

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.
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Senior Vice President

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Vice President - Finance

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Tel No.: 079 2970 5124
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Ref No.: AIPMA/ RC/2021-2022

19th February 2021

Shri. B.B Swain
Secretary
Ministry of Micro, Small & Medium Enterprises
Udyog Bhawan, Rafi Marg,
New Delhi – 110011

Subject: Inputs of AIPMA on behalf of the Plastic Industry for your kind perusal.

Dear Sir,

Greetings from All India Plastics Manufacturers Association.

This has reference to the **Plastic Waste (Management & Handling) Rules 2016 notification, dated 18th March, 2016** by the Government of India in the Ministry of Environment, Forest and Climate Change as amended from time to time, providing a regulatory framework for management of plastic waste generated in the country.

We sincerely appreciate the efforts of the Government in providing and drafting the Plastic Waste (Management & Handling) Rules. We recognize our responsibility towards environment and are committed to the cause to reduce plastic waste and are aligned with the government on this issue.

The recent pandemic has forced everyone to rethink about the definition of Single Use Plastics. SUP's played a vital role in protection of the frontline workers, pharmaceutical industry, food packaging, health and safety etc. therefore, we strongly believe that the decision on SUPs should be thoroughly thought through from the perspective of functionality towards hygiene and safety.

We thank you for providing us an opportunity to share our viewpoints with you in person on 18th Feb during our meeting. We would like to submit our suggestions and recommendations for immediate attention, inclusions and deletion in the proposed amendments of Plastics Waste Management 2016, if any: -

1. The PWM Rules have wholly put all the responsibilities on the producers with no mention to the other stakeholders involved in the value-chain. **We suggest that raw material manufacturers, brands,**



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2. The material to be restricted under SUPs should not be generalized or categorized. For example, Crockery as a category would include disposable as well as items for longer uses. Banning a whole category would jeopardize the industry and manufacturers. **Rather the products/materials to be banned should be evaluated and specified on the basis of volume, weight, size and shape, so as to exclude the usage of products contributing towards environmental impact.**
3. Without clarity around the definition of SUP, implementing a change of the rules and further implementing these rules would be challenging and therefore will create a turmoil in the industry, as thousands of products are manufactured every day and without specification about the undesirable product, it can thus lead to misinterpretation by the implementing authority that could compromise industrial activity of manufacturing the desirable products.
4. The materials which are non- recyclable or cannot be retrieved from the environment should only be included under the SUPs.
5. **Plastic packaging and plastic food packaging should not be classified as single-use plastic products.** As, Plastic Packaging Market is expected to grow and expected to reach 315.5 billion USD by 2025, from 265.2 billion USD in 2020 at a CAGR of 4.1%. The packaging and food packaging industry was already huge and has shown exceptional growth during and post Covid-19. Taking action against these industries could result in tremendous setback for the GDP of India as well as for the Lakhs of people employed in it.
6. Plastics are capable of providing lowest carbon emissions of available materials provided they are recycled properly. Many studies have shown that most alternatives to plastics such as bamboo, glass, cardboard etc. emit more greenhouse gases as compared to plastics. **Therefore, we suggest that the alternatives should be examined and analyzed over Life- Cycle, Carbon Footprints, Environmental Impacts, and End of Life Management etc. before taking the decision to do away with or ban certain plastic products.**
7. **Any amendment made, added or revised should be done after appropriately defining the material or product.**



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9. With the nation-wide ban on various single use and other plastic products, those associated with the industry and millions of livelihoods will be put to risk. It would also impact the consumer choices, costs, health and safety. **Therefore, it is recommended that the prudent way forward is not an outright ban on plastic products but rather finding solutions to the problem of plastic waste management.**
10. Also, as the ban is expected to hit more than 15 lakh jobs and a number of manufacturing units, the government should therefore focus on providing the required help to the industry for survival. **Schemes/ Policies should be amended in the interest of the industry affected, with a motive to secure their future. Revival packages/ Funding/Financial Aid should be provided to the units to help them find alternate businesses.**

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Shri. Naresh Pal Gangwar
Joint Secretary (Hazardous Substance Management)
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Hiten Bheda
Chairman, Environment Committee



POWERING PROGRESS THROUGH PLASTICS
ISO 9001:2008 Certified

AIPMA



THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ref No.: AIPMA/ RC/2021-2022

19th February 2021

Shri. Yogendra Tripathi
Secretary
Department of Chemicals and Petrochemicals
Ministry of Chemicals and Fertilizers
Government of India
Shastri Bhawan
New Delhi

Subject: Inputs of AIPMA on behalf of the Plastic Industry for your kind perusal.

Dear Sir,

Greetings from AIPMA.

This has reference to the **Plastic Waste (Management & Handling) Rules 2016 notification, dated 18th March, 2016** by the Government of India in the Ministry of Environment, Forest and Climate Change as amended from time to time, providing a regulatory framework for management of plastic waste generated in the country.

We sincerely appreciate the efforts of the Government in providing and drafting the Plastic Waste (Management & Handling) Rules. We recognize our responsibility towards environment and are committed to the cause to reduce plastic waste and are aligned with the government on this issue.

The recent pandemic has forced everyone to rethink about the definition of Single Use Plastics. SUP's played a vital role in protection of the frontline workers, pharmaceutical industry, food packaging, health and safety etc. therefore, we strongly believe that the decision on SUPs should be thoroughly thought through from the perspective of functionality towards hygiene and safety.

We thank you for providing us an opportunity to share our viewpoints with you in person on 18th Feb during our meeting. We would like to submit our suggestions and recommendations for immediate attention, inclusions and deletion in the proposed amendments of Plastics Waste Management 2016, if any: -

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1. The PWM Rules have wholly put all the responsibilities on the producers with no mention to the other stakeholders involved in the value-chain. **We suggest that raw material manufacturers, brands, processors etc. should be held equally responsible and mentioned under the PWM Rules.**
2. The material to be restricted under SUPs should not be generalized or categorized. For example, Crockery as a category would include disposable as well as items for longer uses. Banning a whole category would jeopardize the industry and manufacturers. **Rather the products/materials to be banned should be evaluated and specified on the basis of volume, weight, size and shape, so as to exclude the usage of products contributing towards environmental impact.**
3. Without clarity around the definition of SUP, implementing a change of the rules and further implementing these rules would be challenging and therefore will create a turmoil in the industry, as thousands of products are manufactured every day and without specification about the undesirable product, it can thus lead to misinterpretation by the implementing authority that could compromise industrial activity of manufacturing the desirable products.
4. The materials which are non- recyclable or cannot be retrieved from the environment should only be included under the SUPs.
5. **Plastic packaging and plastic food packaging should not be classified as single-use plastic products.** As, Plastic Packaging Market is expected to grow and expected to reach 315.5 billion USD by 2025, from 265.2 billion USD in 2020 at a CAGR of 4.1%. The packaging and food packaging industry was already huge and has shown exceptional growth during and post Covid-19. Taking action against these industries could result in tremendous setback for the GDP of India as well as for the Lakhs of people employed in it.
6. Plastics are capable of providing lowest carbon emissions of available materials provided they are recycled properly. Many studies have shown that most alternatives to plastics such as bamboo, glass, cardboard etc. emit more greenhouse gases as compared to plastics. **Therefore, we suggest that the alternatives should be examined and analyzed over Life- Cycle, Carbon Footprints, Environmental Impacts, and End of Life Management etc. before taking the decision to do away with or ban certain plastic products.**



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7. Any amendment made, added or revised should be done after appropriately defining the material or product.
8. In some specific applications like Thin Films, it becomes very difficult for the manufacturers to mark or label the product with information like name, registration number, thickness etc. **Therefore, such items should be exempted from mandatory marking or labelling, wherever technically not feasible.**
9. With the nation-wide ban on various single use and other plastic products, those associated with the industry and millions of livelihoods will be put to risk. It would also impact the consumer choices, costs, health and safety. **Therefore, it is recommended that the prudent way forward is not an outright ban on plastic products but rather finding solutions to the problem of plastic waste management.**
10. Also, as the ban is expected to hit more than 15 lakh jobs and a number of manufacturing units, the government should therefore focus on providing the required help to the industry for survival. **Schemes/ Policies should be amended in the interest of the industry affected, with a motive to secure their future. Revival packages/ Funding/Financial Aid should be provided to the units to help them find alternate businesses.**

We request you to kindly consider our recommendations and take suitable actions.

Thank You and Best Regards
Yours Sincerely,

For The All India Plastics Manufacturers Association


Chandrakant Turakhia
President


Hiten Bheda
Chairman, Environment Committee