

NOIDA SPECIAL ECONOMIC ZONE

Minutes of meeting of the Approval Committee of Noida SEZ held under the Chairmanship of Shri Gopal Meena, IAS, Development Commissioner (DC), Noida SEZ at 11:00 AM on 23/06/2026 through hybrid mode.

A. The following members of the Approval Committee were present during the meeting:-

- (1) Shri Paras Mani Tripathi, Jt. Development Commissioner, NSEZ (Nominee of Deptt. of Commerce in terms of letter dated 23/09/2008).
- (2) Smt. Aashima Chawla, Dy. DGFT, CLA, New Delhi (Nominee of Zonal Joint Director General of Foreign Trade, Delhi)
- (3) Shri Saibal Roy, Asstt. Commissioner, Customs, Noida Commissionerate (Nominee of the Commissioner of Customs, Noida Customs Commissionerate, Gautam Budh Nagar)
- (4) Shri Vivek Chaudhary, Income Tax Officer, Income Tax Deptt., Noida (Nominee of the Principal Commissioner of Income Tax, Noida).
- (5) Shri Vivek Kumar, Manager, Noida Authority ((Nominee of the Chief Executive Officer, New Okhla Industrial Development Authority).

Special invitee:

- i. Shri Ravikesh Tripathy, Specified Officer, NSEZ.
- ii. Shri Pratul Saxena, Member Secretary, Central Ground Water Board.
- iii. Shri Riteesh Tiwari, R.O., UPPCB, Noida
- iv. Shri Sushil Kumar, S.D.O., UPPCL, Noida.

B. Besides, during the meeting S/Shri (i) Sh. Gya Prasad, Dy. Development Commissioner, (ii) Sh. Noman Hafiz, Dy. Development Commissioner, (iii) Shri Ashish M. Rawlani, Dy. Development Commissioner, (iv) Sh. Pramod Kumar, Executive Assistant; (v) Sh. Amir Eqbal, ADC and (vi) Sh. Bharat Bhushan, Assistant, Project Section were also present to assist the Approval Committee. It was informed that the stipulated quorum for holding the meeting was available and meeting could proceed.

C. At the outset, the Chairman welcomed the participants. After a brief introduction, the agenda was taken up sequentially. After detailed deliberations amongst the members of the Approval Committee as well as interaction with the applicants / representatives of the units, following decisions were unanimously taken:-

D. New initiatives / reforms in view of good governance for Viksit Bharat 2047:-

- i. Approvals **shall be issued during** the meeting itself, immediately after the approval of the Approval Committee (in cases where all documents are complete).
- ii. **Approvals at NSDL portal** shall also be given on same day.
- iii. Calendar for conducting the Approval Committee meeting has been issued.
- iv. **In case of setting up of new unit in NSEZ, only those applications shall be considered by the Approval Committee, which are having the provisional offer of space issued by NSEZ Authority.**

- v. **Details of vacant plots / SDFs shall be displayed at NSEZ Website with complete description, condition & photos and applicant has to secure space through e-Auction.**
- vi. **Vacant plots / SDFs shall be auctioned through nominated agency, MSTC/CPP.**
- vii. Applicant may contact Shri Pramod Kumar, OSD (Telephone No. 0120-2562315, Email ID: ea@nsez.gov.in) & Shri Arun Singh Parihar, Steno-II (Telephone No. 0120-25672681 Ext.: 14 & Email ID: steno4@nsez.gov.in), for information regarding availability of plots / SDFs in NSEZ.
- viii. Estate Management section shall ensure the visit of applicant at vacant plots / SDFs. Thereafter as per Rule 18(2)(ii) of SEZ Rules, 2006, the Estate Management section shall confirm in writing to the applicant regarding availability of space and other infrastructure support applied for, by way of a provisional offer of space. With this, the applicant can apply for LoA before Approval Committee.
- ix. After grant of LoA under rule 19 to the applicant, allotment of Plots/SDFs shall be done through e-Auction only, thereafter, signing of lease will be done by the Estate Management section.
- x. In case of non-cooperation from Estate Management section, the applicant may contact Shri Paras Mani Tripathi, Joint Development Commissioner (Telephone No. 0120-2567274 & Email ID: jdc@nsez.gov.in).
- xi. The scheduled date of **next meeting** of Approval Committee is **07/07/2026**.
- xii. Only those proposals which are received before five working days of the next scheduled date of the Approval Committee, shall be placed before the Approval Committee.
- xiii. Whatever documents/ITR etc. are submitted online or details filled in online form by the applicant will be considered evidence as per IT Act, 2000.

E. The following references were taken into the account by the Approval Committee while considering the proposals: -

- i. Decision of the Approval Committee meeting held on **09/06/2026** regarding separate LOA for manufacturing & trading activity.
- ii. DoC's letter dated 16/02/2026 regarding single LOA for manufacturing & trading activity.
- iii. DoC's letter dated 09/04/2026 with direction that the matter of manufacturing & trading activity under single LOA may be kept in abeyance.
- iv. Rule 18(2)(ii) of SEZ Rules, 2006 regarding '*availability of space and other infrastructure support applied for, it confirmed by the Developer in writing, by way of a provisional offer of space*'.
- v. Rule 11(5) of SEZ Rules, 2006, provides that '*The land or built-up space in the processing area or Free Trade and Warehousing Zone shall be given on lease only to the entrepreneurs holding a valid Letter of Approval issued under rule 19 and the lease period shall not be less than five years but notwithstanding any other condition in the lease deed. The lease rights would cease to exist in case of the expiry of cancellation of the Letter of Approval.*'
- vi. SEZ Rules, 2006, SEZ Act, 2005 and Instruction issued by Department of Commerce.

F. Status of agenda discussed & decisions of the Approval Committee: -

Sr. No.	Subject	No. of proposals	Proposals approved/ processed	Proposal deferred	Proposal rejected
1.	Proposals for setting up of new unit in NSEZ	4	1	1	2
2.	Proposals for inclusion of additional authorized operation (Broad-banding)	3	2	0	1

	in LOA.				
3.	Miscellaneous matters.	3	0	1	2
4.	Monitoring of performance of unit	12	11	0	1
-	Total:	22	14	2	6

G. Item wise decisions on proposals included in agenda:

(1) Ratification of Minutes of last meeting of the Approval Committee held on 09/06/2026.

It was informed to the Approval Committee that there were neither any references nor objections against the decisions of the Approval Committee held on 09/06/2026. Hence, the Approval Committee 09/06/2026 were unanimously ratified by the Approval Committee.

Status of LOAs/Letters- Distribution of LOA, NSDL upload

Sr. No.	Subject	Proposals approved	LOA issued	NSDL upload
1.	Proposals for setting up of new unit in NSEZ	02	02	02
2.	Proposals for inclusion of additional authorized operation (Broad-banding) in LOA.	03	03	03
3.	Monitoring of performance of unit	02	02	-
4.	Change in Director/Shareholding pattern	01	01	01
5.	Exit from SEZ Scheme	01	01	01
6.	Cases remanded back from BoA	01	01	-
-	Total:	10	10	09

2(i). M/s. Cyber IIT Private Limited - Proposals for setting up of new unit in NSEZ.

M/s. Cyber IIT Private Limited has submitted proposal for setting up of unit in NSEZ for establishment of 10 MW AI-enabled Data Centre to undertake service activities namely "(i) Application service provisioning (83152); (ii) Computer systems management services (83162); (iii) Hosting and Information Technology (IT) Infrastructure Provisioning Services (8315); (iv) Information Technology (IT) design and development services (8314); (v) IT consulting services (83131); (vi) IT design and development services for applications (83141); (vii) IT design and development services

for networks and systems (83142); (viii) IT infrastructure and network management services (8316);(ix) IT Support services (83132);(x) Network management services (83161); (xi) Other hosting and IT infrastructure provisioning services (83159); (xii) Other information and support services n.e.c. (8599); (xiii) Other support services n.e.c. (85999); (xiv) Software originals (83143); (xv) Website Hosting Services (83151)". The applicant has proposed cumulative export of Rs.12000 lakhs and NFE of Rs.11088 lakhs during first block of five years. Applicant has proposed investment of Rs.10000 lakhs towards imported capital goods & Rs.11000 lakhs towards indigenous capital goods. The applicant has also proposed requirement of imported input services of Rs.600 lakhs & indigenous input services of Rs.900 lakhs. Proposed employment generation is 19 persons. Requirement of electricity power has been shown as 17500 KVA & requirement of built-up area of 1000 Sqmt.

2. Following documents still required to be submitted by the applicant:-

- i. Consent letter for financial assistance for the SEZ project.
- ii. Provisional offer letter for availability of space in NSEZ.

3. Shri Thana Ram Meghwal, Director appeared before the Approval Committee and explained the proposal.

4. The Committee observed that that the unit has projected a requirement of approximately 1000 sq. mtr. of built-up space for establishment of the proposed Data Centre, whereas the requisite built-up space is presently not available in NSEZ. Further, the representative of UPPCL informed the Committee that the existing electrical substations installed in NSEZ are not capable of catering to the proposed power requirement of 17500 KVA without substantial augmentation of the power infrastructure. The Committee also noted that operation of the proposed Data Centre would entail **significant quantity water requirement** for cooling purposes, which would place additional demand on the existing utilities and infrastructure of the Zone. The Committee noted that NSEZ have only ground water extracted from land. The Committee has asked about the consumption of water during the process of data center. The representative of the unit could not give satisfactory reply in this regard. The Committee also noted that operation of the proposed Data Centre would entail significant water requirement for cooling purposes, which would place additional demand on the existing utilities and infrastructure of the Zone.

5. Shri Pratul Saxena, Member Secretary, Central Ground Water Board briefed that depletion of ground water levels locally in NOIDA and Greater NOIDA area is attributed **to over exploitation of ground water**. Higher Manganese concentration in NOIDA urban areas is also reported. Further, the requirement for a 'No Objection Certificate (NOC)' to extract groundwater via borewell / tubewell in Noida is prescribed by **The Uttar Pradesh Ground Water Management and Regulation Act, 2019**. This mandate is enforced locally by the **Central Ground Water Authority (CGWA)** and the **Uttar**

Pradesh Ground Water Department (UPGWD).

6. The Committee discussed the agenda in detail and in view of the above constraints relating to availability of space, power infrastructure and water requirement, the Approval Committee did not find the proposal feasible for implementation in the available built-up space of NSEZ at present and accordingly **rejected** the proposal.

2(ii). M/s. IIT Alumini Network Private Limited - Proposals for setting up of new unit in NSEZ.

M/s. IIT Alumini Network Private Limited has submitted proposal for setting up of unit in NSEZ for establishment of 10 MW AI-enabled Data Centre to undertake service activities namely "(i)Application service provisioning (83152); (ii) Computer systems management services (83162); (iii) Hosting and Information Technology (IT) Infrastructure Provisioning Services (8315); (iv) Information Technology (IT) design and development services (8314); (v) IT consulting services (83131); (vi) IT design and development services for applications (83141); (vii) IT infrastructure and network management services (8316);(viii) IT Support services (83132);(ix) Network management services (83161); (x) Other hosting and IT infrastructure provisioning services (83153); (xii) Other information and support services n.e.c. (8599); (xiii) Other support services n.e.c. (8599); (xiv) Software originals (83143); (xv) Website Hosting Services (83151)". The applicant has proposed cumulative export of Rs.58740.00 lakhs and NFE of Rs.39865.00 lakhs during first block of five years. Applicant has proposed investment of Rs.10000.00 lakhs towards imported capital goods & Rs. 21350.00 lakhs towards indigenous capital goods. The applicant has also proposed requirement of imported input services of Rs.950 lakhs & indigenous input services of Rs.750 lakhs. Proposed employment generation is 19 persons. Requirement of electricity power has been shown as 18000 KVA & requirement of built-up area of 1100 Sqmt.

2. Following documents still required to be submitted by the applicant:-

- i. Copy of Memorandum of Association of the company incorporating proposed service activates.
- ii. Consent letter from 'Digital India Fund (DIF)' for financial assistance for investment Rs.313.50 Crore for the SEZ project.
- iii. Provisional offer letter for availability of space in NSEZ.

3. Shri Apporva Gaurav, authorized representative of M/s. IIT Alumini Network Private Limited joined the meeting through Video Conferencing and explained the proposal.

4. The Committee observed that that the unit has projected a requirement of approximately 1100 sq. mtrs. of built-up space for establishment of the proposed Data Centre, whereas the requisite built-up space is presently not available in NSEZ. Further, the representative of UPPCL informed the Committee that the existing electrical sub-stations installed in NSEZ are not capable of catering to the proposed power

requirement of 18,000 KVA without substantial augmentation of the power infrastructure. The Committee noted that NSEZ have only ground water extracted from land. The Committee asked about the consumption of water during the process of data center. The representative could not give the satisfactory reply in this regard. The Committee also noted that operation of the proposed Data Centre would entail **significant water requirement** for cooling purposes, which would place additional demand on the existing utilities and infrastructure of the Zone.

5. Shri Pratul Saxena, Member Secretary, Central Ground Water Board briefed that depletion of ground water levels locally in NOIDA and Greater NOIDA area is attributed **to over exploitation of ground water**. Higher Manganese concentration in NOIDA urban areas is also reported. Further, the requirement for a 'No Objection Certificate (NOC)' to extract groundwater via borewell / tubewell in Noida is prescribed by **The Uttar Pradesh Ground Water Management and Regulation Act, 2019**. This mandate is enforced locally by the **Central Ground Water Authority (CGWA)** and the **Uttar Pradesh Ground Water Department (UPGWD)**.

6. The Committee discussed the agenda in detail and in view of the above constraints relating to availability of space, power infrastructure and water requirement, the Approval Committee did not find the proposal feasible for implementation in the available built-up space of NSEZ at present and accordingly **rejected** the proposal.

2(iii). M/s. Golden Nebhraj Manufacturing Private Limited - Proposals for setting up of new unit in NSEZ.

M/s. Golden Nebhraj Manufacturing Private Limited has submitted proposal for setting up of new unit in NSEZ for manufacturing of '*Snus / Filter Khaini / Chewing Tobacco (HSN 24039910) (4200 Cartons / annum)*'. The applicant has proposed cumulative export of Rs.1825.88 lakhs and NFE of Rs.1785.09 lakhs during first block of five years. Applicant has proposed investment of Rs.45 lakhs on indigenous capital goods and employment generation of 25 person. Estate Division, NSEZ has issued provisional offer for allotment of SDF I-10A (314.57 Sqmt.) to the applicant.

2. Shri Savya Baweja, authorized representative appeared before the Approval Committee and explained the proposal.

3. The Committee informed the representative of the applicant that as per recent discussions held in department, the vacant SDFs in NSEZ shall be auctioned.

4. The Committee discussed the agenda in details and after due deliberations, **deferred** the

proposal and the representative of the applicant was informed that allotment of built space

in SDFs shall be done through e-auction only.

5. The Committee further directed DC(C) to look into their various raw materials, HSN and any other observations and submit a detailed report in this regard to be communicated to the unit in 05 working days for compliance.

2 (iv).M/s. Elite Basket Pvt.Ltd.- Proposal for setting up of new unit in NSEZ for 'Trading' activity-reg.

M/s. Elite Basket Private Limited, SDF No. I-16(B), NSEZ, had applied for inclusion of 'Warehousing of goods under chapter 09, 12, 61, 62, 63 & 88' in their LOA dated 08/02/2024. The proposal was placed before the Approval Committee in its meeting held on 29/05/2026. The Committee observed that the unit has been allowed for Trading, manufacturing, as well Warehousing activities. The Committee had deferred the proposal and directed the unit to apply for separate LOA for Trading, manufacturing, as well Warehousing activities, in terms of DoC's letter dated 09/04/2026. Accordingly, the unit vide its letter dated 05/06/2026 has submitted application in Form-F for separate LOA for *Warehousing of under following ITC (HS) Codes:*

- i. **Warehousing of goods** under Chapter 25, 30, 32, 33, 39, 40, 44, 45, 46, 50, 55, 56, 60, 65, 66, 67, 68, 69, 70, 72, 73, 80, 82, 84, 85, 90, 92, 94, 95, 96, 97.
 - ii. **Warehousing of goods** under Chapter 22 & 24 (Only for export).
 - iii. **Warehousing of goods under Chapter 08, 09, 12, 61, 62, 63 & 88 (unit has submitted a list of 70 Nos. 8 digit HS Codes).**
3. Following discrepancies have been observed in the proposal:
 - i. Duly signed Form-F not submitted.
 - ii. Unit has submitted a list of 70 Nos. 8-digit ITC HS Codes. However, it has been observed that various HS Codes do not exist.
 - iii. Under existing LOA No. 09/02/2023-Proj/1273 dated 08/02/2024, Chapter-wise goods for warehousing of goods are allowed. However, specific ITC HS Codes of good proposed for warehousing, required to be given by the applicant, in terms of Rule 19(2) of SEZ Rules, 2006.
 - iv. The unit needs to submit separate performance details in respect of trading, manufacturing & warehousing activities, since inception, in terms of Rule 22(2) of SEZ Rules, 2006.
 4. Shri Kushagra Tiwary, Director joined the meeting through video conferencing and explained the proposal.
 5. The Committee observed that in the existing LOA dated 08/02/2024, chapter-wise goods for warehousing of goods are allowed. However, specific ITC HS Codes of goods proposed for warehousing, required to be given by the applicant, in terms of Rule 19(2) of SEZ Rules, 2006. **Further, the unit has proposed warehousing of 'Walnut, Walnut Kernal, Walnut in-shell (HS Code 08023100), which is also approved for manufacturing in existing LOA.** The representative informed that he wants to remove these items from their warehousing items while revising their Form F. The Committee further observed that the unit has submitted a list of 70 Nos. 8-digit ITC HS Codes, in which **various HS Codes do not exist as per DGFT Website, the same needs revision too.**

6. The Committee discussed the agenda in detail and after due deliberations, granted **in-principle approval** for issuance of **LOA only for 'Warehousing'**, subject to submission of **04-digit ITC HS Code of goods proposed for warehousing** and rectification of discrepancies pointed out at para 3 above. The committee also directed that sensitive commodities brought in for warehousing shall be 100% examined by NSEZ Customs and shall not be allowed for DTA clearance.

3 (i).M/s. Associated Lighting Company - Proposals for inclusion of additional authorized operation (Broad-banding) in LOA.

M/s. Associated Lighting Company, Plot No. 101-102, NSEZ has submitted proposal for inclusion of 'manufacturing of (i) Glass Items, Others (70139900) (50000 Pcs / annum; (ii) Lamp Other Parts, Metal Parts, Bases, Ring Frames, Brackets, Reflectors & Other Lamp Accessories (94059900) (200000 pcs / annum); (iii) Other Fabric with HIPS Laminated or Pasted (39219099) (500000 pcs / annum)' in their LOA dated 28/12/2005.

2. Shri Randhir Kumar Singh, joined the meeting through Video Conferencing and explained the proposal.

3. The Committee observed that there are difference in the data given in APRs for FY 2020-21 to 2024-25 vis-à-vis NSDL Data. Further, the export performance / NFE achievement of the unit is not satisfactory as compare the plot area of 2000 Sqmt. allotted to them.

4. The Committee observed that the NFE achievement in terms of allotted land is as under:

Name of the unit	Actual NFE in last five years (in Rs.)	Area (Sq. Mtr)	NFE per Sq. Mtr (5 Years)	NFE per Sq. Mtr (One Year)	NFE per Sq. Mtr (One month)
Associated Lighting India Pvt. Ltd.	Rs.62,78,97,000/-	2000	Rs.313948.50	Rs.62789.70	Rs.5232.47

5. The Committee discussed the agenda in detail and after due deliberations, granted **in-principle approval** to the proposal, subject to submission of clarification in difference in the data given in APRs for FY 2020-21 to 2024-25 vis-à-vis NSDL Data. The Committee also advised the unit to improve their export performance.

3 (ii).M/s. Lakshman Overseas - Proposals for inclusion of additional authorized operation (Broad-banding) in LOA.

M/s. Lakshman Overseas, Plot No. 19 & 67, NSEZ has submitted a proposal for inclusion of additional item namely 'Warehousing of goods under Chapter heading 2402,

2403, 6401, 6402, 6403, 6404, 6405, 6406, 7002, 8477, 8515, 8703, 8704, 8711, 9018, 9503, 9506, 9614' in their LOA dated 25/10/2002. The unit has submitted a list of 37 Nos. goods containing 4- & 8-digit HS Codes.

2. The Committee observed that following discrepancies have been found in the proposal:

- i. In APR for FY 2023-24 & 2024-25 the unit has declared DTA sale of Rs.1675.68 lakhs & Rs.82.67 lakhs. Therefore, unit needs to provide **details of these DTA sales** and **mode of payment** received against such DTA sale, whether in free foreign currency or INR.
- ii. Figures of mentioned in **APRs are not matching with NSDL Data**. The unit needs to clarify the same.
- iii. The unit needs to submit separate performance details in respect of trading, manufacturing & warehousing activities, since inception, **in terms of Rule 22(2) of SEZ Rules, 2006**.
- iv. Unit's LOA has been approved for 'manufacturing' & 'warehousing' both. Hence, the unit is required to obtain separate LOA either for 'manufacturing' or 'warehousing', as per their preference, in terms of DOC's letter dated 09/04/2026, within 02 months.
- v. The export **performance / NFE achievement** of the unit is very poor as compared to the authorized operations approved and plot area allotted to them. Details are as under:

Name of the unit	Actual NFE in last five years (in Rs.)	Area (Sq. Mtr)	NFE per Sq. Mtr (5 Years)	NFE per Sq. Mtr (One Year)	NFE per Sq. Mtr (One month)
Lakshman Overseas	Rs.1,22,59,000/-	8460	Rs. 1449.05	Rs. 289.81	Rs. 24/-

3. Shri Vipul Aggarwal, Proprietor & Shri Ram Kishor, authorized representative of the unit appeared before the Approval Committee and explained the proposal. On being asked by the Approval Committee, he informed that 'manufacturing' activity shall be discontinued from the existing LOA and they shall apply separately for manufacturing activity and exclude the 'coffee' and related operations. No fresh import in respect of 'coffee' and related operations shall be permitted; however, the existing stock may be cleared as per terms and conditions of extant LoA.

4. The Committee observed that the **export performance / NFE achievement** of the unit is **extremely poor** as compared to the authorized operations approved and plot area allotted to them. The **value of land utilization is extremely poor**. The Committee directed the representative of the unit to improve their export performance. Their performance shall be reviewed again after 6 months by approval committee. The committee also directed for clear demarcation and separation manufacturing activities from warehousing activities. The SO NSEZ to submit compliance report on this aspect.

5. The Committee discussed the agenda in detail and after due deliberations, **approved** the proposal and directed the unit to submit the documents pointed out at Para 2 above. This approval is **subject to the following terms & conditions:-**

- i. All export/import of Warehousing goods shall be subjected to 100% examination by

- Customs in terms of quantity and value.
- ii. **No DTA sale of Warehousing goods** shall be allowed.
 - iii. The authorized operations of the unit will be strictly as per scope of Rule 18(5) of SEZ Rules, 2006.
 - iv. No export / import of any items will be allowed, which comes under **Prohibited / Restricted items** under prevalent Import policy given in latest ITC (HS) Classification or any other law and/or covered under **SCOMET list** as per DGFT Notifications/Public Notice /Instructions issued from time-to-time.
 - v. The unit to comply with Cigarettes and Other Tobacco Products Act (COTPA) 2003.
 - vi. Unit shall obtain necessary NOC from the concerned department, whenever required as per Import Policy of DGFT.
 - vii. All transactions shall only be in free foreign currency in terms of proviso to Rule 18(5) of SEZ Rules, 2006.

3(iii) M/s. ClearTrail Technologies Pvt. Ltd.- Proposals for inclusion of additional authorized operation (Broad-banding) in LOA.

M/s ClearTrail Technologies Pvt. Ltd. has been granted LOA dated 24/11/2011 for undertaking service activities namely 'Computer Software, IT and IT Enabled Services'. The unit has applied for inclusion of additional authorised operation namely 'Trading of (i) Server and Desktop computer (8471); (ii) Network packet broker and network devices (8517); (iii) Racks, storage and network material (7326, 8414, 8504 & 8544)', in their LOA. The unit has informed that they have received specific requirements from their overseas customers who demanded that their proprietary software applications be tested, validated and compatible with specific physical hardware applications such as servers, networking devices, switched or Aggregator, Network Packet Broker racks etc., and then the specific physical hardware appliances is required to be exported to the client. Unit has further stated that to fulfil these requirements and expand their business operations, they intend to import / procure the required physical hardware components, in their SEZ unit, and export the tested specific physical hardware appliances to the client. Unit has further stated that they will continue their prevailing practice of accounting for and declaring the software value portion through the prescribed SOFTEX Form tacking mechanism. The physical movement of the accompanying hardware will be processed via standard customs shipping bills through the SEZ online portal, ensuring clear bifurcation or combined value realization as per SEZ and RBI rules.

2. Shri Sanjeev Agarwal, Director joined the meeting through video conferencing and explained the proposal.
3. The Committee discussed the proposal in details and after detailed deliberations, the Committee observed that the proposed additional activity has been described by the unit as "Trading"; however, the justification furnished by the unit indicates that the proposed operations involve **configuration, testing, validation and export of hardware integrated** with proprietary software. The Committee noted that such activities go beyond the scope of mere trading and appear to involve value addition through system

integration and configuration. The Committee was of the view that the proposed activity is more appropriately classifiable as a "**Manufacturing**" activity rather than trading. For manufacturing activities, the unit shall be required to obtain a separate Letter of Approval (LOA) and cannot be considered as an additional trading activity under the existing LOA, the Committee did not find the proposal acceptable in its present form and accordingly **rejected** the same.

4 (i). M/s Plastic Processors & Exporter Pvt. Ltd. – Submission of plan implementation of unit in NSEZ and proposal for inclusion of additional authorized operation in LOA.

The Board of Approval (BoA) in its meeting held on 06.03.2024 had granted renewal of LOA dated 05/11/1997 of M/s. Plastic Processor & Exporter Pvt. Ltd. for a period of five years from 20/03/2024 to 19/03/2029 (conveyed to the unit vide this office letter dated 04/04/2024), subject to following conditions:-

(i) The Unit shall ensure necessary funding is arranged within 3 months of the date of approval of extension and construction commences immediately to ensure that commercial production commences within 18 months of the date of approval.

(ii) The Unit would ensure their first export orders within 24 months from date of renewal of LoA. No further request will be considered to extend this time limit of 24 months.

(iii) No DTA sales would be allowed during the period of this 5-year extension irrespective of fulfilling of NFE and other conditions. Thereafter, DTA sales may be allowed as per prevailing norms.

(iv) Exit of the Unit in terms of Rules 74 and Transfer of its Assets in terms of Rule 74A of the SEZ Rules, 2006 would not be allowed during the period of this 5-year extension.

(v) Environment Clearance and other statutory clearances, required, would be obtained by the Unit.

(vi) The Unit will provide a clear roadmap and the UAC, NSEZ would examine the performance of the Unit after every six months period.

(vii) These conditions are over and above the extant conditions of NFE requirements under rule 53 of SEZ Rules.

2. However, M/s. Plastic Processor & Exporter Pvt. Ltd. **has not complied with the terms & conditions of LOA renewal as per directions of BOA viz. "construction activities commences immediately to ensure that commercial production commences within 18 months of the date of approval till date.** Accordingly, vide

letter dated 25.09.2025, unit was asked to show cause as to why action should not be initiated against them for cancellation of LOA for non-implementation of project and non-compliance with the decision of Approval Committee and Board of Approval.

3. The unit vide its letter dated 20/11/2025 submitted its reply stating that they tried to plan their operations in such a manner that they may be able to abide by this condition of export of 100% turnover, they found that it was an impossibility at the current juncture due to following reasons:-

(a) Political unrest in Bangladesh and Nepal which restrained us from securing any commitments for supply.

(b) New trade barriers and uncertain and sudden policy changes in export markets

(c) Apart from the above, the decision of the European Union (EU) to stop supplying raw materials to non-OECD countries led to major uncertainty on their supply chain and they had to scurry to explore new reliable and steady alternate sources.

4. The Unit vide its letter dated 06/04/2026 had submitted request for surrender of LOA and exit from SEZ Scheme. As per Condition No. (vi) of the BoA approval, renewal was granted subject to condition that '*Exit of the Unit in terms of Rules 74 and Transfer of its Assets in terms of Rule 74A of the SEZ Rules, 2006 would not be allowed during the period of this 5 years extension*'.

5. Thereafter, **the unit vide its letter dated 23/05/2026 requested to keep their request for surrender of LOA, in abeyance for two months.** The unit has stated that they are exploring the viability of a new product and other potential business for sustaining viability.

6. **The unit vide its letter dated 09/06/2026 submitted an implementation plan of the unit.** The unit submitted that it had completed the required financial tie-ups and explored manufacturing through job work in FALTA SEZ; however, unforeseen developments including political instability in Bangladesh, increased tariffs in the USA, restrictions on export of plastic waste from Europe, and global supply-chain disruptions adversely impacted its business plans. Consequently, the unit has revised its strategy and now proposes to undertake manufacturing of plastic articles using domestically procured raw materials, along with warehousing activities for *polymers, lithium cells, packs, and batteries*. The unit has assured that necessary infrastructure and machinery will be installed and commercial operations commenced within six months, while requisite details and projections for the proposed activities will be submitted separately. Meanwhile, they are proposing broad-banding of following product in LOA:-

Existing approved authorized operations	Proposed additional authorized operation
---	--

Manufacturing of: Plastic Agglomerates/ Granules and Plastic Component and Articles (39011090) (15000.00 Tons/annum).	Manufacturing of: Article of Plastic like Polythene bags in various thickness (HS Code 39011020-LDPE; and HS Code 39014010-LLDP) (250 Tons / annum)
---	---

7. The Committee observed that as per **Rule 18 (4A) of SEZ Rules, 2006**, 'for existing plastic or used clothing Units in Special Economic Zones:-

(a) **Broad banding and splitting of license for setting up of sub-Units shall not be allowed** and all transactions of a Unit shall be regulated through a single bank account;

(b) no third-party exports shall be allowed by any such Unit;

(c) all such Units shall set up facilities to make products out of used clothing or plastic waste;

(d) 100 per cent. inspection of the consignment of used clothing sale to Domestic Tariff Area shall be under taken.

8 . **Physical verification report:** The Committee further observed that a physical verification on 20.06.2026 of M/s Plastic Processors & Exporter Pvt. Ltd. at Plot No. 24A, NSEZ revealed a completely **non-operational, neglected site devoid of standing buildings, manufacturing infrastructure**, or even a boundary gate. Furthermore, **no staff** or **security personnel** could be found on the premises. **The huge plot currently serves merely as a dumping ground, heavily cluttered with discarded industrial scrap, including rusted motor parts, alongside significant piles of demolished brick and concrete rubble. No commercial or export activities are possible at this location sans a factory building.** The Photographs taken during the visit were shown to the Committee members and **annexed as 4(i).**

9. **Shri Mukesh Tandon**, AVP of M/s Plastic Processors & Exporter Pvt. Ltd. joined the meeting through video conferencing and explained the proposal and reiterated his earlier written submissions.

10. The Committee observed that the **unit had consistently failed to fulfil the basic objectives as envisaged in Section 05 of the SEZ Act, 2005**, for which the Letter of Approval had been granted to them. **The unit has been occupying valuable SEZ space (2700 Sq. Mtrs) for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ.** The continued retention of SEZ space by a **non-performing unit adversely affects the optimal utilization** of scarce land and infrastructure resources, which could otherwise be allotted to the prospective entrepreneurs capable of generating exports and employment. The committee also observed that NSEZ Noida being in **close proximity to Delhi** and NOIDA being an industrial hub, industrial land/plots are scarce

and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

11. The Committee discussed the agenda in details and after due deliberations, **rejected** the proposal for broad-banding in terms of Rule 18 (4A) of SEZ Rules, 2006. The Committee observed that the unit has been non-performing since FY 2019-20 and is non-compliant with the conditions laid down by BOA in its meeting held on 06.03.2024 while renewal of its LOA. The Committee also decided to recommend the unit's proposal dated 06.04.2026, for surrender of LOA & exit from SEZ scheme, to BoA, to allow exit of unit under Rule 74 of SEZ Rules, 2006.

4(ii) M/s Ajit Exports - Monitoring of Performance of the unit.

In spite of several emails, no one from M/s. Ajit Exports was appeared before the Approval Committee. It was informed that they are **not receiving phone calls** on the mobile numbers available in records. **Despite of service of notice by email dated 19.06.2026 and message through WhatsApp on 22.06.2026** by Shri Bharat Bhushan, Assistant, NSEZ, no one appeared from their side.

2. The Committee further observed that the matter was placed before the Approval Committee in its meeting held on 13.10.2025. However, no one from the unit appeared for the said meeting. The Approval Committee observed that earlier also no one from the unit turned up for personal hearing during the last UAC held on 22/09/2025 as well as before DC, NSEZ on 26/09/2025. It was further informed that as per legal opinion received, NSEZ Customs vide Internal Memo dated 10/10/2025, has been requested to file an early hearing application before the Hon'ble High Court to expedite disposal of the pending Customs Appeal. Accordingly, the Approval Committee deferred the proposal for adjudication of SCN & decision on LOA. The matter is pending with Hon'ble Court for final order.

3. The Committee observed that the LOA of the unit was valid upto 31/12/2013. The Plot No. 129G/9, NSEZ has already taken over by NSEZA under proper panchnama on 22/12/2020. The said plot had been auctioned **through MSTC e-auction** portal on 14/12/2023. M/s. Yesventive IT Labs Pvt. Ltd. has taken the said plot through auction and plot is presently in their possession. M/s. Ajit Export has filed W.P. before Hon'ble High Court of Delhi. The matter was listed on 05/05/2026 and deferred for next hearing on 16/09/2026.

4. The Committee discussed the agenda in detail and after due deliberations, **directed to obtain legal opinion in the matter**, forwarding all details to it.

4(iii) M/s S.I. Overseas Jewellers- Monitoring of Performance of the unit.

M/s. S.I. Overseas Jewellers had been granted LOA No. 07/02/2015-Proj/3466 dated 31/03/2015 for setting up of unit in NSEZ for 'Manufacturing of handcrafted plain gold jewellery'. The unit had commenced operation w.e.f. 28/03/2018 and LOA was valid upto 27/03/2023. The unit had not made any export during 2019-20 to 2022-23. The unit committed persistent defaults in payment of lease rent, resulting in accumulation of substantial arrears. Consequently, proceedings under the Public Premises (Eviction of Unauthorized Occupants) Act, 1971 (PP Act) were initiated and notices under Section 7 of the PP Act were issued during 2021 and 2022. Since, the unit continued to occupy the premises after expiry of the LOA, a Notice under Section 4 of the PP Act, 1971 was issued on 26/06/2025 on the ground of authorized occupation.

2. The Committee further observed that the unit had a Customs mis-declaration case in which Order-in-Original dated 14.01.2021 penalties amounting to approximately ₹4.28 crore were imposed upon the unit, along with penalties of ₹1.49 lakh each upon the partners. Further, their Writ Tax No. 1006 of 2021 has been dismissed by the Hon'ble High Court of Allahabad. Further, the Review Misc. Application No. 168 of 2023 is pending before the Hon'ble High Court.

3. The Approval Committee further noticed that unit's LOA expired on 27.03.2023 and no application for renewal of LOA has been filed. The Committee also noted that unit is non-functional since 2019-20. Unit has also not submitted Annual performance reports as mandated under Rule 22(3) of SEZ Rules, 2006.

4. The Committee also observed that Rule 11(5) of SEZ Rules, 2006, prescribes that, *"The land or built up space in the processing area or Free Trade and Warehousing Zone shall be given on lease only to the entrepreneurs holding a valid Letter of Approval issued under rule 19 and the lease period shall not be less than five years but notwithstanding any other condition in the lease deed, **the lease rights would cease to exist in case of the expiry** or cancellation of the Letter of Approval"*. The committee took a serious view of the unit's expired LOA (expired on 27/03/2023), unit being non-functional since FY 2019-20, not filing APRs and a confirmed case with pending demand of Customs to the tune of **₹4.28 Crore** & personal penalties of **₹1.49 Lakh** on each partner. After repeated compliance violations, the company became persona non grata. As the **LOA had already expired**, the Approval Committee further directed the Estate Section, NSEZ to **start the eviction proceedings** in terms of Section 5 of the P.P. Act read with Rule 11(5) of SEZ Rules, 2006.

5 (i). M/s. Shree Shyam Exports - Monitoring of Performance of the unit.

M/s. Shree Shyam Export had been granted LOA No. 07/08/2016-Proj./8964

dated 16/09/2016 for setting up of unit in NSEZ for 'Manufacturing of plain gold jewellery'. The unit had commenced operation w.e.f. 20/02/2017 and **LOA was valid upto 19/02/2022**. Thereafter, unit **did not apply for renewal of LOA**. The unit is non-functional since 2018-19.

2. A site inspection of the premises of the unit at Plot No. 129G/31, NSEZ was carried out and it was found that **the premises of the unit was locked and non-operational with no manufacturing or production activity underway. The building appears dilapidated and abandoned, resulting in the underutilization of valuable SEZ land.** The Photographs taken during the visit were shown to the Committee members and **annexed as 5(i)**.

3. Despite being invited for the UAC vide email dated 18.06.2016 & 22.06.2016, the unit replied that they cannot attend the said meeting. No one from the unit, appeared for the meeting either physically or virtually.

4. The Committee discussed the agenda in detail and after due deliberations concluded that the unit had consistently failed to fulfil the basic objectives as envisaged in Section 5 of the SEZ Act, 2005, for which the Letter of Approval had been granted to them from 2014-15 (except for the period 2016-17 & 2017-18). The unit has been occupying valuable SEZ space for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ. The continued retention of SEZ space by a non-performing unit adversely affects the optimal utilization of scarce land and infrastructure resources, which could otherwise be allotted to prospective entrepreneurs capable of generating exports and employment. The Committee also observed that NSEZ Noida being in close proximity to Delhi and NOIDA being an industrial hub, industrial land/plots are scarce and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

5. It was informed to the Committee that M/s. R.A. International is the original allottee of Plot No. **129G/31**, NSEZ and M/s. Shree Shyam Exports was working on sharing basis from the said plot.

6. The Committee observed that the Letter of Approval issued to M/s. Shree Shyam Export expired on **19.02.2022** and that the unit neither applied for renewal of the Letter of Approval nor undertook any manufacturing or export activity since FY **2018-19**. The Committee further noted that the unit has remained non-functional for a prolonged period and that no representative of the unit appeared before the Committee to explain its continued non-performance which shows their lackadaisical approach.

7. After due deliberations and in the light of above-mentioned facts, the Committee unanimously decided to treat the **Letter of Approval No.- 07/08/2016-Proj./8964** dated **16/09/2016** granted to M/s. Shree Shyam Export as expired with effect from

19.02.2022 and non-submission of any application for renewal thereof. The Committee further authorized the Development Commissioner to issue a **Show Cause Notice** to the unit as to why their LOA shall not be cancelled **under Section 16 of the SEZ Act, 2005 read with Rule 77 of the SEZ Rules, 2006**; and the terms and conditions of the Letter of Approval issued thereof. The Committee further directed to place the performance of original allottee i.e., M/s. R.A. International for review and monitoring in the next meeting.

5 (ii). M/s. Advance Nanomeds - Monitoring of Performance of the unit.

M/s. Advance Nanomeds had been granted LOA No. 06/02/2017-Proj/5397 dated 16/05/2017 for setting up of unit in NSEZ for '*Manufacturing of Nutraceuticals and Dietary Supplements namely: (i) Liposomal vitamin C, (ii) Liposomal Glutathione, (iii) Liposomal curcumin, (iv) Liposomal Resveratrol, (v) Liposomal herbal combination, (vi) Omega 3-fatty acid softgels, (vii) Green coffee bean extract capsule, (viii) Bone support tablets, (ix) Hair and Nail Support, (x) Conjugated linoleic acid capsules, (xi) CoQ10 capsules*'. The unit had commenced operation w.e.f. 05/11/2019 and **LOA was valid upto 04/11/2025**. It has been observed that the **unit is not functional since 2022-23**.

2. A site inspection of the premises on 23.06.2026 of the unit at Plot No. 142A/20A NSEZ was carried out and it was found that **the premises were secured and locked, exhibiting significant physical dilapidation. There was no indication of recent or on-going manufacturing activity, suggesting the facility has been abandoned or inactive for an extended period.** The Photographs taken during the visit were shown to the Committee members and annexed as 5(ii).

3. It was further informed that the Approval Committee in its meeting held on 07.02.2025 had earlier renewed LOA for shorter period from 05/11/2024 to 04/11/2025 based on the unit's submission to have export orders from Bulksupplements.com, USA and statement that if the renewal of LOA is granted, they would resume export from March, 2025. However, unit failed to make any export during the extended period. Now, the unit has again applied for renewal of LOA and submitted a purchase order once again from Bulksupplements.com, USA. The genuineness of the said export orders was checked from the said company 'Bulksupplements.com, USA' through email dated 16.04.2026, however, **no reply has been received from the said company.** It was also noted that the purchase order was signed by one of the directors of the company namely, Mr. Sunil Agarwal, which is **annexed as 5(ii)**.

4. The factsheet was emailed to the unit on 18.06.2026 & 22.06.2026 (sanjay@advancenanomeds.com, info@advancenanomeds.com) and a call was also made by Shri Bharat Bhushan, Assistant, NSEZ to Shri Sunil Agarwal, partner, he was informed that their monitoring has been listed before the Approval Committee meeting to be held on 23.06.2026, however, **no one from the unit appeared** for the meeting.

5. The Committee observed that the **unit has remained non-operational since 2022-23 and has failed to undertake any manufacturing or export activities despite**

having been renewal of its Letter of Approval up to 04.11.2025 on the basis of assurances regarding revival of operations and proposed export orders. The Committee further noted that no evidence of resumption of production or exports has been furnished by the unit and that the authenticity of the export orders submitted by the unit could not be independently verified. The unit also failed to appear before the Committee to explain its continued non-performance or substantiate its request for renewal of the Letter of Approval.

6. The Committee discussed the agenda in detail and after due deliberations concluded that the unit had consistently failed to fulfil the basic objectives as envisaged in Section 05 of the SEZ Act, 2005, for which the Letter of Approval had been granted to them, since 2022-23 onwards. The unit has been occupying valuable SEZ space (510 Sq. mtrs.) for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ. The continued retention of SEZ space by a non-performing unit adversely affects the optimal utilization of scarce land and infrastructure resources, which could otherwise be allotted to prospective entrepreneurs capable of generating exports and employment. The committee also observed that NSEZ Noida being in close proximity to Delhi and NOIDA being a industrial hub, industrial land/plots are scarce and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

7. After due deliberations and in light of above mentioned facts, the Committee authorized the O/o DC, NSEZ to issue a Show Cause Notice calling upon the unit to explain as to why its application for renewal of the Letter of Approval beyond 04.11.2025 should not be rejected under the provisions of Rule 19(6A) of the SEZ Rules, 2006, and further why their LOA shall not be cancelled under Section 16(1) of SEZ Act, 2005 on account of its persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to make any export since FY 2022-23, non-utilization of the allotted premises, and failure to demonstrate any credible plan for revival of operations and failure to re-start the bussiness. The Committee further decided to grant a Personal Hearing (PH) to the unit in its next meeting to be held on 07.07.2026.

5 (iii). M/s. PC Jeweller Ltd. (Unit-I) - Monitoring of Performance of the unit.

M/s. PC Jeweller Ltd. (unit-I) had been granted LOA No. 07/16/2007-Proj/5763 dated 25/09/2007 for setting up of unit in NSEZ for *Manufacturing of: (i) Plain Gold Jewellery (71131911)(125 Kgs/annum); (ii) Gold Jewellery with other precious and semi precious stone (71131915)(20 Kgs/annum); (iii) Repairing or remaking of old Plain Gold Jewellery (71131911)(5 Kgs/annum); (iv) Repairing or remaking of old Plain Gold Jewellery with precious and semi precious stone (71131915) (5 Kgs/annum); (v) Gold Jewellery with Pearls (71131912)(5 Kgs/annum); (vi) Gold Jewellery with Diamonds (71131913) (5 Kgs/annum); (vii) Platinum Jewellery (71131921) (5 Kgs/annum); (viii) Plain Silver Jewellery (71131141) (5 Kgs/annum); (ix) Silver Jewellery with Gems*

(71131145) (5 Kgs/annum); (x) Other articles of Silver Jewellery (71131149) (5 Kgs/annum); (xi) Repairing or remaking of old Platinum Jewellery (71131921)(5 Kgs/annum); (xii) Repairing or remaking of old Plain Silver Jewellery (71131141)(5 Kgs/annum); (xiii) Repairing or remaking of old Silver Jewellery with Gems (71131145)(5 Kgs/annum) (2) Repair and Remaking of Old Gold/Platinum/Silver (Plain & Studded Jewellery'. The unit had commenced operation w.e.f. 20/11/2007 and LOA had been renewed upto 19/11/2027. It has been observed that the unit is not functional since 2021-22 and there is a mismatch in NSDL vis-à-vis APR data which required further clarification

2. A site inspection of the premises of the unit at Plot No. 65, NSEZ was carried out and it was locked on two sides and no sign of any activity was found. The unit appeared to have remained unused for an extended period. These observations indicate that no production or manufacturing activity has been carried out at the premises for a considerable duration. The Photographs taken during the visit were shown to the Committee members and annexed as 5(iii).

3. The unit was invited to attend the said meeting vide email dated 18.06.2026 & 22.06.2026, however unit replied that they were unable to attend the meeting and requested to grant an opportunity in next meeting. No one from the unit appeared for the meeting held on 23.06.2026.

4. The Committee discussed the agenda in detail and after due deliberations concluded that the unit had consistently failed to fulfil the basic objectives as envisaged in Section 5 of the SEZ Act, 2005, for which the Letter of Approval had been granted to them. The unit has been occupying valuable SEZ space for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ. The continued retention of SEZ space by a non-performing unit adversely affects the optimal utilization of scarce land and infrastructure resources, which could otherwise be allotted to prospective entrepreneurs capable of generating exports and employment. The committee also observed that NSEZ Noida being in close proximity to Delhi and NOIDA being a industrial hub, industrial land/plots are scarce and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

5. After due deliberations and in the light of above mentioned facts, the Committee authorized O/o DC, NSEZ to issue a **Show Cause Notice** to the unit as to why the Letter of Approval No. 07/16/2007-Proj/5763 dated 25/09/2007 issued to them shall not be cancelled in terms of **Section 16(1) of the SEZ Act, 2005, read with Rule 77 of the SEZ Rules, 2006**, for persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to make any export since **FY 2017-18** (except for one export in 2020-21).

5 (iv). M/s. Bhayani Plastic India (P) Ltd. - Monitoring of Performance of the unit.

M/s. Bhayani Plastic India (P) Ltd. had been granted LOA No.- 11/02/2011-Proj/698 dated 18/01/2012 for setting up of unit in NSEZ for 'Manufacturing of Plastic Hangers and Plastic Sizers & Trading of above items. The unit had commenced operation w.e.f. 25/09/2012 and LOA had been renewed upto 24/09/2027.

2. The Committee noted that the unit has remained non-functional since 2016-17. The Approval committee in its meeting held on 12.01.2026 had took a very serious view regarding their non-performance and non-payment of rental dues and directed for issuance of Show Cause Notice proposing cancellation of LOA and penalty under FT (D&R) Act, 1992. Show Cause Notice No. 11/02/2011-Proj/1061 dated 11/02/2026, the unit was called upon to show cause, as to **why their LOA should not cancelled under Section 16 of SEZ Act, 2005 and penal action should not be initiated in terms of FT(D&R) Act, 1992, for non-performance since 2016-17, non-submission of acceptance and non-execution of Bond-cum-LUT** thereby violating conditions of LOA renewal letter dated 30.10.2023 and **non-submission of APRS since 2022-23** thereby violating Rule 22(3) of SEZ Rules, 2006 and condition No. 7 of Bond-cum-LUT.

II. The unit was also granted a personal hearing before the Development Commissioner on 24/02/2026, wherein, the representative of the unit Mr. Atul Bhayani, appeared virtually and informed that the unit had now secured an investor who is interested in investing in the business and they will submit a concrete business plan, along with supporting documentary evidence, within one month.

III. The then DC, NSEZ vide Order-in-Original dated 05/03/2026 had passed the following order:

- i. **The unit shall submit a concrete and detailed business plan and signed copies of agreements with their investors, within a period of one month.**
- ii. **The unit shall deposit the outstanding lease rent immediately.**

IV. W.r.t., the Order-in-Original dated 05/03/2026, the unit vide its letter dated 20/03/2026 furnished details of their plan to diversify. However, till date **the unit has not started any activity on the said premises. They have also not paid the rentals which has accumulated to the tune of Rs. 6,22,777 /-** as per data received from Estates Section, NSEZ. Therefore, they have failed to comply with O-I-O dated 05.03.2026.

3. Earlier, while renewing the LoA, a PH was held before the Development Commissioner, NSEZ on 31/10/2022 with Mr Atul Bhayani from Bhayani Plastics. He reiterated the reasons as to why he could not start his business such as the Chennai floods, business model of supplying to DTA with EEFC payments and the pandemic. The business model which he would adopt and look at a 3-4 month period to restart was the

following:

- i. kitchenware and hardware of plastics exports to UAE
- ii. plastic hangars with furnishing products like quilts, bedsheets, curtain and other made-ups to US company based out of Atlanta, which would supply these to motels in the Southern part of the US

He indicated that a 5-year extension would be required without which the financial institutions would not fund him. It was mentioned the loans have already been cleared.

In the light of this, DC, NSEZ granted 5-year extension. Accordingly, LOA was renewed upto 24/09/2027. It is to mention that at the time of submission of the application for renewal of LOA, the unit had submitted copies of email received from jeweldxb, UAE. It is also mentioned that after renewal of LOA unit has not done any activity in SEZ.

In reply to O-I-O dated 05/03/2026, the unit has again submitted copies of emails from jeweldxb, UAE, as part of 'Business Plan', as submitted at the time of previous renewal of LOA in 2022, for same products.

Therefore, in light of above, the unit's plan doesn't appear credible, moreover they haven't done any work at the premises to substantiate the genuineness of their intent and claim.

4. A site inspection of the premises of the unit at Plot No. 142A/54, NSEZ was carried out and it was found that the **premises were unlocked**. The security personnel present at the site informed the inspection team that manufacturing activities at the unit had ceased for a considerable period. This observation was corroborated by the absence of any manufacturing machinery and the non-availability of staff at the premises. Further, the area was found to be occupied by stored finished goods, indicating that the premises are presently being utilized for storage purposes, possibly in connection with another nearby unit. Whereas **neither such permission has been granted to the unit for storing/warehousing other unit's finished goods into the premises allotted to them nor warehousing has been approved as the authorized operations for the said unit**. Therefore, it appears to be in **violation of the SEZ Act/Rules**. The Photographs taken during the visit were shown to the Committee members and **annexed as 5(iv)**.

5. Shri Atul Bhayani, Director of the unit appeared before the Approval Committee and explained the proposal. He cited that the company was in financial crunch and hence could not start the export activities. Now, they have found an investor and will start the business. However, despite being specifically queried by the Committee, he was unable to furnish any satisfactory explanation or authorization for the storage of goods belonging to another entity in the unit's premises. The Committee noted that the assurances regarding revival remained unsupported by any concrete business plan, investment agreement, or other verifiable documentation.

6. The Committee discussed the agenda in detail and after due deliberations concluded that **the unit had consistently failed to fulfil the basic objectives as envisaged in Section 5 of the SEZ Act, 2005, for which the Letter of Approval had been granted to them.** The unit has been occupying valuable SEZ space for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ. The continued retention of SEZ space by a non-performing unit adversely affects the optimal utilization of scarce land and infrastructure resources, which could otherwise be allotted to prospective entrepreneurs capable of generating exports and employment. The committee also observed that NSEZ Noida being in close proximity to Delhi and NOIDA being an industrial hub, industrial land/plots are scarce and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

7. After due deliberations and in light of the above-mentioned facts, the Committee unanimously concluded that M/s. Bhayani Plastic India (P) Ltd. has persistently contravened the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failed to make any export since **FY 2017-18**. Unit also failed to demonstrate any credible prospects for revival of operations despite being granted repeated opportunities. Accordingly, the Committee took following decision:

(i) To **cancel** the Letter of Approval No. 11/02/2011-Proj/698 dated 18.01.2012 granted to the unit under the provisions of Section 16(1) of the SEZ Act, 2005, read with Rule 77 of the SEZ Rules, 2006, and the applicable terms and conditions of the Letter of Approval.

(ii) The unit is directed to deposit the outstanding lease rent dues within one week.

(iii) NSEZ Authority shall initiate proceeding for recovery for lease rent and subsequent eviction of the premises in accordance with law.

(iv) The **O/o DC, NSEZ shall initiate action under the SEZ Act & Rules read with FT(D&R) Act, 1992 for storing unauthorized goods at unit's premises.** The penal action is to be decided in the next Approval Committee meeting based on the assessment of the goods to be furnished by Specified Officer, NSEZ.

8. The Committee further authorized the O/o Development Commissioner, NSEZ to **issue a reasoned speaking order** in accordance with law and to initiate all consequential actions for **cancellation** of the LOA, imposition of penalty and subsequent eviction of the premises in accordance with law.

5 (v). M/s. Jayshree General Trading Co. - Monitoring of Performance of the unit.

M/s. Jayshree General Trading Co. had been granted LOA No. 09/09/2005-Proj/3969 dated 17/05/2005 for setting up of unit in NSEZ for *Manufacturing of: (i) Plain*

*Gold Jewellery (71131910) (27 Kgs/annum); (ii) Gold Jewellery studded with Coloured Gem Stones, Of Gold, set with other precious and semi-precious stones (71131940) (5 kgs/annum); (iii) Gold jewellery studded with diamonds (71131930)(2 kgs/annum); (iv) Silver Jewellery studded with gems (71131120)(2 kgs/annum); (v) Platinum, unstudded Jewellery (71131950) (4 kgs/annum); (vi) Plain Silver Jewellery (71131130)(8 kgs/annum); and 2. Trading of: (i) Silver Bar (71069220); (ii) Gold Bars (71081200); (iii)Cashew Nuts in shell (08013100); (iv) Almonds in shell (08021100); (v) Almonds shelled (08021200); (vi) Pistachios in shell (08025100); (vii) Pistachios shelled (08025200); (viii) Green Tea in Bulk (09022020); (ix) Black Tea, leaf in bulk (09024020); (x) Fresh Turmeric (09103010); (xi) Dried Turmeric (09103020); (xii) Powder Turmeric (09103030); (xiii) Chilly Powder (09042211); (xiv) Shirting Fabrics (52082310); (xv) Mats and Matting (57023130); (xvi) Carpets (57023110); (xvii) Coir Matting, woven (57022010); (xviii) Cotton (57049010); (xix) of Jute of blended jute (57050031); (xx) of Jute of Coir Jute (57050032); (xxi) Torch (85131010); (xxii) Other flash lights excluding those for photographic purposes (85131020); (xxiii) Bulb, for torches (85392920); (xxiv) Other Garments, Mens or Boys of Cotton (6211320); (xxv) Other garments mens or boys of man-made fibres (62113300); (xxvi) Other Garments women of girls (62113990); (xxvii) Blankets (other than electric blankets) and travelling rugs, of cotton (63013000); (xxviii) Other woven fabrics, containing 85% or more by weight of polyester filaments: containing 85% or more by weight of non-textured polyester filaments (54076190); (xxix) Soft (khayzur or wet dates) (08041020); (xxx) Fresh (excluding wet dates) (08041010); (xxxi) Other Woven Fabric, containing 85% or more by weight of textured polyester filaments - Of yarns of different colours (54075300); (xxxii) Dyed (55151130); (xxxiii) Printed (55151140); (xxxiv) Pile fabrics, including long pile fabrics and terry fabrics, knitted or crocheted (60011000); (xxxv) Knitted or Crocheted fabrics of a width exceeding 30cm, Containing by weight 5% or more of elastomeric yarn but not containing rubber thread (60041000)*¹. The unit had commenced operation w.e.f. 13/07/2006 and LOA had been renewed upto 12/07/2026. **It has been observed that the unit is not functional since 2020-21. Unit has not done any activity and has not made any export activity since 2020-21.**

2. A site inspection of the premises of the unit at Plot No. 142A/13, NSEZ was carried out. The premises of the **unit were found locked**, and the building was observed **to be in a dilapidated condition, indicating prolonged non-utilization. No machinery, manpower, or other evidence of ongoing manufacturing activity was found at the site**, suggesting that **manufacturing operations have remained discontinued for a significant period**. The Photographs taken during the visit were shown to the Committee members and annexed as 5(v).

3. The factsheet was emailed to the unit on 18.06.2026 & 22.06.2026 and the unit vide email dated 19.06.2026 has requested for adjournment of the case for next Approval

Committee meeting. **No one from the unit appeared** for the meeting.

4. The Committee also observed that in the previous UAC held on 19.09.2023, serious view was taken for their failure to achieve 3.5% minimum value addition on Plain Gold Jewellery for which **the unit has been penalized for Rs. 10,000/- for violations of Rule 53 (C) of SEZ Rules, 2006.**

5. The Committee discussed the agenda in detail and after due deliberations concluded that the unit had consistently failed to fulfil the basic objectives as envisaged in Section 5 of the SEZ Act, 2005, for which the Letter of Approval had been granted to them. The unit has been occupying valuable SEZ space for several years without making any meaningful contribution towards exports, employment generation, or achievement of the objectives of the SEZ. The continued retention of SEZ space by a non-performing unit adversely affects the optimal utilization of scarce land and infrastructure resources, which could otherwise be allotted to prospective entrepreneurs capable of generating exports and employment. The committee also observed that NSEZ Noida being in close proximity to Delhi and NOIDA being a industrial hub, industrial land/plots are scarce and in great demand, therefore, keeping the SEZ land idle without any business /export activity is not acceptable.

6. Unit has requested for renewal of LOA vide letter dated 08.04.2026, the deficiencies observed has been communicated to the unit vide this office letter dated 13.05.2026, however, no satisfactory response has been received from the unit.

7. After due deliberations and in the light of above mentioned facts, the Committee unanimously authorized the O/o DC, NSEZ to issue a **Show Cause Notice** to the unit as to why the request for renewal of LOA shall not be rejected and further the Letter of Approval No.- 09/09/2005-Proj/3969 dated 17/05/2005, issued to them, shall not be **cancelled** in terms of Section 16(1) of the SEZ Act, 2005, read with Rule 77 of the SEZ Rules, 2006, for persistent contravention of the provisions of SEZ Rules/Act, LOA & BLUT terms and conditions and failure to make any export since **FY 2020-21.**

5(vi): M/s. Maya Crafts Private Limited- Monitoring of performance of the unit.

M/s Maya Crafts Private Limited has been issued LOA No. 07/04/2014-Proj/11773 dated 13/11/2014 for "Manufacturing of (i) Handcrafted Plain Gold Jewellery (71131910) (88000 grams/ annum); (ii) Handcrafted Studded with other precious and semi-precious stones Gold Jewellery (71131940) (88000 Grams/annum)" at Plot No. 142A/55 admeasuring 450 sq. mtrs. The unit has commenced its commercial activities w.e.f. 26/07/2017 and the LOA is valid upto 25/07/2027.

2 . The Approval Committee noted that unit has not made any export activities since 2020-21.

3. The Approval Committee was also intimated that during physical inspection of the

premises of the unit it was observed that the building was locked and **appeared run-down and neglected. It was evident from the weathered state of the premises that no manufacturing operations have taken place here for a long time.** The Photographs taken during the visit were shown to the Committee members and annexed as 5(vi).

4. The unit had also been issued Show Cause Notice dated 18/11/2022 for shortfall in value addition and vide Order-In-Original dated 25/11/2002 a **penalty of Rs. 10,000/-** has been imposed on the unit. The unit has deposited the penalty amount.

5. The Approval Committee observed that the unit has remained non-operational / underperforming for the past several years and has failed to achieve any appreciable export turnover or generate meaningful employment within the Zone. Continued retention of allotted SEZ space by such a unit result in sub-optimal utilization of land and infrastructure resources, which could otherwise be made available to export-ready and operationally active enterprises.

6. The unit was invited to attend the meeting vide email dated 18.06.2026 & 22.06.2026, however, the unit replied vide email dated 22.06.2026 showing inability to attend the meeting citing medical issues.

7. The Approval Committee discussed the matter in details and after due deliberations directed the O/o DC, NSEZ to issue a **Show Cause Notice** to the unit as to why action for cancellation of LOA should not be initiated against the unit for persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to make any export since **FY 2020-21**.

5(vii); M/s. Gold Craft International - Monitoring of performance of the unit.

M/s Gold Craft International has been issued LOA No. NEPZ/Proj/7/3/2002-NEPZ/10825 dated 31.05.2002 for "Manufacturing of Plain Gold /Silver/ Platinum Jewellery, Plain Casted, Annual permission to import upto 12KG broken gold jewellery for repair/remaking" at Plot No. 86 admeasuring 1713 sq. mtrs. The unit has commenced its commercial activities w.e.f. 14/12/2002 and the LOA is valid upto 13/12/2027.

2. The Approval Committee was also noted that during physical inspection of the premises of the unit it was observed that **the building was in utterly ruined condition and the inside premise of the unit is found dilapidated.** It was noted by the Committee that **some workers were seen in carrying out some work but the condition of the infrastructure including the electrical fitting & machinery, were in dilapidated condition.** The representative **assured** the Committee that the infrastructure of the unit **will be improved in two months' time** The Photographs taken during the visit were shown to the Committee members and annexed as 5(vii).

3. The Approval Committee noted that the unit had also been issued Show Cause Notice

dated 25/01/2024 for shortfall in achievement of value addition and vide Order-In-Original dated 04/03/2024 a **penalty of Rs. 1,38,174/- has been imposed** on the unit. The unit has deposited the penalty amount in protest and filed appeal in DGFT against the same.

4. The Approval Committee was informed that the unit has not submitted its APR since 2022-23 and as per NSDL & ICEGATE data the unit has been underperforming for the past several years and has failed to achieve any appreciate export turnover or generate meaningful employment within the zone. Continued retention of allotted SEZ space by such a unit results in sub-optimal utilization of land and infrastructure resources, which could otherwise be made available to export-ready and operationally active enterprises.

5. Shri S. K. Mittal, proprietor and Shri Manoj, Manager appeared before the Approval Committee and explained the matter.

6. The Approval Committee discussed the matter in detail and after due deliberation unanimously decided to impose a penalty of ₹ 10,000 /- for non-submission of each APR in time, resulting in a total penalty of ₹ **30,000/-** (Rupees Thirty Thousand only) for non-submission of 3 APRs for the FY 2022-23, 2023-24 & 2024-25. The unit was directed to submit their pending APRs within a period of 07 days. Further, **the committee directed the representative of the unit to improve the infrastructure of the unit in two months' time and submit report to the O/o DC, NSEZ.**

**5(viii): M/s. Heuer International (A division of G.S.T. Corporation Limited)-
Monitoring of performance of the unit.**

M/s Heuer International (A division of G.S.T. Corporation Limited) has been issued LOA No. 02/06/2006-Proj./9338 dated 07/07/2006 for " (1) Manufacturing of medical/surgical devices, including manufacture of orthopaedic implants, instruments accessories, orthotics aids, resuscitator silicon project. (2) Trading items (52 items) [ITC HS Code list as per letter dated 14/06/2021], 3. Trading of (i) .Umbilical Cord Clamp (9018) (ii) Pulse Oximeter (90189019) (iii) Stop watch (91029120) (iv) Umbilical Cord Tie (901890) (v) Ultrasound Fetal Doplar (90181990) (vi) Mosquito net Single & double (63049270) (vii) Autoclave indicator tape (39199090) (viii) Medicine Pouch/ envelope (90189099) (ix) Oxygen flow meter with humidifier (90261010) (x) Infant Radiant Warmer (90189099) (xi) Suction machine (90189099) (xii) Vacuum Extractor electrical (90189099) (xiii) Safety box plastic (39239090) & corrugated (48191090) (xiv) Laryngoscope (90189099) " at Plot No. 142A/52 admeasuring 450 sq. mtrs. The unit has commenced its commercial activities w.e.f., 27/07/2007 and the LOA is valid upto 26/07/2027.

2. The Approval Committee noted that the unit had also been issued Show Cause Notice dated 28/09/2021 for shortfall in achievement of value addition and vide Order-In-Original dated 26/10/2021 a penalty of Rs. 33,208/- has been imposed on the unit. The unit has deposited the penalty amount in protest and filed appeal in DGFT against the

same.

3. Shri Aryan Grover, Director and Shri Daman Singh Bedi, DGM appeared before the Approval Committee and explained the matter.

4. The Approval Committee noted that unit has made DTA sale to the tune of ₹42.25 lakhs, however, the nature of goods is not clear whether it is manufacturing / trading goods. The Committee further directed DC(C) NSEZ to submit a detailed report regarding the goods sold in DTA and the payment received thereof in 07 working days' time.

5. The Approval Committee was informed that the unit did not submit APR from FY 2022-23 to 2024-25 within the stipulated time. The Approval Committee discussed the matter and unanimously decided to impose penalty of ₹ 10,000 /- for non-submission of each APR in time, resulting in a total penalty of ₹ 30,000/- (Rupees Thirty Thousand only) for non-submission of 03 APRs.

6. The Approval Committee further noted that during the site inspection of the premises of M/s Bhayani Plastics Limited, finished goods pertaining to M/s Heur International were stored in the premises of M/s Bhayani Plastics Limited in an unauthorized manner i.e., without any intimation or prior permission. **The Committee directed Specified Officer, NSEZ to examine the goods and submit a detailed report including the assessable value of goods before the next Approval Committee meeting to be held on 07.07.2026.** The penal action is to be decided in the next Approval Committee meeting based on the assessment of the goods to be furnished by Specified Officer, NSEZ. Till then goods were not to be removed.

7. The Approval Committee also directed the unit to submit separate application for setting up a Trading unit.

5(ix): M/s. Smart Environmental Private Limited - Monitoring of performance of the unit.

M/s Smart Environmental Private Limited has been issued LOA No. 03/03/2005-Proj./5104 dated 23/06/2005 for "(i) Repairing & Refurbishing of Mobile Phones and its accessories (85171890); (ii) Maintenance Services (changes of key pad and parts) (85171890); (iii) Updating/automation of Software & services related thereto (85171890)" at Plot No. 129G/32 admeasuring 450 sq. mtrs. The unit has commenced its commercial activities w.e.f., 25/02/2008 and the LOA is valid upto 24/02/2028.

2. The Approval Committee was informed that the unit has not submitted its APR since 2022-23 and as per NSDL & ICEGATE data **the unit has been underperforming for the past several years** and has failed to achieve any appreciate export turnover or generate meaningful employment within the zone. Continued retention of allotted SEZ space by such a unit result in sub-optimal utilization of land and infrastructure resources,

which could otherwise be made available to export-ready and operationally active enterprises. The Committee noted that the unit has been issued LOA for authorized operations dealing with the sensitive commodities and despite of that performance of the unit is very poor. The Committee also noted that there is an **outstanding lease rent of Rs. 1,12,649/- as on 30.06.2026**

3. A site inspection of the unit has been carried out and it was found that the building stood devoid of any manufacturing or inventory. **The premises were found locked and as seen from the outside the glass gate was open with dust and overgrown vegetation that point to long-term neglect. Zero manufacturing, commercial, or administrative activities were observed during the visit.** Furthermore, **the location was entirely deserted, lacking any management, operational staff, or even security personnel.** The Photographs taken during the visit were shown to the Committee members and annexed as 5(ix).

4. The factsheet was emailed to the unit on 19.06.2026 & 22.06.2026. The unit vide email dated 22.06.2026 requested for adjournment of their case for next Approval Committee meeting. **No one from the unit appeared** for the said meeting.

5. The Approval Committee discussed the matter in detail and after due deliberation unanimously decided to impose a penalty of ₹ 10,000 /- for non-submission of each APR in stipulated time, resulting in a total penalty of ₹ **30,000/-** (Rupees Thirty Thousand only) for non-submission of 3 APRs for the FY **2022-23, 2023-24 & 2024-25**. Further, the committee directed the O/o DC, NSEZ to examine the performance vis-à-vis projections **and issue Show Cause Notice** for shortfall and initiate penal action thereof. If the unit fails to deposit penalty for non-submissions of APR, the same to be also included in SCN. The unit was further directed to deposit the pending rents.

6. The Committee directed the Specified Officer, NSEZ that keeping in view of the sensitivity of the items of the unit, each and every export/import consignment of the unit shall be counterchecked by the Senior Officers of Customs wing.

5(x): M/s. Prompt International - Monitoring of performance of the unit-reg.

M/s Prompt International has been issued LOA No. 08/26/91-NEPZ dated 26/12/1991 for "(i) Manufacturing of Cotton Garments (61142000); Denim Jeans (62034290, 62046290) and service activities viz. other Data Processing Services (updatation of product data on an ecommerce site (CPC-8439)." at Plot No. 119 admeasuring 1000 sq.mtrs. The unit had commenced its commercial activities w.e.f. 19/02/1992 and the LOA is valid upto 31/12/2027.

2. The Approval Committee was informed that there is an outstanding lease rent of ₹ **1,16,380/-** pending upto 30.06.2026.

3. The Approval Committee was informed that the unit was declared sick unit in 2008. In

2021, unit submitted request for revival of LOA. The BoA in its meeting held on 17.11.2023 approved the proposal for revival of LOA in terms of Rule 72(1) of SEZ Rules, 2006 and decided to renew its LoA for a period of one year, **subject to the condition that the Unit has to show exports over the extended period of one year during which no transfer would be permitted.** In FY 2024-25, the unit has made export of ₹16.65 lakhs. As per ICEGATE Data an export of ₹ 55.57 lakhs was made in FY 2025-26, however, **the corresponding import or DTA purchase figures were not found in the NSDL data.**

4. The Approval Committee noted that the unit has been **non-functional for the past several years and has failed to achieve any appreciate export turnover or generate meaningful employment within the zone.** Continued retention of allotted SEZ space by such a unit result in sub-optimal utilization of land and infrastructure resources, which could otherwise be made available to export-ready and operationally active enterprises. The unit has therefore mis-utilized the assets of the nation which could otherwise have resulted in export business by budding entrepreneurs, thereby making positive contribution to the nation's economy.

5. And that the *service activities viz. other Data Processing Services (updatation of product data on an ecommerce site (CPC-8439)* were added in the unit's authorized operations w.e.f., 21.08.2025, however, the unit has not set up any infrastructure with respect to their authorized operations i.e., manufacture of readymade garments and for the services. The Committee also noted that during site inspection there was no machinery available for manufacturing and no devices/desktops for the service activities were found inside premises. The building was in poor shape, devoid of any infrastructure.

6. Shri Sukhbir Singh, Director (Logistics) appeared before the Approval Committee and explained the matter. However, he has failed to provide any concrete business plan.

7. The Approval Committee discussed the matter in details and after due deliberations authorized the O/o the Development Commissioner, NSEZ to issue a **Show Cause Notice** to the unit as to **why their LOA should not be cancelled** in terms of **Section 16(1) of the SEZ Act, 2005, read with Rule 77 of the SEZ Rules, 2006**, for persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to utilize properly the large plot of 1000 Sqmt.

5(xi): M/s. JP Horology- Monitoring of performance of the unit-reg.

M/s JP Horology has been issued LOA No. 3/01/96-NEPZ dated 01/01/1996 for "(i) (1) Manufacturing of Clock/ Time Pieces/ Watches of all types and parts thereof including gift items and watch tools viz. (i) Clock-Time pieces pcs/annum) Watch all types (100000 (ii) Set (Dummy Watches) all types (300000 pcs/annum) (iii) Bracelets/ Bands/ Chain of all metals and all types (300000 pcs/annum) (iv) Straps of all materials (300000 pcs/annum) (v) Movement for clocks/ Time pieces/ watches all types (100000 pcs/annum) (vi) Dials of all types (300000 pcs/annum) (vii) Crowns all types (3000000

pcs/annum) (viii) Hands sets all types (3000000 pcs/annum) (ix) Button Cells all types (600000 pcs/annum) (x) Clock Time-pieces Bodies all types (12000 pcs/annum) (xi) Clocks Time pieces parts all types (200 Kgs/annum) (xii) Clocks Time-pieces parts specialized all types (50000 pcs/annum) (xiii) Watch parts all types (600 Kgs/annum) (xiv) Watch parts specialized all types (2000000 pcs/annum) (xv) Tool Equipments Machines & other watch industries items (20000 pcs/annum) (xvi) Watch Tools all type (100000 pcs/annum) (xvii) Gift etc. Misc. items all types (20000 pcs/annum) (2) Trading activities (subject to condition that 100% physical export shall be carried out by the unit and no DTA sale shall be allowed in respect of trading goods)." at Plot No. 89 admeasuring 1000 sq. mtrs. The unit has commenced its commercial activities w.e.f. 18/11/1996 and the LOA was valid upto 08/05/2026.

2. The Approval Committee was informed that there is an outstanding lease rent of ₹ **1,79,689/- is pending upto 30.06.2026.**

3. The Approval Committee noted that the LOA of the unit has already been expired on 08.05.2026. The unit has not applied for renewal of LOA.

4. The unit has remained non-functional since 2018-19 and has not submitted APRs from F.Y. 2021-22 and thus violated provisions of Rule 22(3) of SEZ Rules, 2006.

5. It was also noted that the Approval Committee in its meeting held on 28.07.2025 had granted "in-principle" approval for transfer of Assets & Liabilities to M/s Brite LED Private Limited. However, till date unit has not submitted any NOC/application/documents in this regard.

6. It was further noted that the proposed transferee viz. M/s Brite LED Private Limited' was valid till 06.02.2026. M/s Brite LED Private Limited has also not made any application for extension of LOA. Further, M/s Brite LED Private Limited not commenced production though their request for allotment of SDF already approved. And, therefore, in terms of Rule 19 (5) of SEZ Rules, 2006, their LOA is deemed to have been lapsed w.e.f., the date from which its validity expired, i.e. 06.02.2026.

7. The Approval Committee was informed that during physical verification of M/s JP Horology; Plot No.-89, NSEZ, Noida it revealed that the unit was completely non-operational and abandoned site. The premises are in an utterly dilapidated state, characterized by severe structural decay and overgrown vegetation that point to long-term neglect. Zero manufacturing, commercial, or administrative activities were observed during the visit. Furthermore, the location was entirely deserted, lacking any management, operational staff, or even security personnel. The Photographs taken during the visit were shown to the Committee members and annexed as 5(xi).

8. Shri Atul Narula appeared before the Approval Committee and explained the matter. However, he could not justify for not implementing the Approval Committee's decision dated 28.07.2025 regarding "in-principle" exit & transfer of assets & liabilities under Rule

74A of SEZ Rules. The Approval Committee noted that one of the conditions of Rule 74A is – “74A(iv) – *the transferee fulfils all eligibility criteria applicable to a unit*. The Committee noted that in the present case the transferee’s LOA being lapsed under Rule 19(5), the “**In-principle**” permission granted is **non implementable** and has become null and void.

9. The Approval Committee discussed the agenda in detail and after due deliberations authorized the O/o DC, NSEZ to issue a **Show Cause Notice** to the unit as to why the Letter of Approval issued to them shall not be cancelled in terms of **Section 16(1) of the SEZ Act, 2005, read with Rule 77 of the SEZ Rules, 2006**, for persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to make any export since **FY 2018-19**.

5(xii): M/s. Aksasia Creations Pvt. Ltd. - Monitoring of performance of the unit-reg.

M/s Aksasia Creations Pvt. Ltd. has been issued LOA No. 08/01/2005-Proj/1421 dated 21/02/2005 for “Manufacturing of: (i) Leather Garments ((42031010) (Capacity:40000 pieces/annum); (ii) Fabric Garments (61130000) (Capacity: 40000 pieces/annum); (iii) Bag, Clutch, Purse etc. (42023190) (Capacity:75000 pieces/annum)” at Plot No. 142-I admeasuring 2925 sq. mtrs. The unit has commenced its commercial activities w.e.f. 31/07/2008 and the LOA is valid upto 30/06/2026.

2. The Approval Committee was informed that there is an outstanding lease rent of ₹ **1,78,256** /- is pending upto 30.06.2026.

3. The Approval Committee also noted that the unit is holding a large area of 2925 Sq. Mtr and has not made any export from the **FY 2020-21 to 2023-24**. The export of ₹ 5.12 lakhs as reflected in F.Y. 2024-25 is also not corroborated by respective import or DTA purchase.

4. The Approval Committee in its meeting held on 24.03.2026 **has extended the validity of LOA of the unit from 01.01.2026 to 30.06.2026 exclusively for completing exit formalities**, however, the unit **failed** to initiate any action in this regard.

5. The Approval Committee was informed that physical verification of M/s Aksasia Creations Private Limited at Plot No. 142-1, NSEZ Phase-II, Noida was conducted on 20.06.2026. The inspection confirmed the unit’s physical existence. The premise was found secured by a large metal gate and staffed by on-site security. However, despite the intact infrastructure, the guards present at gate, reported that all manufacturing and production activities at the site have been completely stopped for quite some time due to ongoing administrative or managerial issues, rendering the facility currently non-operational. The Photographs taken during the visit were shown to the Committee members and annexed as 5(xii).

6. The factsheet was emailed to the unit on 22.06.2026 and invited to attend the said

meeting. Initially the representative of the unit waited in the virtual lobby, but by the time his case came up for hearing, he had left the meeting. **No one from the unit appeared** for the meeting.

7. The Approval Committee discussed the matter in detail and after due deliberations authorized the O/o Development Commissioner, NSEZ to issue a **Show Cause Notice** to the unit as to **why their LOA shall not be cancelled** under Section 16(1) of the SEZ Act, 2005 for persistent contravention of the provisions of SEZ Rules/Act, LoA & BLUT terms and conditions and failure to make any export since **FY 2020-21**.

8. The Approval Committed also directed Specified Officer, NSEZ to provide a report on the functioning of the unit including the infrastructure set up regarding the authorized operations and anomalies in the performance data.

Meeting ended with a vote of thanks to the Chair.

Digitally signed by
Paras Mani Tripathi
Date: 25-06-2026
22:01:26

(Paras Mani Tripathi)
Jt. Development Commissioner

Digitally signed by
Gopal Meena
Date: 25-06-2026
19:28:24

(Gopal Meena)
Development Commissioner