

BDMAI /TGPCB/ 2026

15<sup>th</sup> May 2026

Sri G Ravi, IAS  
Member Secretary  
State Pollution Control Board  
Hyderabad  
Telangana

Dear Sir,

We refer to the meeting our Committee Members had on 18<sup>th</sup> March 2026 at your office and subsequent letter dated 26<sup>th</sup> March 2026.

We would like to once again reiterate the concerns of the industry discussed in the meeting as follows:

#### **Change in Product Mix:**

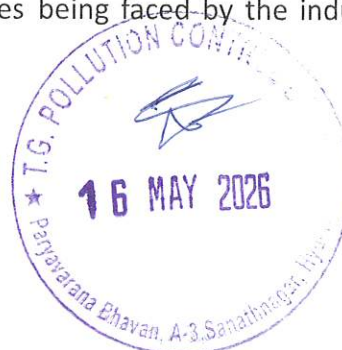
As informed during the meeting, senior officials of MoEF clarified to the industry delegation who met them on 12<sup>th</sup> March 2026 that industries can change/increase or decrease the number of products and also **the total quantity of Products**, provided there is no increase in Pollution Load and the pollution loads are within the limits of approved EC. Further it is also permitted to treat Drugs and Intermediates as one single category and product change within the category is permissible.

During the meeting with our EC members, you were kind enough to inform that you would get the clarification from MoEF officials and take necessary action. We once again request you to look into it.

#### **Amendment to CTO in Case of Product Mix**

In cases of Product Mix, the industry is required to apply for CTE and then for CTO. You would kindly appreciate that review by Committees for CTE and then CTO practically takes 4-6 months. This long delay in obtaining CTOs is excessively long and is not aligned with the present international market dynamics, which are highly time-sensitive. In many instances, industries are losing valuable export opportunities and customers due to non-availability of CTO approvals within the required timelines.

In view of the above genuine difficulties being faced by the industry, we have made the following suggestions:



1. Since there is no change to the establishment in cases involving only change in product mix, the requirement for obtaining CTE may kindly be exempted.
2. Existing CTOs may be permitted to be amended directly in cases involving change in product mix.
3. The entire process for obtaining amendment to the existing CTO may kindly be made completely online with clearly defined timelines for disposal and issuance of amended CTOs.
4. A separate and rationalized fee structure may kindly be prescribed for applications relating to change in product mix.

Your kind consideration of the above request would greatly facilitate smooth and efficient operations of the pharmaceutical industry and enhance its ability to respond promptly to changing market requirements.

**Escalated costs of Waste Disposal:**

We wish to bring to your kind notice that the costs of hazardous waste disposal have become abnormally high. Re-Sustainability Ltd which is authorized to collect and dispose the wastes is increasing the charges without any rationale. Over and the above the charges negotiated and agreed upon with the BDMAI, which are commonly applicable to all BDMAI members in Telangana and AP, Re-Sustainability is levying additional charges for handling, treatment etc., without any standard or pre-approved criteria.

We sincerely request your good offices to kindly look into the abnormal escalation in hazardous waste disposal charges being levied by Re Sustainability Limited and take suitable measures to regulate and rationalize the same in the larger interest of the pharmaceutical industry in the State

**Request for an appointment:**

Our Committee members would once again like to meet you along with all concerned senior officials of TG PCB and make a detailed presentation on the above issues for clear understanding of the concerns and suggestions made by us to resolve the same.

We shall be grateful if sometime is given during next week for the above meeting.

Thanking you,

Yours sincerely,

  
L V Sunil  
Secretary



BDMAI /TGPCB/ 2026

26<sup>th</sup> March 2026

Sri G Ravi, IAS  
Member Secretary  
State Pollution Control Board  
Hyderabad  
Telangana



Dear Sir,

We refer to the meeting the members of Executive Committee of BDMAI had with you on 18<sup>th</sup> March 2026 at your office. At the outset, we express our sincere thanks for providing us the opportunity to meet you and for your patient hearing of the concerns of the industry.

We would like to reiterate the points discussed and seek your clarifications on some of the issues:

**Product Mix Change:**

It is understood that now Bulk Drug Industries in the Telangana State are allowed to change their product mix (change or increase / decrease the number of products) provided there is no change in the total production capacity and there is no increase in the Pollution Load, as allowed in the EC obtained by the manufacturer. Further currently Drugs and Intermediates are treated separately and it is not permitted to change from Intermediate to Drug products vice versa without obtaining fresh EC.

In this connection, we have brought to your notice GO S.O.980 (E) dated 2<sup>nd</sup> March 2021 , OM Dated Dec 17 , 2025 and a recent industry interaction with the senior officials of MoEF on 12<sup>th</sup> March 2026 at Delhi, wherein it was clarified that industries can change/increase or decrease the number of products and also the **total quantity of Products**, provided there is no increase in Pollution Load and the pollution loads are within the limits of approved EC. Further it is also permitted to treat Drugs and Intermediates as one single category and product change within the category is permissible. We enclose herewith a copy of the minutes and other documents, for your reference.

As many of our member industries are not fully aware of these provisions and clarifications, we would be grateful if your good office could kindly issue a guidance document/circular for the benefit of the industry.

### **Amendment to CTO:**

At present, in the event of any change in product mix, the industry is required to submit an online application to the state PCB duly along with "no increase in pollution load" certificate. This goes to a CFE/CTE committee which reviews the application and issues a CFE/CTE to the industry. Based on this CFE the industry has to apply for CFO, which is again reviewed by a CFO committee and then the CFO is issue to the industry. This process is taking a lot of time and is not attuned to current international market dynamics which are extremely time sensitive.

As per the minutes of the industry interaction with MoEF&CC officials held on 12th March 2026, it has been clarified that, subsequent to submission of the online application to MoEF & CC on Parivesh Portal, the industry can approach the PCB for amendment of CTO by furnishing a copy of the acknowledgement of the application submitted to MoEF&CC.

As per the above minutes, we humbly request the Sate PCB's to amend the process for change in product mix approval process to include the following procedural changes

1. Treat the product mix request as an amendment to CFO
2. Make the submission completely online
3. Fix a time period for issue of amendment to CFO
4. Separate fee structure for Change in product mix

As there is no change to the establishment in cases of product mix change, the CFE & CFO steps may be combined and converted into an time bound on line approval process. Your kind consideration of this request would greatly facilitate smooth and efficient operations of the industry.

### **ZLD status for the Units of the Members of CETPs with ZLD facilities:**

We are very thankful for clarifying that all the manufacturing units which are the members of a Common Effluent Treatment Plant with ZLD facilities and regularly sending their effluents to such CETPs are also considered as ZLD facilities. Also thankful for clarifying that those manufacturing units which are having their own ZLD facilities, but would like to use the common ZLD facility ( not wanting to operate them due to uneconomical size) and instead wanting to send their effluents to a ZLD CETP can also be permitted and treated as ZLD units.

We shall be grateful if the above clarification is also included in the requested Guidance Document / Circular for the benefit of the industry.

Thanking you once again for your kind cooperation.

Yours sincerely,

L V Sunil

Secretary

