St 110 & CR)

D.O.No. 25012/2/2011-PC-II



MRS. NEELKAMAL DARBARI, IAS JOINT SECRETARY PH. 23383428 भारत सरकार

GOVERNMENT OF INDIA
रसायन और उर्वरक मंत्रालय
MINISTRY OF CHEMICALS & FERTILIZERS
रसायन और पेट्रोरसायन विभाग
DEPARTMENT OF CHEMICALS & PETROCHEMICALS
शास्त्री भवन, डॉ राजेन्द्र प्रसाद रोड,
SHASTRI BHAVAN, DR. RAJENDERA PRASAD ROAD,
नई दिल्ली-110 001

NEW DELHI-110001 Dated: 18th November 2011

Dear Shri Keshav Chandra,

This is with reference to your letter No. F 8(86)/ EA/ Env./ 2008/ 20663- 713 dated 23.9.2011 received today regarding draft Notification to prohibit manufacture, sale, storage and use of plastic carry bags in the National Capital Territory of Delhi, and seeking objections/suggestions of this Department. In this context the views of Department of Chemicals & Petrochemicals are as under:

The twentieth century remains witness to the invention of one of the most versatile commodity material in the history of material science i.e synthetic polymers also known as plastics. The need for better quality of life has been driving human race through decades to come up with new improved materials and develop value added commodities. This development led to a shift in manufacturing from the metal / conventional materials based products to polymer based products on account of growing awareness regarding the need to reduce pressure on natural resources, improve energy efficiency, adopt innovative designs and other cost saving measures. The above is particularly noteworthy in the context of providing user-friendly packaging materials like the carry bag, which as per the life cycle analysis, relative to other/alternate packaging material, facilitates in preserving our natural resources and conservation of energy. Hygiene, aesthetic appeal and ease of convenience are some of its numerous other advantages.

The domestic polymer consumption is around 8.5 million tons as against the global polymer consumption of about 200 million tons. The per capital consumption of plastics in India is around 7 kg as compared to world average of 28 kg. The polymer consumption has a multiplier effect with the Gross Domestic Production (GDP) and high consumption is indicative of the growth of the economy of a country. Out of the total polymer consumption it is estimated that around 2-3% only is consumed in the manufacture of plastic carry bags. Globally, there is no example of a country prohibiting the manufacture or use of plastic bags. Instead, policies & programmes have been devised which promote citizen participation and producer responsibility in proper disposal & recycling of packaging materials.

There have been various environmental concerns raised from time to time by various sections of the society, NGOs etc. regarding the environmental degradation caused by plastics carry bags. It may be noted that Plastics by nature are chemically inert substances and do not harm the environment and health and are 100% recyclable.

The main reason behind disproportionate criticism of plastic carry bags and other packaging material is due to its indiscriminate littering, rendered even worse by its high visibility due to its light weight and use of colours. These are visible objects in the Municipal Solid Waste (MSW), although they constitute <1% (by weight) to the final landfill sites. The plastic carry bags are the cheapest mode of carrying goods and these were introduced decades bags to check the menace of deforestation. The life cycle comparative analysis indicates that plastic carry bags consume less energy and have less impact on the environment in terms of emission of green house gases, in manufacturing, transportation and recycling as compared to alternate materials like paper bags, jute bags, glass bottles etc.

The myth regarding the polluting characteristic of Plastic needs to be addressed. However, as mentioned above, municipal authorities encounter problems in their disposal, which are actually reflective of the larger-problem associated with solid waste management. If plastics can be collected and disposed off or recycled as per laid down guidelines/rules then the issue of Plastic waste can be suitably addressed.

The issue of plastic waste management has been raised in various Standing/Consultative Committees of Parliament while discussing matters related to this Department. Keeping this in mind it was decided to move a note for it Committee of Secretaries (COS) regarding addressing issues of plastic waste & The note was discussed in the COS meeting on 17.3.2010. Recognising the real > problem as being that of littering and difficulties faced by Municipal authorities in disposal of the same, certain decisions were taken. M/o Environment & Forest ර් Government of India implemented the decision and accordingly Plastic Waste (Management and Handling) Rules, 2011 were issued on 4.2.2011 with subsequent amendment on 21.4.2011 and 2.7.2011. Subsequent draft s amendment of these Rules have various features /guidelines with regard to increase of thickness of plastic carry bags from 20 micron to 40 microns, responsibility for setting up collection systems for plastic waste by the municipal authority concerned along with Extended Producers' Responsibility, pricing of plastic carry bags etc. It is felt that the Central Notification issued by M/o E&F, Government, of India can help to solve the problems related to Plastic Waste Management if it is implemented in letter & spirit.

The answer to the management of plastic waste lies in devising models for its integrated waste collection, segregation & recycling. There are various technologies available for recycling & some new methods being attempted are

recovery of liquid fuel/gas/hydrocarbons by feedstock /chemical recycling, use of plastic wastes in construction of asphalt roads and scientific disposal of wastes in cement kilns etc.

Also, it may be further noted that Plastics bags and other kinds of plastic packaging material have allowed creating an efficient; pilfer proof, hygienic and cost effective packaging of commodities like milk, spices, edible oil, bread, confectioneries, rice, wheat flour, snack foods, medicines and host of food items required by the common man in their day to day life. Being extremely cost efficient, these serve the lower strata of society by making available small and affordable sizes of products. The proposed draft notification by National Capital Territory of Delhi will also aggravate problems of unemployment and job loss due to the closure of existing units of Plastic carry bags.

The D/o Chemicals and Petrochemicals is of the view that the proposed draft notification may not be issued in the present form and needs to be amended in line with the Central Government Notification issued by M/o E&F on Plastic Waste (Management and Handling) Rules, 2011 issued on 4.2.2011 with subsequent amendments on 21.4.2011 and 2.7.2011. I am also enclosing the epresentations submitted by various Industry Associations on the above subject.

buth Best Worker

Yours sincerely,

(NEEL KAMAL DARBARI)

Shri Keshav Chandra
Secretary (Environment, Forests and Wildlife)
Department of Environment,
Government of National Capital Territory of Delhi,
5th Level, 'C" Wing, Delhi Secretariat,
..P.Estate,
New Delhi – 110002.