

Your (**Half Yearly Compliance Report**) has been **Submitted** with following details

Proposal No	IA/GJ/IND3/422273/2023
Compliance ID	125729224
Compliance Number(For Tracking)	EC/COMPLIANCE/125729224/2025
Reporting Year	2025
Reporting Period	01 Jun(01 Oct - 31 Mar)
Submission Date	02-05-2025
RO/SRO Name	Shrawan Kumar Verma
RO/SRO Email	kr099.ifs@nic.in
State	GUJARAT
RO/SRO Office Address	Integrated Regional Offices, Gandhi Nagar
Note:- SMS and E-Mail has been sent to Shrawan Kumar Verma, GUJARAT with Notification to Project Proponent.	



Bharat
RASAYAN LIMITED

WORKS : UNIT-II: Plot No. 42/4, Amod Road, GIDC, Dahej, District-Bharuch
Gujarat-392130, Ph.: +91-2641-291123, +91-2642-241100

Ref. BRL-Dahej/DIR/MoEF/2025-26/03

Date: 29.04.2025

To,
Scientific C,
Integrated Regional Office,
Ministry of Environment & Forests
Aranya Bhavan, Sector 10,
Gandhinagar- 382 010

SUB: Submission of six monthly EC Compliance Report for the Period Oct-24 to Mar-25

Ref.: EC granted vide letter F. No. J-11011/961/2008-IA-II(I) dated 15th November, 2023

Dear Sir,

With Reference to above subject, we are submitting herewith the Six-month EC compliance Report for the period October-24 to March-25. Said compliance report is uploaded on Parivesh portal also.

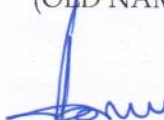
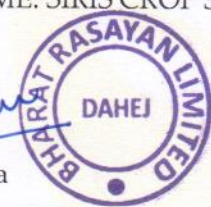
Please find the above in order and acknowledge receipt.

Thanking You,

Yours faithfully,

For **BHARAT RASAYAN LIMITED**

(OLD NAME: SIRIS CROP SCIENCE LTD)

Ajay Gupta

(Director Operation)

Copy to:

1. The Secretary, Department of Environment and Forest, Govt. Of Gujarat, Secretariat, Gandhinagar - 382010.
2. The Chairman, Central Pollution Control board, Parivesh Bhawan, CBD-Cum Office Complex, East Arjun Nagar, New Delhi - 110032.
3. Monitoring Cell, Ministry Of Environment and Forest, Paryavaran Bhavan, CGO Complex, New Delhi - 110003.
4. The Member Secretary, Gujarat Pollution Control Board, Paryavaran Bhavan, Sector - 10A, Gandhinagar - 382010.
5. Scientist F, Zonal Officer, Central Pollution Control Board, West Zone Office, "Parivesh Bhawan", Opp. VMC Ward Office No.10, Subhanpura, Vadodara-390 023, Gujarat

CIN : L24119DL1989PLC036264

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Half Yearly Compliance Report
2025
01 Jun(01 Oct - 31 Mar)

Acknowledgement

Proposal Name		M/s. Bharat Rasayan Limited (Unit-2)	
Name of Entity / Corporate Office		BHARAT RASAYAN LIMITED BRL	
Village(s)		Dahej	
District		BHARUCH	
Proposal No.	IA/GJ/IND3/422273/2023	Category	Industrial Projects - 3
Plot / Survey / Khasra No.	42/4	Sub-District	Vagra
State	GUJARAT	Entity's PAN	*****4127A
MoEF File No.	J-11011/961/2008-IA-II(I)	Entity name as per PAN	BHARAT RASAYAN LIMITED

Compliance Reporting Details

Reporting Year 2025
Remarks (if any)
Reporting Period 01 Jun(01 Oct - 31 Mar)

Details of Production and Project Area

Name of Entity / Corporate Office BHARAT RASAYAN LIMITED BRL

	Project Area as per EC Granted	Actual Project Area in Possession
Private	10.5106	10.5106
Revenue Land	0	0
Forest	0	0
Others	0	0
Total	10.5106	10.5106

Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Cypermethric acid chloride (CMAC)	Tons per Day (TPD)	10/10/2027	2000	706.505	2000
2	Penoxsulam	Tons per Day (TPD)	10/10/2027	100	0.000	100
3	Pymetrozine	Tons per Day (TPD)	10/10/2027	200	97.560	200
4	Thiophanate-Methyl	Tons per Day (TPD)	10/10/2027	500	252.775	500
5	Topramezone	Tons per Day (TPD)	10/10/2027	50	23.219	50
6	Tolfenpyrad	Tons per Day (TPD)	10/10/2027	100	59.940	100
7	Alpha Cypermethrin Technical	Tons per Day (TPD)	10/10/2027	900	243.369	600
8	Cypermethrin Technical	Tons per Day (TPD)	10/10/2027	1800	753.676	1500
9	Diafenthiuron Technical	Tons per Day (TPD)	10/10/2027	800	300.430	800
10	Ethion Technical	Tons per Day (TPD)	10/10/2027	1200	443.017	1200
11	m-Phenoxybenzaldehyde	Tons per Day (TPD)	10/10/2027	3000	1163.028	3000
12	Metsulfuron-methyl Technical	Tons per Day (TPD)	10/10/2027	100	25.380	100
13	Metribuzine Technical	Tons per Day (TPD)	10/10/2027	1200	460	1200
14	Phenthoate Technical	Tons per Day (TPD)	10/10/2027	900	235.417	900
15	Permethrin Technical	Tons per Day (TPD)	10/10/2027	500	102.653	500
16	Chlorimuron Ethyl Technical	Tons per Day (TPD)	10/10/2027	25	10.740	25
17	Diuron Technical	Tons per Day (TPD)	10/10/2027	900	492.540	900
18	Zeta Cypermehrin	Tons per Day (TPD)	10/10/2027	600	16.450	600
19	Ethiprole	Tons per Day (TPD)	10/10/2027	300	2.786	300
20	Acetal of m-phenoxy benzaldehyde (MPBA)	Tons per Day (TPD)	10/10/2027	500	90.000	500
21	Thiamethoxam Technical	Tons per Day (TPD)	10/10/2027	1000	219.360	1000
22	Tembotrione	Tons per Day (TPD)	10/10/2027	200	27.69	200
23	Isopropyl bromide	Tons per	10/10/2027	600	56.845	600

Conditions		
Specific Conditions		
Sr.No.	Condition Type	Condition Details
1	MISCELLANEOUS	The unit shall make the arrangement for protection of possible fire hazards during Manufacturing process in material handling. Fire-fighting system shall be as per the norms.
PPs Submission: Complied Unit have arrangement for Protection of possible fire hazard. Please, see the details of Fire and safety arrangement is attached as Annexure.		Date: 28/04/2025
2	GREENBELT	The PP shall maintain/develop greenbelt over an area of at least 34792.93 m2 (33%) within one year of grant of EC. The saplings (1650 number of trees) selected for the plantation should be of sufficient height, preferably 6-ft. The budget earmarked for the plantation shall be kept in a separate account and should be audited annually. The PP should annually submit the audited statement along with proof of activities viz. photographs (before & after with geo-location date & time), details of expert agency engaged, details of species planted, number of species planted, survival rate, density of plantation etc. to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.
PPs Submission: Complied Unit has already developed greenbelt in an area of 33 percentage i.e. 34792.93 sqm Out of total area of the project. It is a continuous process as more than 9300 plants have been planted. Total Plant area: 105000 M2 Total Build-up Plot area: 45714 M2 Total Greenbelt area: 34792.93 M2 Unit has already planted the 510 number of trees additionally. Green belt photograph is attached as Annexure 1.		Date: 28/04/2025
3	WASTE MANAGEMENT	Industrial Effluent of 1501 m3/day shall be treated through Effluent Treatment Plant (ETP) having Primary, Secondary & Tertiary Treatment, MEE and RO. 150 m3/day cooling tower blowdown shall be treated through RO/Filtration and approx. 130 m3/day RO permeate shall be used as makeup water for cooling tower. 20 m3/day RO reject shall be treated in MEE system. 644 m3/day industrial effluent shall be treated through pre-treatment, stripper and MEE system. 616 m3/day MEE condensate and 828 m3/day industrial effluent shall be treated in ETP. 1439 m3/day shall be treated in ETP by giving tertiary treatment. 739 m3/day ETP treated effluent will be passed through cartridge filter. 117 m3/day shall be used in cooling tower makeup and 622 m3/day to processing, APCM and washing purpose. 700 m3/day ETP treated effluent shall be treated through RO, MEE and approximately 505 m3/day RO permeate and 185 m3/day MEE condensate shall be used for boiler makeup. Domestic effluent of 100 m3/day shall be treated through Sewage Treatment Plant (STP) & treated water shall be used for greenbelt development and maintenance OR mixed with industrial effluent.
PPs Submission: Complied Industrial effluent generation is also less than 1501 m3/day. Effluent stream are segregated into High TDS/COD, Low TDS/COD, and Domestic waste. However High TDS/COD stream has been treated in Stripper column followed by MEE and ATFD. Dilute stream having low TDS/COD has been treated in Biological system followed by MBR and Reverse Osmosis (RO) Plant. RO Permit water has been recycle in Cooling tower make up in utility. Domestic waste has been treated separately in STP plant. Details is attached as Annexure.		Date: 28/04/2025

4	MISCELLANEOUS	As proposed, PP shall explore the possibility of reduction of Coal consumption gradually as primary fuel and replace with green fuel (Natural Gas, Agro-Briquettes).
PPs Submission: Complied Noted		Date: 28/04/2025
5	MISCELLANEOUS	No banned chemicals shall be manufactured by the project proponent. No banned raw materials shall be used in the unit. The project proponent shall adhere to the notifications/guidelines of the Government in this regard.
PPs Submission: Complied Noted. Unit has also submitted undertaking regarding the same.		Date: 28/04/2025
6	ENERGY PRESERVATION MEASURES	The project proponent shall utilize modern technologies for capturing of carbon emitted and shall also develop carbon sink/carbon sequestration resources capable of capturing more than emitted. The implementation report shall be submitted to the IRO, MoEF&CC in this regard.
PPs Submission: Complied Noted.		Date: 28/04/2025
7	Statutory compliance	The project proponent shall comply with the environment norms for Pesticide Industry as notified by the Ministry of Environment, Forest and Climate Change, vide GSR 446(E), dated 13.6.2011 under the provisions of the Environment (Protection) Rules, 1986..
PPs Submission: Complied Noted.		Date: 28/04/2025
8	AIR QUALITY MONITORING AND PRESERVATION	The volatile organic compounds (VOCs)/Fugitive emissions shall be controlled at 99.97 % with effective chillers/modern technology. Regular monitoring of VOCs shall be carried out.
PPs Submission: Complied We have provided two stage condenser system for the process vessels (primary condenser with cooling water and secondary condenser with chilled brine) where solvent recovery operations are carried out. All the solvent tanks are having breather valve and tank vents and condensers are connected to the chillers. All the solvent operations are been in closed loop to prevent losses. Further to control fugitive emissions, we have installed pumps with Carbon phased Mechanical seals with O ring and monitoring the Total VOCs with ION Science meter. We have been provided Chilled brine based condensers.		Date: 28/04/2025
9	MISCELLANEOUS	The storage of toxic/hazardous raw material shall be bare minimum with respect to quantity and inventory. Quantity and days of storage shall be submitted to the Regional Office of Ministry and SPCB along with the compliance report.
PPs Submission: Complied Noted. Main toxic / Hazardous raw material list is attached herewith.		Date: 28/04/2025
10	MISCELLANEOUS	The occupational health center for surveillance of the worker's health shall be set up. The health data shall be used in deploying the duties of the workers. All workers & employees shall be provided with required safety kits/mask for personal protection.

PPs Submission: Complied Photograph of Occupational health are attached in supporting document.		Date: 28/04/2025
11	MISCELLANEOUS	Training shall be imparted to all employees on safety and health aspects for handling chemicals. Safety and visual reality training shall be provided to employees. Action plan for mitigation measures shall be properly implemented based on the safety and risk assessment studies.
PPs Submission: Complied Complied. Training record Details is attached herewith.		Date: 28/04/2025
12	Risk Mitigation and Disaster Management	The solvent management shall be carried out as follows: (a) Reactor shall be connected to chilled brine condenser system. (b) Reactor and solvent handling pump shall have mechanical seals to prevent leakages. (c) Solvents shall be stored in a separate space specified with all safety measures. (d) Proper earthing shall be provided in all the electrical equipment wherever solvent handling is done. (e) Entire plant shall be flame proof. The solvent storage tanks shall be provided with breather valve to prevent losses. (f) All the solvent storage tanks shall be connected with vent condensers with chilled brine circulation.
PPs Submission: Complied A. Yes, we have our own utilities and provided Brine/Chilling condenser and Column to reactors. B. Yes, all the pumps installed in plants are having standard mechanical seal C. Yes, the condensers are having sufficient Heat Transfer Area (HTA) and recovery more than 95 percentage achieving. D. Solvent are stored in a separate space specified with all safety measures. E. Proper earthing are provided in all the electrical equipment wherever solvents handling are done.		Date: 28/04/2025
13	WASTE MANAGEMENT	The PP shall undertake waste minimization measures as below (a) Metering and control of quantities of active ingredients to minimize waste; (b) Reuse of by-products from the process as raw materials or as raw material substitutes in other processes. (c) Use of automated filling to minimize spillage. (d) Use of Close Feed system into batch reactors. (e) Venting equipment through vapor recovery system. (f) Use of high pressure-hoses for equipment cleaning to reduce wastewater generation.
PPs Submission: Complied Complied as we have been undertaken the following waste minimization measures Provided magnetic flow meter for charging with metering pumps. Vent gases re-use for internal other processes and made valuable products. Company use automated material transfer system to minimize spillage in closed loop. Provided closed feed system into batch reactors. Maximize recovery system. We have provided Jet cleaning machine with safety standard to reduce wastewater generation with high cleaning performance.		Date: 28/04/2025
14	MISCELLANEOUS	A separate Environmental Management Cell (having qualified persons with Environmental Science/Environmental Engineering/specialization in the project area) equipped with full-fledged laboratory facilities shall be set up to carry out the Environmental Management and Monitoring functions. PP shall engage Head EHS- Head (R&D) for ETP – Sr. safety and fire officer-manager process safety – Manager Environment- Assistant Manager Environment- Shift Environment Engineer. In addition to this one safety & health officer as per the qualification given in Factories Act 1948 shall be engaged within a month of grant of EC. PP should annually submit the audited statement of amount spent towards the engagement of qualified persons in EMC along with details of person

		engaged to the Regional Office of MoEF&CC before 1st July of every year for the activities carried out during previous year.
PPs Submission: Complied Complied. We are having separate Environmental Management Cell. Please, see the details of Environment Management cell attached as Annexure.		Date: 28/04/2025
15	MISCELLANEOUS	All necessary precautions shall be taken to avoid accidents and action plan shall be implemented for avoiding accidents. The project proponent shall implement the onsite/offsite emergency plan/mock drill etc. and mitigation measures as prescribed under the rules and guidelines issued in the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, and the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996.
PPs Submission: Complied Unit has onsite/offsite emergency plan.		Date: 28/04/2025
16	MISCELLANEOUS	The company shall comply with all the environmental protection measures and safeguard proposed in the documents submitted to the Ministry. All the recommendations made in the EIA EMP in respect of environmental management and risk mitigation measures relating to the project shall be implemented. The budget proposed under EMP is 16 Crore Capital cost and 27.20 Crore per annum Recurring cost shall be kept in separate account and should be audited annually. The PP should submit the annual audited statement along with proof of implementation of activities proposed under EMP duly supported by photographs before after with geo location date and time and other document as applicable to the Regional Office of MoEF and CC before 1st July of every year for the activities carried out during previous year.
PPs Submission: Complied Recurring cost of the EMP for the last Financial year was Rs. 6,59,94,227.02 /-		Date: 28/04/2025
17	MISCELLANEOUS	The Total water requirement shall not exceed 3446 m3 per day of which fresh water requirement of 1787 m3 per day shall be met from GIDC supply. The PP should ensure that water supply should not be above the permissible limit as mentioned in the letter and fresh water shall be withdrawn only after obtaining valid agreement from Concerned Authority. The PP should submit the details of utilization to the Integrated Regional Office IRO MoEF and CC before 1st July of every year for the activities carried out during the previous year.
PPs Submission: Complied As we have consume water consumption less than water requirement of 3446 m3/day. The details of water consumption for the period of Oct-24 to Mar-25 is attached as Annexure.		Date: 28/04/2025

General Conditions

Sr.No.	Condition Type	Condition Details
1	Statutory compliance	The PP shall strictly comply with the rules and guidelines issued under the Manufacture, Storage and Import of Hazardous Chemicals (MSIHC) Rules, 1989, as amended time to time, the Chemical Accidents (Emergency Planning, Preparedness and Response) Rules, 1996, an Hazardous and Other Wastes (Management and Trans-Boundary Movement) Rules, 2016 an other rules notified under

		various Acts.
PPs Submission: Complied Noted and complied		Date: 28/04/2025
2	ENERGY PRESERVATION MEASURES	The energy source for lighting purpose shall be preferably LED based, or advanced having preference in energy conservation and environment betterment.
PPs Submission: Complied For existing plant we are already using LED light, and we will follow it in expansion. Photograph of LED light is attached as Annexure.		Date: 28/04/2025
3	Noise Monitoring & Prevention	The overall noise levels in and around the plant area shall be kept well within the standards by providing noise control measures including acoustic hoods, silencers, enclosures etc. on all sources of noise generation. The ambient noise levels shall conform to the standards prescribed under the Environment (Protection) Act, 1986 Rules, 1989 viz. 75 dBA (day time) and 70 dBA (night time).
PPs Submission: Complied Complied. M/s. Eco Earth Env. Consultancy carries third party analysis. Analysis report are attached herewith. Noise Monitoring Data from Oct-24 to Mar-25 are attached as Annexure.		Date: 28/04/2025
4	Corporate Environmental Responsibility	The company shall undertake all relevant measures for improving the socio-economic conditions of the surrounding area. The activities shall be undertaken by involving local villages and administration. The company shall undertake eco-developmental measures including community welfare measures in the project area for the overall improvement of the environment.
PPs Submission: Complied We undertakes community Welfare measures in the project area for overall improvement of environment. Details of CER activities are attached as Annexure.		Date: 28/04/2025
5	MISCELLANEOUS	The company shall earmark sufficient funds towards capital cost and recurring cost per annum to implement the conditions stipulated by the Ministry of Environment, Forest and Climate Change as well as the State Government along with the implementation schedule for all the conditions stipulated herein. The funds so earmarked for environment management/ pollution control measures shall not be diverted for any other purpose.
PPs Submission: Complied Approx. 16 Crore Capital cost is reserve for Environment Management/Pollution Control Measures and it will not diverted for any other purpose.		Date: 28/04/2025
6	MISCELLANEOUS	A copy of the clearance letter shall be sent by the PP to concerned Panchayat, Zilla Parishad/Municipal Corporation, Urban local Body and the local NGO, if any, from whom suggestions/ representations, if any, were received while processing the proposal.
PPs Submission: Complied Unit has sent copy of clearance to The District collector office-Bharuch and The Mamlatdar office Vagra as per given condition.		Date: 28/04/2025
7	Statutory compliance	The PP shall also upload/submit six monthly reports on Parivesh Portal on the status of compliance of the stipulated Environmental Clearance conditions including results of monitored data to the

		respective Integrated Regional Office of MoEF&CC, the respective Zonal Office of CPCB and SPCB. A copy of Environmental Clearance and six monthly compliance status report shall be posted on the website of the company.
PPs Submission: Complied Half-Yearly Compliance report is successfully submitted on Parivesh Portal as well as to SPCB office. Copy of Half yearly EC Compliance was also uploaded on company website.		Date: 28/04/2025
8	Statutory compliance	The environmental statement for each financial year ending 31st March in Form-V as is mandated shall be submitted to the concerned State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently, shall also be put on the website of the company along with the status of compliance of environmental clearance conditions and shall also be sent to the respective Integrated Regional Office of MoEF&CC by e-mail.
PPs Submission: Complied The environment statement of each financial year ending 31st March in form-v Submitted regularly to the GPCB. Acknowledge copy is attached as Annexure.		Date: 28/04/2025
9	Statutory compliance	The PP shall inform the public that the project has been accorded environmental clearance by the Ministry and copies of the clearance letter are available with the SPCB/Committee and may also be seen at Website of the Ministry and at https://parivesh.nic.in/ . This shall be advertised within seven days from the date of issue of the clearance letter, at least in two local newspapers that are widely circulated in the region of which one shall be in the vernacular language of the locality concerned and a copy of the same shall be forwarded to the concerned Regional Office of the Ministry.
PPs Submission: Complied We have received the EC letter on 15/11/2023 and published the Advertisement in local Newspaper of Gujarat Samachar and Times of India dated 18/11/2023. We have also forwarded the newspaper advertisement copy along with EC copy to the regional office-Bharuch, GPCB Gandhinagar, CPCB Delhi, Central Ground Water Authority- Delhi, IRO Gandhinagar, MOEF and CC-Delhi and Forests and Environment Department-Gandhinagar.		Date: 28/04/2025
10	MISCELLANEOUS	The project authorities shall inform the Regional Office as well as the Ministry, the date of financial closure and final approval of the project by the concerned authorities and the date of start of the project.
PPs Submission: Complied Noted.		Date: 28/04/2025
11	MISCELLANEOUS	This Environmental clearance is granted subject to final outcome of Hon'ble Supreme Court of India, Hon'ble High Court, Hon'ble NGT and any other Court of Law, if any, as may be applicable to this project.
PPs Submission: Complied Noted.		Date: 28/04/2025
12	AIR QUALITY MONITORING AND PRESERVATION	a) Adequate Scrubbers shall be provided to control process emissions viz. Ammonia, HCl, HBr, NaCN, DMA, Cl ₂ , H ₂ S, Br ₂ and SO ₂ . The scrubbing media shall be reclaimed or sent to effluent treatment plant (ETP) for treatment. Efficiency of scrubber shall be monitored regularly and maintained properly. At no time, the

		emission levels shall go beyond the prescribed standards. Methane and Isobutylene shall be diffused by using Nitrogen through Flame arrestor to avoid Formation of explosive mixture.
PPs Submission: Complied Unit has provided all the necessary scrubber to control process gas emission. Unit is complying all the given condition.		Date: 28/04/2025
13	MISCELLANEOUS	PP shall sensitize and create awareness among the people working within the project area as well as its surrounding area on the ban of Single Use Plastic in order to ensure the compliance of Notification published by MOEFCC on 12th August, 2021. A report along with photographs on the measures taken shall also be included in the six-monthly compliance report being submitted to concerned authority.
PPs Submission: Complied Noted.		Date: 28/04/2025
14	MISCELLANEOUS	No further expansion or modifications in the plant, other than mentioned in the EIA Notification, 2006 and its amendments, shall be carried out without prior approval of the Ministry of Environment, Forest and Climate Change/SEIAA, as applicable. In case of deviations or alterations in the project proposal from those submitted to this Ministry for clearance, a fresh reference shall be made to the Ministry/SEIAA, as applicable, to assess the adequacy of conditions imposed and to add additional environmental protection measures required, if any.
PPs Submission: Complied Noted.		Date: 28/04/2025
Visit Remarks		
Last Site Visit Report Date:		20/03/2025
Additional Remarks:		
Note: This acknowledgement is as per the details submitted by project proponent. In no way is this document to be considered as conclusion on any action on the compliance of the project. This is strictly for the project proponent's reference purpose.		