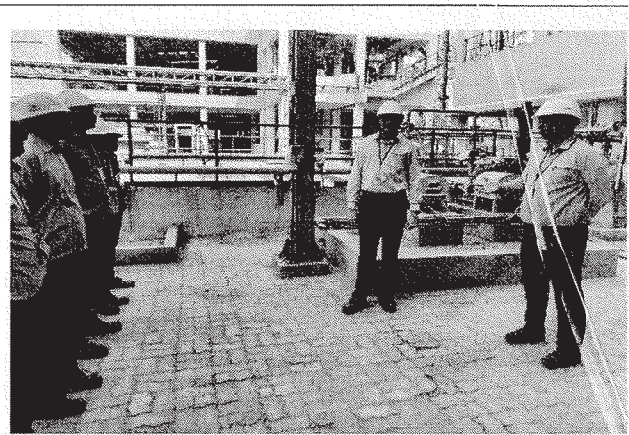


SMC explained about the scenario and basic observations process of each activities performed.

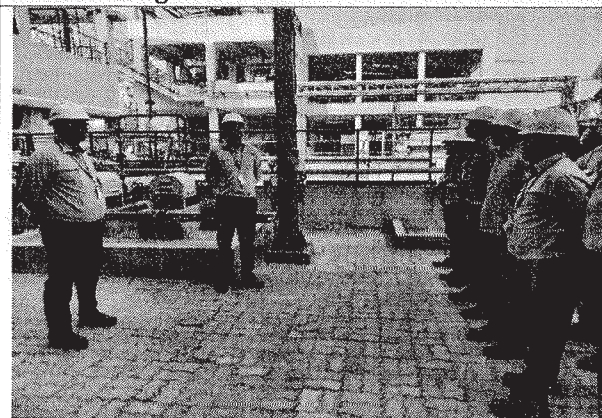
Plant Operator explained team about about the actions taken as first responder.



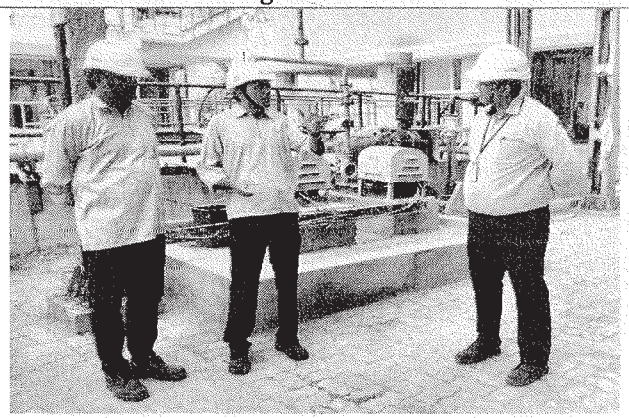
Incident Controller explained about the action taken during Mock Drill



Engineering In charge explained about the role of electrical team during Power Failure



HSE In charge explained about the role of fire crew to extinguish the fire and evacuation procedure.



Team members of ETP explained about their action to close & check the various Utilities which affected due to this power failure of API-ETP.

Mayur Rawal (SMC), Shailesh Suthar (IC), Divyesh Mori (HSE I/C) & Jyoti Mistry (Main Observer) discussed in length about the Positive sides and area of improvement of the mock drill. They congratulated all for delivering exemplary performance in mock drill.

| Head Count Details | | |
|-------------------------------------|--------------|---------|
| Pre – Drill | Post – Drill | Remarks |
| TPL- 11 | TPL- 11 | **** |
| CWs-19 | CWs -19 | **** |
| Conclusion: Head Count tally | | |

**** End of Report ****

Monthly Report from Industry

Form No D

Gujarat Pollution Control Board

February , 202

- 1. Name & address of Industry :** Torrent Pharmaceuticals Ltd.,
Ahmedabad Mehsana Highway, INDRAD, Tal-KADI, Dist-
Mehsana,
INDRAD - 382721
DIST : Mehsana, TAL : Kadi, SIDC : Not In Gide
- 2. Phone No. :** 02764-233671-80
- 3. Date of commencement of Manufacturing process :** 01/03/1988
- 4. CTEs No. & Date :** CEE-122829,09/07/2029
- 5. CCA No. & Date of Expiry :** AH-127931, 31/12/2027
- 6. Water Cess (with Interest) paid up to which Period :** 2017-2018
- 7. Laboratory charges pending if any :** 0
- 8. Water consumed during the month (by all sources) in KL :** Meter Reading=3903845,Kilo Litre=38871
Water Cess Cooling Boiler/Dom/BIO Degrable/Non BIO Degrable : 15694 / 7622 / 15551 / 4
- 9. Electricity consumed in PRODUCTION :** 3286013 **ETP/CETP :** 142928 **APCM :** 10564
- 9A. Stack attached to :** Boiler,D.G. Sets,Fuel Heater(Thermic)
- 10. Fuel consumed during the month :** Agro Waste/Briquettes,Furnace Oil,H.S.D
- 11. Products :** hard cell capsule,tablets,vials
- 12. Work of Control Measures In Progress :** Nothing in Progress
- 13. Upgradation / Addition of PCM is Required :** Nothing Suggested
- 14. HAZ Waste Disposal(in Metric Tonne):** Co-Incineration Waste to other Industry=23.750,Recyclable to Regd Recyclers=87.620,Trucks despatched=20

PCB ID : 18441

N I C

Date : 09/03/2024

1 / 3

Company Seal

Authorised Signatory

Yours Faithfully

Monthly Report from Industry

Form No D2

Gujarat Pollution Control Board

February , 2024

| Type | Code | Name | Qty-Unit | Remark |
|------|-------|-----------------------|-------------------|--|
| FUE | AGR | Agro Waste/Briquettes | 661.000-M.T | |
| FUE | F.O | Furnace Oil | 4100.000-KGS | replace furnace oil with alternate fuel lshs wef may 21. lshs in not in there in selection |
| FUE | HSD | H.S.D | 0.415-KLT | |
| GAS | | HCl | 0.840---- | |
| GAS | | NoX | 4.170---- | |
| GAS | | SOx | 10.890---- | |
| GAS | | SPM | 26.000---- | |
| PRD | 65593 | hard cell capsule | 17048320.000-NOS | |
| PRD | 9873 | tablets | 217242172.000-NOS | |
| PRD | 9892 | vials | 2085348.000-NOS | |

Online Manifest Prepared

| MF ID-Date | Truck No-Date | TSDF Name | H.W Remark / Qty |
|--------------------|-----------------------|-----------|--|
| 2425765-29/02/2024 | GJ06BX4788-29/02/2024 | | Mix Rec. MDC for recycling purpose 21.820 MTS (28.6) |
| 2425468-29/02/2024 | GJ27X7373-29/02/2024 | | Empty Barrel for recycling purpose. 1.170 MTS (33.11-Empty barrels/containers contaminated with hazardous chemicals /wastes) |
| 2424327-28/02/2024 | GJ27X7373-28/02/2024 | | Liners bag for recycling purpose. 1.710 MTS (33.13-liners) |
| 2419478-23/02/2024 | GJ27TT3252-23/02/2024 | | Off Specification Drugs for Co-Processing Purpose 11.930 MTS (28.4) |
| 2417876-22/02/2024 | GJ27X7373-22/02/2024 | | Empty Drums for recycling purpose 0.990 MTS (33.11-Empty barrels/containers contaminated with hazardous chemicals /wastes) |
| 2412846-17/02/2024 | GJ27X7373-17/02/2024 | | Empty drum for recycling purpose. 1.080 MTS (33.11-Empty barrels/containers contaminated with hazardous chemicals /wastes) |
| 2412813-17/02/2024 | GJ16Z0704-17/02/2024 | | Distillation Residue for Pre processing 7.930 MTS (36.1) |
| 2412123-16/02/2024 | GJ01DV9001-16/02/2024 | | Spent solvent for Recycling (Recovered MDC, Recovered DMF & Recovered Mix Solvent) 9.400 MTS (28.6) |
| 2411862-16/02/2024 | GJ27X7373-16/02/2024 | | Liner bag for recycling 1.310 MTS (33.13-liners) |
| 2410703-15/02/2024 | GJ27X7373-15/02/2024 | | Waste liners for scrap (Booties) 1.250 MTS (33.13-liners) |
| 2409828-14/02/2024 | GJ10W6426-14/02/2024 | | Date Expired Medicine for Co-processing 3.920 MTS (28.5) |
| 2408333-13/02/2024 | GJ27X7373-13/02/2024 | | Empty MS & Plastic Drums for recycling purpose 0.680 MTS (33.11-Empty barrels/containers contaminated with hazardous chemicals /wastes) |



Date : 09/03/2024

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Company Seal

Authorised Signatory

Yours Faithfully

Monthly Report from Industry

Form No D2

Gujarat Pollution Control Board

February , 2024

| | | |
|--------------------|-----------------------|--|
| 2405585-10/02/2024 | GJ16W9888-10/02/2024 | Misc Contaminated waste (gloves, Hosepipe etc) for recycling purpose) 2.470 MTS (33.2~Contaminated cotton rags or other cleaning materials) |
| 2404375-09/02/2024 | GJ27X7373-09/02/2024 | Empty Drums for recycling purpose 1.020 MTS (33.11~Empty barrels/containers contaminated with hazardous chemicals /wastes) |
| 2402541-07/02/2024 | GJ27TT6590-07/02/2024 | Mix solvent for recycling purpose. 5.900 MTS (28.6) |
| 2401099-06/02/2024 | GJ27X7373-06/02/2024 | Liners bag (Dull Plastic) for recycling purpose 1.310 MTS (33.13~liners) |
| 2400120-05/02/2024 | GJ06BX4788-05/02/2024 | Spent Solvent Recovered Methanol for Recycling purpose 22.270 MTS (28.6) |
| 2399805-05/02/2024 | GJ27X7373-05/02/2024 | Empty drum for recycling purpose. 1.020 MTS (33.11~Empty barrels/containers contaminated with hazardous chemicals /wastes) |
| 2399798-05/02/2024 | GJ16AU1359-05/02/2024 | Recovered Mix solvent for recycling purpose. 7.540 MTS (28.6) |
| 2397346-02/02/2024 | GJ01DV9001-02/02/2024 | Recovered Solvent for recycling purpose. 6.680 MTS (28.6) |

N I C

Date : 09/03/2024

3 / 3

Company Seal

Authorised Signatory

Yours Faithfully



Gujarat Industrial Safety & Health Services

Authorised & Approved Training Institute of by "Chief Factory Inspector" (DISH), Govt. of Gujarat

D-302, S.G. Business Hub, Nr. Gota Bridge, S.G.Highway. Gota, A,bad-382481. M. 98250 33085 Email: traininginstitutesafety@gmail.com, www.gishs.in

CERTIFICATE NO. TPL/10/2023/018

FORM NO. 37

(Prescribed under Rule 12-B)

Register containing particular of monitoring of working environment
Required under sections 7-A (a) (e).

Company Name and Address

: TORRENT PHARMACEUTICALS LTD.

Ahmedabad-Mehsana Highway, Village: Indrad,
Tal. Kadi, Dist. Mehsana-382721.

Date of Sampling

: 28.10.2023

1. Name of the Department / Plant

: QC LAB AREA

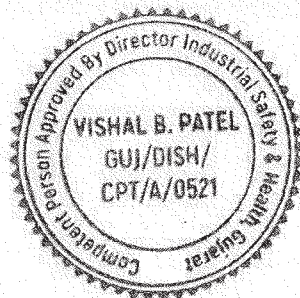
2. Raw material, by Product and Finished products involved in the process.

: ACETONITRILE, METHANOL, IPA,
ACETIC ACID

3. Particulars of sampling.

| Sr. No. | Location/ Operation Mentioned | Identified contaminant | Sampling instrument used | Airborne Contamination | | Average | TWA concentration (As given in second Schedule) |
|---------|-------------------------------|------------------------|--------------------------|------------------------|---------|---------|---|
| | | | | No. of samples | Range | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| 01 | GC ROOM (QB-38) | ACETONITRILE | VOC Sampler (MultiRae) | 01 | 0 (ppm) | 0 (ppm) | 20 (ppm) (ACGIH) |

| Reference method | No. of workers exposed at the location being monitored | Remarks | Signature of person taking samples | Name (in Block Letter) |
|-----------------------------|--|--------------------------------|------------------------------------|------------------------|
| 9 | 10 | 11 | 12 | 13 |
| Real - time sampling method | 02 | Results are well within limits | | SANJAY PANCHAL |



VISHAL B. PATEL
(Competent Person)

(Report Declare as per Standard Lab analysis)

(Special Post)

Annexure-6

Date: 07th March 2024

The Regional Officer,
Gujarat Pollution Control Board,
Plot No. H/3 - A, Phase I
GIDC, Modhera Road,
Mehsana, Gujarat.

GPCB ID 18441

Subject : Monthly Environment Monitoring Reports for the month of
February 2024

Ref. : Our CCA No. AWH-118989, dtd 14.06.22; amended CCA No. AH 127931, dtd
25.07.23, issued vide letter no. 751699, dtd 25.08.23.

Dear Sir,

As per General Conditions of CCA, please find enclosed herewith following monthly
Environment Monitoring Reports for the month of February 2024, carried out by GPCB
approved laboratory.

1. Waste water analysis
2. Ambient Air Monitoring
3. Stack analysis (Flue and Process)
4. Waste

Thanking you,

for Torrent Pharmaceuticals Ltd.



Ilesh Parikh

(GM-HSE)

Encl: As above

EMCH4240151M TWR:4971430624015
SP CHHISRA SD (380729)
Counter Post: 02/03/2024 11:53
To: THE REGIONAL OFFICE, MEHSANA India Post
PIN: 380001, Mehsana (G)
From: TORRENT PHARMA, GWH
Wt: 100gms
Amt: 41.30/(Cash) Tax: 6.30
<Track on www.indiapost.gov.in>

TORRENT PHARMACEUTICALS LIMITED

CIN : L24230GJ1972PLC002126

Ahmedabad-Mehsana Highway, Indrad, Tal. Kadi, Dist. Mehsana, India. Phone: +91 2764 233671-75,

Reg. Office : Torrent House, Off Ashram Road, Ahmedabad - 380 009, India. Phone: +91 79 26599000 www.torrentpharma.com