



Hon'ble Shri Prakash Javadekar,
Union Minister of Environment,
Forests & Climate Change,
Indira Paryavaran Bhawan,
Jor Bagh Road,
New Delhi-110003.

No. IBA/44A/15-16

November 11, 2019

Sub: Single Use Plastics and Extended Producer Responsibility Steps Affecting PET Bottles

Sir,

The Indian Beverage Association (IBA) is a body of beverage companies which also produce packaged drinking water and, combined, have a market share of +60% of total Non-Alcoholic Ready to Drink (NARTD) beverages at the national level.

2. Our members have been individually and collectively engaging with relevant authorities like the Central Pollution Control Board (CPCB) to strengthen activities on managing plastic waste and honouring their Extended Producer Responsibility (EPR) obligations under the Plastic Waste Management Rules, 2016.

3. A meeting was convened by Chairman, CPCB on September 5, 2019 seeking the views and inputs of the industry regarding the definition, list of items and action against Single Use Plastics (SUP). At this meeting, the industry had unanimously voiced its concern about various State Governments and Urban Local Bodies imposing a ban on PET, which is the most recycled plastic, with approximately 85% of used PET being collected and recycled in India. In view of the high recycling rate of PET, members of the Industry have been requesting CPCB to ensure that PET is not classified as a Single Use Plastic. The Industry had stressed the need for addressing the same through EPR and assured its commitment to further improving collection and recycling. At the meeting, the members had also sought intervention and help to address the issue of State Governments, Union Territories and Urban Local Bodies coming out with their respective, separate policies/orders banning PET or classifying the same as SUP.

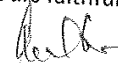
4. In this background, the order of the Andaman & Nicobar Administration, in exercise of powers under section 5 of the Environment Protection & Conservation Act, 1986, banning PET bottles of less than 2 litres for Water and Beverages, including Alcohol, vide its notification dated September 5, 2019 published in the newspapers on September 13, 2019, came as a rude shock. The Andaman Chamber of Commerce and Industry and some IBA member companies have already formed a partnership and started enhancing the collection of PET and other plastics in A&N Islands. Some Members of IBA have also submitted a proposal to the Port Blair Municipal Council for establishing a Material Recovery Facility in Port Blair to address the challenges of plastic waste. In spite of the above steps and assurance to deal with the issue through collection and recycling of PET and other plastics under EPR, the Andaman & Nicobar Administration has gone ahead and issued the above notification.

Receipt No : 243936/2019/MO

.....

5. We believe that the above order of the Andaman & Nicobar Administration is not in harmony with the Plastic Waste Management Rules, 2016 and its subsequent amendment. Imposing a ban on PET bottles of less than two litres is, therefore, disruptive to business and against the Central Government's policy to address used plastic packaging through collection and recycling under EPR obligation as prescribed by the PWM Rules.
6. Apart from the above, the action of banning PET bottles sets a precedent and sends a wrong message to other States/Union Territories, who are closely watching the developments relating to Single Use Plastics.
7. In the light of the foregoing, this Association earnestly urges the Hon'ble Minister to kindly ensure that the policy of the A&N Administration is in line with the national policy. It would be in the fitness of things that the Administration's notification of September 5, 2019 is withdrawn immediately or held in abeyance till the Central Government comes out with a clear definition of SUP and the items to be banned under that definition.
8. This Association further requests for an opportunity to call on you urgently and present its concerns and the challenges that its Members are facing in several States in this regard.

Yours faithfully,



(Arvind Varma)
Secretary General

Receipt No : 243936/2019/MO

17-2-2001-HSMD-PT-Part(1) (Computer No. 122029)

Receipt No : 243936/2019/MO

1 4 0