

Ref No.BDMA/APPCB/13/2025-26

Date:6<sup>th</sup> October 2025

**Sri S. Sri Saravanan, IFS**  
**Member Secretary**  
**A.P. Pollution Control Board**  
Paryavaran Bhavan  
APIIC Colony Road, Gurunanak Colony  
Vijayawada, Andhra Pradesh- 520007

Dear Sir

**Sub: Request for Implementation of MoEF&CC Notification on COD Discharge Limits  
for Marine Outfalls**

**Greetings from the Bulk Drug Manufacturers Association of India!**

At the outset, on behalf of our member industries, we extend our sincere gratitude for your continued support in understanding and resolving the genuine concerns of the pharmaceutical and chemical sectors.

We wish to bring to your kind attention a matter of pressing concern affecting industries operating in Andhra Pradesh:

As you are aware, the Ministry of Environment, Forest & Climate Change (MoEF&CC), Government of India, through its Notification No. 3864(E) dated 9th September 2024, has amended certain provisions under the Environment (Protection) Act. As per the revised norms, a Chemical Oxygen Demand (COD) limit of up to 500 mg/l is permitted for treated effluent discharged into the sea via properly designed marine outfalls.

Further, vide letter No. APPCB-11022/348/2025-TEC-CFO-APPCB dated 20-09-2025, your esteemed office advised all Common Effluent Treatment Plants (CETPs) and relevant stakeholders to adhere to these amended rules, which came into effect from 1st September 2025.

However, despite the clarity provided in the MoEF&CC notification and your office's direction, industries in Andhra Pradesh are still not being permitted to discharge treated effluents with COD levels up to 500 mg/l, even when marine discharge systems are fully compliant with the stipulated norms. This has led to significant additional expenditure for industries on further effluent treatment, despite the availability of natural dilution through marine outfall systems.

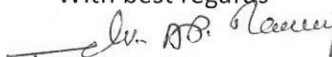
It is pertinent to note that PCBs in states like Maharashtra and Gujarat, where similar marine discharge infrastructure exists for chemical and pharmaceutical hubs, are already permitting the discharge of treated effluents up to the revised COD limits. This inconsistency has placed industries in Andhra Pradesh at a competitive disadvantage

In light of the above, we earnestly request your kind intervention in directing the concerned authorities to implement the revised COD limits as per the MoEF&CC notification, enabling a level playing field for industries in Andhra Pradesh.

Your timely support and cooperation in this matter will go a long way in improving the operational sustainability and competitiveness of the bulk drug and pharmaceutical industry in the State.

Thanking you for your continued support.

With best regards



Ch. A P Rameswara Rao  
National President



CC to: a. Dr. P. Krishnaiah, I.A.S. (Retd.), Chairman APPCB,  
b. Mr. Tanmay Kumar, Secretary (EF&CC), MoEF&CC