

9th July 2025

Shri S Suresh Joint Director Commissionerate of Industries State Government of Telangana Hyderabad

Dear Sir

Sub: Minimum Wages Act, 1948 – Revision of Minimum Wages in 73 Categories Ref: Your email dated 4th July 2025

We refer to the proposed revision of minimum wages as recommended by the Minimum Wages Advisory Board of the Government of Telangana for issuance of final notification. On behalf of the Bulk Drug Manufacturing Industry, we wish to submit the following observations and concerns:

a)Uniform Wage Structure across Industries:

It has been observed that the proposed minimum wages are uniformly applicable across all industries, without taking into consideration the nature, operational characteristics, or revenue-generating capacities of different sectors. This marks a significant deviation from the established practice of fixing industry-specific minimum wages, which considers sectoral diversity and economic realities.

b) Steep and Sudden Wage Hike:

The proposed wages reflect a steep hike compared to those mentioned in the preliminary notification dated 29.01.2024. For unskilled workers, the increase exceeds 125%, which is both abrupt and difficult to absorb, particularly for MSMEs.

c) Lack of Justification for Uniform Increase:

We are concerned about the absence of a rational basis for fixing identical minimum wages across industries and for all categories of employment. The flat increase, especially of such a significant magnitude, is not aligned with economic or operational variances among different sectors.



d) Impact on Bulk Drug Industry:

The Bulk Drug Industry is a technology-intensive sector that relies on skilled manpower. While we do employ unskilled workers, they undergo 1–2 years of in-house training before being integrated into critical operations. Imposing a high minimum wage at the unskilled entry level undermines the industry's structured skill development efforts and imposes unsustainable costs.

e) Adverse Effect on MSMEs in the Sector:

The industry, especially MSME units, is already grappling with regulatory challenges and volatile market conditions in both domestic and global markets. The proposed hike will place an additional financial burden on these units, potentially threatening their viability.

Conclusion and Request:

In light of the above, we sincerely urge the Government to reconsider the proposed revision. We believe a reasonable increase of **10–15% over the prevailing minimum wages** would be more appropriate and sustainable, while also ensuring the welfare of workers.

We request your kind consideration of the above points before finalizing the notification.

Thanking you

Yours sincerely,

Executive Directo