



A BLAST OF FAILURES: LEGAL INSIGHTS INTO INDUSTRIAL ACCIDENTS IN BHARAT

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INTRODUCTION

On 30th June, 2025 (Monday morning), A massive blast erupted in Pashamylaram near Hyderabad in a Pharma Factory Sigachi Industries Private Limited. A majority of victims got trapped inside the production unit near the reactor when it was dismantled. These incidents have become increasingly common in India nowadays. The rise of such incidents raises concerns about their safety issues and the need for regulatory measures. But does it imply that there is a legislative deficiency? Do we have adequate laws for workers' safety and industrial explosions in India? Discussing such topics is particularly distasteful when you are part of the world's 5th largest economy, by nominal GDP, or now the 4th largest economy globally. Anyways, GDP Growth does not reflect the Welfare of its citizens. Now, the question arises whether we need more laws or whether we need to regulate the existing laws properly to maintain the safety measures of our workers working in an industrial unit. The death toll rises to 35 (as on 1st July, 2025), with the numbers expected to climb while simultaneously treatment of 34 is still ongoing. Telangana Chief Minister A. Revanth Reddy instructed officers to give compensation of ₹1 crore to families of the workers who died in the blast and ₹10 lakh to those several injured. As immediate relief, officials had been directed to provide ₹1 lakh each to the families of the workers who died and ₹50,000 each to the injured.¹ What do these politicians cost the life of a human being? How can they lead money to replace justice and the human cost? Not only talking about Telangana, but we see several cases in other states also, like Rajasthan, Punjab, Tamil Nadu, Odisha, etc, are costing human lives with money. Is this how justice is served? Instead, they should regulate the existing laws and governance. Many things are indeed needed to be discussed here. Telangana as a region is home to more than 800 pharma companies and also contributes to 35-40% of In-

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¹ Telangana factory blast: CM announces ₹1 crore to families of deceased workers, ₹10 lakhs to severely injured, (The Hindu, 1 July 2025) <[Telangana factory blast: CM announces ₹1 crore to families of deceased workers, ₹10 lakhs to severely injured - The Hindu](#)> accessed 7 July 2025

dia's bulk drug production. Despite growth, industrial safety lapses are significantly surging. Not just the pharmaceutical industry is concerned about such blasts, but several other industries also have a high potential to attract such blasts in the future. India must ensure a strict regulatory framework for such industries. These industries may include textile industries, oil and gas industries, chemical industries, etc. especially, when the government had planned to set up several small modular reactors (SMR) for nuclear energy mission with an outlay of ₹20000 crore in the union budget of 2025-26; which are highly flammable – putting them at risk of industrial explosions, if safety is not strictly enforced.

This Blog is written for the following purpose;

- To discuss the legal laws, safety, and regulatory aspects of such incidents happening in industrial tragedies in India.
- To raise awareness about the critical safety standards in pharmaceutical manufacturing, emphasizing the need for stringent regulatory oversight to prevent future incidents.
- To analyse the workers' safety laws in India.

THE TELANGANA PHARMA FACTORY BLAST: WHAT WE KNOW SO FAR

At least 38 people had died (as of 2nd July, 2025) so far, and 36+ were injured in the recent blast at a chemical/pharma factory in Sangareddy (Pashamylaram), district of Telangana; Family members and relatives of those reported missing since the blast, hoping for some news about their loved ones. Among them is 25-year-old Sajana, a relative of Ramesh who has been missing since the explosion. “No one can tell us if he is alive or dead. We have been waiting for hours to get some news,” she told The Indian Express. Ramesh had been working at the plant for the past 5 years.² This is how some factories and industries in India treat their workers after an explosion. What are the rights that the family members or relatives of such a worker will have after such incidents? It's very crucial to have legal provisions to protect the rights and privileges of such workers, balancing with the rights enjoyed by industries and employers in India. Huge portions of the three-storey plant were reduced to debris because of the explosion. The district administration had collected blood samples from several people to

² Nikhila henry, No one has told us if he's alive or dead: Anxious wait for families of those missing since Telangana factory blast (The Indian Express, 2 July 2025) <[No one has told us if he's alive or dead': Anxious wait for families of those missing since Telangana factory blast | India News - The Indian Express](#)> accessed 7 July 2025

identify victims by DNA match. At least 25 bodies are yet to be matched (as of 1st July, 2025).³ At the time of the explosion, 143 people were at the spot, according to a public servant. The factory was engaged in producing microcrystalline cellulose (MCC) – a chemical compound which is used in the pharmaceutical industry. The blast had occurred in the spray dryer unit. The machine, which turns liquid into a powder, requires continuous temperature monitoring to ensure that it does not heat up. Also, the dryer requires regular cleaning and maintenance to prevent the accumulation of fine dust particles because this can turn a spark into fire. This blast is the latest in the country's chemical sector. Investigators believe that the blast took place due to overheating or pressure buildup inside the spray dryer reactor, which led to an explosion. However, the company denied such reports and reiterated that the accident was not caused by a reactor explosion.

Director General of Telangana State Disaster Response and Fire Services, Y Nagi Reddy, confirmed that while the 1989-constructed building may have initially followed applicable rules and contained some fire safety equipment, the installation lacked current fire department oversight and mandatory safety certifications. No third-party safety examinations had been conducted in recent times, and outdated machinery continued to be used despite worker warnings about safety pitfalls. The violations found during the investigation revealed that the unit operated without a Fire NOC. There were serious safety equipment deficiencies, including the absence of fire alarms, heat detectors, and automatic fire of systems. Additionally, there were structural safety issues, as there were no blast-resistant walls or roofs in processing areas. Additionally, material handling was also inappropriate, which led to criminal negligence and misconduct as done at the side by the company. Thereafter, operations of the firm will be closed for almost 90 days ahead, and also as a part of ex gratia (as stated by the management), they have assured to compensate ₹1 crore to the families of the deceased.

LEGAL ISSUES INVOLVED

The recent tragic accident in Telangana's pharmaceutical manufacturing facility raises serious legal concerns in this matter. At the core, it may attract criminal negligence (section 304A of IPC, 1860) for the loss of lives and injuries caused due to strong lapses in the safety measures of such factories. Section 304A says that "Whoever causes the death of any person by doing any rash or negligent act not amounting to culpable homicide, shall be punished with imprisonment of either description for a term which may extend to two years, or with

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fine, or with both.”⁴ If the investigation team found that there were flaws in safety protocols (like overheating dryers, lack of emergency mechanisms, etc) of the factory, then it may be inferred that it was criminal negligence that caused death due to negligent acts. Employers, who are employing people, have a duty of care to the hired employees. Unsafe working conditions, such as the absence of a temperature monitor, can also lead to violations of labour laws in India. Experts suggest that delays of safety audits and inspections by the concerned departments are also one of the causes of such incidents in India. People had to work for long hours, around 8-10 hours per day, in several states, which raises questions about their mental state and the overload of work they do. Also, do legal standards mandate having safety precautions while giving training to employees before and after hiring? This led to a violation of several laws in India, and thus the judiciary is also responding swiftly and efficiently, but still things are getting worse day by day. One should also look into the material they use in making such factories and infrastructure because low-quality material can lead to destruction and can cause the deaths of multiple lives.

Despite the existence of IPC Sections 304A, 337, and 338, such incidents reflect how these provisions remain largely ineffective in practice, with both corporations and government authorities neglecting essential safety protocols. The Government had come up with hazardous waste (management and handling) rules 1989, which provide for duties and instructions for hazard prevention, identifying and reporting of such issues directly.⁵ Thus, later brought the Public Liability Insurance Act, 1991, which mandates insurance for hazardous accidents to ensure quick relief facilities for the victims.⁶ But still, the issue remains active because of a lack of proper implementation of such laws and rules promptly. An FIR was launched against the company filed by the son of one of the deceased, who is being accused under sections 105, 110 & 117 of BNS (THE BHARATIYA NYAYA SANHITA, 2023), which charges the accused with attempt to commit culpable homicide and voluntarily causing grievous hurt.⁷ Another complainant accused the company of operating outdated machinery that resulted in the loss of the lives of workers who were working inside the factory.

EXISTING INDUSTRIAL SAFETY FRAMEWORKS IN BHARAT

When we are discussing the existing industrial frameworks, one of the most prominent here would be “The Factories Act, 1948,” which is about non-compliance with industrial safety

⁴ Indian Penal Code 1860, s 304A

⁵ Hazardous Waste (Management and Handling) Rules 1989

⁶ Public Liability Insurance Act 1991

⁷ The Bharatiya Nyaya Sanhita 2023, ss 105,110 and 117

norms. Are there proper worker safety nets in a factory? This compliance is monitored by this act. In the recent incident, as we had seen *prima facie* (on the face of it), the lack of emergency worker safety protocols had hampered operations in the pharma factory. Thus, this act comes into the picture! The Factories Act, 1948, is now known as “Occupational Safety, Health & Working Conditions Code, 2020”. This act clearly outlines the responsibility of factory owners, like licensing, providing appropriate working conditions for labour provides provisions for hazardous processes and machinery.⁸ If, in case, further investigation found that the factory had violated the environmental norms, then in addition to the statutory obligations in The Factories Act, 1948, which governs the safety and welfare of workers inside industrial premises, the incident also attracts provisions of “The Environment (Protection) Act, 1986,” considering the possible handling and release of hazardous substances that could pose a risk to the surrounding environment and public health concerns.

The Environment (Protection) Act, 1986 is also an umbrella legislation under Article 253 of the Indian Constitution, which empowers the Central Pollution Control Board (CPCB) as well as, State Pollution Control Board (SPCB) to regulate and enforce environmental safety.⁹ In 2016 Government had notified rules for this act called ‘Hazardous Waste Rules, 2016.’¹⁰ In response to the overheating issue or pressure that may have been built up in the spray dryer, which caused a blast in the pharma factory as reported and what experts had suggested, “The Boilers Act, 1923” can play a vital and legitimate role in this regard. The Boilers Act, 1923, regulates the inspection, installation, maintenance, and operation of industrial boilers and pressure vessels. Section 8 of this beautiful act requires periodic inspection and certification by a boiler inspector. So, if the equipment is found to be defective, outdated, or uncertified, then the factory may face liability for failing to follow the Act.¹¹ While the Boilers Act, 1923, ensures mechanical safety, a broader framework for an industrial safety net exists in Bharat is also provided by the Bureau of Indian Standards, called BIS, which issues comprehensive technical guidelines aimed at minimizing industrial hazards. BIS provides codes of practice and technical safety guidelines for various industrial operations in India, not just chemical or pharma, but also electrical, fire safety protection, etc. While BIS standards are voluntary, courts and consumers/society treat them as a benchmark for reasonable care.

⁸ The Factories Act 1948

⁹ The Environment (Protection) Act 1986

¹⁰ Hazardous Waste Rules 2016

¹¹ The Boilers Act 1923, s 8

ENFORCEMENT GAPS AND CHALLENGES

Despite the existence of a legal, statutory, and regulatory framework governing industrial safety and environmental compliance, incidents like the Telangana chemical factory blast expose critical and crucial enforcement gaps and challenges that can hinder the effective implementation of such laws on the ground.

The Gaps and challenges are given as follows:

Lack of regular inspection and monitoring: Telangana factory blast is a heartbreaking event that highlights the immediate and stringent enforcement of industrial statutes in Bharat. While departments like the Telangana Department for Factories will be responsible for its inspection of the perilous unit. Experts suggest that safety audits are generally delayed, incomplete, or sometimes neglected entirely. For example, in Maharashtra, only 23.89% of hazardous factories were inspected in 2021, while Tamil Nadu had a usual inspection rate of 17.04% of high-risk units. Nationally, the figures were 14.65% (General) and 26.02% (Hazardous).

Poor coordination between agencies: In agencies like the SPCB and the Factory Inspectorate poor coordination is one of the major challenges.

Delayed Legal Proceedings and Accountability: Reports propose poor prosecution rates in India, such as Gujarat having a 6.95% prosecution rate, which is too low and far from a satisfactory level.

Non-reporting of compliance violations: This isn't an isolated case between 2019 to 2023 India reported over 3,000 industrial accidents, many of which go unreported or ignored. Until accountability and proactive regulation become the norm, tragedies like these will continue to haunt our headlines.

PAST SIMILAR TRAGEDIES IN BHARAT

A pattern of repeated safety failures had been seen in recent years, more strategically in chemical factories. This highlights the need for stringent regulation, timely inspection, and faster legal prosecution of the real offenders in society at large. Some of the recent similar tragedies are discussed below-

Atchutapuram Pharma Factory Explosion (Visakhapatnam, August 2024): In this a reactor exploded due to an electrical fire, killing at least 18 and injuring around 40 workers. This highlights poor maintenance as a key factor.¹²

Dombivli (Thane) Chemical Factory Blast (May 2024): In this a similar accident to what we saw in the Telangana factory blast, involved a boiler that caused a blast in the reactor, causing widespread destruction, killing almost 10+ people.¹³ This tragedy highlighted the inspection failure.

Hapur Chemical Plant Explosion (Hapur, UP, June 2022): In this at least 13 killed in a chemical factory blast, which is linked to an unauthorized use of gunpowder. Owners had been arrested, but it underscores the operational negligence and licence violations.¹⁴

Bhopal Gas Tragedy (1984): In this a methyl isocyanate leak at Union Carbide's plant killed thousands instantly, with long-term health impacts.¹⁵ This was one of the most severe accidents that happened in India, which recognized the need for stringent liability and enforcement of existing laws properly.

PAST JUDGMENTS IN SUPPORT OF SUCH INCIDENTS

M.C. Mehta v. Union of India (Oleum Gas Leak, 1987): An oleum gas leak from the Shriram Foods and Fertilisers plant in Delhi led to destruction and thus raised serious public concerns. Thereafter, the Supreme Court of India, in light of such incidents, introduced the concept of the "absolute liability" principle.¹⁶ These principles require injurers to compensate victims without any exceptions, unlike in the case of the strict liability principle. Hence, no escape, even if all safety precautions were taken.

Municipal Corporation of Delhi v. Subhagwanti (1966): A Clock tower collapsed in Chandni Chowk, Delhi, killing people. In this case, the Honourable Supreme Court of Bharat had applied res Ipsa loquitur (the thing which speaks for itself), holding the MCD liable for

¹² Atchutapuram pharmaceutical factory explosion (Wikipedia, 21 August 2024) <[Atchutapuram pharmaceutical factory explosion - Wikipedia](#)> accessed 12 July 2025

¹³ Dev Kotak, 8 killed, over 48 injured after boiler blast in factory in Maharashtra's Thane, India Today (Mumbai, 23 May 2024) <[8 killed, over 48 injured after boiler blast in factory in Maharashtra's Thane - India Today](#)> accessed 12 July 2025

¹⁴ Hapur chemical plant explosion, (Wikipedia, 4 June 2022) <[Hapur chemical plant explosion - Wikipedia](#)> accessed 12 July 2025

¹⁵ Vajiram editor, Bhopal Gas Tragedy 1984, Causes, Deaths, Impact, (Vajiram & Ravi, 5 June 2025) <[Bhopal Gas Tragedy 1984, Causes, Deaths, Impacts, Govt Response](#)> accessed 12 July 2025

¹⁶ *M.C. Mehta v Union of India* (1987) 1987 AIR 1086

defects and non-inspection on time.¹⁷ Hence, demonstrating liability for failures to timely inspect and adjudicate the maintenance of such structures, this parallels the responsibility of factory owners in the recent blast at the Telangana Pharma factory. There are many more cases to tell, but these are the most prominent cases in which the courts have frequently dealt with such scenarios in the country.

CONCLUSION

The fatal explosion at the Telangana pharmaceutical facility is a clear illustration of the institutionalized carelessness that still exists in many Indian industrial sectors. Although the nation has established several protective laws, such as the Boilers Act of 1923, the Factories Act of 1948, the Environment (Protection) Act of 1986, and the Hazardous Waste Management Rules of 2016, the mere existence of laws does not ensure safety unless they are applied honestly and properly. From a legal perspective, the tragedy could lead to prosecution under Section 269 of the IPC, which addresses activities likely to spread illnesses or damage public health, and Section 304A of the IPC, which deals with causing death by negligent conduct. Furthermore, provisions under the EPA, 1986, and environmental boards impose both civil and criminal liability for failure to comply with industrial safety and waste disposal standards. Similar past tragedies like the Dahej blast (2020) in Gujarat, the Amber Chemical fire in Thane (2024), and the Atchutapuram explosion (2024) echo the same issues: overheated machinery, poorly managed chemicals, and inadequate safety mechanisms. In such contexts, the doctrine of absolute liability, as laid down by the Supreme Court in *M.C. Mehta v. Union of India*, becomes crucial, holding hazardous industries strictly responsible, regardless of intent or negligence. Moreover, the ruling in the *Indian Council for Enviro-Legal Action v. Union of India* reaffirmed the need for industries to not only compensate victims but also restore environmental damage caused by their operations. What becomes painfully clear is that while laws and precedents do exist, enforcement is patchy, inspections are either delayed or superficial, and many industrial units operate without real-time accountability. Without regular audits, stronger inter-departmental cooperation, and swift legal recourse in case of violations, such accidents will continue to recur. To move forward meaningfully, India must focus not just on penal action after the fact but on preventive compliance and worker safety as a proactive priority. Strengthening the reach and teeth of local authorities such as Pollution Control Boards, mandating transparent safety disclosures, and revising the functioning of BIS standards in critical sectors like pharmaceuticals are steps long overdue. Industrial growth must

¹⁷ *Municipal Corporation of Delhi v Subhagwanti* (1966) 1966 AIR 1750

never come at the cost of human lives. The law is meant not only to punish after harm is done but also to prevent the harm in the first place.