

K. JAIN

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AIPMA

23rd August 2002

The Secretary,
Ministry of Environment & Forests (MOEF),
Government of India,
Paryavaran Bhavan,
CGO Complex,
New Delhi.

Sub: Proposed amendments vide gazette notification No.S.O.685(E) to
Recycled Plastics Manufacture and Usage Rules 1999 issued on 1st
July 2002.

Dear Sir,

With reference to the above, we at AIPMA wish to bring the following suggestions with regard to amendments to definition of plastic carry bags and containers.

1. PLASTIC CARRY BAGS

VEST TYPE BAGS / ZABLA BAGS:

According to us the definition of carry bags should be such that "it does not cover primary packaging."

2. It may be recalled that MOEF had earlier put partial restrictions on plastic carry bags in respect of their thickness not being below 20 microns and for recycled/coloured plastic bags not being used for carriage/storage/serving of foodstuffs.

AIPMA welcomes this decision in view of the overall interest of the citizens health had accepted this amendment.

3. With regard to the size of the plastic bags, the provisions of Rule No.8 reads as under:

- No person shall manufacture, distribute or sell carry bags made of virgin recycled plastic below 8x12 inches (20x30 cms) in size.
- No vendor shall use carry bags made of virgin or recycled plastic below 8 x 12 inches (20 x 30 cms) in size for selling any commodity.

AIPMA welcomes the decision and accepts such restrictions in this regard.

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

(An ISO 9002 Certified Organisation)

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4. PLASTIC CONTAINERS: (Definition)

According to us any control on use of plastic containers should be made only to on those meant for one time use. (Disposable containers which are one time used for ready to eat food etc.)

5. REGISTRATION WITH POLLUTION CONTROL BOARD:

In the proposed amendment, there is a proposal of registration of manufacturers with the State Pollution Control Board. We are of the opinion that such rule of getting registered with the State Pollution Control Board will lead to corruption and harassment by the Inspector to small scale industry units. It is worth mentioning here that the units under SSI are mostly registered under the government agency. If the Government needs any information or statistics from the units, it can very well seek the information from the industries department. Thus the registration with the State Pollution Board is not required at all.

We also wish to bring few suggestions for your kind perusal.

- a) We would like to stress that plastics are very useful and co-friendly. In the life common man, plastics play an important role. Shopping without polythene bags, picnics without disposable glass, our kitchen without rows of plastic jars, is just unthinkable.
- b) There is shortage of conventional materials like wood, paper, metal and glass all over the world. Considering the flexibility in changing the properties of plastics to suit the requirements, it is stated that very soon plastics will occupy every walk of our life and its adoption means:
 - > Convenience and comfort
 - > Reducing the huge consumption of paper which results in massive deforestation
 - > Restricting the erosion and depletion of limited natural resources
 - > Upgrading packaging Technology
 - > Helping to achieve the goal of hi-tech in each sector of science and technology
 - > Modernizing the living standards
 - > Usage in Agriculture, Horticulture and Floriculture.

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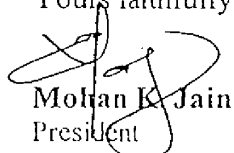
Besides the above stated properties, plastics are the lightest among all the materials used commonly, they are tailor made to meet the exact performance requirement of any end product. These could be recycled and re-used.

- c) We would like to further highlight that the per capita consumption of plastics in our country is the lowest in the world at 3.6 kgs. as compared with 100 kgs. in countries like the USA, and GERMANY. Even in these countries where the per capita consumption is so high, there is no such ban on the production and consumption of plastic carry bags.
- d) The Government gets a revenue in terms of excise duty of Rs. 5000 crores from the Plastic Industry in India. There are 15 major Polymer manufacturers and around 22000 Processing Units, which are mainly under SSI and form a major part of this vast horizon.
- e) The Plastic Industry has shown its willingness to co-operate with the Governments in any meaningful waste disposal programme.
- f) We would like to extend our co-operation and assistance to all Municipal Corporation and the Ministry of Forests and Environment for a proper Waste Management System. Basically, Waste Management and littering habits of people are responsible for this situation. Wet waste (organic) could go for vermiculture, which will provide organic fertilizer and could be sold for commercial value. By using incinerator for incinerating non-recyclable plastic waste could generate power. It would be better if we practice 'Bin' culture.

We are confident that if the above suggestions are accepted and implemented, the general public will continue to enjoy the use of plastic products which has become a part and parcel of our modern life.

Thanking you,

Yours faithfully,


Mohan K. Jain
President

C.C. To: Indian Centre for Plastics in Environment, Mumbai.

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