



Dated : 04 October,2019

To,  
The Hon'ble Minister  
Ministry of Environment Forest and Climate Change,  
Government of India

**Subject: In reference to non-woven fabric carry bags being proposed to be banned as single use plastic items**

Respected Sir,

This is in continuation of our previous representation while requesting the government to reconsider the proposal to ban all non-woven carry bags as single use plastics. We are grateful that the government has reconsidered the decision to implement an immediate ban owing to the destructive disruption it would cause on the industry. However, in the absence of a clear stance of the government on the issue there is much apprehension in the markets which has led to difficulty in moving even the existing stocks.

While we support the government's intention to discourage the use of single-use plastics for the harm it causes to the environment, we would also like to point out that non-woven carry bags, particularly those made from non-woven fabrics with a specification over 25GSM are sturdy and cannot be classified as being of single use. The current discussion has proposed that polythene bags over the thickness of 50 microns are not considered to be single use, in the same manner the non-woven carry bags with specification over 25GSM should not be classified as single use. In fact, owing to its porosity and easy degradability, non-woven carry bags are many times safer for the environment when compared to higher micron polythene carry bags.

It is our apprehension that since in earlier discussions as well as in the policies implemented by various states, only polythene bags below 50 microns are being banned, while no such limits have been discussed for non-woven carry bags, buyers will prefer environmentally unsafe polythene bags instead of the safer alternative of non-woven carry bags.

We thus implore you to hold early discussions on the matter and clarify the definition of single-use items viz-a-viz non-woven carry bags, and recommend the sturdy and reusable higher GSM non-woven carry-bags with specification over 25 GSM as reusable items.

In the absence of such policy clarification, there is confusion in the market regarding the future stance of the government and possibility of ban on the entire range of non-woven carry bag products and is causing difficulty for manufacturers and processors to move our products, and thus causing market disruption even without a ban being imposed.

Therefore, while reiterating the benefits of non-woven fabric carry bags below, we would like to humbly request that an advisory/clarification be issued in the above matter, as and when you may deem appropriate.



*Non-woven fabric bags are most effective in reducing bag impacts on the environment because they combine three key advantages.*

**Very low resource use**

**Very low cost**

**Very high reuse rates.**

*Non-woven fabric bags are globally known as "GREEN BAGS" and many global studies have classified them as the most preferred option for replacing Polythene Carry Bags.*

**Economic Contribution to the Country**

*Our Non Woven fabric and bag Industry has about 4000 MSMEs spread throughout the country Employing about 5 lakhs people directly and indirectly. Thereby supporting 5 lakh families or 25 lakh people directly, and heavily contribute to our Prime Minister's Vision of Make in India and Standup India*

**Government Incentives and Recognition**

*Ministry of Textiles vide order in The Gazette of India of even noF.No.8/3/2001-TPC dt 19.12.2001 has classified Nonwoven fabric under the head Technical Textiles*

*Further, notification No. 54/2-15-2010 dt 15.01.19 states that Non-Woven fabric is a product covered under Technical Textiles vide entry No. 57 to 64 and 171*

*All States have included Non-woven Fabric in their Textile Policies and giving incentives.*

*Various Govt, Semi-govt Labs and Institutions, like CIPET, DGFT, DKTE, IET, NITRA, SASMIRA, TITS and Shriram Industrial Lab have Certified the Non-woven fabric as Textile Material highlighting its benefits*

**PRESENT CONCERN**

*The government on one hand is launching New Textile Policies to promote the Technical Textiles and have also announced various Incentives to start manufacturing units and on other hand they are mistakenly banning Nonwoven fabric Bags as Plastic product. Government is planning to ban Plastic bags below 50 microns, Whereas NON-WOVEN BAGS are well Above 200 microns making it a perfect choice for reuse, economical to recycle and easy for rag pickers as well.*

**Advantages of using Non-woven Fabric Bags:**

1. Nonwoven fabrics are 100% Re-usable and 100% Re-cyclable.
2. They are photodegradable and decomposes under Sunlight (UV).
3. The fabric has air and water permeability, hence cannot clog drains or nullahs.
4. Nonwoven fabric are made from Poly Propylene which is inert and non-toxic, therefore safe if it comes in contact with food, water or any edible substance.
5. Burning of nonwovens does not produce any poisonous gases or toxic pollutant.
6. A nonwoven fabric can decompose completely within 90 days.

Thanking you

Yours faithfully,

Sd/-   
Naveen Mittal

President

Association of Technical Textiles Manufacturer & Processors  
(9818894444)P

**PRIME MINISTER'S OFFICE**

South Block,  
New Delhi - 110 011

Please find enclosed, for action as appropriate, copy of a self-explanatory letter dated 12.09.2019 received in this office from Indinon-Indian Nonwoven Fabric Manufacturer Association, Ahmedabad.



(Ajit Kumar)  
Deputy Secretary  
Tel. 2301 7367

19/9  
JS [nk]

Secretary, Ministry of Environment, Forests & Climate Change

PMO ID No. 5125948/2019-ES-2

Dated: 17.09.2019

I/ 3705502/2019

INDINON - INDIAN  
NONWOVEN MANUFACTURE  
ASSOCIATION OF INDIA  
AHMEDABAD.

DATE: 12/09/2019

TO,

SH. HARDIK BHAI SHAH  
HONORABLE DEPUTY SECRETARY  
PMO, NEW DELHI

SUBJECT:- Representation from Indinon  
Association.

Respected Sir,

Herewith, we would like  
to represent ourselves as manufacturers  
of PP. spun bond Nonwoven fabrics  
manufacturers and Nonwoven Bags  
manufacturers.

We are in support of our PM's  
mission against single use plastic.

Kindly find enclosed herewith  
our presentation and samples of our  
product - Nonwoven Bags, which is best  
and appropriate substitute of single use plastic  
at this stage.  
Thanking you.

Regards

~~Shub~~

President  
Indinon.

M-9824606250

Yash

Secretary  
Hemil Patel (GOT)  
02-0009945099

Office Bearer

President

SURESH PATEL  
98246 04730

Secretary


HEMIL PATEL  
90999 45099


Treasurer

SHAILABH DIDWANIA  
9825014781

**IndiNON**

INDINON Manufacturer Association of Nonwovens

 [www.indinon.org.in](http://www.indinon.org.in)

 [secretary@indinon.org.in](mailto:secretary@indinon.org.in)

**PRESENTATION**

**FROM**

**INDINON- INDIAN**

**NONWOVEN FABRIC**

**MANUFACTURER**

**ASSOCIATION,**

**AHMEDABAD**



Receipt No : 233781/2019/SECY OFFICE-MOEFCC

Subject: **Swachh Bharat Abhiyan (Suggested Policy for Non-Woven Carry Bag With having minimum thickness of 250 microns & above may be permitted)** Date: 09/19/19 11:14 AM  
From: RAJAN KOHLI <director@aonenonwoven.com>  
To: secy-moef@nic.in

NONWOVEN PRESENTATION.docx (1.5MB)

Suggestion.docx (19kB)

Respected Sir,

Good Morning

Soft reminder on our below mail, we request you to please consider our suggestion for non woven carry bags and looking forward positive response from your end.

Best Regards

Rajan Kohli

**From:** RAJAN KOHLI [mailto:director@aonenonwoven.com]**Sent:** Tuesday, August 20, 2019 4:31 PM**To:** 'secy-moef@nic.in'**Subject:** Swachh Bharat Abhiyan (Suggested Policy for Non-Woven Carry Bag With having minimum thickness of 250 microns & above may be permitted)

secy - 01/12/2019  
JSLK

Respected Sir

Greetings !!!

I take this opportunity to introduce myself, RAJAN KOHLI (Non Resident Indian) engaged in manufacturing of NON WOVEN FABRIC (Technical Textile) under the name of:

M/S A ONE TEX TECH (PVT) LTD.

Plot number. 2046, Rai Industrial Area, Phase II

Dist. Sonapat (131001) Haryana

(www.aonenonwoven.com)

This project was started in 2013 (using German technology) of SPUNBOND NON WOVEN FABRIC. It was started keeping in mind that as plastic is more hazardous to environment; there has been an increase in demand for Non Woven Fabric in India. This phenomenon has been observed in other parts of the world like Europe, USA, Australia, and the Middle East.

**We are enclosing a file with our suggestion which must be taken into consideration in terms of carry bags (with min. thickness of 250 microns and above )policy in India, which will be hailed by all government departments as it will lead to cleaner India, which helps our municipalities team to easy collection of waste.**

Thank you for going through this document and hoping you will take swift action.

Best Regards

Rajan Kohli

MD ( A-One Tex Tech Pvt Ltd.)



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### **INTRODUCTION TO NONWOVEN FABRIC AND NON WOVEN BAG**

Non-woven Fabric is manufactured from fiber grade Polypropylene Granules by adopting the Spun Bond technology of Technical Textile. It is submitted that this technology is the latest textile technology and different from the traditional Weaving Technology.

Under this process, PP Granules are fed to the Hopper and at a certain temperature they are passed through the extruder and melted. After this, material is filtered and passed through the spinning unit to obtain a continuous single filament with the help of cool air, which is called polypropylene filament. The filaments are then subject to lying on the continuous web and under control pressure thermal bonding of filaments takes place and Fabric is formed which is called Polypropylene Nonwoven Fabric (Kind of Technical Textile).



## **NON WOVEN BAGS ARE MADE OF TEXTILE FABRIC AND NOT PLASTIC**

Definitions of Non-woven fabric as per various organizations and experts :-

(A) As per ISO (International Organization for Standardization) 9092, nonwoven is defined as "manufactured sheet, web or batt of directionally or randomly oriented fibers, bonded by friction, and/or cohesion and/or adhesion, excluding paper and products which are woven, knitted, tufted, stitch-bonded incorporating binding yarns or filaments or felted by wet-milling, whether or not additionally needled. The fibers may be of natural or man-made origin. They may be staple or continuous filaments or be formed in situ.

The aforesaid definition of non-woven, given by ISO 9092, has been adapted by CEN (EN 29092), and consequently by DIN, AFNOR, and all standardization offices in the EU.

(B) ASTM (American Society for Testing Materials) prefers to define nonwoven as "a textile structure produced by bonding or interlocking of fibers, or both, accomplished by mechanical, chemical, thermal, or solvent means, and combinations thereof. This definition is available in many ASTM standards including D 123, D 1117, D 2646, D 3786, D 3787, D 5684, D 5732, D 5733, D 5734, D 5735, and D 5736.

(C) The Ministry of Commerce and Industries- DGFT vide notification no 54/2015-2020 dated 15.01.2019 has notified Non Woven fabric and bags as Technical Textile. Moreover, Ministry of Textiles has classified Spun Bond Nonwoven fabric under the head Technical Textiles. Technical Textiles are textile materials and products, used for their technical performance and functional properties. Unlike conventional textiles used traditionally for clothing or furnishing, technical textiles are used basically on account of their specific physical and functional properties. They represent a multi-disciplinary field with numerous end user applications. This industry has penetrated major areas of economic activity: Clothtech, Geotech, Homotech, Aerospace, shipping, Sports, Agriculture, Defence, Medical, etc. Ministry has broadly grouped them into 12 segments viz: Agrotech, Buildtech, Indutech, Meditech, Mobiltech, Oekotech, Packtech, Protech and Sporttech.

(D) With the development of science and technology textile fabrics are not limited to as was earlier understood by the common man as fabric manufactured by weaving of Yarn from Natural fibers only. With the growth of population and advancement of technology, the fabric is started to be manufactured from Man-made fibers also which are popularly known as Polyester, Polypropylene, Terylene, Terene, Rayon, Nylon, Dacron, Nylex, etc.

### Manufacturing Process flow chart of Spun bond Non-woven fabric

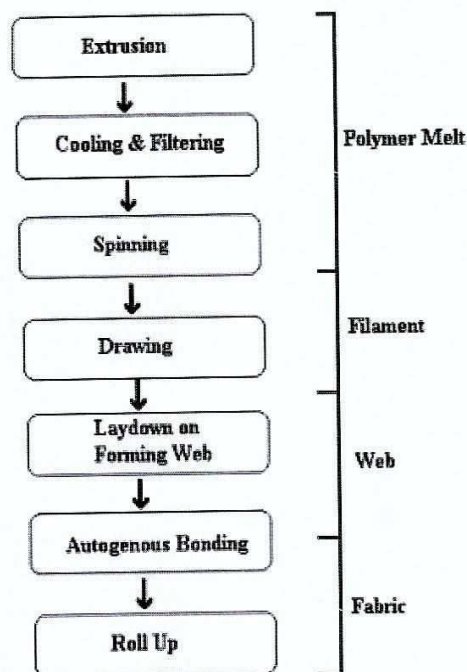
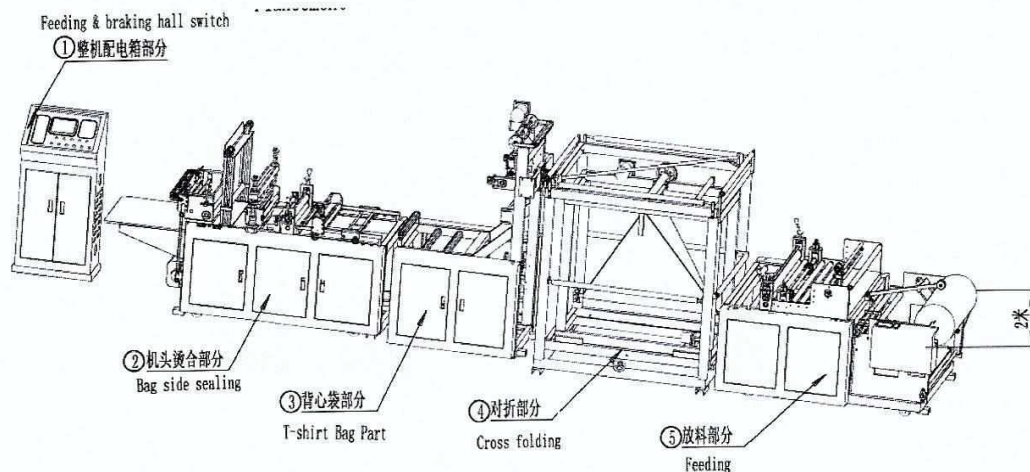


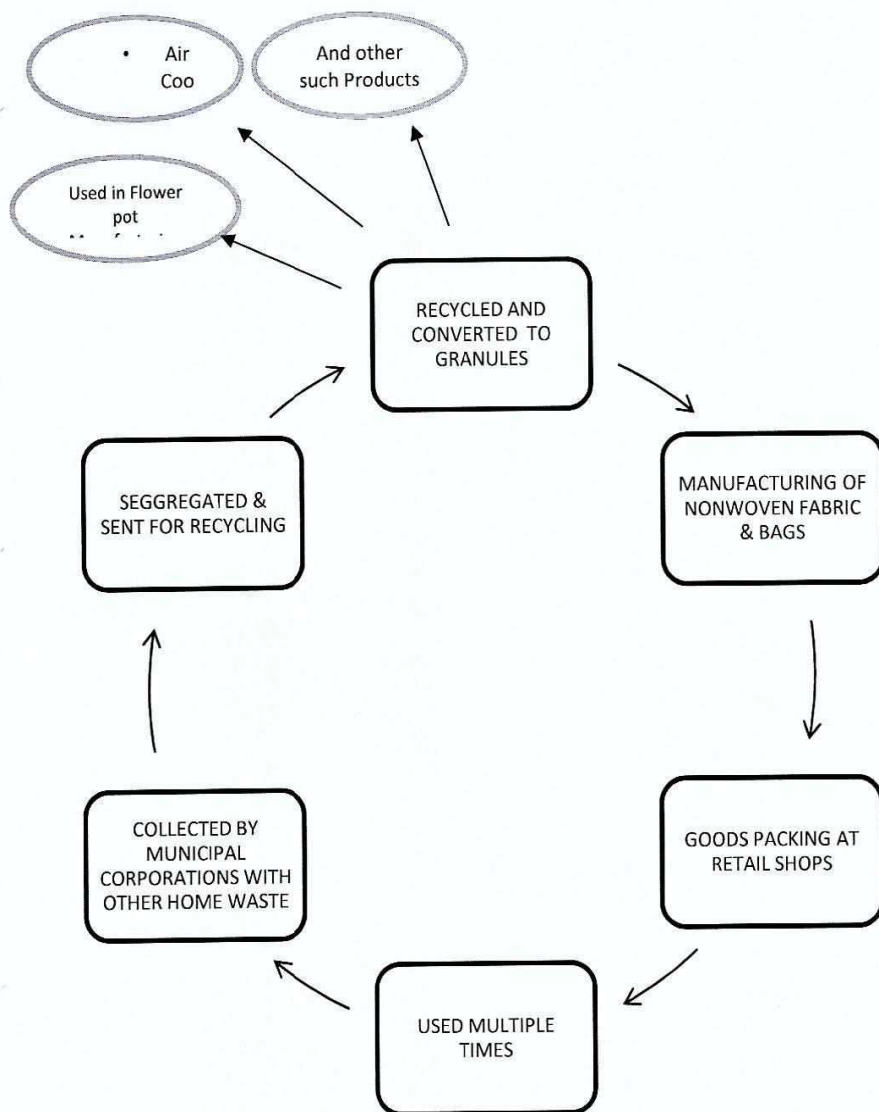
Fig. 1: Flowchart of spunbonding process [3]

### Manufacturing Process flow chart of Spun bond Non-woven Bag

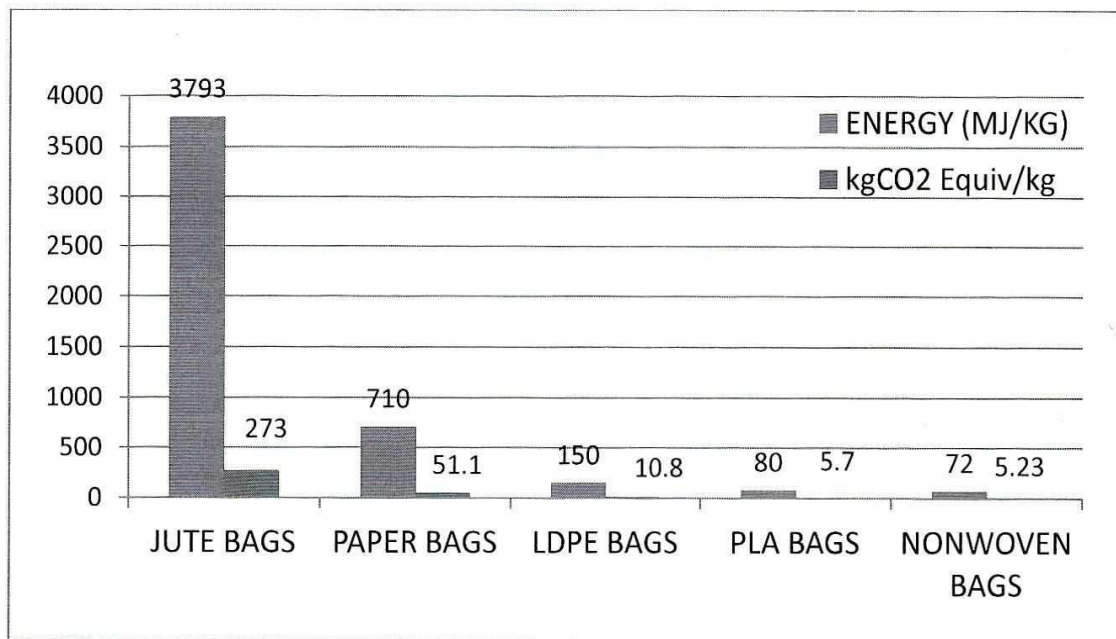
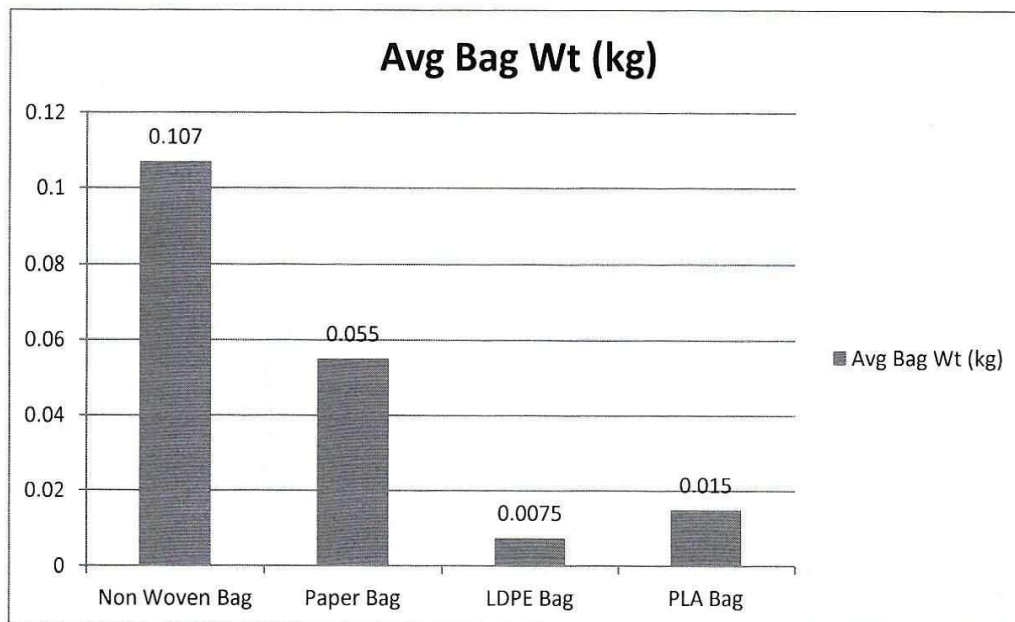


**PROPERTIES OF PP NON WOVEN BAGS**

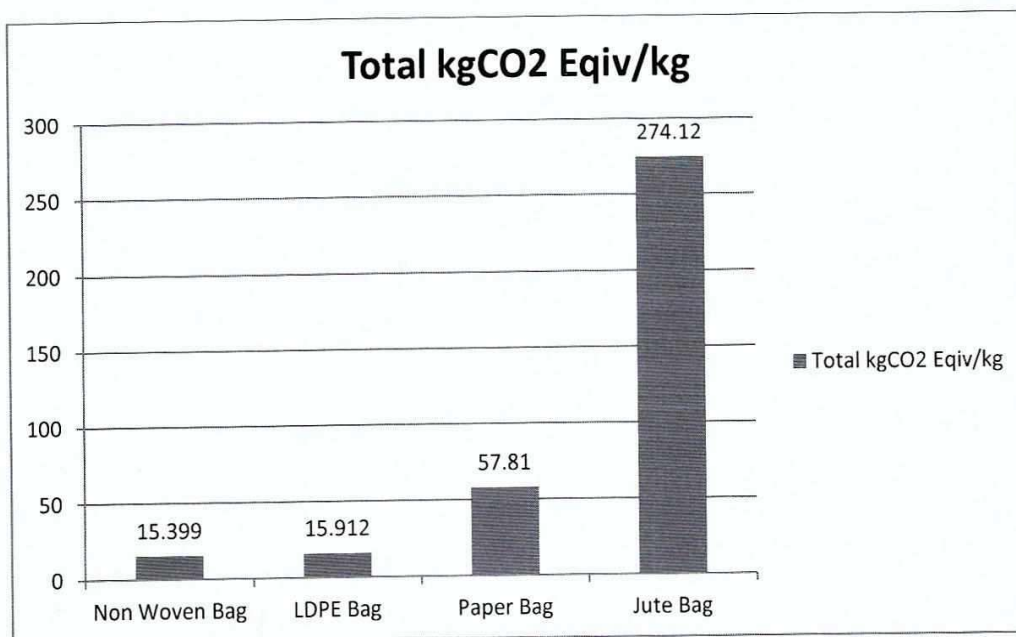
- a. RECYCLABLE :** Non Woven bags are 100% recylclable as it is made from fiber grade polypropylene. Attached reports from CIPET Aurangabad dt. 08.07.2018, Certificate from DKTE Centre of Excellence in Non Wovens d 27.03.2018 clarifies the same.
- b. PHOTO DEGRADABLE :** Non woven bags have a natural property of degradation under exposure of sunlight. Attached reports from CIPET Aurangabad dt. 15.12.2017, Shriram Institute of Industrial Research dt. 18.02.16 scientifically clarifies the same.
- c. WATER AND AIR PERMEABLE:** Non woven bags are porous in nature and hence do not blocks the flow of water and air. Attached report from Shriram Institute of Industrial Research dt. 03.10.12 clarifies the same.
- d. SAFE IN CONTACT WITH FOODSTUFF, PHARMACEUTICAL AND DRINKING WATER:**  
Non woven fabric is manufactured using IS 10910 complaint Polypropylene Grade from Reliance Industries Limited, Indian Oil Corp. Ltd etc. As per IS 10910 Technical Data Sheet from Reliance Industries Ltd and Indian Oil Corp. Ltd, it cleraly states that Polypropylene and its Copolymers are safe for use in contact with Foodstuff, Pharmaceutical & Drinking water. Attached Technical Data Sheet of RIL and IOCL.
- e. NON TOXIC:** Non woven bags are chemically inert and non toxic. Attached Certificate from DKTE Centre of Excellence in Non Wovens d 27.03.2018 clarifies the same.

**LIFE CYCLE OF A NON WOVEN BAG**



**ENVIRONMENTAL IMPACT OF NON WOVEN BAGS****LCA STUDY OF PLASTICS PACKAGING PRODUCTS – CENTRAL POLLUTION****CONTROL BOARD, MARCH 2018****Nonwoven Bags consumes least energy during Manufacturing Process****Non woven bags average weight is more than LDPE, Paper and PLA Bags**

**Non woven bags are better than Paper, Jute and LDPE bags in terms of Greenhouse gases emission which causes Global Warming**



**AS PER THE UNITED NATIONS ENVIRONMENT PROGRAMME**  
**MEDITERRANEAN ACTION PLAN dt 11 Sept 2018**

- Non-Woven polypropylene bags (or others such as nylon and polystyrene bags). This option is very suitable to be sold in supermarkets, and they can be reused later at smaller grocery shops. In Ireland, non-woven bags are now by far the preferred bag by consumers, chosen by 66% of those surveyed as their bag of choice



**SUSTAINIBILITY VICTORIA. COMPARISION OF EXISTING LIFE CYCLE ANALYSIS  
OF SHOPPING BAG ALTERNATIVES, APRIL 2007**

- Australia has termed Nonwoven bags as **GREEN BAGS**
- Reusable Nonwoven bags have lower environmental impacts than all of the single use bags
- A substantial shift to more durable bags would deliver environmental gains through reductions in greenhouse gases, energy and water use, resource depletion and litter.
- The reusable, non-woven plastic (polypropylene) 'Green Bag' was found to achieve the **greatest environmental benefits**
- Recycled content in bags generally led to lowering the overall environmental impact of bags The end of life destination is crucial, with greater environmental savings achieved from recycling all bags at the end of their useful life
- Reusable Non Woven Green bags have a **Life Expectancy of 104 trips (2 years)**

**BUILDING LONG TERM SOLUTIONS: RETAIL SHOPPING BAG IMPACTS AND  
OPTIONS, BSR JUNE 2010**

As per report of BSR dt June 2010, Non Woven bags are found to be better than any kind of bags.

BAG TYPE	MATERIAL CONSUMPTION (KG)	GREENHOUSE GASES (kg CO2)	FOSSIL FUEL Consumption (kg SB Eq)	EUTROPHICATION (kg PO4 Eq)	LITTER ASTHETICS (M2.Y)
Starch PE Bags	3.12	4.74	0.0694	0.00258	0.078
Single Use HDPE Plastic Bags	3.12	6.13	0.102	0.00246	0.312
Kraft paper Bags	22.152	30.2	0.285	0.0266	0.078
PLA Bags	4.212	16.7	0.0776	0.00911	0.078
<b>Non Woven Bags</b>	<b>0.209</b>	<b>1.95</b>	<b>0.023</b>	<b>0.00126</b>	<b>0.00187</b>

Receipt No : 233781/2019/SECY OFFICE-MOEFCC

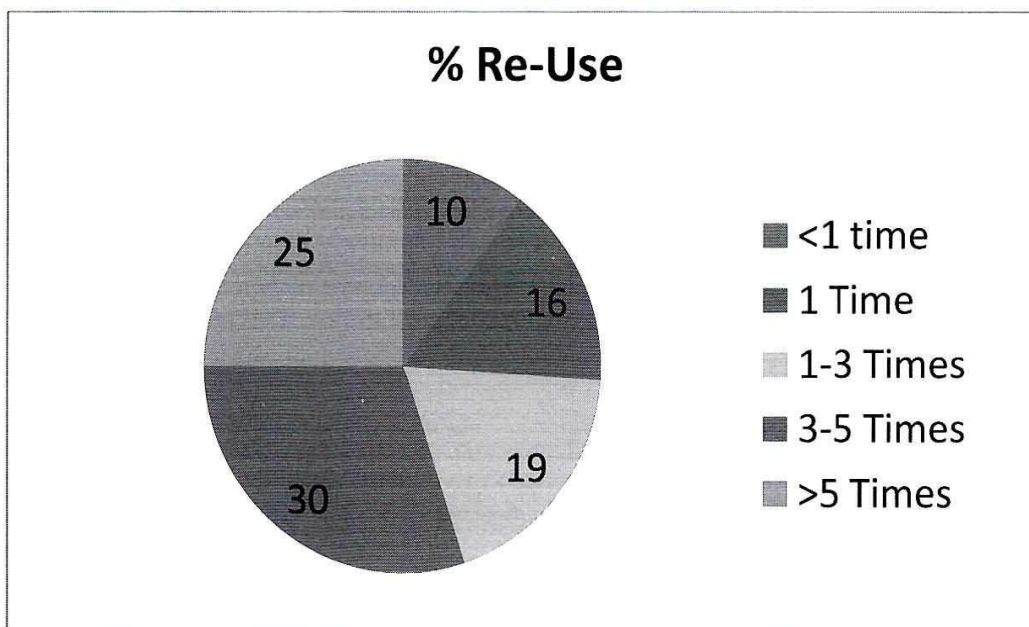
Cotton Bags	1.141	6.42	0.0177	0.00795	0.00164
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\*Eutrophication refers to the emissions of Nitrates and Phosphates into waterways

**NON WOVEN BAGS ARE USED MULTIPLE TIMES**

- As per the Survey Conducted by the Hong Kong Polytechnic University- Eco Impact of Shopping Bags; Consumer Attitude and Government Policies

- 30% Indian Consumers Re-Use Nonwoven Bags 3-5 Times.
- 25 % Indian Consumers Re-Use Nonwoven Bags More than 5 times.



### **CONCLUSION**

To safeguard the Environment, we should opt for Reusable Shopping Bags, made of materials that

- Don't harm the environment during production'
- Don't need to be discarded after each use
- Reduce pollution
- Save resources that could be put to better uses than making plastic or Paper bags.

**NONWOVEN FABRIC BAGS EMERGES AS THE BEST AVAILABLE  
OPTION ON ALL SUCH PARAMETERS**

1

**ASSOCIATION OF TECHNICAL TEXTILES MANUFACTURERS  
AND PROCESSORS (ATTMAP)**

**H. No. 21-A, First Floor, Basement, Tagore Park,  
New Delhi - 110009**

Ref No.....

Date : 16/04/2018

Dr Harshvardhan  
Minister of Science & Technology,  
Minister of Environment, Forest and Climate Change  
Minister of Earth Sciences,  
Government of India

**Subject : Nonwoven Fabric - Technical Textile, an Alternative to Plastics**

Respected Sir,

We are engaged in manufacturing of **PP Non-woven Fabric** from fiber grade Polypropylene Granules by adopting the **Spun Bond technology of Technical Textile**. This technology is the **latest textile technology** and different from the traditional Weaving Technology.

The announcement of **ban on plastic bags, including Non woven fabric**, by various States and the recent Ban by Maharashtra government on Plastic products has affected Nonwoven fabric industries / processers also as State governments are considering and terming this fabric as Plastic Product instead of Textiles.

These governments, on one hand launching **New Textile Policies to promote the Technical Textiles** and have also **announced various type of Incentives to establish Technical Textile** manufacturing units in their states and on other hand they are refusing to recognize the Nonwoven fabric as Textile. They are under the false belief that it is a Plastic product because it is made of plastic granules, **whereas it is a law that Plastic "EXCLUDES" all those items/products which comes under TEXTILES**".

Non woven fabric falls under **tariff heading 5603 of Section XI of Central Excise Tariff Act - "Nonwoven, whether or not impregnated, coated, covered or laminated of Man-made filaments"**. Section XI exclusively deals with various kind of Textiles, whether, cotton, woolen, silken or synthetic. Further, The Central Board of Excise and Customs, under Chapter 39, which deals with Plastics and articles thereof, has

*[Handwritten signature]*  
15/4/2018  
ES(RKS)

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specifically excluded, "Material regarded as textile material of Section XI," from the definition of Plastic.

Ministry of Textiles has classified Spun Bond Nonwoven fabric under the head Technical Textiles. Technical Textiles are textile materials and products, used for their technical performance and functional properties. DKTE Centre of Excellence in Nonwovens, promoted by Ministry of Textiles, to encourage and assist new entrepreneurs in the non-wovens and Technical textiles sector has tested the Non woven fabric in its laboratory and came out with following results:

I) Fabric like feel, II) 100% recyclable, III) Reusable, IV) Breathable, V) Washable VI) Chemically Inert & Non-Toxic, VII) Burning does not produce any poisonous gases.

According to use, Ministry has broadly grouped the Technical Textile into 12 segments viz: Agrotech, Buildtech, Indutech, Meditech, Mobiltech, Oekotech, Packtech, Protech and Sporttech.

Government has provided several Investment promotion schemes for establishing technical textile unit in India :

- Technology Upgradation Fund Scheme (TUFS)
- Scheme for Integrated Textile Parks (SITP)
- Coverage of major machinery for technical textile manufacturing under concessional customs duty list of 5%
- Certain technical textile products are covered under Focus Product Scheme, under which exports of such products carry duty credit scrip equivalent to 2% of FOB value of exports
- Technology Mission on Technical Textiles (TMTT)
- Focus Incubation Centres (FIC)
- Scheme for promoting usage of Agro-textiles in India (excluding North East Region)
- Scheme for promoting usage of Agro-textiles in North East Region
- Scheme for promoting usage of Geotechnical textiles in North East Region.

Additionally, several States in India, like Gujarat, Maharashtra, Haryana, etc., also offer incentives and assistance to investors, which can include Capital Subsidy, Interest re-imbursement, electricity and stamp duty exemptions, concessions in land registration, and single window clearance facilities for investment project applications.

It is an Alternative to Plastics.

Non woven fabrics got environmental benefits over other traditional fabrics and papers in regards to mainly its production process and its recycling benefits due to natural degrading properties and the recycle process for its production. Cheap, Non



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woven is very competitive with other fabrics (often cheaper than paper or plastic bag) and is very durable with all the attribute of woven fabrics. Main benefits are : Softness, air permeability, dehumidifying, cushioning, resilience, good light weight, ability to repel water and to evaporate water, resistance to mold and insect., etc..

#### Environment Impact Assessment

a) **Non Choking & Permeable** - The **PP Nonwoven fabrics** are classified as textile material very similar to that of regular fabrics manufactured from other synthetic filaments/fibres like Polyester, Nylon, Viscose, Acrylic, etc. These fabrics have **breathability and high permeability** of air and water. On the other hand, Plastic sheets or bags are extruded from different polymer Granules, as mentioned above, and they are totally **impermeable/ non-breathable** in nature and air or water cannot pass through the plastic sheet. Due this unique property of PP Nonwoven fabrics/bags, **these bags will not choke the drains and also will not create problems in solid waste management.**

b) **Degradability**- PP Spun Bond Nonwoven Fabrics/Bags have been tested at the NABL accredited Laboratory as per Indian Standard test method- IS-14887 and found that fabric is totally fragments after Sun light exposure of only 100 hrs. It means that these bags will be fragmented within short span of time and will not cause any problem in Solid waste management. Test report from the Central Institute of Plastics Engineering & Technology is enclosed for your reference (ANNEX-2).

c) **Recyclability**- PP Spun Bond Nonwoven Fabrics/Bags can be 100% recycled very easily The recovered polymers thus obtained can be reused for making the similar products. Many such recycling unite are available in the Maharashtra state. PP Nonwoven fabric is a perfect substitute and replacement of plastic & paper bags.

d) **Reusability**- PP Nonwoven materials are Strong, Sturdy & washable - hence promotes reusability & thus helps avoid the use of single use plastic & polythene bag.

#### Judicial Interpretations and State Government Views

Hon'ble Supreme Court and various Hon'ble High Courts, in different cases, have defined the Term Textile in a very wide sense and Non woven fabric falls within the definition of Textiles. Even various State governments, like Himachal Pradesh, Kerala, Karnataka, Delhi and Rajasthan have clarified that Non woven fabric is Textiles.

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**Intervention Required**

Non woven fabrics are made of polymers of polypropylene but it is pertinent to mention that its properties are much different and definitely environment and pollution friendly than the so called plastic films/bags. We would urge to look at Poly Propylene non woven fabric in a different context, as a blanket ban, due to treating it as Plastic product instead of Textiles, would not only be unjust but also eschew the possibility of a viable, economical and sustainable alternative for day to day needs of the common man.

**Your intervention in this regard is highly solicited because only your Ministry can understand and clarify the things.**

Thanking you.

Yours faithfully,

**For Association of Technical Textiles Manufacturers  
And Processors (ATTMAP)**

For ATTMAP  
  
**President**  
President