



Proposed Amendments to the Ministerial Regulation on Fees for Issuance of Licenses, Certificates of Notification, and Provision of Services for Sewage or Solid Waste Management

A public hearing is currently being held on the Draft Ministerial Regulation on Fees for Issuance of Licenses, Certificates of Notification, and Provision of Services for Sewage or Solid Waste Management (No. 3) (“Draft”).

In 2016, the Ministry of Public Health (“MOPH”) issued a ministerial regulation that established fees related to the management of general sewage and solid waste. This regulation defined the costs for issuing licenses and providing services for the collection, transportation, and disposal of sewage and general solid waste.

Subsequently, the Ministry of Interior (“MOI”) issued its own regulations in 2024, with a subsequent amendment in 2025, detailing rates and exemptions for sewage and solid waste management. These updated MOI regulations adjusted the fee structures to accurately reflect current operational costs.

Because the MOI's updated regulations cover the same fee scopes as the 2016 MOPH's regulation, this has caused legal overlap and a lack of clarity for local administrative organizations attempting to issue local ordinances and collect fees. To prevent this redundancy, create clarity in legal enforcement, and support local government agencies in administering their duties more efficiently and flexibly, it is necessary to update the 2016 regulation by repealing the overlapping fee provisions.

The Draft proposes two primary amendments to the 2016 regulation as follows:

1. **Repeal of Business Licensing Fees:** The draft cancels Clause 2 (1) (a) and (b), which previously set the fees for licenses to operate businesses that collect, transport, and dispose of sewage or general solid waste.

2. Repeal of Local Government Service Fees: The draft cancels Clause 4 (1), (2), (4), and (5), removing the regulations that previously governed the service fees local government agencies (or their authorized third parties) could charge for the collection, transportation, and disposal of sewage and general solid waste.

Should you have any question, please do not hesitate to contact us via info@bglballaw.com

