

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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**Ms. Leela Nandan**  
Secretary  
Ministry of Environment, Forest & Climate Change  
Indira Paryavaran Bhawan  
Jor Bagh, New Delhi

**Subject: Request for including Stretch Film in the list of items that may be allowed to be manufactured below the thickness of 50 micros**

Dear Madam,

Greetings from AIPMA.

This is regarding **stretch film** commonly used for packaging. Stretch films are stretchable plastic films that are used to wrap a product to keep them in place securely. Stretch film is used for packing and protection of products, ranging from loads bundled on pallets to individual items of large overall dimensions. Globally, this product is not banned for relevant applications. It provides much-needed functionality and there are no alternatives to match at this point of time. There is a technical limitation in making a higher gauge. The functionality **of the Stretch file would get impaired/compromised if the thickness is made to 50 micros**. Being monolayer it can be easily recycled. Stretch film is like adhesive tape which sticks to the product. Once packed, it can't be opened. After its use, it is cut and opened. Thereafter, it takes the shape of a lump that is more than 100 micros thick and therefore can be easily collected and recycled.

Kindly refer to Rule 4, Sub Clause D of PWM Rules. It states the following: -

d) plastic sheet or like, which is not an integral part of multilayered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be less than fifty microns in thickness **except where the thickness of such plastic sheets impair the functionality of the product;**

Taking the above into consideration and under the purview the Rule 4, clause D of the PWM Rules, you are kindly requested to include **Stretch Film in the list of items that may be allowed to be manufactured below the thickness of 50 micros**.

The above is for your kind consideration.

Yours sincerely,

  
**Kishore Sampat**  
President

Copy to:

1. Ms. Arti Ahuja, Secretary, DCPC
2. Dr. Prashant Gargava, Member Secretary, CPCB