

Plastic Waste Management – All is not well

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The Central Pollution Control Board (CPCB) has recently published its Annual Report for the year 2018-19 on implementation of Plastic Waste Management (PWM) Rules, 2018, as required under Rule 17(4) of the said Rules. The report is certainly an improvement over the previous year's (2017-18) report in as much as it has been able to get data, albeit partial in many cases, from all States and UTs. However, a lot still needs to be done to improve plastic waste management in the country and quality of its reporting.

The report estimates that a total of 33,60,043 tons (3.36 million tons) of plastic waste was generated in the country during the year. As per a pamphlet released by the CPCB on World Environment Day – 2018 (5th June, 2018), the total plastic waste generation in the country was estimated to be around 9.46 million tons. With no evidence of reduction in production and consumption of plastic, the plastic waste generation cannot come down from 9.46 million tons to 3.36 million tons (almost one third) in a span of just one year. It only implies that the report for 2018-19 is far from complete. This is possibly on two counts. Firstly, in case of many States and UTs, not all local bodies have submitted their annual report to the State Pollution Control Board / Pollution Control Committee, and secondly even those who have submitted the report may not have submitted the complete picture, grossly underestimating the quantum of plastic waste generation. Further, as per the pamphlet of CPCB released on 5th June, 2019, out of 9.46 million tons of plastic waste generation per annum, only 5.67 million tons is collected per annum and uncollected plastic waste is about 3.78 million tons per annum. The Annual Report of 2018-19 doesn't give break up of 3.36 million tons into collected and uncollected plastic waste. It is quite possible that a huge quantity of uncollected plastic waste (which presumably leaks into the environment as pollution) has just not been taken into account by urban local bodies in estimating total plastic waste generation. Perhaps, for them what is collected is the total plastic waste generated. There is thus a huge gap and reporting needs to improve to plug this gap.

Another inconsistency in the report is that while very few States have compiled data from both urban and rural areas, vast majority of states have collected the data only from urban local bodies which cover only the urban areas. Therefore, the report is a mixture of data from all areas in some parts and from urban areas in other major parts. From the reading of Rule 17(2) of PWM Rules, 2018 and Form V and Form VI, the intention seems to collect the data from urban local bodies only. If true, this needs to be changed and data should be collected from all areas including urban and rural areas. This will require amendments in Rule 17(2) of PWM Rules, 2018 and Form V and Form VI. If not true, a clarification needs to be issued to all States and UTs that their reports should aggregate data from both urban and rural areas.

One major drawback in the report is that while it provides the figure of total plastic waste generated in the country, it doesn't give any break-up of quantities of plastic waste sent for recycling, co-processing in cement plant, conversion of waste to RDF, road construction, etc. The flaw is in the formats of Form-V and Form-VI. This information is not captured at all. The heading of column 4 of Form VI reads as, 'Details of Plastic Waste Management Ex. Collection, Segregation & Disposal (CoProcessing, Road construction, etc.) Rules (5 & 6 & 9) (Attach Action Plan)'. In response to this overwhelming majority of states and UTs have only indicated what they are doing with the plastic waste without indicating any quantities. Only a few states (Goa, Gujarat, Karnataka, Madhya Pradesh, Puducherry, Telangana & Uttar Pradesh) have given some indication of quantities, albeit not fully accounting for the total plastic waste generated. Other states and UTs have not indicated quantities of plastic waste processed in different manners. Many states have not even mentioned in what way

they have processed the plastic waste. Goa is the best state in reporting this aspect. It has reported that out of 32, 580.52 tons of plastic waste generated, 26, 279.38 tons baled RDF sent for Co-processing in cement Kilns, 6057.62 tons of waste recycled and remaining 243.52 tons of inert waste is disposed in sanitary landfill. This is how all states and UTs should report. The Ministry of Environment, Forest and Climate Change should amend Form-V and Form-VI to capture this kind of break-up. Many of those who have provided some figures of quantities, have not provided complete picture. For example, Gujarat has reported that out of 3,56,873 tons of plastic waste generated, 86,553.62 tons of plastic waste has been used for co-processing in cement plants. There is no indication as to what has been done with the remaining plastic waste. Unless each state and UT gives complete picture of how plastic waste has been processed, that is, how much has been recycled, how much has been used for construction of roads, how much has been used for energy recovery, how much waste used to convert to oil, etc and finally how much sent to landfills, it will not be possible to assess the effectiveness of plastic waste management in states and UTs. Capturing this information through Form V and Form VI is crucial. As per the report, "it has been observed that most of the States/UTs have not established the organized system for Plastic Waste Management. Hence, resulting into widespread littering of plastic waste in towns and cities of the country." Eight (8) States/UTs namely; Arunachal Pradesh, Bihar, Daman Diu & Dadra Nagar Haveli, Jammu & Kashmir, Kerala, Maharashtra, Manipur & Sikkim have not even cared to submit any details in this matter. This is a serious matter and should be appropriately addressed by the Ministry of Environment, Forest and Climate Change.

Another worrying aspect of the report is the status of implementation of Rules 4(c) & 4(d) of PWM Rules, 2018. Under these rules, plastic carry bags and plastic sheets used for packaging/wrapping of thickness less than 50 microns are banned. 4 States/UTs namely Arunachal Pradesh, Delhi, Mizoram & West Bengal have not provided the information in this matter. It is reported that 22 states and UTs have imposed complete ban on carry bags but the report is silent whether they have imposed ban on plastic sheets used for wrapping/packaging. 9 other states and UTs are reported to be complying with thickness criteria under Rules 4(c) & 4(d).

The report mentions that there are 1080 unregistered plastic manufacturing/recycling units running in 12 States/UTs, namely; Assam, Bihar, Jammu & Kashmir, Karnataka, Madhya Pradesh, Maharashtra, Puducherry, Punjab, Tamil Nadu & Uttar Pradesh. Further, Chhattisgarh, Daman & Diu, Dadra & Nagar Haveli, Delhi, Himachal Pradesh, Uttarakhand & West Bengal have not provided the details in this matter. The existence of so many unregistered units in the country is worrisome. Bihar has the maximum number of the unregistered units (43%), followed by Tamil Nadu (26%) and Maharashtra (13%). Swift action should be taken against all unregistered plastic manufacturing/recycling units.

It is a matter of satisfaction that some states and UTs are taking action on violation of PWM rules, 2018. As per Rule '12' "the prescribed Authorities for implementation of Rules" of PWM Rules, 2018, 21 States/UTs have imposed fine, issued notices, closure directions to the defaulters & seized the material in their respective State/UT. These are Andhra Pradesh, Bihar, Chandigarh, Chhattisgarh, Daman & Diu, Dadra & Nagar Haveli, Delhi, Goa, Gujarat, Haryana, Jammu & Kashmir, Jharkhand, Karnataka, Madhya Pradesh, Maharashtra, Punjab, Puducherry, Tamil Nadu, Telangana, Tripura, Uttarakhand & Uttar Pradesh. Besides, no violations are reported in 9 States/UTs namely Andaman and Nicobar Islands, Arunachal Pradesh, Assam, Kerala, Lakshadweep, Mizoram, Nagaland, Rajasthan and West Bengal. However, 5 States/UTs namely Himachal Pradesh, Manipur, Meghalaya, Odisha, & Sikkim have not submitted any information in this regard.

In conclusion, while a good beginning has been made with notification of PWM Rules, 2018 (amended in 2018), we still have to go a long way to improve plastic waste management in the country.