

ENVIRONMENT STATEMENT

(FORM - V)

Integrated Cement Manufacturing Plant (Line-1 & WHRS-1)

And

Integrated Cement Manufacturing Plant (Line-2 & WHRS-2)

FY:2025-26

M/s JK Lakshmi Cement Ltd.

Shripati Nagar, CFA, P.O. Dabok,
District: Udaipur – 313022, Rajasthan

Environmental Statement for the financial year ending the 31st March, 2026

FORM – V
(See rule 14)
Environmental statement for the financial year ending the 31st March 2025

PART – A

1.	Name and address of the Owner/Occupier of the Industry, operation of the process.	After amalgamation with M/s Udaipur Cement Works Ltd. (w.e.f. 01/08/2025), now the company name is; M/s JK Lakshmi Cement Ltd., Shripati Nagar, CFA, P.O. Dabok, Dist. Udaipur – 313022, Rajasthan
2.	Industry category	Red, Large
3.	Production Capacity	4.93 MMTPA* - Cement 3.50 MMTPA* - Clinker
4.	Year of establishment	Line - 1: 2016 Line - 2: 2023
5.	Date of the last environmental statement submitted	25 th September, 2025

*MMTPA: Million Metric Tons per Annum

PART – B

Water and Raw Material Consumption

(I) Water consumption in m³/day.

Process	:	N. A. (As the plant is based on dry process technology)
Cooling	:	710.63 M³/day (Including WHRS)
Domestic	:	128.09 M³/day (Gardening, Plant Domestic & Dust Suppression)

Name of products	Process Water consumption** per unit of product output	
	During the Previous financial year 2024-25	During the current financial year 2025-26
	(1)	(2)
KL/MT Cement Equ.	0.067	0.076

**Cooling/spray & WHRS

(II) Raw Material consumption

S. No.	Name of raw material	Name of products	Consumption of raw material per unit output (Per Ton)	
			During the Previous financial year 2024-25	During the current financial year 2025-26
1.	Limestone	MT/MT Cement Equ.	0.966	0.993
2.	Gypsum (Virgin)		0.048	0.054
3.	Gypsum (waste)		0.015	0.019
4.	Fly Ash (wet + dry)		0.150	0.148
5.	Coal	MT/MT	0.033	0.040

6.	Petcoke	Cement Equ. For FY:2025- 26 – MT/MT of Clinker	0.051	0.060
7.	FF Slag		0.015	0.025
8.	Red Ocher		0.107	0.146
9.	Alumina Clay		0	0
10.	Others		0.015	0.022

(III) Production

S. No.	Name of Product	During the Previous financial year 2024-25	During the current financial year 2025-26
1	Clinker (MT)	2317404	2649840
2	Cement (MT)	2292919	2787448

(IV) WHRS Generation

S. No.	Operation/Service	During the Previous financial year 2024-25	During the current financial year 2025-26
1	WHRs Power Generation (KWh)	68302568	84938981

(V) Fly-ash Utilization

S. No.	Type of Fly ash	During the Previous financial year 2024-25	During the current financial year 2025-26
1	Wet Fly ash (MT)	75094.06	71396
2	Dry Fly ash (MT)	413535.64	441771

PART – C

Pollution discharged to environment/unit of output generated (Parameter as specified in the Consent issued)

S. No.	Pollutants	Quantity of Pollutants discharged (Kg/day)	Quantity of Pollutants discharged (mg/l)	Percentage of variation from prescribed standards with reason.
a. Water				
	Industrial	The Cement plant is based on dry process technology, hence there is no trade effluent generated from cement plant process, the water requires only for machinery cooling purposes which is re-circulated back into the system.	NIL	NIL

	Domestic	JKLCL has an STP of the capacity 250 KLD. We are adhering to zero water discharge. Treated water is being used in horticulture and dust suppression purposes.	NIL	NIL		
b. Air (Stack Emission)						
(Stack emission) Particulate matter	(Avg. values of the year 2025-26)					
	Stack Attached to		Quantity of Pollutants discharged (kg/day)	Quantity of Pollutants discharged (mg/Nm3)	Percentage variation from prescribed standards with reason (%)	
	VRM/ Kiln – 1	PM	6363.82	10.0	66.80	(Below Prescribed Standards)
		NOx	138395.55	216.6	72.92	
		SO2	1873.69	2.9	97.07	
	Vertical Coal mill – 1		498.56	7.2	75.85	
	Clinker Cooler – 1		4400.77	12.9	57.10	
	Cement Mill – 1		90.94	5.2	82.62	
	Cement Mill – 2		13.88	2.5	91.63	
	VRM/ Kiln – 2	PM	3576.05	6.8	77.18	
		NOx	122893.89	235.3	70.59	
		SO2	5405.20	10.4	89.65	
	Vertical Coal Mill – 2		779.19	6.1	79.61	
	Ball Coal Mill		0.03	0.4	98.66	
	Clinker Cooler – 2		1887.72	6.2	79.34	
	Cement Mill - 3		346.51	7.1	76.33	
	Cement Mill – 4		2061.98	4.0	86.63	

PART – D

Hazardous Wastes

(As specified under Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016)

S. No.	Hazardous Waste	Total quantity (Lit.)	
		During the Previous financial year 2024-25	During the current financial year 2025-26
a.	From Process (Generation)	1050 L (Sch.-I, Cat. -5.1, Used/Spent Oil)	1005 L (Sch.-I, Cat. - 5.1, Used/Spent Oil)
b.	From pollution control facility	Nil	Nil

HWM Utilize as Co-Processing

S. No.	Co-Processable Hazardous Waste	Quantity consumed (in MT)
1	35.3 - Chemical Sludge from wastewater treatment	28450.003
2	26.1 – Chemical Gypsum	12792.261
3	29.1 – Process Waste or Residue	6824.240

4	20.3 – Distillation Residue	262.847
5	Sch. – I – Waste Mix Liquid	23023.150
6	Sch. - III (OW) - Waste Mix Solid	558.138
7	28.6 - Spent Solvent	1237.54
Total		73148.179

PART – E

Solid Waste

S. No.	Solid Waste	Total quantity (Tons)	
		During the Previous financial year 2024-25	During the current financial year 2025-26
a. From Process	Plastic waste	8.97	5.87
	E-Waste	0.32	0.168
	Bio-medical waste	0.03535	0.0013
	Construction and demolition waste	0	0
	Battery waste	8.766	0
	Radioactive waste	0	0
	Hazardous waste	Used Oil – 1.05 KL	Used Oil – 1.005 KL
	Other non-hazardous waste	- Aluminum scrap – 0.94, TOR steel scrap – 109.94, conveyor belt – 38.78, copper scrap – 13.48, firewood scrap – 42.36, MS scrap – 1170.06, high chrome scrap – 11.88, PVC scrap – 6.1, alumina bricks scrap – 509.5 and manganese scrap – 24.7 - Total – 1927.74	MS Scrap – 1077.82 Others (PVC, Bricks, rubber/tyre, wood etc.) – 816.14
b.	From pollution control facility	0	0
c.	1. Quantity recycled or reutilized within the unit	0	0
	2. Sold	1941.37	1893.96
	3. Disposed	1.09	10.05

PART – F

Please specify the characterization (in terms of composition & quantum) of hazardous as well as solid wastes and indicate disposal practice adopted for both these categories of wastes.

Hazardous Waste Management

The Used Oil generated in the year 2025-26 was 1005 Lit. The Used oil is stored in closed leak proof steel containers and kept on an impervious site at an isolated place, properly marked with a sign board having danger signage and warning text “**Hazardous waste – Unauthorized persons keep away**”, and away from the operational area and human activities & has been co-processed into kiln.

Bio Medical Waste Management-

The Bio-medical waste generated from OHC Centre, located in Shripati Nagar Colony is being segregated into distinguish colored bins & disposed through the authorized CBMWDF which is M/s En-Vision Enviro Engineers Pvt. Ltd. The transportation of BMW was carried out by their own vehicle for final treatment and disposal.

S. No.	BMW Quantity disposed during	2025-26
1	Category wise waste generated & sent to M/s Envision for disposal at CBMWTF	Yellow Category:- 23.62 Kg
2		Red Category:- 12.07 Kg
3		White:- 1.30 Kg
4		Blue Category:- 27.05 Kg
5		General Solid Waste:- 50 kg

Solid Waste Management-

JKLCL has always remained committed towards embracing the ‘Reduce - Reuse – Recover - Recycle’ approach, recognizing its potential to transform waste into valuable resources and create wealth from it. Our goal is to achieve a zero-waste future by institutionalizing sustainable practices and resource efficiency.

With a strong focus on waste 4R principle and system optimization, we strive to achieve our Zero-waste-to-landfills goal. A key differentiator is our on-site treatment of organic waste, including food waste, garden waste, and STP sludge, aligning with our genuine net-zero strategy while continuing to adopt sustainable practices throughout our operations to minimize waste generation and ensure long-term environmental sustainability.

- I. As a Brand Owner and Importer under Extended Producer Responsibility (EPR) guidelines outlined in the PWM Rules of 2016 and as amended, **we have co-processed 3140.307 MT of RDF of Cat.-II.**
- II. The domestic sewage generated from the residential colony as well as from the plant is being treated in STP and then used in horticulture and dust suppression on roads.
- III. The dust collected by air pollution control equipment in the process is recycled back into the system.
- IV. Pyro refractory bricks are being sold to vendors.
- V. High volume low effective waste such as fly ash and additives was used as an alternative raw material in cement manufacturing for conservation of virgin natural resources.
- VI. E-waste and Battery waste is being sold to SPCB/CPCB authorized recyclers.

PART – G

Impact of the pollution abatement measures taken on conservation of natural resources and on the cost of production.

The cement plant is based on dry process technology which is very cost effective and
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environmentally clean technology. The co-processing of hazardous waste such as waste mixed liquid, Chemical Gypsum, petcoke (byproduct of petroleum refineries) as a fuel in cement kiln and utilization of fly ash of the thermal power plant as an alternative raw material for cement manufacturing, **conserving the virgin natural resources**. The PM emission from the stacks is controlled by the bag filters installed at various material transfer points. The particulate matter collected in the pollution control equipment is recycling in the process and neutralizing the cost of operation of pollution control equipment hence no cost impact on the production cost.

Depending of limestone quality, **Red Ocher** is widely used and key additive to design raw mix. As users are many, the availability is confined and limited natural resource, we were encouraged to use alternative material instead of Natural Resource Red Ocher. Keeping in mind with quality parameters of Red Ocher, our own (JKLCL) quality standards and BIS specification, we found **Zinc Slag (waste of zinc smelting process)** is an alternate resource which can replace Red Ocher without compromising product quality. Earlier it was the problem of generator to dispose of this waste in environmentally sound manner.

Being a resource-responsible corporate, the Company has done considerable work in water conservation and stands almost **4.17 times water positive** and has **saved about 8.97 Lakh Tons of Virgin natural resources** by replacing them with other industrial waste-derived raw materials in the process.

ALTERNATIVE RAW MATERIAL USED IN PRODUCTION	RECYCLED OR REUSED INPUT MATERIAL RATIO TO TOTAL PRODUCT
CHEMICAL GYPSUM	2.19 % (as % of cement production)
JAROSITE	0.31 % (as % of cement production)
FLYASH	19.38 % (as % of cement production)
(FF + IFS + Granulated) SLAG	2.49 % (as % of clinker production)

The following measures have already been adopted for the conservation of virgin natural resources

1. Products are produced with marginal grade of limestone and thereby best utilization of the natural resource.
2. Installed cross belt analyzer for online quality checking.
3. Other industries' waste i.e Pet Coke is used as main source of fuel.
4. Increased utilization of alternative fuels in kiln like Spent Carbon, Spent Solvent, waste Mix Liquid etc.
5. Use fly ash generated from the power plant for making blended cement.
6. Use of Jarosite (Hazardous waste of industrial process) in cement manufacturing as a part replacement of natural Gypsum.
7. Use of Zinc Slag which is an alternative of Red Ocher. Raw Material and Product in the plant are transferred via closed bucket elevators and covered conveyor belts, with installed efficient pollution control equipment at each material transfer point, thereby ensuring no fugitive emissions.
8. Covered conveyor belt provided for transportation of raw material and product inside the plant premises to reduce fugitive emission and loss of resources.
9. Dust collected inside the pollution control device recycle back into the process
10. Bag filters are provided at all raw material transfer point and materials product storage Silo to control free emissions.

11. Unit has installed one of its lightweight structures based 6.00 kms long Covered Over Land Belt Conveyor from mines crusher to plant site that eliminates the need of transportation of limestone via trucks through roads, thereby saving fuel and thus mitigating associated carbon emissions.

PART – H

Additional measures/investment proposal for environmental protection including abatement of pollution/prevention of pollution.

Air Pollution Control Measure

JKLCL plant designed and adopted world-class technology. Keeping in mind the air pollution as major concern all the pollution control equipment (Bag filters/Bag Houses/ESP/RABH) have been installed to get the emission level below 30 mg/Nm³.

S. No.	Major Source of Air Pollution	Pollution Control Equipment's
1	Vertical Raw Mill & Kiln – 1	Reverse Air Bag House
2	Vertical Coal mill – 1	Bag House
3	Clinker Cooler – 1	Electrostatic Precipitator
4	Cement Mill – 1	Bag House
5	Cement Mill – 2	Bag House
6	Vertical Raw Mill & Kiln – 1	Reverse Air Bag House
7	Vertical Coal Mill – 2	Bag House
8	Ball Coal Mill	Bag House
9	Clinker Cooler – 2	Electrostatic Precipitator
10	Cement Mill - 3	Bag House
11	Cement Mill – 4	Bag House
12	Material Transfer Point/Discharge of conveyor belts	Nuisance Bag Filters

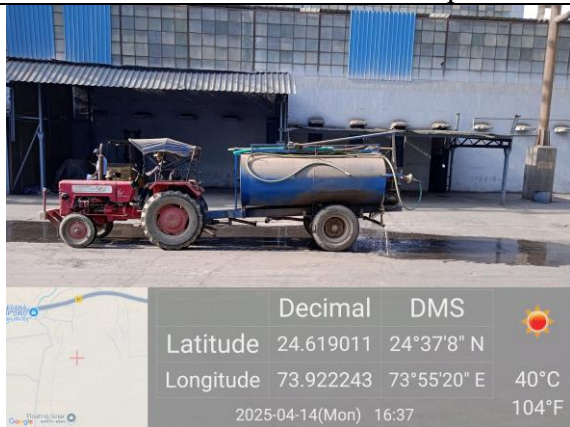
1. Regular housekeeping of plant and colony areas by truck mounted sweeping machine and water sprinkling on the roads through tankers to maintain dust free environment.
2. All the PCE's listed above are monitored 24*7. In case of any operation failure maintenance work is carried out accordingly.
3. The SNCR system is installed and used to control NO_x Emission.
4. To monitor the PM, SO₂ and NO_x emission, opacity monitor, and gaseous analyzers have been installed at each stack and the data is also available on RSPCB portal.
5. To monitor the ambient air quality, 3 CAAQMS have been installed, and the data is also available on RSPCB portal.
6. We are maintaining green belts around the periphery and inside the plant which is also contributing a lot to reduce dust emission.



Visuals of CAAQMS, Analyzers and display Board

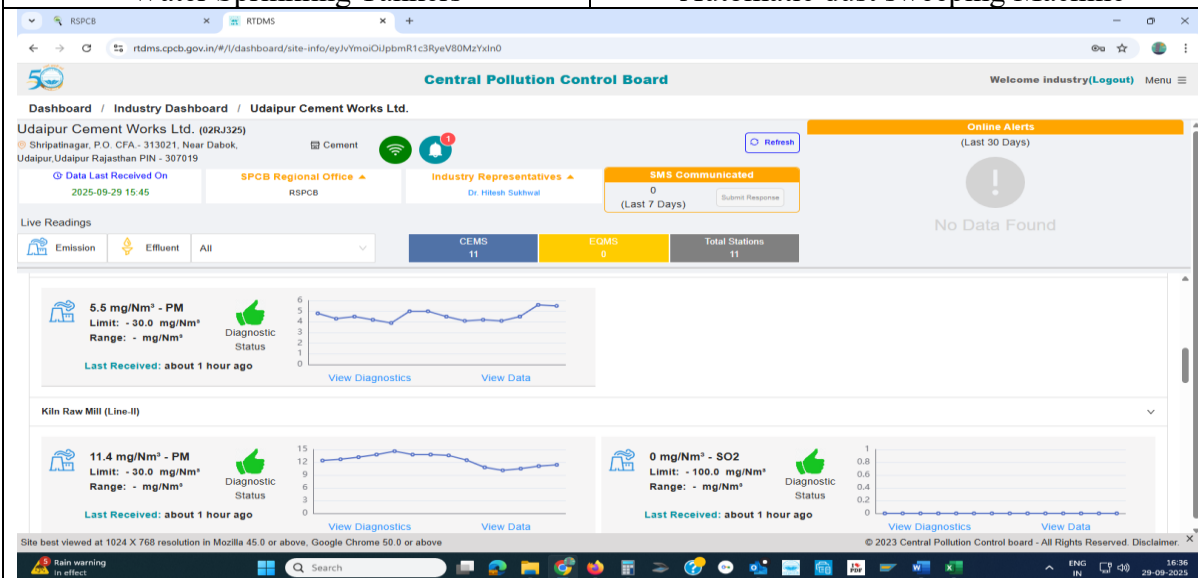


A Visual of Liquid AFR Tank & feeding arrangement



Water Sprinkling Tankers

Automatic dust sweeping Machine



Stack emission data available on RSPCB Portal

Water Pollution Control Measure

Cement manufacturing is a dry process thus there is no direct utilization of water in the process. Water is only being used for industrial cooling purpose. And there is no wastewater generated from cement manufacturing process. UCWL is maintaining Zero Wastewater Discharge Unit status. The company has placed Sewage Treatment Plants (STPs) for domestic sewage, Effluent Treatment Plants (ETPs) for wastewater generated from automobile workshops and N Pit for Waste Heat Recovery Power Plant. Recycled 100% treated water is reused in Machineries' cooling, Dust suppression, Greenbelt development etc. within Unit's premises.

At JKLCL, our aim is to become a more and more water positive organization by working in the areas of water management like.

- ❖ Water conservation
- ❖ Water and sanitation
- ❖ Water recycling
- ❖ Zero liquid discharge
- ❖ Water efficient technologies
- ❖ Rainwater harvesting

JKLCL is a 'water-positive' Company and takes great pride in harvesting more water than we need, with a Water Positivity Index of 4.17.

We have conserved 33 KL/day of water in FY:2025-26 which is explained below.

FY:2025-26	33 KL/day	1. Previously, water was directly sprayed on conveyor belts through in-house nozzles to control dust emission. This resulted in higher water consumption due to uncontrolled spray. 2. VRM-2 water tank had a separate fill-up line, but whenever the main tank water level dropped or any issue occurred in the main tank, VRM-2 water tank became empty. This caused stoppage of VRM water spray and occasionally led to mill stoppage due to high vibration.
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We have used STP treated water also, we can say it recycle water having qty. 57672.70 KL in green belt development and over the road to suppress the dust in FY:2025-26.

JKLCL installed 08 no's of Digital Water Flow Meter at bore wells to monitor the abstraction of water along with telemetry system & also installed 3 no's Digital Water Level Recorder to monitor the water level with telemetry system.

In addition to wastewater management, we have implemented scientifically designed rainwater harvesting structures to harness natural rainwater effectively. This initiative allows us to substitute fresh water with harvested rainwater in our plant operations; further reducing our reliance on external water sources and promoting sustainable water management practices.

The non-working pit in the mines area is also being used as a rainwater collection pit. And used that rainwater for industrial and domestic purposes.

CGWA Compliance - JKLCL always committed to meet CGWA guidelines and conduct ground Water Audit by CGWA accredited water auditor.

JKLCL has also installed a Continuous Effluent Quality Monitoring System at the WHRS N-Pit and data is available at RSPCB Portal.

Through responsible sourcing, efficient utilization and innovative solutions, we strive to safeguard water resources for future generations while minimizing our environmental footprint.



A Visual of Digital Water Flow Meter, Digital Water Level Recorder along with telemetry system.



A Visual of roof top & surface rainwater harvesting structures



Sewage Treatment Plant

Effluent Treatment Plant

Unit meets its maximum water requirement by sourcing the harvested rainwater stored in the

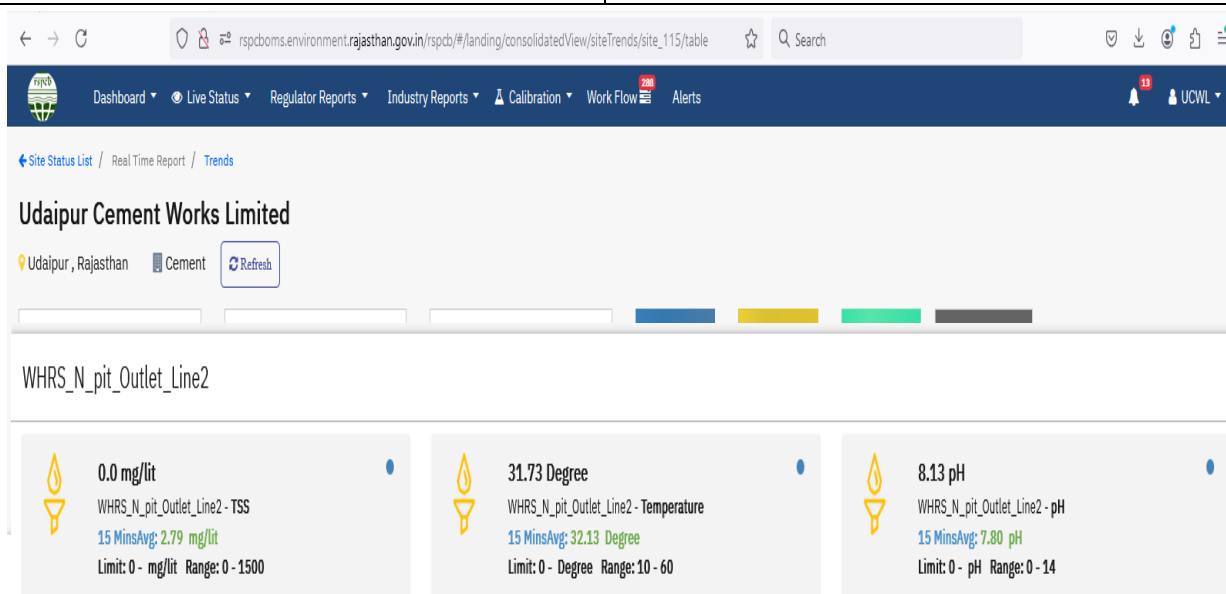
mines pit that reduces the need of ground water abstraction thereby conserving Ground Water Resource.



Location-South Daroli Block



Location-North Daroli Block



CEQMS data available at RSPCB Portal

Noise Pollution Control Measures

Adequate noise control measures have been provided to control the noise level within the permissible limit at our plant premises.

1. Closed building and acoustic silencer for compressor and Cooler fan.
2. Closed building for DG set of 500 KVA.
3. Regular maintenance of plant machinery.
4. The Ambient noise level in plant boundary is being monitored at regular interval and within the prescribed standard.
5. The personal protective equipment like ear plug provided to the workers & employees exposed to the high noise area.

PART – I

Any other particulars for improving the quality of the environment.

Environmental management cell

1. The unit has established an environmental management cell under the leadership of senior executives.

2. The environmental cell is responsible to take care of overall environmental monitoring of all types of air, water and noise pollution. Implementation of environmental protection measures, pollution control equipment performance checking, regular checking of leakages and look after other general environmental activities like Green Belt, explore Rainwater Harvesting areas etc. with coordination of other departments.
3. Awareness promotion through various environmental competitions, presentations, mails, tree plantation etc. conducted on world environment day, Earth Day etc.- A Report of WED Celebration is attached as Annexure-1.

Environmental monitoring program

JKLCL has already installed pollution control equipment and provided various pollution control measures at various sources of plant and mining areas. To check the effectiveness of pollution control measures provided, we have made a comprehensive environmental monitoring plan, and Environmental monitoring is carried out by an NABL approved Laboratory regularly as per standard frequency.

JKLCL established 4 Nos of Ambient Air Quality Monitoring stations around the plant periphery in downwind/upwind direction to monitor real time impact of emission on Air environment.

Also 3 Continuous Ambient Air Quality Monitoring System have been also installed in plant premises, 1 in upwind and 2 in downwind direction.

The stack emission monitoring facility with safe platform, staircase has been provided at the major process stack of plant.

The calibration of all monitoring equipments is being done by an external calibration agency on a yearly basis.

Continuous Emission Monitoring System

As per the guideline issued by CPCB the online continuous emission monitoring system for stack monitoring has been installed and the same is connected with RSPCB/CPCB online portal.

Accreditation & Awards

JKLCL is an ISO Certified organization & certified by Bureau Veritas under following standards.

- 1) ISO 9001:2015 for Quality Management System
- 2) ISO 14001:2015 for Environment Management
- 3) ISO 50001:2011 for Energy Management System
- 4) ISO 45001:2018 for Occupational Health & Safety Management System
