



POWERING PROGRESS THROUGH PLASTICS  
ISO 9001:2008 Certified

# AIPMA



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.  
Phone : (+91-22) 6777 8899 (30 Lines) 2835 2511 / 2835 2512  
Fax : +91 - 22 - 2821 6390 • E-mail : office@aipma.net • Website : www.aipma.net

### OFFICE BEARERS :

**CHANDRAKANT TURAKHIA**  
President

**KISHORE SAMPAT**  
Senior Vice President

**MAYUR D. SHAH**  
Vice President - Finance

**AKSHAT LADHA**  
Vice President (West Zone)

**LALIT KUMAR SINGH**  
Vice President (North Zone)

**ANIL REDDY VENNAM**  
Vice President (South Zone)

**ASHOK AGARWAL**  
Vice President (East Zone)

#### **North Zone :**

Plot No. 232, Sector - 18,  
Phase - IV, Udyog Vihar,  
Gurugram, Haryana - 122 016.  
Tel. No.: 0124 4050 005 / 6  
naresh@aipma.net

#### **South Zone :**

4C-Gaiety Palace,  
1, Blackers Road, Chindadripet,  
Chennai - 600 002.  
Tel No.: 044 4203 0236  
ibrahim@aipma.net

#### **East Zone :**

Gajraj Signature,  
Suite # 5E, 5th Floor,  
5A, Sadananda Road,  
Kolkata - 700 026.  
Tel No.: 033 4005 0367  
tapas@aipma.net

#### **West Zone :**

Mondeal Heights, Tower - A  
13<sup>th</sup> Floor, Office No.1306/1307,  
S.G. Highway, Near Wide Angle  
Cinema, Next to Hotel Novotel,  
Ahmedabad - 380 015.  
Tel No.: 079 2970 5124  
maulik@aipma.net

2<sup>nd</sup> March, 2021

To,  
**Shrimati Manisha Mahaiskar,**  
**Principal Secretary,**  
**Environment Dept.**  
**Government of Maharashtra**

**Subject: Dissent to usage of 20% recylates in all Plastics Products**

Respected Sir,

Greetings from The All India Plastics Manufacturers' Association (AIPMA).

With reference to the amended notification released by Maharashtra Pollution Control Board regarding in consent to Operate of Leading Brand Owners and Plastic Producers for Use of Recycled Plastics in Plastic Packaging and Plastic items, AIPMA welcomes this decision made with objective of post-consumer plastic waste management which will bring us closer to sustainable consumption.

The industry will be facing following major concerns in response to the amendment:

1. The use of recylates world over is based on non-compromise of product functionality and necessitates availability of desired quantity and quality of recycled plastics to be used in plastic packaging and other specific items for non-critical use. As of now the availability of such quality recycled materials is limited and hence it will be difficult and impossible to achieve the targets. The task will be all the more difficult particularly for small and medium enterprises as they will find it unremunerative to source such quality recylates in competition with brands owned by large companies and multinationals.
2. Mandatory usage in such circumstances will only compromise the product quality if done across the board as suggested.
3. Bulk of recycling at present happens in informal segment based on waste



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collected from variety of sources and yields recycled material largely suitable for down cycled products. For consistent quality of recyclates, good segregation practices and infrastructure for scientific sorting and recycling is a must. Such infrastructure has yet to come up to ensure adequate quantum of recycling so that recycled plastics fulfill the quality norms specified for product.

4. There is Lack of clarity on the processes to be followed by packaging producers and users of plastic packaging.
5. With regard to other moulded items it would be prudent to specify the products slated to be in the purview of this amendment as it would be technically not feasible or will not provide resource efficiency based on life cycle analysis and environment impact analysis of the product. The specification of the suggested products should be clearly mentioned to avoid dilemma later.
6. It is not clear as to how the products will be tested to identify percentage (%) of regrind used so that the intended objectives of the amendment are achieved.
7. The raw material manufacturers have increased their prices exponentially, therefore obtaining recycled material at suitable prices and of the specific grade would be a challenge for the plastic industry. This in turn will impact product costing affecting end consumer.
8. The recycling industry is yet to graduate in terms of quality and quantity to justify blanket use of recyclates without compromising functionality and life of product.
9. It is impossible to use varying quality of recyclates unless they are used for down-cycled products which will compromise lowering of carbon footprint, the ultimate goal for sustainable growth of the economy.

AIPMA is aligned with government's initiatives of Swachh Bharat Abhiyan. But, considering the industry's concern and functionality and quality of finished products, AIPMA is of the strong opinion that this norms of incorporating 20% recycled material should not be applied to all plastic packaging materials based



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on scientific analysis.

We sincerely request you to reconsider your decision keeping in mind the wider implications and additional constraints accompanied with this amendment.

We look forward to your positive consideration at the earliest.

Thanks and Regards Yours Sincerely,

**For The All India Plastics Manufacturers Association**

**Hiten Bheda**  
Chairman, Environment Committee

CC:

1. **Shri Sudhir Shrivastava**, Chairman, M.P.C Board, Mumbai