

4<sup>th</sup> April 2025

Mr. Tanmay Kumar, IAS  
Secretary  
Ministry of Environment, Forest & Climate Change  
Government of India  
New Delhi

Dear Sir,

**Sub: Request for Implementation of Environmental laws by State Boards.**  
**Ref : S.O. 980(E) dated 2nd March 2021 and Office Memorandum dated 21st January 2021.**

Greetings from the Bulk Drug Manufacturers Association of India (BDMAI)!

We are Hyderabad based national representing body of Bulk Drug Manufacturers mostly manufacturing lifesaving Bulk Drugs for Domestic and Globe.

We wish to bring to your attention the Office Memorandum dated 21<sup>st</sup> January 2021 and Notification No. S.O. 980(E) issued on 2nd March 2021 ( copies attached ) Which were issued by MoEF&CC after multiple round of discussions/ deliberations involving Industry Associations, Department of Pharma & MoEF and representatives of CPCB. A record of discussions of meeting held on 10<sup>th</sup> December 2020 herewith attached for ready reference. .

On behalf of the industry, representatives from BDMAI and the Indian Drug Manufacturers Association (IDMAI) discussed with the Secretary along with other officials from MoEF & CPCB on several challenges faced by the industry.

- a) Permitting the change in product mix or raw material mix including no cap on increase in the production quantity without prior environmental clearance as long as no increase in pollution load;
- b) Considering the issuance of the prior EC and Consent for category wise (API and intermediates as one category) instead of individual products wise;
- c) Considering load based permissions instead of quantity based permissions as parameters for the measurement of pollution remains same for all products.

In response, Notification No. S.O. 980(E) dated 2nd March 2021 addressed the concerns raised in the first point, while the Office Memorandum dated 21st January 2021 mitigated the issue outlined in the second point.

Unfortunately, despite our repeated requests and representations at various forums, the SPCBs have yet to implement both the Notification and the Office Memorandum. As a result, the industry continues to face the same challenges.

Given the recent imposition of tariffs by the U.S. on several countries, the Indian API manufacturing industry is hoping for a positive change that will strengthen its position in international markets. The timely implementation of your guidelines by the State authorities at this critical juncture would provide significant support to the API industry. A Relook for simplification of Environmental rules which are not impacting the environment is the need of the hour to fulfill Government of India's vision of reducing dependence on China and for health security of our country.

We kindly request your intervention to ensure that the State Pollution Control Boards implement your guidelines promptly.

Thank you for your attention to this matter. We look forward to your cooperation.

Yours sincerely,

  
R.K. Agrawal  
National President

