

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ref. No. AIPMA/RC/2020-754

26th May, 2020

To,
Smt. Dr. Usha Titus, IAS
Principal Secretary,
Department of Higher Education
4th Floor, Annex II, Government Secretariat,
Thiruvananthapuram-1

Subject: Proposal to replace Plastic packets with Compostable materials.

Respected Madam,

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

AIPMA is a leading industry trade body representing plastic processing industry serving 22,000 plastic processors and have been active in representing industry issues with the government.

This has Reference to the G O (Ms) No 6/2020/ENVT dated 11/05/20.

AIPMA represents the plastic processing industry including the manufacturers, producers, processors and converters. We would like to reemphasize that the industry is aligned with the government to address the environmental concerns resulting from plastic packaging with the objective of addressing visible plastic pollution in the environment.

We understand from your above mentioned order dated 11/05/20 that the state of Kerala is considering usage of compostable materials to replace plastic packaging used for vast variety of food and other items. We would like to draw your kind attention to the following points for your consideration before an educated decision is made in this regard.

- (1) While Compostable materials are considered eco friendly, it's eco friendliness can only be realized if and only if the post consumer waste of compostable material is brought to industrial composting facilities after collection of segregated (separated from non compostable waste) waste at the source. This at present is not available and hence as consequences the waste can end up without composting or as micro plastics in the environment. This could be more damaging to the environment.
- (2) In absence of clarity on the issue, many materials claimed to be compostable tends to get used which are not compostable and do not serve towards the intended objectives.



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- (3) Typically these materials have limited load bearing capacity limiting it's usage for all food packaging.
- (4) These materials are several fold expensive compared to currently used materials because of imported input materials required.
- (5) At present such materials are not available to cater to large volumes necessary for replacing.
- (6) It is seen that the economic delta leads to unscrupulous practices pushing regular or cheap materials thus self defeating the very objectives.
- (7) This will undermine hundreds of existing units engaged in manufacturing packaging materials.
- (8) There will be substantial cost involve in plant and equipment modification to process these materials.
- (9) The registration /certification cost are several lacs as charged by authorized agency and takes almost a year for testing.

You will appreciate the fact that due to the above constraints all the states and central Government have not opted for switching over to the Compostable materials. Most of our members engaged in processing/converting are small and medium enterprises providing large employment and as such burdening them with unrealistic compliance will significantly compromise ease of business for them.

In line with the above, we recommend that the Government of Kerala should review proposal to use compostable materials and wait till there is consensus on its usage for India as a nation.

We look forward to your acknowledgement.

Thanking you.

Yours sincerely,

The All India Plastics Manufacturers' Association

Jagat Killawala
President

Hiten Bheda
Chairman, Environment Committee