BULK DRUG MANUFACTURERS ASSOCIATION OF INDIA

BDMAI /TGPCB/ 2026

25th August 2026

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

Dear Sir,

We refer to the meeting our Executive Committee members had with you on 14th August 2026 at your office and we express our sincere thanks for giving the opportunity to meet you and your patient hearing to the issues of the industry.

Requests for a Committee in TG PCB to monitor Hazardous Waste Management Services:

During the meeting, we have brought to your notice about abnormal prices increases by the agency handling hazardous wastes and also informed about Andhra Pradesh Environment Management Corporation Ltd (APEMCL), where the Member Secretary of APPCB will be the Managing Director of the Corporation, which is monitoring such services. BDMAI is the member of one of the Committees formed by APEMCL. We enclose herewith a communication received in this regard, for your information.

It would immensely help the industry, if a Committee to monitor the services rendered and charges levied by the agencies that are handling Hazardous wastes in Telangana also.

CTE/CTOs in case of change in Product Mix:

Vide our representations dated 26th March 2026 and 15th May 2026, we have requested for issuing CTOs through online in cases of change in product mix. Copies of the representations are enclosed herewith with a request to kindly look into our requests.

Thanking you and looking forward to your cooperation.

With regards

M Roja Rani
Executive Director

BULK DRUG MANUFACTURERS ASSOCIATION HYDERABAD

T.G. POLLUTION CONTROL BOARD
25 AUG 2026
Paryavarana Bhavan, A-3, Sanathnagar, Hyd-18.

C-25, Industrial Estate, Sanathnagar Hyderabad - 500 018 Ph : 040-23706718/3910/4804
info@bdmai.org www.bdmai.org

BDMAI
BULK DRUG MANUFACTURERS ASSOCIATION OF INDIA

BDMAI /TGPCB/ 2026

15th 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 18th March 2026 at your office and subsequent letter dated 26th 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 12th 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

BULK DRUG MANUFACTURERS ASSOCIATION HYDERABAD

BDMAI BULK DRUG MANUFACTURERS ASSOCIATION OF INDIA

O/c

BDMAI /TGPCB/ 2026

26th March 2026

T.S. POLLUTION CONTROL BOARD
20 MAR 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 18th 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 2nd March 2021 , OM Dated Dec 17 , 2025 and a recent industry interaction with the senior officials of MoEF on 12th 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.

C/o 25, Industrial Estate, Sanathnagar, Hyderabad - 500018. Ph: 040-23704718/23704804

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

BULK DRUG MANUFACTURERS ASSOCIATION HYDERABAD

Andhra Pradesh Environment Management Corporation Limited
Environment & Forests Department, Govt. of AP
#56-2-11, 2nd floor, A.P Markfed Office Building, Autonagar, Vijayawada- 520007
Website: http://apemcl.ap.gov.in/

Lr.No: APEMCL/pricing committee/I/5000658/2026 Date:09-08-2026

Sub:	M/s. Andhra Pradesh Environment Management Corporation Limited (APEMCL) – Reconstitution of the Pricing Committee for fixation of waste management service charges payable to APEMCL – Request for nomination of suitable representative Bulk Drug Manufacturing Association (BDMA) – Reg.
Ref:	1. EFS&T Dept., GoAP G.O.R.T. No. 27, dated 24.04.2020 2. Lr. No: APEMCL/HO/13/05/2020- 13/05/2020 3. EFS&T Memo.No. EFS01-ENV0PEST(SEAC)/1/2020-SEC-I, Dated:24.08.2020

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It is informed that the Environment, Forests, Science & Technology (EFS&T) Department, Government of Andhra Pradesh, vide G.O.Rt. No.27, dated 24.04.2020, constituted a Pricing Committee for fixation of the service charges payable to APEMCL for waste management, with the following members:

1. Spl Chief Secretary/ Prl Secretary / Secretary, EFS&T Department -- Chairman
2. Spl. Chief Secretary / Prl. Secretary / Secretary, Industries Department
3. Commissioner of Industries
4. Chairman, APPCB
5. Member Secretary, APPCB
6. Managing Director, APEMCL- Member Convenor
7. An authorized representative from Bulk Drug Manufacturing Association (BDMA)
8. An authorized representative from Cement Industries Association
9. A representative from CETPs (To be nominated by the Govt.)
10. A representative from TSDFs (To be nominated by the Govt.)
11. An authorized representative from Andhra Pradesh Federation of Indian Chambers of Commerce and Industry (AP FICCI)
12. A representative from Pre-Processing Units (To be nominated by the Govt.)
13. An authorized representative from Andhra Pradesh Waste oil Used oil Reclamation Industries Welfare Association (Recycling Units).

vide reference 3rd cited, the Government nominated representatives from various stakeholder organizations to the Pricing Committee constituted for fixing service charges payable to APEMCL for waste management. The details of representative nominated earlier from Bulk Drug Manufacturing Association (BDMA) is furnished below:

S.No	Name of the Association / Organization	Name of the proposed representative
7	Bulk Drug Manufacturing Association (BDMA)	Shri Narasimha Rao Chava, Vice President, M/s Laurus Labs Ltd Mobile: 98662 96669 Email: nrao.chava@lauruslabs.com

However, while the Government Order provided for the nomination of representative from the above stakeholder organizations, it did not prescribe the tenure of the nominated members. Consequently, the present composition of the Pricing Committee requires revision to ensure proper and effective representation of the Bulk Drug Manufacturing Association (BDMA).

In view of the above, it is requested to kindly nominate one suitable representative from the Bulk Drug Manufacturing Association (BDMA) for inclusion in the Pricing Committee constituted for fixing the waste management charges and the service charges of APEMCL.

S SRISARAVANAN, I.F.S

MANAGING DIRECTOR

To

Bulk Drug Manufacturing Association (BDMA),
Regd. Office: C-25, Industrial Estate, Sanathnagar,
Hyderabad – 500 018, INDIA.

Digitally signed by
SHANMUGAM SRISARAVANAN
Date: 09-08-2026 19:10:11