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Representation on the Plastic Reuse Requirement Under the Plastic Waste Management Rules (PWMR) 2024

Sandeep Khosla <dg@bombaychamber.com>

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To: ccb.cpcb@nic.in

Mr. Tanmay Kumar
Chairman
Central Pollution Control Board
Parivesh Bhawan
East Arjun Nagar
Delhi – 110032

Sir,

Subject: Representation on the Plastic Reuse Requirement Under the Plastic Waste Management Rules (PWMR) 2024

The Bombay Chamber of Commerce and Industry (BCCI) extends its appreciation to the Ministry for its ongoing efforts to address plastic waste through the updated PWMR framework. As one of the oldest industry associations in India, representing a diverse membership base across multiple sectors, we fully support the government's sustainability goals and initiatives aimed at fostering a circular economy. Our member companies are committed to enhancing sustainable packaging practices and are diligently working toward meeting regulatory requirements.

However, with the upcoming "Reuse of packaging" mandate under Rule 7.4 Sub-Clause b(I) and b(II) of Schedule II set to commence in FY 2025-26, we would like to present some practical concerns and considerations. We respectfully submit this representation to highlight the industry's challenges and propose constructive solutions to ensure the intended objectives are achieved effectively.

Key issues are:

1. **Informal Reuse Practices in India:** Reuse of rigid plastic packaging is already prevalent at the consumer level, with items repurposed for everyday household uses such as water storage, grain containers, and other requirements. This practice is deeply embedded in the cultural landscape and differs from the formalized reuse systems seen in other developed markets.
2. **Environmental Impact:** A new system for collecting and redistributing rigid plastic packaging introduces its own environmental costs, particularly in terms of carbon emissions from transportation and handling. This will be higher than the current consumer practice of using them for their personal requirements.
3. **Operational Barriers:**
 - a. The infrastructure necessary to retrieve brand-specific packaging is underdeveloped, particularly when packaging designs are often indistinguishable between different brands.
 - b. Without a reliable system to track how many times packaging has been reused, companies face potential risks in maintaining product safety and ensuring compliance with the regulations.
4. **Product Safety and Standards:**

- a. Repeated use of plastics brings up the risk of microbial contamination, which could pose a health threat to consumers.
- b. Currently, there are no established standards for cleaning and sanitizing packaging for reuse. Without clear guidelines from BIS, companies are at risk of compromising product safety.
- c. Certain sectors already have restrictions in place on packaging reuse, creating additional barriers to compliance for those industries.

5. **Risk of Counterfeit Products:** Reused packaging could easily be refilled with counterfeit products, which poses significant risks to consumer safety and could damage the reputation of trusted brands.

We would recommend:

- a) An extension of the timelines by 2 to 3 years
- b) Developing Regional implementation strategy starting with some states or districts that volunteer to develop all the operational modalities
- c) Start with more gradual implementation milestones focussed only on Large packs (5L and above) such as 2% in Yr 1 and going to 10% in Yr 3 of implementation.
- d) Depending on the learnings from the above (b&c) initiatives, we might want to consider a compliance mechanisms that achieves an equivalent reduction in virgin plastic measured through a composite KPI (e.g. Absolute Reduction in Virgin Plastic). This may allow for a more thorough development of practical, safe, and effective reuse systems customized to individual industry needs.

We request your consideration of these proposals and look forward to engaging in constructive discussions to advance our shared sustainability goals.

Thanking you,

Yours sincerely,

Sandeep Khosla
Director General

BOMBAY CHAMBER OF COMMERCE AND INDUSTRY

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