

**Half Yearly Compliance Report****2024****01 Dec(01 Apr - 30 Sep)****Acknowledgement**

<b>Proposal Name</b>	Expansion project for manufacturing of Adhesives, Sealants and surface treatment products at Plot No.: D-4/1 & D-4/2, MIDC Kurkumbh, Dist. Pune, Maharashtra by Henkel Adhesive Technology India Pvt. LTD		
<b>Name of Entity / Corporate Office</b>	HENKEL ADHESIVE TECHNOLOGIES INDIA PVT. LTD.		
<b>Village(s)</b>	N/A		
<b>District</b>	PUNE		
<b>Proposal No.</b>	SIA/MH/IND2/63284/2015	<b>Category</b>	Industrial Projects - 2
<b>Plot / Survey / Khasra No.</b>	N/A	<b>Sub-District</b>	N/A
<b>State</b>	MAHARASHTRA	<b>Entity's PAN</b>	*****1954B
<b>MoEF File No.</b>	SIA/MH/IND2/63284/2015	<b>Entity name as per PAN</b>	HENKEL ADHESIVES TECHNOLOGIES INDIA PRIVATE LIMITED

**Compliance Reporting Details**

<b>Reporting Year</b>	2024
<b>Remarks (if any)</b>	We are submitting herewith the six monthly EC compliance report for the period April 2024 to September 2024.
<b>Reporting Period</b>	01 Dec(01 Apr - 30 Sep)

**Details of Production and Project Area**

**Name of Entity / Corporate Office** HENKEL ADHESIVE TECHNOLOGIES INDIA PVT. LTD.

	<b>Project Area as per EC Granted</b>	<b>Actual Project Area in Possession</b>
Private	10.0027	10.0027
Revenue Land	0	0
Forest	0	0
Others	0	0
<b>Total</b>	<b>10.0027</b>	<b>10.0027</b>

**Production Capacity**

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	SURFACE TREATMENT PRODUCTS	Tons per Annum (TPA)	31/03/2028	45000 TPA	7644 Tonnes for Six Months	33000 TPA
2	ADHESIVES	Tons per Annum (TPA)	31/03/2028	174250 TPA	17193.64 Tonnes for Six Months	50000 TPA

## Conditions

### Specific Conditions

Sr.No.	Condition Type	Condition Details
1	Risk Mitigation and Disaster Management	PP to ensure compliance of all recommendations of HAZOP and Risk Assessment.
<p><b>PPs Submission:</b> Complied Unit has set up the risk elimination initiatives at required locations. The points highlighting the initiatives are listed in the attached annexure with photographs. Refer Annexure 8A.</p>		Date: 31/12/2024
2	Statutory compliance	PP to submit lay out plan showing internal roads with minimum six meter width and nine meter turning radius, entry/exit gates (preferably sliding gates), provision of cul- de-sac at dead ends of the internal roads if any, location of pollution control equipment, parking areas, 33% green belt (5 meter wide and preferably along the periphery)with its dimensions, rain water harvesting structures (locations with dimensions), storm water drain lines, along with index and area statement showing calculations for each area and cross sections of storm water drain and rain water harvesting pits etc.
<p><b>PPs Submission:</b> Complied The Layout Plan showing required details attached Refer annexure 1.</p>		Date: 31/12/2024
3	Statutory compliance	PP to provide continuous online monitoring system connected to the servers of MPCB and CPCB.
<p><b>PPs Submission:</b> Complied Unit has installed online monitoring system and it is connected to MPCB and CPCB server. The snap is taken for current data from the portal. Refer annexure 2</p>		Date: 31/12/2024
4	Statutory compliance	PP has obtained permission from the CETP for discharge of treated effluent.
<p><b>PPs Submission:</b> Complied Unit has obtained permission from the CETP for discharge of treated effluent. The quantity approval provided in annexure. Refer annexure 3</p>		Date: 31/12/2024
5	Corporate Environmental Responsibility	PP to ensure to utilize CER fund before the commissioning of the manufacturing activity in consultation with the District Collector.
<p><b>PPs Submission:</b> Complied Unit has listed some projects and taken approval from District Collector. Unit has utilized the CER fund for the approved projects and complied all the projects The supporting documents are attached in the annexure for all the projects Refer annexure 4</p>		Date: 31/12/2024
6	GREENBELT	PP to complete green belt development with the provision of drip

		irrigation before the commissioning of the manufacturing activity.
<p><b>PPs Submission:</b> Complied Unit is complying the requirement of 33 percent of green belt of the total area. Attached Plot layout and species of all trees with their numbers are tabulated, around 2966 trees are planted Refer annexure 5A and 5B.</p>		<p>Date: 31/12/2024</p>
7	WATER QUALITY MONITORING AND PRESERVATION	PP to complete rain water harvesting facility before the commissioning of the manufacturing activity.
<p><b>PPs Submission:</b> Complied Unit has set up rain water harvesting facility Record of the rainwater actually harvested during the period April to September 2024 - 1658 M3 Refer annexure 6</p>		<p>Date: 31/12/2024</p>
8	WATER QUALITY MONITORING AND PRESERVATION	PP proposes to provide sewage treatment plant for the treatment of domestic sewage. PP to recycle all treated sewage water.
<p><b>PPs Submission:</b> Complied Unit has set up Sewage Treatment Plant for treatment of domestic sewage. Unit is recycling all treated sewage water. Record of the recycled treated sewage water during the period April to September 2024 - 2721 M3. Refer annexure 7</p>		<p>Date: 31/12/2024</p>
9	MISCELLANEOUS	PP to provide sliding gate at entry and exit to achieve maximum turning radius of vehicle entering the site.
<p><b>PPs Submission:</b> Complied Unit has provided sliding gate at entry Refer annexure 8.</p>		<p>Date: 31/12/2024</p>
10	Statutory compliance	PP submitted MIDC plan approval DE/KUR/PLAN/ E-66939/2021, D Dt. 07/12/2021 with 33% green belt. As per the plan Total plot area of the project is 26400 m2 and green belt is 8961.56 m2 (33.94% of total plot area).
<p><b>PPs Submission:</b> Being Complied Yes, agreed and noted.</p>		<p>Date: 31/12/2024</p>
11	GREENBELT	PP to undertake Miyawaki plantation of native and indigenous trees such as Banyan, Peepal, Neem, Jamun and other suitable trees as per the Forest Department, Govt. of Maharashtra circular no SaVaVi-2019/C.R.3/F-11, dated 25th June, 2019. The said plantation to be completed in the first year of operation of Environmental Clearance under expert guidance of Miyawaki experts / arborist.
<p><b>PPs Submission:</b> Being Complied Unit has planted various trees. Attached Plot layout and class of trees with their numbers, around 2966 trees planted Refer annexure 9A and 9B.</p>		<p>Date: 31/12/2024</p>
12	WASTE MANAGEMENT	PP to strictly observe the Solid Waste Management Rules, 2016 as amended time to time
<p><b>PPs Submission:</b> Complied Unit has membership / agreement with Maharashtra Pollution Control Board authorized vendor for solid waste management. Unit has maintaining Solid waste management norms as per the rule. Unit has Maintained dedicated storage yard for solid waste.</p>		<p>Date: 31/12/2024</p>
13	WASTE MANAGEMENT	PP to strictly observe the Hazardous and Other Wastes (Management & Trans boundary Movement) Rules, 2016 as amended

		time to time.	
<p><b>PPs Submission: Complied</b> Unit strictly take care for the compliance of Hazardous and other wastes as per rule requirement Unit has Maintained dedicated storage yard for Hazardous waste Unit has set up separate compartments for each category waste Unit has set up fire protection system for Hazardous waste yard Unit has membership / agreement with Maharashtra Pollution Control Board authorized vendor for waste management Unit has submitted annual return in Form-IV to Maharashtra Pollution Control Board and MEPL membership certificate. Refer annexure 10A and 10 B</p>			Date: 31/12/2024
14	AIR QUALITY MONITORING AND PRESERVATION	PP to identify all sources of fugitive air pollution on site and provide pollution control measures to mitigate pollution and meet the standard parameters stipulated in the Environment (Protection) Rules, 1986 amended time to time & Air (Prevention and Control of Pollution) Act, 1981 amended time to time.	
<p><b>PPs Submission: Complied</b> Unit has identified the sources of air pollution Unit has set up scrubbing systems to control these emission Unit is conducting periodic environment monitoring for these sources Refer annexure 11</p>			Date: 31/12/2024
15	Risk Mitigation and Disaster Management	PPP to ensure storage of chemicals as per the Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 amended time to time to ensure no release of any chemical to the atmosphere and leakage to the soil.	
<p><b>PPs Submission: Complied</b> Unit has maintained the compliance of Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as below: 1. Unit has provided various auto controls and interlocks for loading and unloading operations for chemical storage 2. Unit has set up dedicated Tank farm for storage of chemicals 3. Unit has set overflow protection controls and other precautions to eliminate the release of chemical to environment 4. The unit has set up cold storage for flammable chemicals 5. Unit has set up dedicated and approved CCOE storage 6. The storage areas are isolated from other areas 7. Unit has set up leak detection system in the storage area at dedicated location. Refer annexure 12</p>			Date: 31/12/2024
16	Risk Mitigation and Disaster Management	PP to ensure transport, storage, handling and use of the flammable/toxic chemicals as per conditions stipulated in license/approval of the Petroleum & Explosive Safety Organization (PESO).	
<p><b>PPs Submission: Complied</b> Unit has set up dedicated Tank farm and Storage areas for storage of flammable/toxic chemicals Unit has set overflow protection and other precautions for transport, storage, handling and use of the flammable/toxic chemicals Unit has set up approval of Petroleum and Explosive Safety Organization (PESO). Refer annexure 13A and 13B.</p>			Date: 31/12/2024
17	Statutory compliance	PP to obtain approval and License from the Directorate of Industrial Health & Safety (DIHS) for proposed project and implement all condition stipulated therein. PP to carry out Safety Audit as stipulated in the Maharashtra Factories Rules, 1963 and ensure compliance of recommendation of the Audit.	
<p><b>PPs Submission: Complied</b> Unit has obtained approval and License from the Directorate of Industrial Health and Safety (DIHS) for proposed project Unit has carried out Safety Audit as stipulated in the Maharashtra Factories Rules, 1963 and same submitted to DISH website as per norms. Refer annexure 14</p>			Date: 31/12/2024
18	ENERGY PRESERVATION MEASURES	PP to provide solar energy for illumination of Administrative Building, Street Lights and parking Area.	

<p><b>PPs Submission:</b> Complied Unit has set up solar system and using generated energy for various purposes The solar Plant capacity is 537 KWP and 157 KWP. Percentage of the electricity saved for the period April 2024 to September 2024 -26 percent of Total energy Refer annexure 15.</p>		<p>Date: 31/12/2024</p>
19	MISCELLANEOUS	PP to ensure use of briquette /bio coal/ pellets/ or any such suitable product derived from scientific processing of appropriate stream of dry waste/agricultural waste, not less than 50% of the total fuel requirement to the boiler.
<p><b>PPs Submission:</b> Being Complied Yes, agreed and noted. FO consumption April 2024 to September 2024 - 453624 Kg</p>		<p>Date: 31/12/2024</p>
20	WATER QUALITY MONITORING AND PRESERVATION	PP to provide roof top Rain Water Harvesting facility
<p><b>PPs Submission:</b> Complied Unit has provided Rain Water Harvesting facility Record of the rainwater actually harvested during the period April to September 2024 - 1658 M3 Refer annexure 16</p>		<p>Date: 31/12/2024</p>
<p><b>General Conditions</b></p>		
Sr.No.	Condition Type	Condition Details
1	Statutory compliance	The Environmental Statement for each financial year ending on 31st March in Form-V as is mandated to be submitted by the Project Proponent to the concerned Pollution Control Board as prescribed under the Environment (Protection) Rule, 1989 as amended from time to time, it shall also be put on the website of the company along with the status of the compliance of the conditions stipulated in the Environmental Clearance letter.
<p><b>PPs Submission:</b> Complied The environmental statement for the financial year ending 31st March in Form-V is submitted by the project proponent to the Maharashtra State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently. Pl refer annexure - 22A and 22B</p>		<p>Date: 31/12/2024</p>
2	Statutory compliance	The project proponent shall advertise at least in two local newspapers widely circulated in the region around the project, one of which shall be in the Marathi language of the local concerned within seven days of issue of this letter, informing that the project has been accorded Environmental Clearance and copies of Environmental Clearance letter are available with the Maharashtra Pollution Control Board, website of the company and may also be seen at Website at <a href="http://parivesh.nic.in">http://parivesh.nic.in</a>
<p><b>PPs Submission:</b> Complied The advertisement of the Environmental Clearance was published in the Lokamat, Pune dated 18th Feb 2022 . Pl refer Annexure 17</p>		<p>Date: 31/12/2024</p>
3	Statutory compliance	The project Proponent shall upload the status of compliance (soft copies) of the conditions stipulated Environmental Clearance letter including monitoring data of air, water, soil, noise etc. on their website and shall update the same periodically. The half yearly compliance report shall simultaneously be submitted to the Maharashtra Pollution Controls Board, SEIAA and the Regional Office off MoEF & CC at Nagpur, on 1st June & 1st December of

		each calendar year.	
<p><b>PPs Submission: Being Complied</b> Unit is regularly submitting six monthly reports on the status of compliance of the stipulated EC conditions including results of monitored data (both in hard copies as well as by e-mail) to (a) the Regional Office of MoEF, (b) the Zonal Office of (i) CPCB and (ii) the SPCB. All the parameters are within limits</p>			Date: 31/12/2024
4	Statutory compliance	.Separate fund shall be allocated for the implementation of Environmental Management Plan along with item wise break up and specific time line for its completion. The cost shall be included as part of the project cost. The funds earmarked for the environmental protection measures shall not be diverted for other purpose and year-wise expenditure should be reported to the MPCB and the SEIAA.	
<p><b>PPs Submission: Complied</b> Separate funds are allocated for implementation of environmental protection measures/EMP along with item-wise breaks-up. These costs are included as part of the project cost. The funds earmarked for the environment protection measures is not being diverted for other purposes. Total 4.96 crore investment has been done that includes STP, WTP, ETP. Refer annexure 18</p>			Date: 31/12/2024
5	Statutory compliance	A separate Environmental Management Cell with qualified personnel shall be set up for implementation of the stipulated environmental safeguards.	
<p><b>PPs Submission: Complied</b> Unit is having separate SHE team for Environment compliance as well safety compliance. A separate Environmental management cell is developed having a Well- equipped laboratory to carry out the environmental management and monitoring functions. Refer annexure 19.</p>			Date: 31/12/2024
6	MISCELLANEOUS	In the event of failure of any pollution control equipment, the manufacturing activity shall be immediately stopped safely till the effective functioning of pollution control equipment's is regained.	
<p><b>PPs Submission: Being Complied</b> Yes, agreed and noted.</p>			Date: 31/12/2024
7	Statutory compliance	PP to strictly follow conditions stipulated in the Consent to Establish/Operate issued by the Maharashtra Pollution Control Board.	
<p><b>PPs Submission: Complied</b> Yes, agreed and noted.</p>			Date: 31/12/2024
8	MISCELLANEOUS	PP to provide separate drains for storm water and effluent, and ensure that, the storm water drains are dry all the time and in no case the effluent shall mix with the storm water drain.	
<p><b>PPs Submission: Complied</b> Unit has provided separate drain for storm water. Unit has set up separate close loop transfer system for effluent with pump and pipeline Refer annexure 19A.</p>			Date: 31/12/2024
9	WATER QUALITY MONITORING AND PRESERVATION	PPeriodic Monitoring of ground water in the study area as marked in the Environmental Impact Assessment Report shall be undertaken and results analysed to ascertain any change in the quality of water. Results shall be regularly submitted to the Maharashtra Pollution Control Board.	
<p><b>PPs Submission: Complied</b></p>			Date:

This is not allowed as per MIDC norms.		31/12/2024
10	Noise Monitoring & Prevention	The overall noise levels in and around the factory premises shall be kept within the prescribed standard under the Environment (Protection) Act, 1986 and Rule, 1989 as amended from time to time by providing adequate noise control measures and protective equipment's like ear muff and ear plug etc.
<b>PPs Submission:</b> Complied Necessary noise control measure is provided to control noise level in and around the plant with acoustic hood, silencers, and enclosures All the employees working in plant premises are provided with earmuffs/ear plugs. Noise level measurement is carried out regularly and the results are found within standards Noise level monitoring records are attached Refer annexure 20		Date: 31/12/2024
11	Risk Mitigation and Disaster Management	Adequate safety measures shall be ensured to limit the risk zone within the factory premises. Leak detection system shall be installed for early detection and mitigation purpose.
<b>PPs Submission:</b> Complied Unit has set up leak detection system at required area Refer annexure 21		Date: 31/12/2024
12	Statutory compliance	PP to scrupulously follow the requirements of Maharashtra Factories Act, 1948 & Rules 1963 as amended from time to time.
<b>PPs Submission:</b> Being Complied Unit follows all the applicable norms as required under Maharashtra Factories Act, 1948 and Rules 1963 as amended from time to time.		Date: 31/12/2024
13	MISCELLANEOUS	TThe environmental clearance is being issued without prejudice to the action initiated under EP Act or any court case pending in the court of law and it does not mean that project proponent has not violated any environmental laws in the past and whatever decision under EP Act or of the Hon'ble court will be binding on the project proponent. Hence this clearance does not give immunity to the project proponent in the case filed against him, if any or action initiated under EP Act.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
14	MISCELLANEOUS	In case of submission of false document and non-compliance of stipulated conditions, Authority/Environment Department will revoke or suspend the Environment clearance without any intimation and initiate appropriate legal action under Environmental Protection Act, 1986.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
15	MISCELLANEOUS	In case of submission of false document and non-compliance of stipulated conditions, Authority/Environment Department will revoke or suspend the Environment clearance without any intimation and initiate appropriate legal action under Environmental Protection Act, 1986.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date:

		31/12/2024
16	MISCELLANEOUS	Validity of Environment Clearance: The environmental clearance accorded shall be valid as per EIA Notification, 2006, amended time to time.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
17	MISCELLANEOUS	In case of any deviation or alteration in the project proposed from those submitted to this department for clearance, a fresh reference should be made to the department to assess the adequacy of the condition(s) imposed and to incorporate additional environmental protection measures required, if any.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
18	MISCELLANEOUS	IThe above stipulations would be enforced among others under the Water (Prevention and Control of Pollution) Act, 1974, the Air (Prevention and Control of Pollution) Act, 1981, the Environment (Protection) Act, 1986 and rules there under, Hazardous Wastes (Management and Handling) Rules, 1989 and its amendments, the public Liability Insurance Act, 1991 and its amendments.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
19	MISCELLANEOUS	IAny appeal against this Environment clearance shall lie with the National Green Tribunal (Western Zone Bench, Pune), New Administrative Building, 1st Floor, D-Wing, Opposite Council Hall, Pune, if preferred, within 30 days as prescribed under Section 16 of the National Green Tribunal Act, 2010.
<b>PPs Submission:</b> Agreed to Comply Yes, agreed and noted.		Date: 31/12/2024
<b>Visit Remarks</b>		
<b>Last Site Visit Report Date:</b>		N/A
<b>Additional Remarks:</b>		The project has not been monitored by the Regional Office of MoEF and CC yet.
<p style="text-align: center;"><b>Note:</b> This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.</p>		