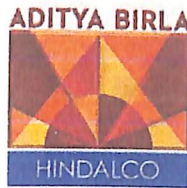


A Report on
Annual Compliance Audit for Ash Disposal
of
Captive Power Plant, Hindalco Industries
Limited, (Unit Birla Copper, Dahej), Village
Lakhigam, Dist. Bharuch – 392 130
(1 × 35 MW + 1 × 60 MW)



[For Financial Year - 2025 – 2026]

Audited by
Department of Civil Engineering
VISVESVARAYA NATIONAL INSTITUTE OF
TECHNOLOGY SOUTH AMBAZARI ROAD,
NAGPUR – 440010



August – 2026

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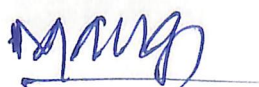
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1.0 INTRODUCTION

The Environment Division at Hindalco Industries Ltd. (Unit: Birla Copper, Dahej) Gujarat reached the CPCB nominated auditor, Dr. Mangesh V Madurwar, Associate Professor, VNIT, Nagpur via mail on 2nd June 2026 requesting a quotation for carrying out the compliance ash audit. The work order for carrying compliance ash audit with PO number 13582330648 was issued on 20th July 2026. After completion of all the formalities the date of audit mutually decided was 07th and 08th August 2026. After a formal introduction of the officials from VNIT and Hindalco Industries the audit commenced on 07th August 2026 around 10:00 a.m.

1.1 Brief description of the Thermal Power Plant

Hindalco Industries Ltd. (Unit: Birla Copper, Dahej) located at Dahej in the Bharuch district of Gujarat, India, is a coal-based thermal power plant in the country with an installed capacity of 95 MW for the operation of the copper manufacturing plant. Hindalco Industries Ltd. comprises of two operating units. Unit 1 has a production capacity of 35 MW and was commissioned in the year May 1999. Unit 3 has a production capacity of 60 MW and was commissioned in the year February 2006. The location of Hindalco Industries Ltd. (Unit: Birla Copper, Dahej) is shown in Figure 1.

Birla Copper unit is an ISO 9001, 14001, 27001, 50001 and OHSAS 18001 certified company, registered on the London Metal Exchange as Grade-A copper brand.

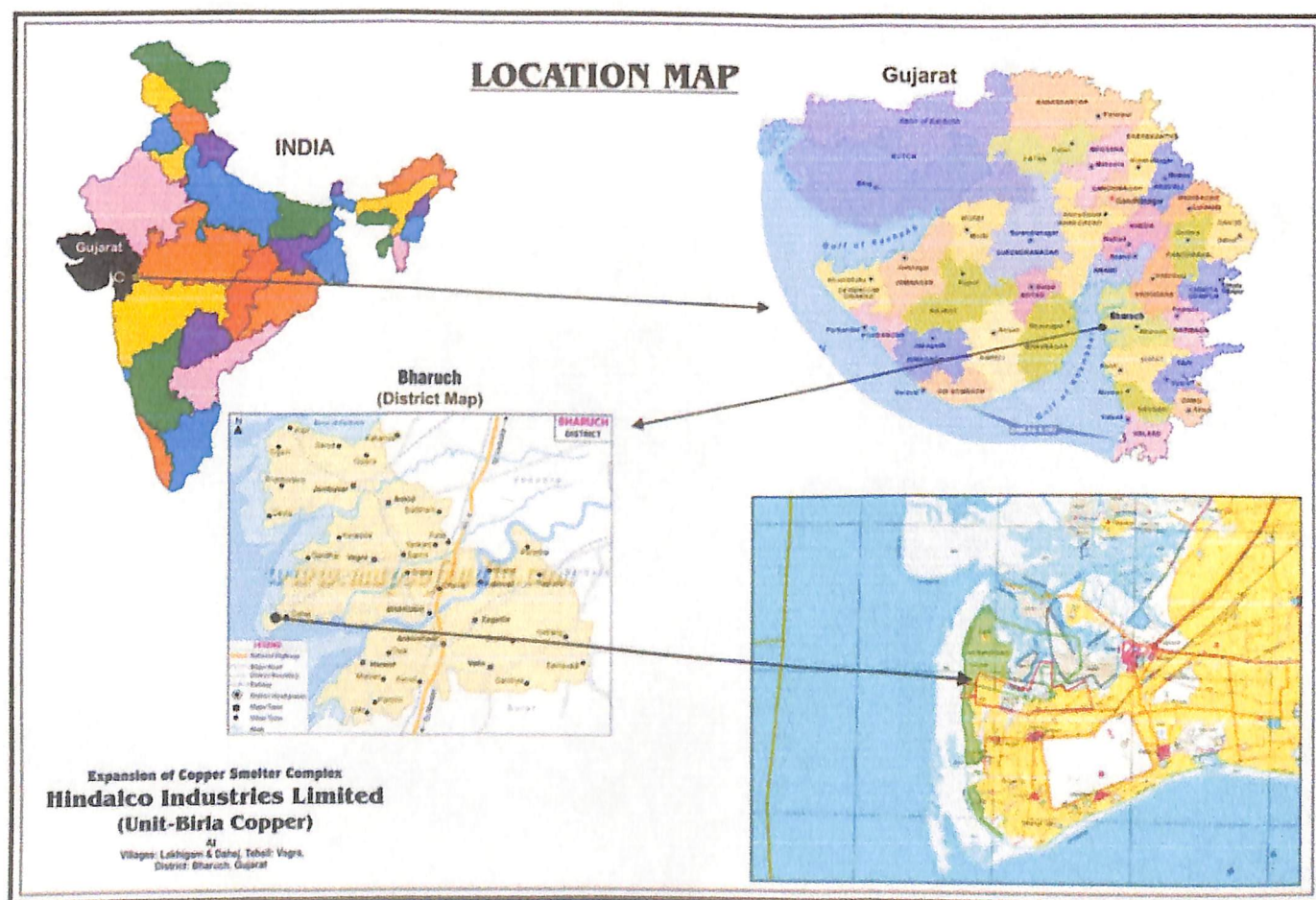


Figure 1: Location of HIL Unit Birla Copper Dahej

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The sitemap of the industry is shown in Figure 2.



Figure 2: Sitemap of Hindalco Industries Limited (Unit Birla Copper) Dahej Bharuch, Gujarat.

Must comprise details/comments on following aspects:

- Name of Thermal Power Plant: Captive power plant 1 & Captive power plant 3 (Hindalco Industries Ltd. (Unit: Birla Copper, Dahej), Bharuch, Gujarat)
- Total Installed Capacity and Unit-wise capacity (MWh): Total Installed capacity 95 MWh
- Unit-01: 35 MW and Unit-03 :60 MW
- The Stage and Unit-wise details of commissioning/ commercial operation date (COD)
Unit -01, 35 MW: commissioned in 06.05.1999
Unit-03, 60 MW: commissioned in 18.02.2006

Purpose of usage (Independent Power Plant supplying electricity to the grid/ Captive Power Plant supplying electricity for self-utilization/ Mixed purpose (with details): Captive Power Plant supplying electricity for self-utilization

- Location with full address:
Plot no. 2,10,11,109P and near road 6
Villages: Lakhigam & Dahej,
Post Office: Dahej, Tehsil: Vagra,
District: Bharuch, Gujarat – 392 130

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- Environmental Clearance (EC) and Consent to Operate (CTO) with date of issuance, validity and specific conditions related to ash generation, utilization/disposal, storage, transportation, etc. Environmental Clearance (EC) vide letter No. F. No. J-11011/927/2008-IA II(I) dated 23.02.2017, wherein Specific Condition No. 13 mandates, "Proper utilization of fly ash shall be ensured as per Fly Ash Notification, 1999 and subsequent amendments in 2003, 2009 and 2016. All the fly ash shall be provided to cement and brick manufacturers for further utilization and Memorandum of Understanding shall be submitted to the Ministry's Regional Office at Chennai." This condition explicitly requires 100% utilization of generated fly ash and submission of executed MoUs with cement/brick manufacturers to the Regional Office, MoEF&CC, Chennai. As of now, Hindalco Industries Limited (Unit: Birla Copper Dahej) is obtaining the environmental clearance from Integrated Regional Office, Gandhinagar. Annexure 9 shows the receipt generated after submission of the half yearly compliance report.

As per the compliance of this condition, the unit ensures 100% utilization of generated fly ash in accordance with the Fly Ash Notification, 1999 and subsequent amendments. The fly ash is effectively utilized in cement and road construction, as well as in manufacturing concrete blocks and bricks.

The project proponent has assured that unit remains committed to sustained compliance and efficient resource utilization while exploring further opportunities for optimizing fly ash management in line with environmental best practices.

Consent to Operate (CTO) issued by the State Pollution Control Board vide CCA No. AWH-108216 dated 30.09.2020, valid up to 02.03.2026 and renewed Consent to Operate (CTO) issued by the State Pollution Control Board vide CCA No. AWH-155156 dated 27.03.2026, valid up to 26.01.2032, wherein Specific Condition E from CCA No. AWH-108216 and Condition F from CCA No. AWH-155156 stipulates: "Unit shall strictly follow the fly ash notification for disposal of Generated Ash." This condition makes it mandatory to comply with the latest MoEF&CC Fly Ash Notification (currently S.O. 254(E) dated 25.01.2016 as amended from time to time) in all matters related to generation, storage, transportation, issuance and utilization of fly ash.

The ash generated at Captive Power Plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)–, Bharuch, Gujarat was found to utilize the ash in accordance with the notifications of Gujarat State Pollution Control Board and Central Pollution Board.

- Operational status during FY: Fully Functional
- **Any other relevant aspect by the Authorized Auditor: Nil**



Table 1: Unit-wise details of TPP

Stage	Unit No.	Capacity (MWh)	COD	Grid connected (IPP) / Captive (CPP) plant	Operational Status during FY
I	01	35	06.05.1999	CPP	Operational
I	03	60	18.02.2006	CPP	Operational
	Total	95			

1.2 Location of the Thermal Power Plant

Must comprise details/comments on following aspects:

- Location including Village(s)/Block/Tehsil, P.O., District, State.:
Plot no. 2,10,11,109P and near road 6 (No plot number assigned)
Villages: Lakhigam & Dahej,
Post Office: Dahej, Tehsil: Vagra,
District: Bharuch, Gujarat - 392130
- Distance from nearby State Highways(s) and NH(s)
SH - 206 (0.5 km in ESE direction)
SH - 6 (2.3 km in ENE direction)
- The exact location and co-ordinates (up to 6 digits after decimal) of the plant, as identified from the Google Earth/Map:

Table 2: Corner Coordinates (in Latitude and Longitude)

Sr. No.	Latitude	Longitude
1.	21°42'06.87"N	72°32'34.06"E
2	21°42'11.56"N	72°32'16.39"E

- The Google Earth image of the nearby areas of the plant

**Figure 3: Google Earth image of plant (area inside the red boundary) and nearby area**

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- Million plus cities, Non-attainment, Critically/Severely/Other Polluted Areas, major cities / towns / municipality, Eco-sensitive Zones (ESZ), Reservoirs, major rivers, etc. located around the plant and their distance (aerial as well as by road) from the plant's ash dyke(s)

Nearest Village: Lakhigam (0.8 km in South direction)

Nearest Railway Station: Dahej Railway station (2.0 km in East direction)

Nearest Airport: Bhavnagar Airport (37 km in West direction)

Surat International Airport (68.4 km in South direction)

Eco sensitive Zones: National Park, Wildlife Sanctuary, Biosphere Reserve, Tiger Reserve, Wildlife Corridors, Reserved / Protected Forest (PF) etc. within 10 km radius

- Dahej Reserved Forest (partly within core zone towards NW Direction)
- Lakhigam Reserved Forest (partly within core zone towards SW direction)
- Luvara Reserved Forest (2.5 km in South direction)

No National Park, Wildlife Sanctuary, Biosphere Reserve, Tiger Reserve, Elephant Reserve falls within 10 km radius of the plant site.

Water Body within 10 km radius

One seasonal drain passing through the plant site (from South towards western direction)

- Lakhigam Lake (0.7 km in South Direction)
- Narmada River (3.0 km in South direction)
- Gulf of Khambhat (3.0 km in West direction)
- Sabarmati Talav (3.5 km in SSE)

Seismic Zone Seismic Zone III (Moderate Seismic Intensity Zone)

- The Google Earth/Maps image of the areas within 10 km radius (aerial) of the plant



Figure 4: 10.0 Km aerial view of captive power plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej) Gujarat

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- Connectivity with the road networks
SH - 206 (0.5 km in ESE direction)
SH - 6 (2.3 km in ENE direction)
- Nearest railway stations and distance from the plant
Nearest Railway Station: Dahej Railway station (2.0 km in East direction)
- Mode of transportation of coal from coal mines (rail: captive or through Indian Railways/road route) to the plant along with %
The captive power plant at Hindalco Industries Ltd. (Unit: Birla Copper, Dahej), Gujarat imports its coal from South Africa. The coal is transported in container ships. The plant has a dedicated jetty, where the coal is unloaded and carried forward through conveyors in the coal stacking yard of Hindalco Industries.
- **Any other relevant aspect by the Authorized Auditors: Yes**
The captive power plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)–, Gujarat uses a mixed fuel source comprising of coal and biomass briquettes. These biomass briquettes are sourced for the local vendors.

Table 3: Location of TPP

	East	West	North	South
Latitude	21°42'1.53"N	21°42'7.05"N	21°42'42.11"N	21°41'49.58"N
Longitude	72°34'16.16"E	72°32'7.84"E	72°33'16.66"E	72°33'17.97"E

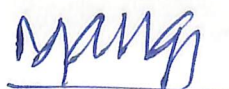
Table 4: Major areas located around the TPP

Name of City/ ESZ / Waterbody etc.	Direction from Ash Pond/dyke	Aerial Distance (km)	Road Distance (km)
Bharuch City	There is no ash pond but a temporary ash storage facility is available within the plant premises. Peripheral wind screens are provided to curb the ash movement with air (Refer Figure 4)	47	52
Lakhigam Lake		0.7	1.3
Gulf of Khambhat		3.0	21
Narmada River		3.0	17

1.3 Annual Compliance Audit

Must comprise details/comments on following aspects:

- Work award details for carrying out Annual compliance audit (with Ref. No., date of issue, and copy of the same)



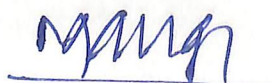
A purchase order was released for conducting the annual compliance ash audit.

Purchase order number: 13582330648

Date of issue: 20th July 2026

Copy of Purchase Order: Refer Annexure 1

- Name and Designation of the Authorised Auditor and other officials, if any
Dr. Mangesh V Madurwar, Associate Professor
- Name of the Institute
Visvesvaraya National Institute of Technology, South Ambazari Road, Nagpur.
- Financial Year of ash utilization for which audit is carried out along with annexing a copy of Annual Implementation Report submitted by the plant to concerned SPCB, MoEF&CC, CPCB, CEA.
Financial Year: 2025 - 2026
- Dates of physical visits of the plant
07th and 08th August 2026
- List of physical/digital records verified for comparing with the information provided by the power plant in the Annual Implementation Report (with attaching documents/images as specimen), including the following:
 - Coal receipts and records of quantity of coal consumption during the period: Yes
Refer ANNEXURE 2 and 3:
ANNEXURE 2 is a coal analysis report provided by SGS South Africa Pvt. Ltd. which shows the quantity of coal procured in the vessel from South Africa to Jetty of Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)– Gujarat.
ANNEXURE 3 includes the total coal and biomass briquettes consumption as fuel source in captive power plant for the financial year 2025-2026.
 - Records for average ash content in coal during the period: Yes
Refer ANNEXURE 2 and 3:
ANNEXURE 2 states the average ash content in coal by the SGS testing services at South Africa for the procured coal.
ANNEXURE 3 states the monthly average ash content in coal (Sr. No: 2) for the financial year 2025-2026. The NABL certificate of the testing lab is attached in ANNEXURE 4 and the Scope is attached in ANNEXURE 5.



ANNEXURE 6 having sample biomass analysis report in month of January 2026, state that ash content in biomass. The testing of biomass is carried out at inhouse laboratory, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)

- Records for ash generation (fly ash and bottom ash) during the period: **Yes**
Refer ANNEXURE 3, Sr. No. 10.
- Records for capacity of dry fly ash silos in comparison to the prescribed capacity: **Yes**
Refer ANNEXURE 7
- Records for ash utilization (fly ash and bottom ash) during the period through ash dispatch records, receipts received from the ash receiving/user agencies/SPCBs prior consent, records of ash usage in the permitted avenues within the plant, etc.: **Yes**
Refer ANNEXURE 8: A copy of tax invoice for ash utilization is attached in ANNEXURE 8
- Records for ash disposal (fly ash and bottom ash) into the ash ponds/dykes and ash evacuated from the ash ponds/dykes for during the period: **No**
The utilization of fly ash and bottom ash was carried out from plant.
- Records for assessment of total ash storage in i) Operational ash ponds/dykes, and ii) Un-operational ash ponds/dykes (ash to be utilized within 10-year time limit), iii) Un-operational ash ponds/dykes (yet to be stabilized and reclaimed with green belt etc. and certified by SPCB), iv) Un-operational ash ponds/dykes (stabilized and reclaimed with green belt etc. and certified by SPCB): **No**

Since the 100% utilization of ash was carried out from plant premises. Hence there was no need of ash disposal into ash ponds. Instead, there was a temporary/emergency ash storage facility with peripheral wind screens. The facility is shown in Figure 4.



Figure 5: Temporary/emergency ash storage facility

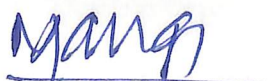
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- Records for assessment of ash slurry disposal (Ash/Water ratio, HCSD/LSD, Water quantity used for slurry preparation) and ash water re-circulation system (AWRS) used during the period: **No** Since the fly ash and bottom ash was 100% utilized in dry form from plant premises, therefore no ash slurry was prepared for disposal into ash ponds. Hence, no ash water recovery plant was seen.
- Records for assessment of ash water discharged into environment, based on inspection of records provided by the power plant, including the condition of surrounding environment in respect of ash released or breached, and actions taken for restoration of environment and status of restoration: **No**
- **Any other relevant aspect by the Authorized Auditors:** The use of temporary ash storage facilities is not recommended, also re-handling of ash is not advised.

1.4 Scope of the Annual Compliance Audit

The scope of the audit as mentioned in the office memorandum of the Central Pollution Control Board IPC-II/TPP/CP-11/76/2022/1252, dated March 06, 2023 is as follows.

1. Verification of ash generation data pertaining to the financial year based on inspection of records of coal receipt/consumption and average ash content in coal, and comparison of this data with the information provided by the power plant in the Annual Implementation Report.
2. Verification of fly ash and bottom ash utilization data pertaining to the financial year based on inspection of records of ash supplied to the user agencies covered under permitted uses/avenues, and comparison of this data with the information provided by the power plant in the annual implementation report.
3. Verification of net ash disposal into ash ponds data pertaining to the financial year 2025-2026 (i.e., difference of ash generation and ash utilization, as above), and comparison of this data with the information provided by the power plant in the annual implementation report.
4. Assessment of total ash storage in operational and un-operational ash ponds and available storage capacity for further disposal at the end of financial year based on details and drawings of ash ponds provided by the power plant and ground verification of the information provided, and comparison of the storage and available storage capacity with the information provided by the power plant in the annual implementation report.
5. Assessment of ash slurry disposal and ash water re-circulation system used during the financial year, in respect ratio of water in the ash disposed to ash ponds, water used for ash slurry disposal to ash ponds, ash water recycled through AWRS, and ash water discharged into environment, based on



inspection of records provided by the power plant and ground verification, including the condition of surrounding environment in respect of ash released or breached, and comparison of the ground situation with the information provided by the power plant in the annual implementation report.

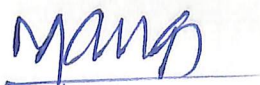
6. Any other relevant aspect by the Authorized Auditors: Nil

2.0 DETAILS OF AUDIT FINDINGS

2.1 Coal receipt/consumption, average ash content in coal and ash generation

Must comprise details/comments on following aspects:

- No. of MW unit's generation during the FY 2025 -2026: 5,89,050.00 MWh
- Average plant load factor (PLF) % and the peak demand % PLF:
Average plant load factor (PLF) %: 71%
Peak demand % PLF: 78%
- Specific coal consumption as per design/operational parameters of the power plant or any other data/calculations: 0.62 Mt/MWh
- Range and average % of ash content in coal as per design/operational parameters of the power plant or any other data/calculations. Sample copies of the test report of ultimate analysis of coal to be attached,
Average annual ash percentage in coal as per testing reports: 20.28%
Average annual ash percentage in biomass as per testing reports: 16.76%
Refer ANNEXURE 2 sample coal analysis report and ANNEXURE 6 sample biomass analysis report of January 2026 used as fuel source in the captive power plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)–, Gujarat.
- Average GCV of coal received from the coal supplying companies:
On as received basis: 5536.4 kcal/kg
Air dry basis: 5886.5 kcal/kg
- Estimated quantity of coal requirement to produce power generated during the FY 2025-2026
Coal consumption: 3,39,436. MT – Refer ANNEXURE 3
Biomass Consumption: 3,830 MT – Refer ANNEXURE 3



- Actual quantity of coal consumption and ash generation during the FY (month wise and annual)

Table 5: Month wise fuel consumption and ash generation for the financial year 2025-2026

Sr. No.	Month	Consumption (MT)			Ash Generation (MT)
		Coal (1)	Biomass (2)	(1) + (2)	
1	April – 25	26289	318	26607	8041
2	May – 25	23984	480	24464	7625
3	June – 25	27339	264	27603	8565
4	July – 25	28832	126	28958	7420
5	August – 25	28008	373	28381	7095
6	September – 25	28848	450	29298	8321
7	October – 25	29964	179	30143	7942
8	November – 25	28004	185	28189	7830
9	December – 25	29111	480	29591	8036
10	January – 26	31937	402	32339	8558
11	February – 26	28398	312	28710	7639
12	March – 26	28722	260.6	28982.6	7136
13	Total	339436	3829.6	343265.6	94206.7

- Verification of the daily/weekly/monthly coal receipt records of the power plant with sample copies to be attached

A sample copy of coal received record is attached in ANNEXURE 2. ANNEXURE 2 is coal analysis report given by SGS South Africa Pvt. Ltd. at South Africa. The report mentions the quantity of coal procured in vessel from South Africa.

- Difference (in MT & %) in estimated vs actual quantity of coal consumption and ash generation and its feasibility

The difference in estimated quantity of coal based on specific coal consumption: 21,945.4 MT (6.39%)

The difference estimated quantity (based on ash percentage from coal analysis report) and actual quantity of ash generation: $94,092.00 - 74,064.79 = 20,027.2$ MT (21.28%)

- % of Fly ash and Bottom ash as per design of ESP/ash evacuation/ash handling units, and difference in reported Fly ash and Bottom ash quantities and its feasibility

Fly ash (percentage): 95%

Bottom ash (percentage): 5%

- Fly ash and bottom ash handling system; Capacity of dry fly ash silos (unit wise and total) in comparison to the prescribed capacity

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Fly ash is evacuated in silos. The evacuation of dry fly ash from silos is carried out through bulkers. The captive power plant is commissioned with two silos. The capacity of first silo is 150 MT and the capacity of another silo is 70 MT. Figure 5 shows the dry fly ash silo. The drawing of silos is enclosed in ANNEXURE 7.

The bottom ash is evacuated from the bottom of the combustor and collected on the floor underneath. After getting cooled the bottom ash is evacuated from the area in dry form.



Figure 6: Dry fly ash silo at captive power plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej), Gujarat

- Any other relevant aspect by the Authorized Auditors: Adequate protective measures shall be implemented during the evacuation of ash from the silos into bulkers/trucks to minimise fugitive ash emissions. The existing arrangement may result in the dispersion of ash into the surrounding environment and nearby premises during periods of high wind, thereby increasing the potential for air pollution and environmental nuisance.

2.2 Utilization of fly ash, bottom ash and legacy/previously stored ash

Must comprise details/comments on following aspects:

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- Separate as well as combined tables for quantity of fly ash, bottom ash and legacy/previously stored ash utilization during the FY (areas of usage/avenue wise) to be made which shall include utilization in only prescribed areas/avenues of usage.

The generated fly ash in a month was evacuated during that particular month. Same is the case of bottom ash utilization. There is no legacy ash with the captive power plant at Hindalco Industries Ltd. (Unit: Birla Copper, Dahej) Gujarat. Please refer ANNEXURE 3.

Table 6: Month wise fly ash and bottom ash evacuation data for utilization

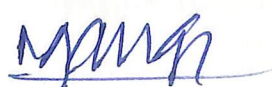
Sr. No.	Month	Total Ash (MT)= Fly Ash + Bottom Ash
1	April – 25	8041
2	May – 25	7625
3	June – 25	8565
4	July – 25	7420
5	August – 25	7095
6	September – 25	8321
7	October – 25	7942
8	November – 25	7830
9	December – 25	8036
10	January – 26	8558
11	February – 26	7639
12	March – 26	7136
13	Total	94206.7

- Major fly ash receiving units and their proximity with the power plant (i.e. with approximate distance): Cement Plants, Brick Manufacturers & Road Construction
- Records for fly ash utilization during the period through ash dispatch records, receipts/declaration received from the ash receiving/user agencies, records of ash usage in the permitted avenues within the plant, etc. shall be verified physically and sample records to be attached as Annexure.

The records of dry fly ash and bottom ash utilization were made available by the plant officials. A tax invoice copy of ash sale is shown in ANNEXURE 8.

- Quantity of storage/disposal of unutilized fly ash into the ash ponds/dykes or in silos or any other area.

The fly ash and bottom ash on monthly basis is evacuated from the plant premises. Therefore, there is not unutilized fly ash and bottom ash. Since the utilization is 100% from the plant premises there is no provision of ash pond. Instead, an emergency/ temporary ash storage facility is provided in the



plant premises. The storage facility is provided with peripheral wind screens to avoid movement of ash due to blowing air. The emergency/ temporary ash storage facility is shown in Figure 4.

- Summary about total current ash utilization during the FY and compliance against the prescribed minimum annual % utilization target.

Table 7: Summary of total current ash utilization in the FY 2025 – 2026

Details	Quantity of Ash Generated (MT)	Quantity of Ash Utilized (MT)	Balance Quantity of Ash (MT)
Current Ash (FY 2025 – 2026)	94206.7	94206.7	0
Legacy Ash	0	0	0
Total	94206.7	94206.7	0

- Estimated amount of environmental compensation for not meeting prescribed minimum annual % utilization target
No environmental compensation shall be levied as the utilization of ash is 100%.
- Summary about cumulative ash utilization during the ongoing compliance cycle till this FY (i.e. ash utilized/unutilized during last 1st year onward (i.e. 2022-23, 2023-24...)).

Table 8: Summary of ash utilization from FY 2022 – 2023 till FY 2025-26

Financial Year	Utilization of Ash (%)
2022 – 2023	100
2023 – 2024	100
2024 – 2025	100
2025 - 2026	100

- Estimated amount of environmental compensation for not meeting the prescribed % utilization target during the compliance cycle.
No environmental compensation shall be levied as the utilization of ash is 100% every year.
- **Any other relevant aspect by the Authorized Auditors: Nil**

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2.3 Ash Disposal into Ash Ponds/Dykes in the FY

The utilization of ash at captive power plant, Hindalco Industries Ltd. (Unit: Birla Copper, Dahej)–, Gujarat was found 100% from the plant premises on dry basis. Therefore, the details of the present and the upcoming sections are not applicable (NA).

Must comprise details/comments on following aspects:

- Total bottom ash disposed, Total bottom ash evacuated, and Net bottom ash disposal into the ash ponds/dykes in slurry form during the FY: **Not Applicable (NA)**.
- Total fly ash disposed, Total fly ash evacuated, and Net fly ash disposal into the ash ponds/dykes in slurry/wet conditioned form during the FY: **Not Applicable (NA)**.
- **Any other relevant aspect by the Authorized Auditors.**

2.4 Total ash storage in operational and un-operational ash ponds and available storage capacity for further disposal at the end of financial year

Must comprise details/comments on following aspects:

- Description in a Table w.r.t. Sl. No. 17 and 18 of Ash Notification 31.12.2021 to be produced with all the details in a clear manner, including details of i) Operational ash ponds/dykes, and ii) Un-operational ash ponds/dykes (ash to be utilized within 10-year time limit), iii) Un-operational ash ponds/dykes (yet to be stabilized and reclaimed with green belt etc. and certified by SPCB), iv) Un-operational ash ponds/dykes (stabilized and reclaimed with green belt etc. and certified by SPCB with certificate): **Not Applicable (NA)**.
- Status of compliance of provisions regarding No. and area of permitted and actual operational ponds, status of reclamation and SPCB certification for un-operational ponds, and status of ash utilization from un-operational legacy ash ponds, with supporting documents and images (with GPS coordinates and time stamp): **Not Applicable (NA)**.
- **Any other relevant aspect by the Authorized Auditors.**

2.5 Ash slurry disposal and Ash Water Re-Circulation System (AWRS) and ash water discharged into environment

Must comprise details/comments on following aspects:

- Total ash in slurry form disposed into the operational ash ponds/dykes during the FY: **Not Applicable (NA)**.

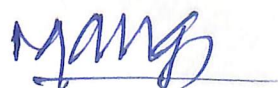


- Source of wastewater (cooling tower blow down/boiler blow down etc.) used for preparing slurry for the bottom/fly ash: **Not Applicable (NA).**
- Lean/medium/high concentration slurry or moistened ash disposal system: **Not Applicable (NA).**
- Ash / water ratio maintained in the Ash Handling Plant (AHP) for disposal of ash into the ash ponds/dykes: **Not Applicable (NA).**
- Uniform/non-uniform disposal of ash into ash ponds (including number of points/way of disposal): : **Not Applicable (NA).**
- Estimated and actual water required (m3) for total ash disposal into the ash ponds/dykes based on ash/water ratio: **Not Applicable (NA).**
- Details of flow diagram of ash water if recirculated or discharged anywhere: **Not Applicable (NA).**
- Schematic diagram of AWRS with details and images of various stages: **Not Applicable (NA).**
- Capacity of pumps of AWRS (m3/hour) for ash water recycling into plant: **Not Applicable (NA).**
- % water recirculated (m3 and %) and further purpose of use and actual status on ground verification; discharge from Ash dyke/pond into natural water bodies, if any: **Not Applicable (NA).**
- Possibility of ash water discharge into the environment during normal times/ monsoon/ etc.: **Not Applicable (NA).**
- Any other relevant aspect by the Authorized Auditors.

2.6 Effects of Ash Ponds/dykes O&M, storage and transportation of ash on environment, condition of surrounding environment, and steps taken for improvement of environmental condition

Must comprise details/comments on following aspects:

- Mode of disposal of ash into the ash ponds/dykes and its effect/impacts on environment: **Not Applicable (NA).**
- Mode of evacuation of ash from the ash ponds/dykes and its effect/impacts on environment: **Not Applicable (NA).**
- Checklist of fugitive emission monitoring and control measures i.e. water sprinklers, water spraying tankers/fogging cannons, covering of vehicles, camera etc. at different ash generation, handling, storage, transportation places - location, nos., frequency, operational status, adequate placement, tyre cleaning, etc., around Dry Ash Silo/ash evacuating area, ash handling area including bulkers loading area, at ash ponds/dykes and its approach roads, bulkers/transport vehicles etc.) : **Not Applicable (NA).**
- Steps taken to ensure storage of ash in ash ponds/dykes in environmentally sound manner, including for different periods of the year: **Not Applicable (NA).**



- Mode of transportation of ash from the ash ponds/dykes and its effect/impacts on environment: **Not Applicable (NA).**
- Share of transportation of ash through road/rail/closed/open vehicles etc.: **Not Applicable (NA).**
- Steps taken to ensure transportation of ash in environmentally sound manner: **Not Applicable (NA).**
- The status of compliance of CPCB's "*Guidelines for disposal/utilisation of Fly Ash for reclamation of Low-Lying Areas and in stowing of Abandoned mines/Quarries*" in case of utilization of ash in low-lying area with prior permission from concerned SPCB only. (Improper/disposal of ash in low-lying area without permission of concerned SPCB shall not be considered as utilization, and remarks regarding such violations shall also be included): **Not Applicable (NA).**
- Any breach of ash ponds/dykes in last three years; details of measures taken and status of environmental restoration, etc.: **Not Applicable (NA).**
- The status of submission of the annual ash dyke stability certification by the TPPs as per "*Guidelines on Design, Construction, O&M and Annual Certification of Coal Ash Ponds, June 2023*": **Not Applicable (NA).**
- Environmental status/ any adverse impact on roads/ roadsides/ river bodies/ etc. nearby plant with images based on physical observations: **Not Applicable (NA).**
- **Any other relevant aspect by the Authorized Auditors.**

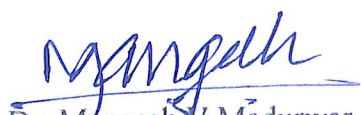
3.0 AUDIT SUMMARY/CONCLUSIONS

Summary of audit must comprise details/comments on following aspects:

- Quantities of coal consumption (MT) and fly/bottom/total current ash generation (MT) reported in Annual Implementation Report submitted to the authorities and accuracy in reporting based on audit
 Fuel (Coal + Biomass) Consumption: 3,43,266.00 MT
 Total Current Ash Generation: 94,206.7 MT
- First compliance cycle (3/4/5 year) and minimum annual ash utilization targets applicable to the plant based on ash utilization % during FY 2021-22 as per Ash Notification (as per Central Electricity Authority's (CEA) report uploaded on CEA's website. In case of new plants/CPPs/plants not included in CEA's report, ash utilization % during FY 2021-22 may be verified from the Annual Report pertaining to that year submitted by the plant to concerned SPCB and other authorities).
 In the first compliance the plant had 100% ash utilization.
- % utilization of current fly ash, current bottom ash, total current ash, legacy ash (if legacy ash available as per legacy ash definition), previously unutilized stored ash (other than legacy), and compliance against prescribed minimum annual utilization % target in the Ash Notification
 Total Current Ash Utilization: 94,206.7 MT (100%)



- d) Share of major ash utilization sectors: Cement Production, Brick Manufacturing and Road Construction
- e) Cumulative ash utilization (MT) during the ongoing compliance cycle till the end of the financial year and % against the cycle's target %: 100% utilization
- f) Quantity of ash stored at the start of the financial year and at the end of the financial year: Nil
- g) Status of uploading of ash data (Monthly, Yearly, Auxiliary data) by plant during the financial year and discrepancies observed by the Auditor, if any, in the uploaded data:
Data is uploaded monthly basis on ash portal.
- h) Status of submission of Annual Implementation Report by the plant to the concerned authorities as per the Ash Notification along with date(s) of submission(s): 06th May 2026
- i) Estimated amount of environmental compensation for not meeting prescribed minimum annual % utilization target and cumulative average ash % utilization target: No Compensation (100% utilization)
- j) Detailed summary of various provisions of the Ash Notification requiring compliance by the plant and the status of compliance observed, and steps being taken by the plant for improvement, if any
The plant had 100% ash utilization from financial year 2022 – 2023.
- k) **Any other relevant aspect by the Authorized Auditors.**


Dr. Mangesh V Madurwar
Coordinator


22/9/2026
Dr. Dilip H Lataye
Head, CED


23-9-26
Dr. Yashawant B Katpatal
Dean (R&C)



ANNEXURE 1



Hindalco Industries Limited

Page 1 of 4

Flat Door - BIRLA COPPER, Village - DAHEJ, Post Office - DAHEJ, City District - BHARUCH, State - GUJARAT, PIN Code - 392130,
Country - India, Tel Number - +91 2641 256004-6, Fax Number - +91 2641 251002-3, Email - hindalco@adityabirla.com

Registered Office: 21st Floor, One Unity Center, Senapati Bapat Marg, Prabhadevi, Mumbai 400013
T: +91 22 6941 7 7000 / 6947 7150 IF: +91226947 7001/6947 7090 I W: www.hindalco.com Corporate ID No. L27020MH1955PLC011238

PURCHASE ORDER (Domestic)

Vendor Code	10028325	PO Number	13582330648
Vendor	VNIT NAGPUR	Creation Date	30-JUL-2026
Site	S1-NAGPUR	Amendment No	
Address	SOUTH AMBAZERI	Amendment Date	
	ROAD	Currency	INR
	NAGPUR	Our Contact	Nitin Dvekar
	NAGPUR, MAHARASHTRA, India - 440010	Email	nitin.dvekar@adityabirla.com
GSTIN No.	27AAATV9885C1ZZ	Phone No	+91 8153005958
Contact Person		Ship to Location	Dishy Stores
Mobile		Service Start Date	2026-07-25 00:00:00

REFERENCE: RPDHU/PL/27/11906-00 PROVIDE AUDIT, TYP FLY ASH AS PER CPCB GUIDELINE, RATE TYP-NEGOTIATED, SITE: HIL
Please Supply/Service the following items subject to the terms & conditions mentioned here under and overleaf

S No	Item Code Desc	HSN/SAC Code	UOM	Ship Qty	Unit Rate
1	841116000150	998.346	LOT	1.000	150000.00
PROVIDE AUDIT, TYPE FLY ASH, SCOPE: FLY ASH AUDIT THROUGH VNIT/IT AUDITOR AS PER CPCB GUIDELINE, SITE: HIL					

Shipment Date 1	31-MAR-2027		
Description	% Amount	Rate	Amount
Basic Value			1,50,000.00
IGST_INV_DHH_19	%	18.00	27,000.00
	Item Total Value		1,77,000.00
	Total Purchase Order Value		1,77,000.00

Value in Words (INR) : (One Lakh Seventy Seven Thousand Only)

Other Terms and Conditions :

Payment Terms : As per attached Annexure (see notes)

Price Type Terms : Fixed

Freight Terms : Paid

Transportation arrangement

Freight Carrier : Generic Shipping Methods

Supplier Note : # FLY ASH AUDIT

Subject to the specified & General Terms and Conditions, including Hindalco Supplier's Code of Conduct attached

Hindalco Industries Limited

Sanjay Salia
Manager

DIVISION	Gujarat	Import/Export Code	0388147237
PAN	AAACH1201R	TAN NO	BRDH00406A
CIN No	L27020MH1958PLC011238	GSTIN	24AAACH1201R1ZT

ANNEXURE 2



SGS Secured document



SGS

Certificate N°: 202600523935

F140101_693222_001
Page N°: 1 / 2

CERTIFICATE OF SAMPLING AND ANALYSIS

Vessel: CUMBRIA
 Port of Loading: Richards Bay Coal Terminal, South Africa
 Initial Draft Survey: 25 December 2025
 Final Draft Survey: 27 December 2025
 Bill of Lading Date: 27 December 2025
 Quantity (as per SGS Draft Survey): 58204 MT
 Goods description as provided by client: SOUTH AFRICAN STEAM COAL IN BULK
 Our Reference: BO 693222

THIS IS TO REPORT that in accordance with instructions received from our Principal, to perform sampling and analysis of the above-mentioned shipment, we hereby report the following:-

SAMPLING Mechanical sampling was performed by SGS, as per ISO 13909 Part 2. Increments were collected using a mechanical sampling system (MSS) during the loading of the vessel.
 The MSS was bias tested and test data / certificate was made available to SGS.

ANALYSIS Analysis performed in accordance with ISO Standards or other International Standards and SGS Procedures.

Proximate Analysis	Unit	As Received Basis (ARB)	Air Dry Basis (ADB)	Dry Basis (DB)
Total Moisture	%	7.0	-----	-----
Inherent Moisture	%	-----	3.1	-----
Ash Content	%	21.3	22.2	22.9
Volatile Matter	%	21.2	22.1	22.8
Fixed Carbon	%	50.5	52.6	54.3
Total Sulphur	%	0.65	0.68	0.70
Gross Calorific Value	kcal/kg	5542	5774	5959
Net Calorific Value	kcal/kg	5371	5619	5816

Ultimate Analysis	Unit	As Received Basis (ARB)	Air Dry Basis (ADB)	Dry Basis (DB)
Total Carbon	%	58.3	60.7	62.6
Total Hydrogen (includes H in moisture)	%	3.48	3.16	2.90
Total Nitrogen	%	1.63	1.70	1.75
Oxygen by diff.(includes O in moisture)	%	14.64	11.56	9.15
Hydrogen (excludes H in moisture)	%	2.70	2.81	-----
Oxygen (excludes O in moisture)	%	8.42	8.81	-----
Total Chlorine	%	0.006	0.006	0.006

Hardgrove Grindability Index (HGI)	56
Nominal Top Size	50mm
Size (0-50mm)	93.6%
Mercury (Hg)	0.16 mg/kg

SGS South Africa Pty. Ltd.
 Marine Services Park, Newark Rd, port of Richards Bay
 Richards Bay, South Africa

This document is issued by the Company under its General Conditions of Service (<https://www.sgs.com/en/terms-and-conditions>). Attention is drawn to the limitation of liability, indemnification and jurisdictional issues defined therein.
 This document is to be treated as an original within the meaning of UCP 600. Any holder of this document is advised that information contained hereon reflects the Company's findings at the time of its intervention only and within the limits of Client's instructions. If any. The Company's sole responsibility is to its Client and this document does not exonerate parties to a transaction from exercising all their rights and obligations under the transaction documents. Any unauthorized alteration, forgery or falsification of the content or appearance of this document is unlawful and offenders may be prosecuted to the fullest extent of the law.
 The authenticity of this document may be verified by scanning the QR code above.

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ANNEXURE 4



NABL

National Accreditation Board for
Testing and Calibration Laboratories

CERTIFICATE OF ACCREDITATION**MITRA S. K. PRIVATE LIMITED**

has been assessed and accredited in accordance with the standard

ISO/IEC 17025:2017**"General Requirements for the Competence of Testing &
Calibration Laboratories"**

for its facilities at

PLOT NO: 97, SECTOR 1/A, KUTCH, GANDHIDHAM, GUJARAT, INDIA

in the field of

TESTING

Certificate Number: TC-14942

Issue Date: 22/11/2024

Valid Until: 21/11/2028

This certificate remains valid for the Scope of Accreditation as specified in the annexure subject to continued
satisfactory compliance to the above standard & the relevant requirements of NABL.
(To see the scope of accreditation of this laboratory, you may also visit NABL website www.nabl-india.org)

Name of Legal Entity: Mitra S. K. Private Limited

Signed for and on behalf of NABL



N. Venkateswaran
Chief Executive Officer

ANNEXURE 5



NABL

National Accreditation Board for Testing and Calibration Laboratories

SCOPE OF ACCREDITATION

Laboratory Name : MITRA S. K. PRIVATE LIMITED, PLOT NO: 97, SECTOR 1/A, KUTCH, GANDHIDHAM, GUJARAT, INDIA
Accreditation Standard ISO/IEC 17025:2017
Certificate Number TC-14942
Validity 22/11/2024 to 21/11/2028

Page No 3 of 7
Last Amended on 14/03/2025

S.No	Discipline / Group	Materials or Products tested	Component, parameter or characteristic tested / Specific Test Performed / Tests or type of tests performed	Test Method Specification against which tests are performed and / or the techniques / equipment used
24	CHEMICAL- SOLID FUELS	Coal	Ash	ASTM D3174 (12e1)
25	CHEMICAL- SOLID FUELS	Coal	Ash	IS 1350 (Part 1)
26	CHEMICAL- SOLID FUELS	Coal	Ash	ISO 1171
27	CHEMICAL- SOLID FUELS	Coal	Fixed Carbon	ASTM D3172 (13e1)
28	CHEMICAL- SOLID FUELS	Coal	Fixed Carbon	IS 1350 (Part 1)
29	CHEMICAL- SOLID FUELS	Coal	Fixed Carbon	ISO 17246
30	CHEMICAL- SOLID FUELS	Coal	Gross Calorific Value	ASTM D5865-19
31	CHEMICAL- SOLID FUELS	Coal	Gross Calorific Value	IS 1350 (part 2)
32	CHEMICAL- SOLID FUELS	Coal	Gross Calorific Value	ISO 1928
33	CHEMICAL- SOLID FUELS	Coal	Hardgrove grindability Index (HGI)	ASTM D409 (M 24)
34	CHEMICAL- SOLID FUELS	Coal	Hardgrove grindability Index (HGI)	IS 4433
35	CHEMICAL- SOLID FUELS	Coal	Hardgrove grindability Index (HGI)	ISO 5074
36	CHEMICAL- SOLID FUELS	Coal	Moisture	ASTM D3173 (M 17a)
37	CHEMICAL- SOLID FUELS	Coal	Moisture	IS 1350 (Part 1)
38	CHEMICAL- SOLID FUELS	Coal	Moisture	ISO 11722 (E)
39	CHEMICAL- SOLID FUELS	Coal	Phosphorus	IS 1350 (Part 5)

This is annexure to 'Certificate of Accreditation' and does not require any signature.

ANNEXURE 6

HINDALCO
ENGINEERING BETTER FUTURES

HINDALCO INDUSTRIES LIMITED
(Unit : Birla Copper , Dahej)
CENTRAL LABORATORY
BIOMASS ANALYSIS REPORT

ADITYA BIRLA
METALS

Date : 16-01-2026

Raw Material : BIOMASS BRIQUETTE-ECO AGRO WASTE

Party Name : M/S-Jupiter Industries

Report For : 08.01.2026 to 14.01.2026

Date	No. of Trucks	Total M/c %	Invoice Total Qty	Average Moisture	Inherent Moisture %	VM %	Ash %	Fix Carbon %	GCV Kcal/ Kg	GCV Kcal/ Kg
		ARB	MT	ARB %	ADB	ADB	ADB	ADB	ADB	ARB
8-Jan-26	1	13.10	14.720	13.89	10.01	62.45	15.00	12.54	3533	3381
11-Jan-26	1	15.00	21.710							
12-Jan-26	1	13.30	21.410							

Note: Average moisture calculated as Weighted Average

For Hindalco Industries Limited

Mehul Trivedi
Dy Engineer (Quality)

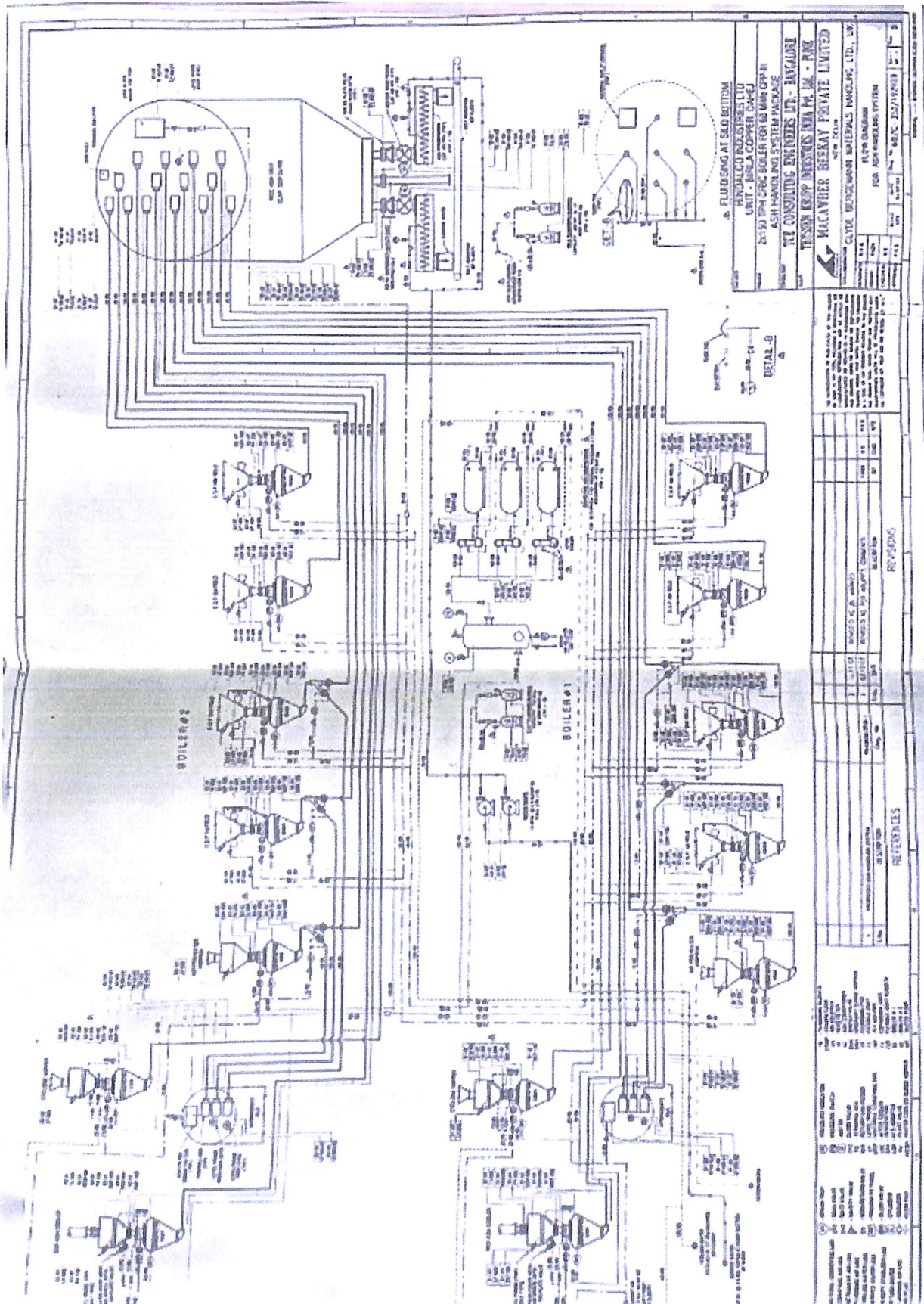
For Mitra S.K. Pvt. Ltd.

Ajit Kumar
Chemist

Surendra Sharma
Manager

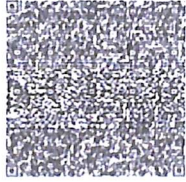
Ketan Shah
Manager (Quality)

ANNEXURE 7



ANNEXURE 8

(ORIGINAL FOR RECIPIENT)

HINDALCO INDUSTRIES LTD. (UNIT : BIRLA COPPER) Register office:- 21st Floor, One Unity Center, Senapati Bapat Marg, Prabhadevi, MUMBAI MAHARASHTRA-400013, Tel: (91-22) 63477000, Tel: (91-22) 659477001 Works:- Hindalco Industries Limited (UNIT : BIRLA COPPER) P.O. DAHEJ LAKHIGAM, BHARUCH-392130, GUJARAT (0264) 256004-5-5 Website :- www.hindalco.com Email : hindalco@adityabirla.com		TAX INVOICE (Issued under Section 31 of the Central Goods and Service Tax Act, 2017) (An ISO 9001 and 14001 Company) Corporate Identity Number: L27020MH1958PLC011238 PAN: AAACH1201R State Code: GJ24J GSTIN: 24AAACH1201R1ZT		INVOICE NO. GJDHJ2510000653 INVOICE DATE: 04-APR-25																					
CUSTOMER CODE: 20305913		IRN: abfd1d1657985426c9ccdd8dc66e1134d4918714ef1d13a08b51548d8		BYPRODUCT PRODUCT																					
DETAILS OF RECIPIENT (BILLED TO) : SHREE RAM ENTERPRISE PLOT NO 9, BLOCK NO. E-5, NADAYAN NAGAR, KHAMDHROL, TALUKA:JUNAGADH JUNAGADH-362002 GUJARAT India PAN No. : BJVPS9850D State Code & Name : 24-GUJARAT GSTIN: 24BJVPS9850D2ZJ		DETAILS OF CONSIGNEE (SHIPPED TO) : SHREE RAM ENTERPRISE PLOT NO 9, BLOCK NO. E-5, NARAYAN NAGAR, KHAMDHROL, TALUKA:JUNAGADH JUNAGADH-362002 GUJARAT, India PAN No. : BJVPS9850D State Code & Name : 24-GUJARAT GSTIN: 24BJVPS9850D2ZJ		RR / LR NO. : 2935 LR DATE : 04-APR-2025 WAGON / TRUCK NO. : GJ25U8926 MODE OF TRANSPORT : ROAD DATE OF ISSUE : 04-APR-25 TIME OF ISSUE : 17:16 DELIVERY NO. : 4444936 FREIGHT TYPE : TRANSPORT & INSURANCE ARRANGED AND PAID BY CUSTOMER DSTN: JUNAGADH CARRIER NAME : SHREE SOMNATH TRANSPORT PLACE OF SUPPLY : 24-GUJARAT																					
ITEM DESCRIPTION		HSN CODE		GROSS WT		NET WT		UOM		RATE		FRT. SUBSIDY		NET PRICE		MATERIAL VALUE		TAXABLE VALUE		CGST		SGST		IGST	
1. FLY ASH		26219000		25.85		25.85		MT		350		0		350		9047.50		9047.50		226.19		226.19		226.19	
Whether the tax is payable on reverse charge basis :- No																									
TOTAL				25.85		25.85										9047.50		9047.50		226.19		226.19			
Total Invoice Value (In Figures) ₹		Rs 9,499.88																							
Total Invoice Value (In Words) ₹		Rupees Nine Thousand Four Hundred Ninety Nine And Paise Eighty Eight Only.																							
Our Delivery Challan Invoice weight is final. Weight difference upto +/- 0.2% will not be accepted under standard weight tolerance norms. Terms & Condition of Sale : 1) Business transaction Subject to the Jurisdiction of Mumbai Court.		Material received in Good condition & as per weight mentioned above.																							
(Signature of Buyer)		(UNIT : BIRLA COPPER) Digitally signed by Varun Bhatnagar Date: 2026.07.31 12:10:06 IST Reason: true Log: [Signature]		Authorized Signatory																					

ANNEXURE 9

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

Proposal No	J-11011/927/2008-IA II (I)
Compliance ID	1226922677
Compliance Number(For Tracking)	EC/M/COMPLIANCE/1226922677/2026
Reporting Year	2026
Reporting Period	01 Jun(01 Oct - 31 Mar)
Submission Date	15-05-2026
RO/SRO Name	Shri Satya Prakash Negi
RO/SRO Email	jhk119@ifs.nic.in
State	GUJARAT
RO/SRO Office Address	Integrated Regional Offices, Gandhi Nagar

Note:- SMS and E-Mail has been sent to Shri Satya Prakash Negi, GUJARAT with Notification to Project Proponent.

