



BULK DRUG MANUFACTURES ASSOCIATION (INDIA)

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Circular No. BDMA/083//2026

Date: 03rd Sep 2026

Dear Sir,

Sub: Clarifications sought from Re Sustainability regarding Additional Handling Charges & Surcharge

Some of our members have approached us seeking clarification regarding the additional handling charges and surcharge being levied by Re Sustainability over and above the basic rates agreed upon with BDMAI.

The Executive Committee of BDMAI had several meetings and discussions with the representatives of Re Sustainability to understand the basis and applicability of these additional charges. Based on the clarifications provided by Re Sustainability, the following points are brought to the notice of our members:

Basic Rates:

BDMAI in consultation with industry experts, negotiates the Basic Rates with Re Sustainability for every three years. The prevailing Basic Rates are as follows:

Slab (MT)	User Charges Upto 31.12.2025 (in Rs. per MT)	Increase YoY @3.5% from 01.01.2026 (in Rs. per MT)	Increase YoY @3.5% from 01.01.2027 (in Rs. per MT)	Increase YoY @3.5% from 01.01.2028 to 31.12.2028 (in Rs. per MT)
0-500	2934	3037	3143	3253
501-2000	2792	2890	2991	3096
2001-5000	2650	2743	2839	2938
5001-10000	2238	2316	2397	2481
>10000	2068	2140	2215	2293

Additional Processing Charges

The hazardous waste collected from industries is required to meet certain parameters prescribed by the Central Pollution Control Board (CPCB) before it can be disposed of through secured landfilling. To ascertain compliance with these prescribed parameters, Re Sustainability will collect samples of hazardous waste from individual member units once every two years and a comprehensive analysis covering 91 parameters shall be conducted at the laboratory of Re Sustainability

- a) Based on the test results, Re Sustainability will communicate to the respective industry the additional treatment/processes, if any, required to bring the waste parameters within the permissible limits for secured landfilling, along with the corresponding costs involved.
- b) Where additional treatment or processing is required, an agreement will be entered into between Re Sustainability and the respective individual company, clearly specifying the additional processing charges to be levied over and above the Basic Rates agreed upon by Re Sustainability with BDMAI.

Transportation Charges

Transportation charges will be levied in addition to the Basic Rates agreed upon by Re Sustainability with BDMAI. Such charges will be determined based on the prevailing fuel costs and the distance between the individual member unit and the designated disposal facility. The applicable transportation charges will be mutually agreed upon between Re Sustainability and the respective individual company and will be incorporated in the agreement entered into between them

Deviations

It is understood that after receipt of the waste from the respective units, random samples shall be collected and Flame Photometric Analysis shall be conducted in their NABL accredited Laboratory for selected parameters, including physical observations and applicable laboratory tests. In the event that any variation or deviation in the waste parameters is observed during such testing, as compared against the Comprehensive Report, Re Sustainability shall inform the concerned company of such variation or deviation. Based on the test results and the nature of the deviation, the applicable charges may be revised accordingly, and the revised charges will be reflected in the subsequent billing, as mutually agreed between Re Sustainability and the respective company

For the reference of members, a list of tests conducted, costs of reagents etc., are given in the Annexure I.

Surcharge

Re Sustainability explained that, due to the recent abnormal increase in the cost of reagents, consumables and other inputs, they were constrained to levy a 10% surcharge over the applicable charges. After detailed discussions and negotiations with Re Sustainability, BDMAI was able to negotiate a reduction in the surcharge to **8% for the period from June to October 2026**, which will be reviewed after October 2026.

Advice to the Members:

Members are advised to have fresh samples of the wastes generated at their respective facilities tested periodically and to renew their agreements with Re Sustainability based on the latest test results. It is recommended that the waste samples be tested and the agreements with Re Sustainability be reviewed and renewed **once every two years** to ensure that the waste classification and disposal arrangements remain appropriate and up to date.

It may please be noted that BDMAI undertook this exercise of engaging and negotiating with Re Sustainability in the best interest of its members, with a view to minimising the additional financial burden on member industries and ensuring the continued and smooth provision of hazardous waste management services.

Members may give their input/advice on this subject.

With regards

M Roja Rani

Executive Director

