

No. Foundation/CAPP/1/2019/4

Dated 22<sup>nd</sup> June 2020

*Respected Sir,*

Warm Greetings from Greater Noida!

2. Let me first introduce myself. I am Anoop Kumar Srivastava, a retired IAS officer of 1981 batch. I have been Secretary to the Govt. of India before retirement. Just after my retirement, I set up an NGO called "Foundation for Campaign Against Plastic Pollution", primarily to create general awareness about the harms of plastic pollution among the people and dissuade them from using single-use plastics. We have been running our campaign against plastic pollution since April, 2019. The Vision, Mission and Objectives of the Foundation & its membership may kindly be seen on our website at <https://capp.org.in>. I am its Founder-Director.

3. While we and a number of other NGOs have been doing our bit to prevent plastic pollution, we feel the problem is humongous and needs to be tackled by all stakeholders in concert with each other. The Union Government, and specially your Ministry, have a very important role to play in this regard. It is only the Union Government which can catalyse synergy between various stakeholders. We have listed suggestions for certain actions, which ought to be taken by the Union Govt, if this problem is to be tackled seriously in the right earnest. The list is attached.

4. I am writing this to request you to seriously consider our suggestions (attached herewith) and initiate action on each of these. We are ready to extend any cooperation that your Ministry may seek from us.

*With kind regards,*

Yours sincerely,



(Anoop Kumar Srivastava)

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Hon'ble Minister of Environment, Forest & Climate Change  
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## Suggestions for prevention and mitigation of Plastic Pollution in Environment

1. Plastic carry bags should be banned completely, regardless of thickness, except those made of bio-degradable / compostable plastics, because plastic carry bags are the major source of plastic pollution and biggest nuisance. This will require amendment in the Plastic Waste Management Rules, 2016 (as amended in 2018), as these rules permit plastic carry bags of thickness above 50 microns. Since eco-friendly alternatives to plastic carry bags (cotton, khadi, jute bags etc.) are easily available, plastic carry bags of all sizes and thicknesses should be banned throughout the country. Several States have banned plastic carry bags, but such bans conflict with the provisions of the Plastic Waste Management Rules, 2016 (as amended in 2018) which permit plastic carry bags of thickness above 50 microns. Therefore, it is absolutely essential to amend the Plastic Waste Management Rules, 2016, to ban plastic carry bags of all sizes and thicknesses. It should also be clarified that PPE bags are also plastic bags and in fact more harmful to the environment.
2. As for the so-called bio-degradable plastics, a word of caution is necessary. As per the report titled "Single-Use Plastics: A roadmap for sustainability" of the UN Environment (page 14), even bioplastics derived from renewable sources (such as corn starch, cassava roots, or sugarcane) or from bacterial fermentation of sugar or lipids (PHA) do not automatically degrade in the environment and especially not in the ocean. Ministry may like to get it confirmed from our experts and follow a cautious approach while promoting the use of the so-called bio-degradable plastics. At least, specific guidelines should be issued regarding safe disposal of bio-degradable plastics.
3. Government should give financial incentives like tax rebate etc. for the sale of non-plastic eco-friendly carry bags, such as those made of cotton, khadi & jute, so as to bring down their prices within affordable limits of all sections of the society.
4. Government should encourage the businesses to levy additional charge for even non-plastic bags or alternatively give discounts for not asking for carry bags, to inculcate among customers the habit of carrying their own non-plastic eco-friendly carry bags while they go for shopping.
5. Government should finance more research and development of alternative materials of single-use plastics, and also fund innovation.
6. In order to enforce the Plastic Waste Management Rules, 2016 (as amended in 2018) more effectively, the Ministry of Environment, Forest & Climate Change should hold a Workshop for representatives of all concerned departments of State Governments and invite all stakeholders, NGOs and representatives of the civil society. Various authorities are not clear about their roles under these rules. All of them need familiarisation through this workshop.
7. 10-steps roadmap for Governments suggested by the UN Environment in its report titled "Single-Use Plastics: A roadmap for sustainability" is worthy of consideration by the Government. Most problematic single-use plastic items (apart from plastic carry bags) should be identified through a baseline survey as recommended and more such items should be considered for banning. Prima facie, Styrofoam is another single-use plastic item, which should be banned, as it has health hazards too. Besides, since alternative eco-friendly materials are available for tumbler, cup, plate, cutlery, bottle & container, Government should also ban these single-use items made of plastic.



8. Extended Producer Responsibility (EPR) is a very good concept. The Ministry should take a lead and encourage single use plastics producers to agree to the EPR. This would work best in case of PET bottles. It should be the responsibility of the producers of soft drinks and drinking water to collect all empty PET bottles and recycle them. It will work best if there is a buy back price for each empty bottle. Empty bottles can be returned by customers either through the retail outlets or vending machines (crushing machines) to be installed by the producers at convenient locations. Such machines are now easily available in Indian market.
9. Efforts should be made to maximise the recycling of single-use plastics. Recycling industry should be helped and encouraged through tax and other financial incentives.
10. An award scheme should be introduced to encourage individuals, institutions, corporates, NGOs, etc. who take effective and workable measures to prevent plastic pollution.
11. The Ministry should take up with Ministry of Housing and Urban Affairs to fund the municipal bodies to improve their solid waste management systems. Improvement of solid waste management systems (including plastic waste management) in cities and towns is key to preventing plastic pollution. Similar action should be taken up by the concerned Ministry in rural areas.



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