

**Half Yearly Compliance Report****2026****01 Jun(01 Oct - 31 Mar)****Acknowledgement**

<b>Proposal Name</b>	Proposed Expansion in Existing Environmental Clearance of 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 M/s. Henkel Adhesives Technologies India Pvt		
<b>Name of Entity / Corporate Office</b>	HENKEL ADHESIVES TECHNOLOGIES INDIA PRIVATE LIMITED		
<b>Village(s)</b>	Kurkumbh		
<b>District</b>	PUNE		
<b>Proposal No.</b>	SIA/MH/IND3/548669/2025	<b>Category</b>	Industrial Projects - 3
<b>Plot / Survey / Khasra No.</b>	Plot No.: D-4/1 & D-4/2, MIDC Kurkumbh, Dist. Pune, Maharashtra	<b>Sub-District</b>	Daund
<b>State</b>	MAHARASHTRA	<b>Entity's PAN</b>	*****1954B
<b>MoEF File No.</b>		<b>Entity name as per PAN</b>	HENKEL ADHESIVES TECHNOLOGIES INDIA PRIVATE LIMITED

**Compliance Reporting Details**

<b>Reporting Year</b>	2026
<b>Remarks (if any)</b>	Submitting six monthly EC Compliance for the period October 2025 to March 2026.
<b>Reporting Period</b>	01 Jun(01 Oct - 31 Mar)

**Details of Production and Project Area**

**Name of Entity / Corporate Office** HENKEL ADHESIVES TECHNOLOGIES INDIA PRIVATE LIMITED

	<b>Project Area as per EC Granted</b>	<b>Actual Project Area in Possession</b>
Private	12.6427	12.6427
Revenue Land	0	0
Forest	0	0
Others	N/A	N/A
<b>Total</b>	<b>12.6427</b>	<b>12.6427</b>

**Others Area**

Sr. no	Other Name	Area Granted	Area Actual
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## Production Capacity

Sr. no	Product Name	units	Valid Upto	Capacity	Production last year	Capacity as per CTO
1	Adhesives	Tons per Annum (TPA)	31/03/2028	174250	40000.56 tonnes	124250.685
2	Surface Treatment Products	Tons per Annum (TPA)	31/03/2028	45000	11982.42 tonnes	12000
3	Sealant	Tons per Annum (TPA)	31/03/2028	12000	925.40 tonnes	12000

## Conditions

### Visit Remarks

**Last Site Visit Report Date:**

N/A

**Additional Remarks:**

Consent to Operate is attached as an additional annexure.

**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.

## EC Compliance document

Pointwise Compliance to the environmental clearance conditions given in letter no. SEIAA-EC-EC22B021MH157606 dated February 10, 2022.

SR NO	EC CONDITIONS	COMPLIANCE STATUS
1	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.	The Layout Plan showing required details attached as an Annexure 1.
2	PP to provide continuous online monitoring system connected to the servers of MPCB and CPCB.	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 is enclosed as an Annexure 2
3	PP has obtained permission from the CETP for discharge of treated effluent.	Unit has obtained permission from the CETP for discharge of treated effluent. The quantity approval provided in Annexure.3
4	PP to ensure to utilize CER fund before the commissioning of the manufacturing activity in consultation with the District Collector.	Unit has listed some projects and taken approval from District Collector. Unit has utilized the CER fund for the approved projects & compiled all the projects The supporting documents are attached for all the projects are as an Annexure 4.
5	PP to complete green belt development with the provision of drip irrigation before the commissioning of the manufacturing activity.	Unit is complying the requirement of 33 % 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. Details are enclosed as an Annexure 5A & 5B.
6	PP to complete rain water harvesting facility before the commissioning of the manufacturing activity.	Unit has set up rain water harvesting facility Record of the rainwater actually harvested during the period October 2025 to March 2026 - 2413 M3 is enclosed as an Annexure 6.
7	PP proposes to provide sewage treatment plant for the treatment of domestic sewage. PP to recycle all treated sewage water.	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 October 2025 to March 2026 is 4021 M3. The photographs of Sewage Treatment Plant is enclosed as an Annexure 7.
8	PP to provide sliding gate at entry and exit to achieve maximum turning radius of vehicle entering the site.	Unit has provided sliding gate at entry. Photograph is enclosed as an Annexure 8.
9	PP to ensure compliance of all recommendations of HAZOP and Risk Assessment.	Unit has set up the risk elimination initiatives at required locations. The points highlighting the initiatives are listed in the attached annexure with photographs as an Annexure 8A
10	PP submitted MIDC plan approval DE/KUR/PLAN/ E-66939/2021, D Dt. 07/12/2021 with 33% green belt. As	Yes, agreed and noted.

	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).	
11	PP to undertake Miyawaki plantation of native and indigenous trees such as Banyan, Peeple, 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.	Unit has planted various trees. Attached Plot layout and class of trees with their numbers, around 2966 trees planted. Details are enclosed in Annexure 5A and 5B.
12	PP to strictly observe the Solid Waste Management Rules, 2016 as amended time to time.	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. The Photograph is enclosed an Annexure-9.
13	PP to strictly observe the Hazardous and Other Wastes (Management & Trans boundary Movement) Rules, 2016 as amended time to time.	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 The unit has planned to submit the Annual Return in Form-IV for the year 2025–2026 before 30th June 2026 to Maharashtra Pollution Control Board. The Form Iv for FY 2024-25 & MEPL membership certificate is enclosed as an Annexure 10A & 10 B
14	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.	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. The Photographs are enclosed as an Annexuure-11.
15	PP 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.	Unit has maintained the compliance of Manufacture, Storage and Import of Hazardous Chemicals Rules, 1989 as below: <ol style="list-style-type: none"> <li>1. Unit has provided various auto controls and interlocks for loading and unloading operations for chemical storage</li> <li>2. Unit has set up dedicated Tank farm for storage of chemicals</li> <li>3. Unit has set overflow protection controls &amp; other precautions to eliminate the release of chemical to environment</li> <li>4. The unit has set up cold storage for flammable chemicals</li> <li>5. Unit has set up dedicated and approved CCOE storage</li> <li>6. The storage areas are isolated from other areas</li> </ol>

		7. Unit has set up leak detection system in the storage area at dedicated location. Details are enclosed as an Annexure-12.
16	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).	Unit has set up dedicated Tank farm & Storage areas for storage of flammable/toxic chemicals Unit has set overflow protection & other precautions for transport, storage, handling and use of the flammable/toxic chemicals Unit has set up approval of Petroleum & Explosive Safety Organization (PESO). The photograph of Tank farm & PESO License enclosed as an Annexure 13A & 13B.
17	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.	Unit has obtained approval and License from the Directorate of Industrial Health & Safety (DIHS) for proposed project Unit has carried out Safety Audit as stipulated in the Maharashtra Factories Rules, 1963 and same submitted to DIHS website as per norms. Details are enclosed as an Annexure 14.
18	PP to provide solar energy for illumination of Administrative Building, Street Lights and parking Area.	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 October 2025 to March 2026 – 32.86 % of Total energy requirement. The Photograph is enclosed as an Annexure-15.
19	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.	Yes, agreed and noted. FO consumption October 2025 to March 2026 – 453886.90 Kg
20	PP to provide roof top Rain Water Harvesting facility	Unit has provided Rain Water Harvesting facility Record of the rainwater actually harvested during the period October 2025 to March 2026 is 2413 M3
21	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>	The advertisement of the Environmental Clearance was published in the Lokamat, Pune dated 18th Feb 2022, enclosed as an Annexure 17.
22	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.	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. The Parivesh portal acknowledgement is enclosed as an Annexure 16.

23	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.	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. Details are enclosed as an 18A and 18B
24	A separate Environmental Management Cell with qualified personnel shall be set up for implementation of the stipulated environmental safeguards.	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. The environment management cell is enclosed as an Annexure 19.
25	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.	Yes, agreed and noted.
26	PP to strictly follow conditions stipulated in the Consent to Establish/Operate issued by the Maharashtra Pollution Control Board.	Yes, agreed and noted.
27	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.	Unit has provided separate drain for storm water. Unit has set up separate close loop transfer system for effluent with pump and pipeline
28	Periodic 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.	This is not allowed as per MIDC norms
29	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.	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 & the results are found within standards Noise level monitoring records are attached as an annexure 20
30	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.	Unit has set up leak detection system at required area. The screenshot of same is enclosed as an Annexure 21
31	PP to scrupulously follow the requirements of Maharashtra Factories Act, 1948 & Rules 1963 as amended from time to time.	Unit follows all the applicable norms as required under Maharashtra Factories Act, 1948 & Rules 1963 as amended from time to time.

32	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.	The project proponent has planned to submit the Environmental Statement in Form-V for the financial year ending 31st March 2026, before 30th September 2026 to the Maharashtra State Pollution Control Board as prescribed under the Environment (Protection) Rules, 1986, as amended subsequently. The Form V for FY 2024-25 & The details on uploaded previous Environment statements are enclosed as an 22A & 22B.
33	The 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.	Yes, agreed and noted.
34	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.	Yes, agreed and noted.
35	The Environment department reserves the right to add any stringent condition or to revoke the clearance if conditions stipulated are not implemented to the satisfaction of the department or for that matter, for any other administrative reason.	Yes, agreed and noted.
36	Validity of Environment Clearance: The environmental clearance accorded shall be valid as per EIA Notification, 2006, amended time to time.	Yes, agreed and noted.
37	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.	Yes, agreed and noted.
38	The 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.	Yes, agreed and noted.
39	Any 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.	Yes, agreed and noted.