



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  
6 वीं मंजिल, 3 आई विजन, शिवालिक प्लाजा के सामने, /605-607, 6<sup>th</sup> Floor, 3<sup>rd</sup> Eye Vision, Opp. Shivalik Plaza,  
आईआईएम-एएमए रोड, पंजरापोल क्रॉस रोड के पास, /IIM-AMA Road, Near Panjarpole Cross Road,  
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No. KASEZ/DCO/AC/123/2008-09/6910 /7092

Dated: 18.08.2025

To: All Approval Committee members: -

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

Madam/Sir,


**Subject: - 131<sup>st</sup> 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 131<sup>st</sup> meeting of the Approval Committee for Dahej - Special Economic Zone, is scheduled to be held on Thursday, 21<sup>st</sup> August, 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)  
Assistant Development Commissioner  
For, Development Commissioner  
Dahej Special Economic Zone  
(M) 8901091255

Agenda for 131<sup>th</sup> meeting of Unit Approval Committee for Dahej SEZ to be held on Thursday, 21<sup>th</sup> August, 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.

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Ratification of Minutes of 130<sup>th</sup> UAC Meeting.

131.1 Fresh Cases for Dahej SEZ: - NIL

131.2 Deferred cases for Dahej SEZ: -One

Sr. No.	Name of Applicant Unit	Proposal/Request
1.	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.

131.3 Other cases for Dahej SEZ: - Two

Sr. No.	Name of Applicant Unit	Proposal/Request
1	M/s. Raks Pharma Pvt Ltd, Dahej SEZ	Application for Addition of Research and Development Services in the existing LoA.
2	M/s Firmenich Aromatics Production (India) Private Limited, Dahej SEZ	Application for addition of Trading Activity in the existing LoA.

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

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 107<sup>th</sup> 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 109<sup>th</sup> 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 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:*

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- (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.

The case of the firm was placed before the 130<sup>th</sup> Approval Committee for consideration and suitable decision.

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.

The 130<sup>th</sup> Approval Committee after detailed discussion unanimously deferred the proposal and directed the firm to submit the following documents: -

1. Submit a copy of Registered Lease Deed to the DC Office within 30 days (As per Rule 74-A of the SEZ Rules, 2006)
2. Submit a Certificate regarding duties and export obligations as per the Customs Act, 1962 from the Specified Officer, DC office (As per Rule 74-A of SEZ Rules, 2006)
3. 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).

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

**Item No. 131.03.01**

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

M/s Raks Pharma Pvt Ltd was issued a Letter of Approval dated 26.06.2012 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. The unit had started commercial production with effect from 22.10.2015.

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.

This office vide letter dated 29.05.2025 had requested the firm to submit the Registered Lease Deed, EC, GPCB CCA, approval of Petroleum and Explosives Safety Organization (PESO) and approval of Food & Drug Administration.

The firm vide letter dated 04.07.2025 had submitted the Registered Lease Deed, EC, GPCB CCA, approval of Petroleum and Explosives Safety Organization (PESO) and approval of Food & Drug Administration.

The firm had informed that they are not able to fully use their available capacity for export of goods. Inclusion of R&D activities will help them to make optimum use of their installed capacity. They wish to provide R&D services to customers outside India, as well as customers in SEZ/EOU/DTA. They had stated that they will ensure that they will maintain positive Net Foreign Exchange Earning (NFE) after inclusion of R&D activity.

The firm had 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	6686.78	8024.14	9628.96	10591.85	11651.04	46582.78
2	*Foreign Exchange Outgo on for the first five years	498.17	597.8	4717.36	860.83	946.92	7621.09
3	Net Foreign Exchange earnings for the first five years(1-2)	6188.61	7426.34	4911.6	9731.02	10704.12	38961.69

This office vide letter dated 10.12.2024 had requested the firm to submit the clarification/reason for delay in submission of APR for the Financial Year 2023-24 and reasons/justification for submission of revised APR for the Financial Year 2020-21 to 2022-23. But till date, the firm had not submitted its response.

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

**Item No. 131.03.02**

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

M/s Firmenich Aromatics Production (India) Pvt Ltd was issued a Letter of Approval dated 01.03.2008 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 29 & 33. The unit had started commercial production with effect from 03.06.2010.

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

Sr No.	Description	ITC (HS) Code
1	AMBROX SUPER- OTHER	29329990
2	METHYL CRESOTINATE- OTHER	29182990
3	MUGUISSIMO- OTHER	33012990
4	OSMANTOL- OTHER	29052290
5	SALICYFLOR- OTHER	29182390
6	PERFUMERY INGREDIENTS- GIBBERELIC ACID	29322090
7	HETEROCYCLIC COMPOUNDS WITH OXYGEN HETRO- ATOM(S) ONLY	29321990
8	ESSENTIAL OILS OF JASMIN	33011990
9	PREPARED BINDERS FOR FOUNDRY MOULDS OR CORES; CHEMICAL PRODUCTS AND PREPARATIONS OF THE CHEMICAL OR ALLIED INDUSTRIES (INCLUDING THOSE CONSISTING OF MIXTURES OF NATURAL PRODUCTS), NOT ELSEWHERE SPECIFIED OR INCLUDED	38244090
10	ORGANIC DERIVATIVES OF HYDRAZINE OR OF HYDROXYLAMINE	29280090
11	ORGANO-SULPHUR COMPOUNDS	29302090
12	COMPOUNDS WITH OTHER NITROGEN FUNCTION- OTHER	29291090

13	OTHER ORGANO-INORGANIC COMPOUNDS	29311090
14	OTHER CYCLC AMIDES (INCL CYCLC CRBAMATES) & THEIR DERIVATIVES & SALTS THEREOF	29241990
15	MIXTURES OF ODORIFEROUS SUBSTANCES AND MIXTURES(INCLUDING ALCOHOLIC SOLUTIONS) WITH A BASIS OF ONE OR MORE OF THESE SUBSTANCES, OF A KIND USED AS RAW MATERIAL IN INDUSTRY; OTHER PREPARATIONS BASED ON ODORIFEROUS SUBSTANCES OF KIND USED FOR THE MANUFACTURE OF BEVERAGES.	33029090
16	AMINO-RESINS, PHENOLIC RESINS AND POLYURETHANES, IN PRIMARY FORMS	39092090

HSN Code- CAPITAL GOODS		
Sr No.	Description	ITC (HS) Code
1	Seamless Pipe (CS/CI/AS/SS)- Other	73041990
2	ERW Pipe (CS/CI/AS/SS)- Other	73069090
3	Seamless / ERW Pipe fittings (CS/CI/AS/SS)- Other	73079390
4	THREADED FITTINGS (CS/CI/AS/SS)- Other	73079290
5	FLANGES (CS/CI/AS/SS)- Other	73079190
6	Complete mechanical seal	84842000
7	PUMP-M&S0201- METERING & DOSING PUMPS	84135010
8	Heat-Exchanger	84195019
9	Reactor, Tank, Receiver, Column- Pressure Vessels	84198911
10	Gear Box	84834000
11	Column packing- other distilling equipment's	84194020
12	Flowmeters- Gauges level	90231020
13	LIT & LS- Parts and accessories	90319000
14	PIT & TIT- For measuring ot checking pressure	90262000
15	Control valve & On-off valve, PRV, ERV, BVFA, PSA- Pressure Reducing Valves	84811000
16	Agitator- Other	84193900

They have 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	2000.00	2300.00	2587.50	2975.63	3421.97	13285.00
2	*Foreign Exchange Outgo on for the first five years	800.00	920.00	1035.00	1190.25	1368.79	5314.04
3	Net Foreign Exchange earnings for the first five years(1-2)	1200.00	1380.00	1552.50	1785.38	2053.18	7971.06

The firm has not submitted the APR for the FY 2024-25 to this office.

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

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