



POWERING PROGRESS THROUGH PLASTICS
ISO 9001:2008 Certified

AIPMA



THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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2nd March, 2021

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

Subject: Dissent to usage of 20% recyclates 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 recyclates 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 recyclates 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