



Director General SEZEPC <dg@sezepc.in>

Urgent Representation for Compliance Alignment: Nabisy Portal Restrictions on Indian Biofuel Exports

8 messages

MadhuKumar S (Sunpure - Finance) <madhukumar.s@sunpure.in> 27 February 2026 at 12:43
To: "dg@epces.in" <dg@epces.in>, "ddg@epces.in" <ddg@epces.in>, "govindy@epces.in" <govindy@epces.in>, "dg@sezepc.in" <dg@sezepc.in>, "rdcsez@eoces.in" <rdcsez@eoces.in>, "query@epces.in" <query@epces.in>
Cc: "Abdul Mannan Khan (Masoom Group - Director)" <amk@masoom.in>, "Sourabh Mittal (Masoom Group - CFO)" <sourabh@masoom.in>, "Bala Krishna (Masoom Group - VP Commercials & Operations)" <balakrishna@masoom.in>, "Mohammed Sami (Masoom Group - Finance)" <mdsami@masoom.in>, "Sreedhar Nandam (Sunpure - Head - Trading & Procurement)" <sreedhar.n@sunpure.in>, "Anirudh Agarwal (Sunpure-Trading)" <anirudh.a@sunpure.in>, "Vibha Rai (M11)" <vibha.rai@m11.co.in>, "Kumar Moorthy Iyer (M11)" <kumar.iyer@m11.co.in>, "Shruthisha R Sanil (M11)" <shruthisha.s@m11.co.in>

Respected Sir/Madam

We **M11 Energy Transition Private Limited, incorporated in December 2019 and based in Karnataka under 100% Export Oriented Unit (EOU)** is a pioneering Indian renewable energy company specializing in producing high-quality **Biodiesel** from used cooking oil. Operating India's largest 100-acre integrated biodiesel plant with a 450 TPD capacity in Padubidri, the company drives carbon reduction by converting waste into fuel & focuses on reducing dependence on fossil fuels and supporting India's net-zero emissions target and the company is an active, **well-capitalized entity with a reported revenue of \$ 111,312,673.00 for the financial year ending March 2025 also projected volume of 149100 MT for the upcoming year 2026-27.**

We are regularly exporting the Biodiesel to European country's & we are committed to maintaining 100% compliance with German trade regulations. However, a recent technical update by the **Federal Office for Agriculture and Food (BLE) via the Nabisy portal** now prevents Indian exporters from fulfilling mandatory sustainability declarations.

As of 19 February 2026, the BLE requires proof that on-site witness inspections by European authorities are feasible. Currently, India is not included in the BLE's list of "Agreed Countries," meaning the Nabisy portal does not allow Indian operators to select the "YES" declaration for these inspections. This omission renders **Indian-origin biofuels ineligible under Germany's Greenhouse Gas Reduction Policy (GHG quota)**, effectively halting trade despite our facility's readiness to undergo any required audits to verify compliance with EU RED II and German Biokraft-NachV/BioSt-NachV regulations.

We represent a significant volume of India's biofuel exports and seek to ensure our operations remain fully aligned with German law. **We respectfully request your urgent intervention to coordinate with the BLE for India's inclusion in the "Agreed Countries" list.** This will facilitate the necessary governmental framework for on-site inspections, preventing a total disruption of sustainable biofuel trade between India and Germany. We are prepared to cooperate fully with any procedural requirements to resolve this administrative bottleneck.

[Thanks & Regards...](#),

[Madhukumar.s](#)

[Sr. Executive](#)

[Import/Export Documentation](#)

M11 Energy Transition Pvt Ltd

#389, M. B. Road, Kaveri Layout,

Srirangapatna – 571 438

Mandya District, Karnataka – INDIA.

Tel: +91 96064 64673

(CIN) - U11100KA1995PTC018144

GST Number - 29AADCM7734K1ZZ

Email: madhukumar.s@sunpure.in <http://www.sunpure.in>, www.masoom.in

3 attachments



Letter to Export Promotion Council for EOU.pdf
435K



NabisyInformation_22 (2).pdf
241K



Weiterentwicklung-THG-Quote (1).pdf
77K

Director General SEZEPC <dg@sezepc.in>

27 February 2026 at 16:03

To: js-europe1@commerce.gov.in

Cc: csoffice@nic.in, "Sh Ajay Bhadoo AS(SEZ)" <astpd-doc@nic.in>, "Vimal ANAND JS(SEZ)" <vimal.anand@nic.in>, Mr Darpan Jain <js1tpd-doc@nic.in>, dir-ft.europe@gov.in

Dear Sir(s)

Please refer to the trailing email from M11 Energy Transition Pvt Ltd regarding the recent regulatory barrier in Germany for biofuel export.

They have stated that a recent technical update by the Federal Office for Agriculture and Food (BLE) via the Nabisy portal now prevents Indian exporters from fulfilling mandatory sustainability declarations.

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It is requested the matter may be examined on priority so that India is included in the list of "Agreed Countries" and export of biofuel to Germany is enabled.

Regards

Alok V Chaturvedi, IAS(Retd) | Director General,

Mobile +91 8130525959 | Tel: +91 11 23329770

Email : dg@epces.in

Export Promotion Council for EOUs and SEZs,

A101, 10th Floor Himalaya House 23, KG Marg, New Delhi, Delhi 110001

[Quoted text hidden]

3 attachments

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Director General SEZEPC <dg@sezepc.in>

27 February 2026 at 16:07

To: madhukumar.s@sunpure.in

Cc: amk@masoom.in, sourabh@masoom.in, balakrishna@masoom.in, mdsami@masoom.in, sreedhar.n@sunpure.in, anirudh.a@sunpure.in, vibha.rai@m11.co.in, kumar.iyer@m11.co.in, shruthisha.s@m11.co.in

Dear Sir

Please see the email below from DG, EPCES to Officers in the Commerce Ministry regarding the issue raised by you.

With regards

Govind Yadav
EA to DG, EPCES



Export Promotion Council for EOUs & SEZs
MINISTRY OF COMMERCE & INDUSTRY, GOVERNMENT OF INDIA

Export Promotion Council for EOUs and SEZs,

Flat No.101A, Himalaya House, 23 KG Marg, New Delhi 110001

Mobile +91 8860442391 | Tel: +91 11 23329770

email : dg@epces.in

website : <https://www.epces.in/>

twitter : [@dgepces](https://twitter.com/dgepces) (<https://twitter.com/dgepces>)

facebook : [@dgepces](https://www.facebook.com/dg.epces) (<https://www.facebook.com/dg.epces>)

Export Promotion Council for EOUs (Export Oriented Units) and SEZs (Special Economic Zones) (EPCES) is a multi-product Export Promotion Council set up by the Ministry of Commerce and Industry, representing the interests of SEZ units, SEZ developers and Export Oriented Units. It has 6,278 members with 4,882 SEZ units, 394 SEZ developers and 1,002 EOUs. In FY 2024-25, total exports of goods and services from SEZs were recorded at US \$ 176.6 billion (21.4% of India's exports) (goods \$69 bn (15.8% of India's goods exports) , services 107.6 bn (27.8% of India's services exports)) and export of goods from EOUs at US\$ 18.1 billion (4.2% of India's goods exports)

----- Forwarded message -----

From: **Director General SEZEPC** <dg@sezepc.in>

Date: Fri, 27 Feb 2026 at 16:03

Subject: Urgent Representation for Compliance Alignment: Nabisy Portal Restrictions on Indian Biofuel Exports

To: <js-europe1@commerce.gov.in>

Cc: <csoffice@nic.in>, Sh Ajay Bhadoo AS(SEZ) <astpd-doc@nic.in>, Vimal ANAND JS(SEZ) <vimal.anand@nic.in>, Mr Darpan Jain <js1tpd-doc@nic.in>, <dir-ft.europe@gov.in>

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MadhuKumar S (Sunpure - Finance) <madhukumar.s@sunpure.in>

27 February 2026 at 16:25

To: Director General SEZEPCC <dg@sezepc.in>

Cc: "Abdul Mannan Khan (Masoom Group - Director)" <amk@masoom.in>, "Sourabh Mittal (Masoom Group - CFO)" <sourabh@masoom.in>, "Bala Krishna (Masoom Group - VP Commercials & Operations)" <balakrishna@masoom.in>, "Mohammed Sami (Masoom Group - Finance)" <mdsami@masoom.in>, "Sreedhar Nandam (Sunpure - Head - Trading & Procurement)" <sreedhar.n@sunpure.in>, "Anirudh Agarwal (Sunpure-Trading)" <anirudh.a@sunpure.in>, "Vibha Rai (M11)" <vibha.rai@m11.co.in>, "Kumar Moorthy Iyer (M11)" <kumar.iyer@m11.co.in>, "Shruthisha R Sanil (M11)" <shruthisha.s@m11.co.in>

Dear Sir.,

Thanks for the reply & pls rectify the email id oo-jseurope1@commerce.gov.in to resend the mail once to ministry of commerce dept.

Thanks & Regards....,

Madhukumar.s

Sr. Executive

Import/Export Documentation

M. K. Agrotech Pvt Ltd

#389, M. B. Road, Kaveri Layout,

Srirangapatna – 571 438

Mandya District, Karnataka – INDIA.

Tel: +91 96064 64673

(CIN) - U11100KA1995PTC018144

GST Number - 29AADCM7734K1ZZ

Email: madhukumar.s@sunpure.in <http://www.sunpure.in>, www.masoom.in

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Sent: Friday, February 27, 2026 4:07 PM

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Nandam (Sunpure - Head - Trading & Procurement) <sreedhar.n@sunpure.in>; Anirudh Agarwal (Sunpure-Trading) <anirudh.a@sunpure.in>; Vibha Rai (M11) <vibha.raai@m11.co.in>; Kumar Moorthy Iyer (M11) <kumar.iyer@m11.co.in>; Shruthisha R Sanil (M11) <shruthisha.s@m11.co.in>

Subject: Fwd: Urgent Representation for Compliance Alignment: Nabisy Portal Restrictions on Indian Biofuel Exports

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[Quoted text hidden]

Director General SEZEPC <dg@sezepc.in>

To: oo-js europe1@commerce.gov.in

Cc: madhukumar.s@sunpure.in

27 February 2026 at 16:29

----- Forwarded message -----

From: Director General SEZEPC <dg@sezepc.in>

Date: Fri, 27 Feb 2026 at 16:03

Subject: Urgent Representation for Compliance Alignment: Nabisy Portal Restrictions on Indian Biofuel Exports

To: <js-europe1@commerce.gov.in>


Cc: <csoffice@nic.in>, Sh Ajay Bhadoo AS(SEZ) <astpd-doc@nic.in>, Vimal ANAND JS(SEZ) <vimal.anand@nic.in>, Mr Darpan Jain <js1tpd-doc@nic.in>, <dir-ft.europe@gov.in>

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MadhuKumar S (Sunpure - Finance) <madhukumar.s@sunpure.in> 28 February 2026 at 10:37
To: "js-europe1@commerce.gov.in" <js-europe1@commerce.gov.in>, "birendra.78@gov.in" <birendra.78@gov.in>
Cc: "Abdul Mannan Khan (Masoom Group - Director)" <amk@masoom.in>, "Sourabh Mittal (Masoom Group - CFO)" <sourabh@masoom.in>, "Bala Krishna (Masoom Group - VP Commercials & Operations)" <balakrishna@masoom.in>, "Mohammed Sami (Masoom Group - Finance)" <mdsami@masoom.in>, "Sreedhar Nandam (Sunpure - Head - Trading & Procurement)" <sreedhar.n@sunpure.in>, "Anirudh Agarwal (Sunpure-Trading)" <anirudh.a@sunpure.in>, "Vibha Rai (M11)" <vibha.rai@m11.co.in>, "Kumar Moorthy Iyer (M11)" <kumar.iyer@m11.co.in>, "Shruthisha R Sanil (M11)" <shruthisha.s@m11.co.in>, Director General SEZEPCC <dg@sezepc.in>, "nabisy@ble.de" <nabisy@ble.de>, "nachhaltigkeit@ble.de" <nachhaltigkeit@ble.de>

Respected Sir..,

We have received the below communication from **NABISY**, the German Government's sustainable biomass database operated by the **Federal Office for Agriculture and Food (BLE)**. NABISY's purpose is to verify and track the sustainability of liquid and gaseous biomass.

At present, **India is not included in the NABISY country list**, and as one of the largest exporters of biodiesel, we would like to register with them. For this purpose, the competent authority is required to send an approval email for their proposed visit, (Please refer to the NABISY email provided below for your reference.)

We kindly request your approval to proceed and send mail to nabisy@ble.de & nachhaltigkeit@ble.de

AW: [external] Urgent clarification regarding the feasibility of witness inspection for Indian biodiesel exp...



nabisy, Funktion <nabisy@ble.de>

To Shruthisha R Sanil (M11)

Cc: Kumar Moorthy Iyer (M11); Vibha Rai (M11); Abdul Mannan Khan (Masoom Group - Director); Anup.ac89@gmail.com; nachhaltigkeit, Funktion



Fri 27-02-2026 19:52

We removed extra line breaks from this message.

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Dear Ladies and Gentlemen,

Thank you very much for your inquiry about the technical adjustments in Nabisy and the related questions of February 26, 2026.

In order to obtain rights of access from the Federal Office for Agriculture and Food (BLE) as the competent authority within the framework of the RED for a state, the consent of the respective state is required.

1. Contacting the competent authority of the country concerned: Please contact the competent authority in the respective country and inform them of the concern.
2. Obtaining written consent: Ask the competent authority of the state to provide its consent to on-site inspections by the BLE in writing.
3. Transmission to the BLE: The competent authority should send its explicit consent to nachhaltigkeit@ble.de by email. A formal application procedure is not required for this.

Best regards,
On behalf of
Your Nabisy team

Unit 523
Sustainable biomass, EU fertiliser products

About our Company:

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Sr. Executive

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Subject: Fwd: Urgent Representation for Compliance Alignment: Nabisy Portal Restrictions on Indian Biofuel Exports

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Dear Sir

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2 attachments



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MadhuKumar S (Sunpure - Finance) <madhukumar.s@sunpure.in>

2 March 2026 at 15:11

To: "js-europe1@commerce.gov.in" <js-europe1@commerce.gov.in>, "birendra.78@gov.in" <birendra.78@gov.in>, "mayank.pratap@gov.in" <mayank.pratap@gov.in>, "rkaushik@nic.in" <rkaushik@nic.in>

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Adding Id's

From: MadhuKumar S (Sunpure - Finance)

Sent: Saturday, February 28, 2026 10:37 AM

To: 'js-europe1@commerce.gov.in' <js-europe1@commerce.gov.in>; 'birendra.78@gov.in' <birendra.78@gov.in>

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nabisy, Funktion <nabisy@ble.de>

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Cc: Kumar Moorthy Iyer (M11); Vibha Rai (M11); Abdul Mannan Khan (Masoom Group - Director);

Anup.ac89@gmail.com; nachhaltigkeit, Funktion

Reply Reply All Forward

Fri 27-02-2026 19:52

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 On behalf of
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To: js-europe1@commerce.gov.in, dir-ft.europe@gov.in, us5-europe@commerce.gov.in

Cc: madhukumar.s@sunpure.in

9 June 2026 at 15:12

Dear Sir

Please refer to the trailing email dated 27.2.2026.

Perhaps matter regarding third party onsite inspection was referred to the MoPNG by the DoC.

MoPNG has now replied that they have no issue in permitting on-site inspection as it is a regulatory requirement for bio-fuel exports to Germany. (Copy attached)

In view of the above, DoC may write to the Federal Office for Agriculture and Food (BLE) agreeing to the third party on-site inspection so that M11 Energy Transition Pvt Ltd can export biofuel to Germany.

The letter has to be written urgently so that India is included in the list of countries agreeing to on-site inspection.

Regards

Alok Chaturvedi

DG

Alok V Chaturvedi, IAS(Retd) | Director General,

Mobile +91 8130525959 | Tel: +91 11 23329770

Email : dg@epces.in

Export Promotion Council for EOUs and SEZs,

A101, 10th Floor Himalaya House 23, KG Marg, New Delhi, Delhi 110001

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From: **Director General SEZEP** <dg@sezepc.in>

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