



भारत सरकार/ Government of India
वाणिज्य एवं उद्योग मंत्रालय/ Ministry of Commerce and Industry
विकास आयुक्त का कार्यालय/ Office of the Development Commissioner
दहेज विशेष आर्थिक क्षेत्र/ DAHEJ Special Economic Zone

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No. KASEZ/DCO/AC/123/2008-09/6910 /7024

Dated: 16.07.2025

To: All Approval Committee members: -

1.	Director, MOC&I, New Delhi;	
2.	Commissioner of CGST & Customs, Vadodara-II.	hq_bharuch@rediffmail.com , commr-cexvdr2@nic.in
3.	Commissioner of Income Tax, Vadodara -III;	amblinking@yahoo.com
4.	Jt. DGFT, Vadodara/ Ahmedabad	vadodara-dgft@nic.in
5.	Director (Banking), Banking Dvn., MOF,	
6.	District Collector, Bharuch, Gujarat.	addl-collector-bha@gujarat.gov.in
7.	General Manager, DIC, Bharuch.	gm-dic-bha@gujarat.gov.in
8.	Developer (Dahej - SEZ), Gandhinagar	ceo@dahejsez.com
9.	Member Secretary, GPCB.	gpcb-bha@gujarat.gov.in

Madam/Sir,

Subject: - 130th meeting of the Approval Committee for Dahej -SEZ.

Reference: - Letter No. KASEZ/P&C/5-A/91/07/6600, dated 01-08-2008.

This is to inform you that the 130th meeting of the Approval Committee for Dahej - Special Economic Zone, is scheduled to be held on Monday, 21st July, 2025 at 12:30 PM through hybrid mode (Webex Video Conferencing & Physical at Dahej SEZ) under the chairpersonship of Shri Anupam Kumar, ITS, Development Commissioner, Dahej SEZ. Agenda papers are enclosed herewith.

You are also requested to inform the Officer's Name, Contact Number and email details who will attend the UAC Meeting to this office by return mail.

Yours faithfully,

Amardeep Satauria
16/07/25

(Amardeep Satauria)
Assistant Development Commissioner
For, Development Commissioner
Dahej Special Economic Zone
(M) 8901091255

Agenda for 130th meeting of Unit Approval Committee for Dahej SEZ to be held on Monday, 21th July, 2025 at 12:30 PM through hybrid mode (Webex Video Conferencing & Physical at Dahej SEZ) under the Chairpersonship of Shri Anupam Kumar, ITS, Development Commissioner, Dahej SEZ.

Ratification of Minutes of 129th UAC Meeting.

130.1 Fresh Cases for Dahej -SEZ: - NIL

130.2 Deferred cases for Dahej -SEZ: -One

Sr. No.	Name of Applicant/Unit	Proposal/Request
1.	M/s Dorf Ketel Chemicals India Pvt Limited., Dahej SEZ	Request for Change of Name.

130.3 Other cases for Dahej - SEZ: -Seven

Sr. No.	Name of Applicant/Unit	Proposal/Request
1.	M/s. Sun Pharmaceutical Industries Limited, Dahej SEZ	Application for Broad Banding of LoA to include additional manufacturing items in the existing LoA.
2.	M/s Arham Biochem Pvt Ltd, Dahej SEZ	Request for change of name/transfer of land in favor of M/s Kumar Organic Products Limited.
3.	M/s Transport India- 3PL, Dahej SEZ	Request for change in Constitution from Partnership Firm to Public Limited Company
4.	M/s Sigachi Industries Limited, Dahej SEZ	Request for extension of LoA
5.	M/s Aarti Industries Limited, Dahej SEZ	Application for Broad Banding of LoA to include additional manufacturing items & removal of items in the existing LoA.
6.	M/s Meghna Colour Chem Pvt Ltd., Dahej SEZ	Cancellation of LoA
7.	Dahej SEZ Unit	Monitoring of Performance (APR) of Dahej SEZ units.

Item No. 130.02

Deferred cases for Dahej -SEZ: -One

Item No. 130.02.01

**M/s Dorf Ketal Chemicals India Pvt Limited., Dahej SEZ
Request for Change of Name.**

M/s Dorf Ketal Chemicals India Pvt Limited., Plot No. Z/108 was issued Letter of Approval dated 02.09.2014 as amended from time to time, for setting up of a unit in Dahej SEZ for manufacturing and export of items mentioned under various HS Codes falling under chapter 29 & 38. The unit had started commercial production with effect from 01.07.2019.

M/s. Dorf Ketal Chemicals India Pvt Limited., Dahej-SEZ, vide their letter dated 19.12.2024 had requested for change in name of the company i.e. Dorf Ketal Chemicals India Private Limited to New Company Name, Dorf Ketal Chemicals India Limited.

The Unit had submitted Certificate of Incorporation, Copy of PAN Card, GST Registration Certificate, IEC Certificate, vide their letter dated 19.12.2024 for change in name of the company.

The case was placed before the 124th UAC Meeting held on 07.02.2025 wherein the committee had deferred the proposal for change of name and requested the firm to submit the required documents.

The firm vide their email dated 12.05.2025 has submitted copy of Board Resolution, Registered Lease Deed, Environmental Clearance, GPCB CCA, Copy of RoC, Memorandum of Association & Articles of Association.

In terms of the Instruction No. 109 dated 18.10.2021 issued by the Ministry of Commerce & Industry, Department of Commerce (SEZ Division), Re-organization including change of name, change of shareholding pattern, business transfer agreement, court approved mergers and demergers, change of constitution of Units located in SEZs may be undertaken with the prior approval of Approval Committee in respect of Units subject to the condition that the unit shall not opt out or exit out of the Special Economic Zone and continues to operate as a going concern. All liabilities of the unit will remain unchanged on such organization.

The firm has made an online application for change in name on 13.06.2025.

Hence, the case is again placed before the Approval Committee for consideration and suitable decision.

Item No. 130.03**Other cases for Dahej - SEZ: - Seven****Item No. 130.03.01****M/s Sun Pharmaceutical Industries Ltd**

Application for Broad Banding of LoA to include additional manufacturing items in the existing LoA.

M/s Sun Pharmaceutical Industries Ltd was issued LOA on 16.12.2008, as amended from time to time, for setting up of a unit in Dahej SEZ for manufacturing and export of items mentioned under various HS Codes falling under Chapter 28, 29 & 30. The firm had started commercial production with effect from 15.06.2015.

M/s Sun Pharmaceutical Industries Ltd, Dahej-SEZ vide their letters dated 28.10.2024, 30.12.2024 & 29.05.2025 had requested for broad-banding/ inclusion of following additional items for manufacturing in the existing Letter of Approval.

Sr No.	Name of the Finished Product	ITC (HS) Code	Annual Production Capacity
1.	Calcium Gluconate	29181610	5 MT
2.	Ferumoxytol	29072990	1250 Ltr
3.	EMPAGLIFLOZIN	29321990	5 MT

They have also submitted the projection for next five years period which is as below:

(Rs. In lakhs)

Sr No.	Items	1st	2nd	3rd	4th	5th	Total
1	Free on Board value of Exports 5 years	2526.96	2758.96	3062.52	3408.52	3373.52	15130.48
2	*Foreign Exchange Outgo on for the first five years	280.00	299.00	324.00	351.00	348.00	1602.00
3	Net Foreign Exchange earnings for the first five years(1-2)	2246.96	2459.96	2738.52	3057.52	3025.52	13528.48

The firm vide letter dated 05.02.2025 has stated that Calcium Gluconate monohydrate is considered as old drug in India hence quantity specific permission not required from FDA.

FDA had granted approval for 200 Kgs. of Ferumoxytol, but the firm had applied for approval of 1250 Litre's. They also submitted FDA approval for Ferumoxytol and reason for difference in quantity of Form- 29 and License is mainly unit of conversion. 1250 Ltr is as a solution of 30 mg/ml iron content and this

quantity is equivalent to 100 Kg of Ferumoxytol as solid API. They have taken form-29 of 200 Kg Ferumoxytol considering current demand of 800 ltr scale-up, 1200 Lt Exhibit, 400 Lt contingency and 100 Lt Development quantity. So total Liquid qty will be 2500 Lt which reflect to 200 Kg Ferumoxytol solid API. 1250 Lt is annual commercial requirement which will be applicable after approval of this product.

The firm has not submitted the Registered Lease Deed (as per requirement of Rule 18(2) of the SEZ Rules, 2006) to this office.

Hence, the case is placed before the Approval Committee for consideration and suitable decision.

Item No. 130.03.02

M/s Arham Biochem Private Limited

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

M/s Arham Biochem Private Limited (Earlier known as M/s Bitumode International Private Limited) was issued LOA on 02.04.2012, as amended from time to time, for manufacturing and export of items mentioned under various HS Codes falling under Chapter 39, 56 & 68 and had started commercial production with effect from 29.03.2016.

The 107th UAC meeting held on 14.06.2022 had approved the request of the firm for change in composition of the Board of Directors and Shareholding pattern of the firm.

The 109th UAC meeting held on 27.12.2022 had approved the request of the firm for change in name of the firm from M/s Bitumode International Private Limited to M/s Arham Biochem Private Limited.

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.

Now, 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.

As per the Rule 74A of the SEZ Rules, 2006.

"Transfer of Assets by SEZ 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 (or Standard Design Factory) 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 firm has not submitted the No Dues Certificate of the Specified Officer, Dahej SEZ and the Developer, Sale Purchase Agreement, Assets and liabilities ownership declaration, responsibility of Operations, past actions, liabilities and obligations declaration, Indemnity Bond, document evidencing repayment of Stamp duty.

Hence, the case is placed before the Approval Committee for consideration and suitable decision.

Item No.130.03.03

M/s Transport India- 3PL

Request for change in Constitution from Partnership Firm to Public Limited Company under Chapter XXI Part I (Sections 366 to 374) of Companies Act, 2013.

M/s Transport India- 3PL was issued Letter of Approval dated 20.09.2024 as amended from time to time, for setting up of a unit in Dahej SEZ for undertaking authorized operations namely trading of products/rendering services under various HS Codes falling under chapter 99.

Now, M/s Transport India- 3PL vide their letter dated 09.06.2025 has requested for change in Constitution i.e. Transport India-3PL to Transport India- 3PL Limited, from Partnership Firm to Public Limited Company under Chapter XXI Part I (Sections 366 to 374) of Companies Act, 2013.

The firm had informed that the unit has now been converted and incorporated as a Public Limited Company under the name Transport India -3 PL Limited, bearing CIN U49230MH2025PLC448681, incorporated with effect from 19.05.2025 pursuant to the applicable provisions of the Companies Act, 2013 and there is no change in partners of Transport India-3PL who all are now directors of Transport India- 3PL Limited.

The change was undertaken to better align with their business expansion goals, enhance operational efficiency and meet long-term strategic & financial requirements. They also informed that there has been no change in the nature of the proposed business operations, shareholding/promoter group, employees and ongoing contracts or the location of the unit within Dahej SEZ. The core activities, management and objectives of the unit remain consistent with the terms originally approved under the LoA.

The firm vide letter dated 09.06.2025 has submitted Copy of Certificate of Incorporation of Transport India- 3PL Limited, Memorandum and Articles of Association, Board Resolution & ROC filings approving the change in the constitution, Copy of New PAN Card and GST Certificate. The firm had informed that New IEC application is under process.

In terms of the Instruction No. 109 dated 18.10.2021 issued by the Ministry of Commerce & Industry, Department of Commerce (SEZ Section), Re-organization including change of name, change of shareholding pattern, business transfer agreement, court approved mergers and demergers, change of constitution, change of Directors etc, of SEZ Developer/Co-Developers as well as SEZ Units may be undertaken by the Unit Approval Committee) concerned subject to the condition that the Developer/Co-Developer/ Unit shall not opt out or exit out of the Special Economic Zone and continues to operate as a going concern. All liabilities of the Developer/Co-Developer/ Unit shall remain unchanged on such organization.

The firm has not commenced commercial production in the SEZ.

Hence, the case is placed before the Approval Committee for consideration and suitable decision.

Item No. 130.03.04

M/s Sigachi Industries Limited
Request for extension of LoA

M/s Sigachi Industries Limited, Plot No. Z/85/1/A, Dahej SEZ vide their above letters has requested for extension of validity of Letter of Approval dated 25.04.2022 (Flag A). They have not commenced commercial production in the SEZ, within the stipulated time-limit as per the terms of Letter of approval granted and are seeking extension in validity of the said LOA by one more year. The firm vide

letter dated 30.05.2025 addressed to the Board of Approval (through Development Commissioner, Dahej SEZ) has requested for extension of LoA for one more year and has submitted copy of CTE approval, EC approval, Application made to Torrent Power for electricity and Application made to GIDC for water connection.

Brief facts of the case are as under: -

Request of M/s Sigachi Industries Limited, Plot No. Z/85/1/A, Dahej SEZ, Village: Luvara, Tal: Vagra, Dist: Bharuch, Gujarat for the Extension of the Letter of Approval (LOA) for a further period of one year i.e. up to 24.04.2026.

- LOA issued on (Date) : 25.04.2022.
- Nature of business of the unit : Items of manufacture under chapter 29,35 & 39
- No. of Extensions : 2(Two)
- LoA valid up to : 24.04.2025
- Request : For further extension of 1 (One) year Up to 24.04.2026.

Present Progress furnished by the applicant unit: -

a) Details of Business Plan:

Sr. No	Type of Cost	Proposed Investment(INR in Cr)
1	Land	18.58
2	Civil	22.18
3	Plant & Machinery	46.51
Total		87.27

b) Investment made so far and incremental investment since last extension:

Sr No	Type of cost	Total Investment made so far (INR in Cr)	Incremental investment since last extension (INR in Cr)
1	Land	18.58	18.58
2	Civil	8.36	8.36
3	Other	0.52	0.52
Total		27.46	27.46

The firm vide letter dated 14.05.2025 has stated that they have made an investment of Rs. 30,25,04,111.40(towards land development, building, consultant expenses, compound wall expenses, electric expenses, employees, pre-operative expenses, other investment) till date.

c) Details of the physical progress made till date:

Sr No	Activities	% completion	% completion during last 1 year	Deadline for completion of balance work
1	Land cleaning	100 %	100 %	-
2	Topographic survey & soil investigation	100%	100%	
3	Power Connection			
				The firm had applied to Torrent Power in the month of March-2023 & they have laid down the live cable to their plot in the month of Jan-25. Now they are in the process to get the final connection for electricity.
4	Water Connection	They had applied in April-2023 but waiting for the final water connection in their premises from GIDC.	They had applied in April-2023 but waiting for the final water connection in their premises from GIDC.	The firm is continuously following up to GIDC official Bharuch but didn't get the final date for water connection in their premises.
5	CTE Application (for NoC EC Products) CTE for EC Products EC	Approval received Approval received Approval received		The firm got CTE approval in March, 2024. The firm got EC approval on 14.04.2025
6	Compound wall	90% Completed.	-	
7	Layout of plant Building	Done	-	Done
8	Warehouse		50% Completed	Rest work is under process.
9	Electrical Panel Room to get the main power connection of	20% Completed		Work is under process & will be completed soon.

	Torrent Power.			
10	Completion of plant Building	Just started the work	Just started the work	Works are under progress and will be completed by 30.03.2026.
11	Erection of Plant Machinery	0%	0%	Works are under progress and will be completed by 30.03.2026.

This office vide letter dated 27.03.2025 had requested the unit to submit the GPCB CCA, Chartered Engineer Certificate (as per Rule 19(4) of SEZ Rules, 2006) and the registered lease deed (as per Rule 18(2) of SEZ Rules, 2006) to this office.

The firm vide their letter dated 14.05.2025 had informed that they have got the GPCB CTE. Once setup or construction activity is finished and before beginning operations, they will apply for a consent to Operate (CTO) from the state pollution control board. They also informed that they are in process to complete compound wall & almost 90% work is completed & once completed they will apply for the lease deed as per the DSL Policy. The firm have informed that they have not completed 2/3 of construction activity, thus unable to furnish the Chartered Engineer certificate.

Reasons for delay: -

Possession of Land	Initially the firm received the LoA on 25.04.2022, but got possession of the land on 20.01.2023. So there was a delay of about 9 months in starting the activities.
Water Connection	The firm had applied for water connection in the month of April-2023. Still they are not getting the water connection at their premises.
Layout of Plant building	They got provisional layout plan approval from DSL on 25.11.2024.
Electric Power Connection	They had applied to Torrent Power for electricity connection in the month of March-2023 and they have laid down the live cable to their plot in the month of January-2025. Now they are in process for connectivity.
EC	The firm got EC approval on 14.04.2025

The firm also informed that they have one existing unit in Dahej SEZ Part-1 at plot no. Z/16 since last 15 years and their NFE is positive.

This office vide letter dated 02.07.2025 has already sent the proposal of the firm for consideration of BoA.

Since, some of the approvals are delayed by the Developer and Co-Developers, thus the issue of the firm is placed before the approval committee for consideration and suitable decision.

Item No. 130.03.05

M/s Aarti Industries Limited, Dahej SEZ

Application for Broad Banding of LoA to include additional manufacturing items & removal of items in the existing LoA.

M/s. Aarti Industries Limited. Plot No. Z/103/H was issued Letter of Approval No. DAHEJ-SEZ/II/29/ASLLP/2011-12 dated 14.03.2012. The unit had commenced commercial production w.e.f. 05.08.2016.

Now, M/s. Aarti Industries Limited. Plot No. Z/103/H vide their letter dated 18.06.2025 requested to broad banding in the existing LoA as under: -

Sr No.	Name of the Product	ITC (HS) Code	Annual Production Capacity
	Ethylation and Propoylation Products-		
1	2-Methyl-6-Ethyl Aniline-29214290 And/or	29214290	48600
2	2,6 Diethyl Aniline-29214290 And/or		
3	3-Methyl 2-6 Diethyl Aniline-29214290 And/or		
4	4-Methyl 2-6 Diethyl Aniline-29214290 And/or		
5	Isopropyl Aniline and 2,6 Diisopropyl Aniline-29214290 And/or		
6	2-Methyl-6-Isopropyl Aniline-29214290 And/or		
7	4-Methyl 2-6 Diisopropyl Aniline-29214290 And/or		
8	2-Ethyl Aniline-29214290 (OEA)		
9	3,5-Diethyl Toluene 2-6 Diamine (DETDA) and 3,5-Diethyl Toluene 2,4-Diamine (DETDA) And/or	29215990	48600
10	3-chloro-2,6-diethylaniline (CDEA) & 3-chloro-2-Ethylaniline (CEA)	29215990	
11	Physical Separation-Distillation of Ortho Toluidine-(29214330) or Para Toluidine-(29214350), or Meta Toluidine -(29214340)	29214330	6000

Removal of Items in the LoA			
1.	Chlor aniline , Dichloro Aniline and other hydrogenation products	29214290	6000
2.	Mono chloro benzene and other chlorination products	29039110	40421

The firm has also submitted the projection for next five years period as mentioned below: -

(Rs. In lakhs)

Sr. No.	Items	1st	2nd	3rd	4th	5th	Total
1	Free on Board value of Exports 5 years	45080.00	51660.00	58240.00	62632.00	67240.00	284852.00
2	*Foreign Exchange Outgo on for the first five years	267.92	270.40	272.88	275.36	281.81	1368.37
3	Net Foreign Exchange earnings for the first five years(1-2)	44812.08	51389.60	57967.12	62356.64	66958.19	283483.63

Hence, the case is placed before the Approval Committee for consideration and suitable decision.

Item No. 130.03.06

M/s Meghna Colour Chem Pvt Ltd
Cancellation of LoA

Letter of Approval No. Dahej-SEZ/II/001/2023-24 dated 21.09.2023 issued to M/s Meghna Colour Chem Pvt Ltd

It is observed that Letter of Approval (LoA) issued to the firm had expired on 21.09.2024. The firm is not allowed for any activity in the SEZ in the absence of a proper & valid LoA.

This office vide email dated 04.10.2023 had requested the firm to submit online application on NSDL portal but till date this office has not received any application of the firm.

This office vide letter dated 29.05.2025 had requested the firm to submit the reasons for not applying for extension of LoA. The firm was requested to submit the reply within a period of 15 days on receipt of this communication. In case of non-submission of reply, appropriate action may be initiated for contravention of

applicable provisions of SEZ Act, 2005 & SEZ Rules, 2006 and accordingly, the matter is now placed before the UAC.

The firm vide email dated 25.06.2025 had requested this office for cancellation of LoA. The firm had stated that "Due to dynamic changes in the international market, we have been compelled to reassess our business strategy and decide not to proceed with the project. We would like to bring to your notice that we have not taken physical possession of the said plot and we haven't executed agreement as well as acceptance letter. Due to uncertainty of global market in chemical sector, we are not in position to invest in SEZ. We request that you consider our application for cancellation of LoA and take necessary action".

The firm has not submitted the No Dues Certificate of the Specified Officer, Dahej SEZ & the Developer.

Hence, the case is placed before the Approval Committee for consideration and suitable decision.

Item No. 130.03.07

Monitoring of Performance of Dahej SEZ units

"Rule-54: Monitoring of Performance:- (1) Performance of the Unit shall be monitored by the Approval Committee as per the guidelines given in Annexure appended to these rules (2) In case the Approval Committee comes to the conclusion that a Unit has not achieved positive Net Foreign Exchange Earning or failed to abide by any of the terms and conditions of "the Letter of Approval of Bond-cum-Legal Undertaking without prejudice to the action that may be taken under any other law for the time being in force, the said Unit shall be liable for penal action under the provisions of the Foreign Trade (Development and Regulation) Act, 1992."

The Annual Performance Report of Dahej SEZ Unit duly audited and certified by the Chartered Accountant appointed by the unit is placed before the Approval Committee for monitoring in terms of provisions of Rule 22 of the Special Economic Zone Rules, 2006.

Year 2020-21 (Second Block of Five Years)

Sr. No.	Name of the SEZ Unit	Date of Commencement of Production/ Service activity	Net Foreign Exchange Earnings for the year (Rs. in lakhs)	Cumulative Net Foreign Exchange Earning (Rs. in lakhs)
			2020-21	
1.	M/s DIC Fine Chemicals Pvt Ltd	06.01.2010	5626.70	To be briefed by the SO, Dahej

Year 2023-24 (Third Block of Five Years)

Sr. No.	Name of the SEZ Unit	Date of Commencement of Production / Service activity	Net Foreign Exchange Earnings for the year (Rs. in lakhs)	Cumulative Net Foreign Exchange Earning (Rs. in lakhs)
			2023-24	
1.	M/s Panama Petrochem Ltd	27.08.2010	0.00	(-)147.40 To be briefed by the SO, Dahej

The SO, Dahej SEZ may like to comment on the NFE position of the above mentioned units.

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