

Minutes of 131st meeting of the Approval Committee for Dahej Special Economic Zone held on Thursday, 21st August, 2025 at 12:30PM through hybrid mode (Webex Video Conferencing & Physical at Dahej SEZ) under the Chairpersonship of Shri Anupam Kumar, ITS, Development Commissioner, Dahej SEZ.

A. List of participants is annexed as per Annexure-A.

(The quorum is complete as per section 13(5) of the SEZ Act, 2005 read with Notification dated 26.07.2007 of MOCI issued from F. No. 1/1/2006-SEZ, as out of the present, there were five designated members).

B. Ratification of the Minutes of last meeting of the Approval Committee.

As no comments/observations on the minutes of 130th meeting of the Approval Committee of the Dahej SEZ held on 21.07.2025 have been received from any member, Minutes of the Meeting as circulated earlier were unanimously ratified.

C. The following cases were discussed as per the Agenda:

Item No. 131.02

Deferred cases for Dahej -SEZ: -One

Item No. 131.02.01

M/s Arham Biochem Private Limited

Request for change of name/transfer of land in favor of M/s Kumar Organic Products Limited

Shri Mitesh Shah, MD from M/s Arham Biochem Private Limited & Shri Sharad Prashad, CFO from M/s Kumar Organic Products Limited has appeared before the Committee through WEBEX video conference and explained their request.

M/s Arham Biochem Private Limited (has a valid letter of approval i.e. up to 28.03.2026) vide letter dated 04.04.2025 had requested this office for change of name/transfer of land in favor of M/s Kumar Organic Products Limited. The firm had requested for exit of their unit (Plot No. Z/43 & Z/44) from Dahej SEZ by transferring of assets/ land under the relevant Rule of SEZ. The firm had submitted list of Directors of M/s Kumar Organic Products Limited, Details for amendment/transfer of LoA and Products List. The firm has stated that they will have projected investment of Rs. 3000 Lakhs, Nil import projection for capital goods, Rs. 217 Crore projection for import of raw materials etc., employment projection is 200 persons, FOB value for export is Rs. 775 Crore, Foreign Exchange outgo is Rs. 217 Crore and NFE is Rs. 558 Crores.

This office vide letter dated 19.11.2024 had requested the firm to submit the revised/amended Registered Lease Deed to this office. But till date, the firm had not submitted the same to this office.

M/s DSL vide letter dated 28.02.2025 had requested the firm to make payment of Rs. 96,61,829 as Transfer fee to DSL for change of name of the firm from M/s Bitumode International Private Limited to M/s Arham Biochem Private Limited. The firm has briefed the committee that they have paid the transfer fee to the Developer.

The Developers representative have informed the committee that the firm has to amend the Registered Lease Deed in the name of M/s Arham Biochem Private Limited, since the name of the firm has been changed.

Rule 74A of the SEZ rules, 2006 provides for manner of transfer of assets and liabilities upon exit from one unit to another and the rule position is reproduced below: -

Transfer of Assets by Special Economic Zone Units upon their exit. - The Unit may opt out of Special Economic Zone by transferring its assets and liabilities to another person by way of transfer of ownership including sale of Special Economic Zone units subject to the following conditions: -

- (i) the Unit has held a valid Letter of Approval as well as lease of land for not less than a period of five years on the date of transfer;*
- (ii) the unit has been operational for a minimum period of two years after the commencement of production as on the date of transfer;*
- (iii) such sale or transfer transactions shall be subject to the approval of the Approval Committee;*
- (iv) the transferee fulfils all eligibility criteria applicable to a Unit; and*
- (v) the applicable duties and liabilities, if any, as calculated under rule 74, as well as export obligations of the transferor Unit, if any, shall stand transferred to the transferee Unit which shall be under obligation to discharge the same on the same terms and conditions as the transferor Unit.*

The Approval Committee after detailed discussion unanimously decided to grant in principle approval for transfer of assets and exit to M/s Arham Biochem Private Limited as per Instruction No. 108. Accordingly, M/s Arham Biochem Private Limited has been directed to submit the following documents: -

1. Submit a copy of Registered Lease Deed to the DC Office within 20days (As per Rule 74-A of the SEZ Rules, 2006)
2. No Dues certificate from the DC office. In this regard, a Shipping Bill-wise statement of export from 2022-23 to 2024-25 duly certified by the Chartered Accountant to verify that they have maintained positive NFE, since the firm has opted for exit from the SEZ (As per Rule 74 of SEZ Rules, 2006).
3. No Dues certificate from the Specified Officer. (As per Rule 74-A of SEZ Rules, 2006). The exiting Unit can remove all existing material to DTA on payment of duties/taxes as assessed by the Specified Officer. The said goods can also be given to the incoming Unit as inter-unit transfer. The existing procedure for exit shall be followed.
4. NOC from the department concerned (in case of pending litigation / cases)
5. No Dues certificate from concerned authorities for water as well as charges payable for other utilities.
6. An affidavit signed by the proprietor/MD/partners/authorized personnel, as the case may be to the effect that labour dues in respect of existing employees have been cleared.
7. An affidavit signed by the proprietor/MD/partners/authorized personnel, as the case may be to the effect that incoming Unit shall be liable for payment of labour dues, if any, determined at a future date, by concerned authority or court.
8. A Legal Undertaking in Form L as stipulated in SEZ Rules, 2006.

All these documents will be scrutinized and if satisfied, an "Exit Order" will be issued by the DC office to M/s Arham Biochem Private Limited.

Subsequent to Exit of M/s Arham Biochem Private Limited, M/s Kumar Organic Products Limited shall submit a detailed proposal and justification for use of additional space to the DC Office. After due verification, the DC office will issue an approval letter for use of the additional space.

Item No. 131.03

Other cases for Dahej - SEZ: - Two

Item No. 131.03.01

**M/s. Raks Pharma Pvt Ltd,
**Application for Addition of Research and Development
Services in the existing LoA.****

Shri Karan Rajvir, Deputy Manager from M/s. Raks Pharma Pvt Ltd, has appeared before the committee through WEBEX video conference and explained their request.

M/s. Raks Pharma Pvt Ltd vide letter dated 06.05.2025 & 04.07.2025 had requested for addition of Research and Development Services in the existing LoA.

The committee after detailed discussion unanimously deferred the proposal and directed the firm to submit following documents: -

1. Submission of list of goods (raw material as well as capital goods) additionally required for R&D.
2. Service Agreement having details of nature of Research & Development activities being undertaken/to be delivered to the client.

Item No. 131.03.02

**M/s Firmenich Aromatics Production (India) Pvt Ltd,
**Application for addition of trading activity in the
existing LoA.****

Shri Kamlesh Gandhi, Senior Plant Director from M/s Firmenich Aromatics Production (India) Pvt Ltd has appeared before the committee through WEBEX video conference and explained their request.

M/s Firmenich Aromatics Production (India) Pvt Ltd, vide their letter dated 03.07.2025 had requested for trading of capital goods and addition of items for trading activity in the existing Letter of Approval.

The committee after detailed discussion unanimously deferred the proposal and directed the firm to submit following documents: -

1. A list of specific goods along with their HSN code for trading activity.
2. A list of specific capital goods along with their HSN code for trading activity.
3. Declaration stating that the goods does not fall in the category of prohibited or restricted items.

A. Satauria
02/09/25

(Amardeep Satauria)
Assistant Development Commissioner,
For Development Commissioner,
Dahej Special Economic Zone

Annexure-A

List of Participants of 131th Approval Committee Meeting of Dahej SEZ held on 21.08.2025: -

01	Shri Anupam Kumar, ITS, Development Commissioner	Chairperson
02	Shri Ramsingh Meena	CGST-DIV-7, Bharuch
03	Shri H.J. Jadeja	GM-DIC-Bharuch
04	Shri Kishore Vaghamshi	GPCB- RO- Bharuch
05	Shri Lokesh Meena	Deputy Commissioner of I. Tax Vadodara
06	Shri Vijay Singh Dhusia, SO, Dahej SEZ.	Special Invitee
07	Shri Amardeep Satauria, ADC, Dahej SEZ	Coordinator
08	Shri Niraj Shah & Shri Bhupendrasinh Vala	Representatives, Dahej SEZ Limited

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