



POWERING PROGRESS THROUGH PLASTICS
ISO 9001:2008 Certified



White Paper by AIPMA

on

Environment Issues

Committed to mitigating environmental impact
and raising awareness on environmental responsibility

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Introduction

The Plastic Processing Industry in India has been increasingly under attack because of visible pollution created by uncollected post-consumer waste. The backlash has been aggravated by Global anti plastic sentiments resulting from fast increasing consumption of plastics mainly for packaging which provides functionality for short time before it becomes waste and ends up in landfills or in oceans affecting eco system. The anti-plastic tsunami has resulted into introduction of stricter regulatory regimen by state and central Government and ban on several products by several State Governments to tackle the issue of post-consumer plastic waste. This has resulted into closure of many units and has dried up new investments in the sector. The All India Plastics Manufacturers' Association (AIPMA), a seven decades old industry body recognised by the Government as mouthpiece of the sector finds it necessary to provide white paper providing clarity on processing sectors stand for sustainable growth of the industry in harmony with environmental as well as socio economic concerns of the society.

AIPMA is committed to work for the development of the Plastic sector in India by partnering with Industry and Government, with it's Pan India presence.

AIPMA passionately strives for the betterment of the plastic industry by ensuring that government's environmental policies for plastic production and waste management are aligned to facilitate ease of functioning and long term growth for the industry.

AIPMA believes that industry growth and environment protection goes hand in hand. It recognizes the responsibility of stake holders across value chain towards the environment and are willing to put forward the conscious steps to reduce environmental impact due to littering of plastic waste and strive to provide feasible solutions towards plastic waste management.

It is endeavour of the association to enhance awareness within our members and the larger Plastic processing industry with respect to the environment by organizing various programs so that they make a practical contribution to the environment through their work.

To achieve the environmental goals of the Plastic industry, we have formulated statement of AIPMA's view point for the environment which lays out specific environmental strategies to be shared with all members of the group.

Our stand and recommended solutions on various environmental issues faced by the processing industry are as below:

- Single-use Plastics (SUP)
- Extended Producer's Responsibility (EPR)
- Producer Responsibility Organization (PRO)
- Environment Regulations
- Recycling

Single-use Plastics (SUP)

Background

Environmental concerns on Plastic Waste Management have risen due to which many state governments have imposed ban on Single Use Plastics. However, there has been difference of opinions on the definition of 'SUP' leading to lack of clarity among stakeholders; namely consumers, plastic industry and implementing agencies. In the absence of clarity, the most common approach taken by some State Governments has been to curtail the use of many plastics products which have rendered many MSME processing units non-functional, thereby affecting employment of several lakhs of people.

The Department of Chemicals and Petrochemicals (DCPC) concerned with subject matters on entries relating to 'Petrochemicals' constituted an Expert Committee to define the 'Single Use Plastics' and related issues. AIPMA presented its view to the expert committee reemphasising alignment and recognition of it's responsibility towards Environment protection.

Following are the recommended solutions:

- Phasing out and banning of specific products/ group of products should be considered only after strictly following ten step process as recommended by UNEP with emphasis on following parameters.
 - Functionality of the product
 - Convenience for user
 - Safety
 - a. Food safety
 - b. Health safety
 - Environmental Impact
 - a. Environmental Impact Assessment (EIA) of plastics and its alternatives
 - b. Life Cycle Assessment (LCA) of plastics and its alternatives
 - c. The carbon footprint of plastics and its alternatives
 - Cost Comparison Analysis of Plastic and its alternatives.
 - Social Impact
 - Economic impact
 - Resource Efficiency provided by the product
 - Consumer Preference and affordability
 - Significance and utility of the product for the economy
 - Recyclability and reusability.
- Primarily, a 360-degree view should be studied and considered before banning or phasing out any product.
- Assess baseline conditions
 - a. Identify the most problematic single-use plastics
 - b. Assess its current causes, extent and impacts.
 - c. Assess the impacts of preferred actions (Social, Economic, Environmental)

d. Periodic review of the policy impact resulting from “SUP's”

- Raise Awareness through education programs, campaigns, social media etc.
- Emphasis should be on practical execution towards a solution.
- Stakeholders across the value chain have to contribute towards successful implementation.
- Strict implementation of laws against littering.

On the above lines, AIPMA gave a representation to the Expert Committee to define 'Single Use Plastics' and put forward the points for consideration.

Extended Producer Responsibility (EPR)

Background:

To promote reuse, recycling, and eco-friendly disposal of polymer waste, the government introduced the legislative strategy termed as Extended Producer Responsibility. The word was introduced in 'The Plastic Waste Management Rules, 2016'. As per the rules, EPR was defined as “extended producer's responsibility” meaning responsibility of a producer for the environmentally sound management of the product until end of its life. The responsibility to work out modalities for waste collection system based on Extended Producer Responsibility was given to the Brand, Importers and producers along with State Urban Development Departments.

EPR is a concept which evolved in Europe where waste management infrastructure is well placed. It is applied on packaging incorporating all possible packaging alternatives like paper, plastics, foils and combination of materials. Different countries have adopted different models with varied success rate. The implementation has matured over the years with reasonable expectations of % of plastic brought back from waste stream. Some countries have exempted small businesses from purview of EPR responsibilities.

In India, ineffective waste management has led to environmental concerns; as a result, various state governments started imposing ban on so called single use plastic products. The 2nd amendment of Maharashtra Plastic and Thermocol Products (Manufacture, Usage, Sale, transport, handling and Storage), Notification, 2018 dated 30th September 2019 made EPR mandatory for the manufacturers / brand owners / Importers / producers of recyclable multi-layered and paper-based carton packaging material. It was instructed to the manufacturers/ manufacturers' association to work together and create a buy-back mechanism and diligently implement their Extended Producer Responsibility (EPR) Plan. They were to be responsible for 100% integral Plastic Waste Management from collection to the final disposal. The EPR plans were submitted to the Government by the associations and producers. But, till date plans have not been approved by the Maharashtra Government or no guidelines have been given to the industry for discharging its responsibility towards EPR.

Our stand and recommended solutions:

- The industry recognizes and accepts the responsibility of EPR and have also initiated the work towards its implementation.
- EPR should be limited to the packaging products with focus on uncollected plastic / paper / composite products along with alternative material like glass, metal, wood etc. as is the norm world over .
- EPR process should be designed in Indian context considering large number of producers in MSME segment, varied geographic terrain, number of Urban Development Bodies and Rural Development Bodies, dominance of multinational brands and large number of smaller brands.
- Small and medium producers processing less than 1000 metric tons of material or having an annual turnover not exceeding 25 crores should be kept out of the ambit of EPR i.e. except for a lump sum annual fee based on total turnover.
- EPR should be uniform Pan India. 'One India One Policy'.
- EPR should be brand neutral and geography neutral.
- EPR should be convenient to implement.
- Industry bodies and associations should be accepted as aggregators for discharging EPR obligations of smaller players.
- Ownership of portals and digital exchange should be with the Government in order to ensure the protection and confidentiality of data.

- Contribution computation should be in proportion to value addition.
- Adequate capacities for collection, segregation, recycling
- Waste to fuel, waste to energy, end of life solutions should be ensured without which successful implementation of EPR is not possible for achieving intended objective of Swacch India.
- To comprehend in the right manner and to proceed in the right direction, EPR guidelines should be immediately released by the government and adequate timeframe should be provided to stakeholders for execution.

Producer Responsibility Organization (PRO)

Background:

As per provision 8(1b & 2) of the Plastic Waste Management (PWM) Rules, 2016 as amended 2018, the waste generators such as Brand Owners/Producers have been given options for collecting back the plastic wastes generated due to their products, either individually or collectively through waste collection agencies such as Producer Responsibility Organization (PRO) appointed by the Producer/Brand Owners.

As per provision 9 (1&2) of the PWM Rules, 2016, as amended in 2018, the primary responsibility is of Producers and Brand Owners to manage their Extended Producer Responsibility (EPR) either by their own distribution channel or through the other agencies like PROs.

As per the policy, CPCB was empowered to register PRO's with certain conditions. However, according to CPCB, sufficient time (8 months) has lapsed since the guidelines have been in public domain and adequate awareness on fundamental principles of EPR including collection, processing or disposal of waste has been created amongst the various stakeholders, it has decided to discontinue the scheme and it will no longer be necessary for organizations intending to act as PROs to register with CPCB.

AIPMA initiatives and some suggested solutions are as follows:

AIPMA considered its participation in the process by becoming a recognized PRO in order to:

- Meet the EPR targets of MSME segment in cost effective manner through various processing technologies for plastic waste management including MLP or its End of Life (EOL) applications like Waste to Energy (W2E), Waste to fuel (W2F), Waste to Road (W2R) and Waste to Cement Kiln (W2K) in the country.
- Provide an Extended Producer Responsibility plan to the members as legally required.
- Take the responsibility of collection and proper disposal of plastic waste.
- Create awareness for masses through social media, corporate events, print and digital marketing.
- Create awareness in public regarding proper disposal of plastics and to conduct the collection drives and various other initiatives regarding collection and channelization of plastic-waste.
- Work with the government for promoting segregation at source through propagation and to support the implementation of segregation and account-keeping of plastic waste.
- Take the onus of implementation and devising the EPR plans.
- Curb plastic pollution, efficiently manage the plastic waste and enhance the recycling of plastics.

(However, the application is subject to approval by CPCB)

Environment Regulations

Background:

In recent years, Central and State Governments have considered and enacted various forms of legislation and regulations w.r.t. Plastic Waste Management in order to address the adverse environmental and economic impacts of plastic waste, including Waste Management Rules, bans, buy-back systems and Extended Producer Responsibility (EPR) policies. Notably, the Ministry of Environment, Forest and Climate Change, Government of India published a notification in 2011, named Plastic Waste Management Rules, 2011. This Notification was later replaced by Plastic Waste (Management and Handling) Rules, 2016 in order to give thrust on plastic waste minimization, source segregation, recycling, involving waste pickers, recyclers and waste processors in the collection of plastic waste fraction, also to adopt polluter's pay principle for the sustainability of the waste management system. These rules describe the responsibility of local bodies, waste generators, all stakeholders as well as of the prescribed authority. However, a substantial reduction in visible plastic pollution was not observed, which led to the ban of specific plastic products. Initially, the ban on plastic bags of less than 50 microns was introduced in Maharashtra Plastic Carry Bags (Manufacture and Usage) Rules, 2006. Despite the ban on plastic bags, there was an increase in the non-biodegradable plastic garbage waste. As a result, Maharashtra Plastic and Thermocol Products (Manufacture, Usage, Sale, Transport, Handling and Storage) Notification, 2018 came into force by the Government of Maharashtra. Following Maharashtra ban, various states in India started implementing the ban on the different type of plastic products.

You can visit our website https://www.aipma.net/page/rules_acts_notifications for more information regarding plastic ban notification in different states of India.

Our stand and suggested solutions to comply with the environmental regulations are as follow:

- Uniform policy across India and promote – One India, One Policy.
- Adequate infrastructure facilities should be provided by the government for proper waste management.
- To issue EPR guidelines for effective implementation.
- We encourage our members to comply with all environmental laws and regulations, and to follow the industry guidelines which have been mandated by the government concerning the environment.
- Conduct various awareness programs to educate the members regarding the environmental compliance.
- We provide guidance and direction to help them to fulfil their environmental legislation.

Recycling

Background:

India has one of the best recycling habits in the world. Recycling status of India is comparatively better than other countries. India's recycling rate is about 60% which is comparatively higher than a few other countries. As per CPCB report, India recycles 90% of the PET waste mostly through the informal sector. The waste pickers in India are the largest driving force behind recycling, given that they are the ones sorting through trash and pulling out recyclable materials.

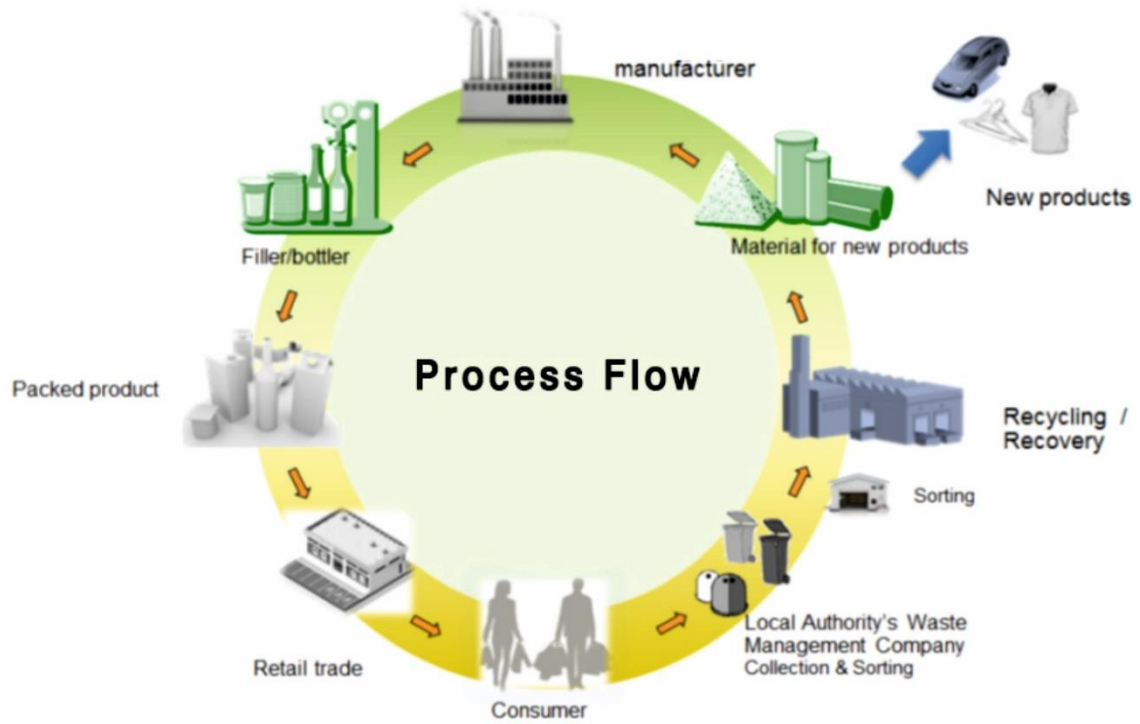
However, the increasing waste management problem gave rise to the recycling sector in India. Thus, plastics recycling is a sprawling sector as it continues to solve the waste management problem and also provides a sustainable solution for plastic waste. Hence, many companies and start-ups are inclined towards recycling opportunities. The operations are largely low tech, low cost and part of informal economy. Recycling has been a proven solution as it has the potential to save natural resources, energy, reduce landfill, carbon footprint and it also generates employment opportunities.

"We have to recycle today for a better tomorrow."

Our stand and recommended solutions:

- We are aspiring to contribute to a sustainable environment by aiming at achieving a recycle-oriented society.
- Formalization of existing recyclers
- Upgradation of recycling technologies and funding.
- Incentivize plastic recyclers for encouragement.
- Government of India should dedicate Recycling facility in all Plastic Parks.
- Land for setting up Recycling Facility should be made available at special rates.
- Tax holiday should be provided for the period of 10 years.
- Impact funding to encourage recycling in India.
- Easy access to finance from banks.
- To regulate and consider the economic viability of End of Life Solutions.
- To re-consider product design in order to promote Design for Environment (DfE)
- To develop Design for Recyclability
- To develop Design for Collectability for better collection mechanism.
- Promote various recycling programs and workshops.
- Incentivize innovative research and investment in the field of recycling.
- Promote standardization of recyclates and products made from recyclates with tax incentives.
- Under Swachh Bharat Abhiyan recycling sectors / zones should be created with complete infrastructure for Air / Water Pollution control, providing ease of business climate and excess to utilities at reasonable rates for making operations viable.
- To conduct awareness programs for waste minimization, resource optimization etc.

Product and Waste Management Process Flow





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THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION



Vision

Professionally Managed Premier Organisation
Powering Growth Of India Through Plastics.



Mission

AIPMA Shall Passionately Strive to Lead Indian Plastics Industry
to Process 20 kg Of Plastic Per Head By 2020,
Leveraging Knowledge And Innovation For Inclusive Growth.

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