



17<sup>th</sup> September, 2019

**Shri Prakash Javadekar**

Hon'ble Minister of Environment, Forests & Climate Change  
Govt. of India  
Shastri Bhawan, C-Wing, Dr. Rajendra Prasad Road  
NEW DELHI-110003

Respected Sir,

**Sub :- Serious Problems faced by the Plastic Processors due to sudden ban on plastic carry bags.**

Greetings from Gujarat Chamber of Commerce & Industry.

We are in receipt of a representation from Gujarat State Plastic Manufacturer Association [GSPMA] and Plastic Processors [Gujarat] Association wherein they have mentioned about the immense hardships being faced by the plastic industry due to the sudden total ban on plastic carry bags, irrespective of thickness.

Sir, as you would be aware, the plastic industry is a huge industry with more than 5000 carry bags manufacturers across the country. Out of this, around 2000 plastic bag manufacturers are based in Gujarat. The total ban on plastic carry bags has come as a sudden shock to the industry as absolutely no time has been provided to the industry to switch over to alternative business. Due to this the plastic carry bag manufacturers are at the verge of a total shutdown which will result in large-scale un-employment and losses for the State of Gujarat.

Sir, we are very much in support of Hon'ble Prime Minister's vision to free the country from using single use plastic. However, we also strongly believe that reasonable and adequate time should be provided to the plastic processors and manufacturers, especially the plastic carry bag manufacturers, to switch over to an alternate business without having to close down their units. Moreover, the definition of single use plastic is not clear and it is questionable whether plastic carry bag of thickness more than 50 microns can be classified as single use plastic.

It is mentioned in the representation of Gujarat State Plastic Manufacturer Association [GSPMA] & Plastic Processors [Gujarat] Association that plastic carry bag with thickness greater than 50 microns is re-usable and easily recyclable. This has to be taken into due consideration before implementing a complete ban.

**Durgesh V. Buch**  
President

**Natubhai Patel**  
Sr. Vice President

**Bhargav Thakkar**  
Vice President

**Sanjeev Chhajer**  
Secretary

**Dilip M. Padhya**  
Secretary (R)

**Pathik S. Patwari**  
Treasurer



: 2 :

Sir, we once again reiterate, we are very much with the Government in its efforts to curb the use of plastic. Our request is only to provide adequate time and implement the restrictions in a phased manner so that plastic industry can be saved from extinction and the producers can switch over smoothly to alternative product without resulting losses to the State and the country.

We look forward to your urgent and favourable intervention in the serious matter.

With regards,

**Durgesh Buch**  
**President**

c.c.

**Chairman**

Central Pollution Control Board  
Parivesh Bhawan, CBD-cum-Office Complex East  
Arjun Nagar,  
DELHI - 110 032

**Member Secretary**

Central Pollution Control Board  
Parivesh Bhawan, CBD-cum-Office Complex East  
Arjun Nagar,  
DELHI - 110 032

**Chairman**

Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector-10-A  
Gandhinagar-382010

**Member Secretary**

Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector-10-A  
Gandhinagar-382010

**Encl : Representation Received from Gujarat State Plastic Manufacturer Association [GSPMA]  
& Plastic Processors [Gujarat] Association.**

# PLASTIC PROCESSORS (GUJARAT) ASSOCIATION

25/B Vaishnavi Devi Society, G.I.D.C. Road, Manjalpur Baroda -11  
Phone: 91-265-2648545 (Off) 91-265-6674538 (fax) email: plastic\_processors@rediffmail.com.

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Date: 09-09-2019

To,  
Gujarat Chamber of Commerce and Industry,  
Gujarat.

Sub: Why "Plastic Carry Bag" is not a Single Use Plastic, EPR (Extended Producers Responsibility) policy in place with effect from 2016.

Sirs,

This letter is drafted in response to the meeting organized by 300+ *Plastic Carry Bag* manufacturers of Panchmahal with Member Secretary, Gujarat Pollution Control Board, Gandhinagar, on 13/9/19 at Halol.

In this meeting it was informed by GPCB official that *there is no future of this industry* as Govt is coming with guidelines of *total ban on plastic carry bag irrespective of thickness*. With no time in hand with industry, he suggested *to switch over from this business*. The industry was *shocked and confused*.

The honourable Union ministers of Union Govt, have several times in recent past has assured the industry that plastic carry bag above 50 microns *will not be included in "Single Use Plastic"*. Currently *Plastic Carry Bag industry is at total shutdown* after Honourable Prime Minister's speech from Red Fort to restrain the use of Single Use Plastic.

Before we list our inputs we would like to reiterate that India's total LDPE, HDPE, LLDPE polymer production is 3,97,000 Tonnes/ month, whereas carry bag consumes 16,000 Tonnes / month ( **Source: Plast India Foundation Report -2018-19** ) by 5000 carry bag manufacturer across the nation (2000 in Gujarat). Hence it is highly unfair to include plastic carry bag in "Single Use Plastic", when 50 Micron carry bag are collected through Municipal Corporation, Rag Pickers and EPR model, (as per Plastic Waste Management rule- 2016).

Our Association has *gone into agreement of 1000 MT/ month* with GPCB licensed agency “Eco-Vision Environmental Resources LLP” for collection, segregation and recycling of plastic carry bag waste. In turn this agency is having MOU with Surat Municipal Corporation (SMC) and Vadodara Municipal Corporation (VMSS) for city’s plastic waste management.

### Why Plastic Carry Bag should not be included in “Single Use Plastic”.

- “50 micron Carry Bag” are
  1. *Re- usable* many times before disposing.
  2. *Re- cyclable* easily and many times.
  3. *More Remunerative* to “Rag Pickers” due to higher thickness.
- Consumes “*post consumer plastic waste*” in its manufacturing.  
(Waste collected by Rag pickers, goes to recycler and after converting into plastic granules is used in making of plastic carry bag).
- Alternates like *cotton bag* and *paper bag* are *very costlier, inconvenient and are larger in carbon foot print (more dangerous to environment)* than plastic carry bag.  
(Source: *Life Cycle Assessment of Plastic Bag, Central Pollution Control Board, March 2018* )
- Plastic Carry Bag industry is high on *Employment to Investment Ratio*. ( 1 lakh investment in machine = 1 Person employment), next best to khadi gram Udhdyog, if banned will create unemployment (direct/indirect) to ~5 lakh people in Gujarat.
- Gujarat accounts to *65% for Nation’s total plastic production*.
- Total Plastic waste in Municipal Solid Waste is 8- 10 % average (varying from city to city) and in that carry bag waste is only 0.8- 1.0 %.  
(Source: **CPCB report 2018-19**)

### Suggestion and Alternates

- “Extended Producers Responsibility” (Collection of waste – Segregation - Recycling by Industry). To be strictly followed by industry and to be monitored by Govt.

- Extended Producers Responsibility to be implemented in Rural Areas also on PPP model.
- Rag Pickers and Kabadiwalas should be registered in MNREGA for plastic waste collection.
- New BIS standard should be framed for “carry bag” made from post consumer plastic waste.

Hence a product which is *Reusable, easily collectable, recyclable and high on employment (especially in Gujarat)* and whose proportion is less in total MSW, should not be considered in Single Use Plastic.

The ban of 50 micron carry bag will be *a big loss for Gujarat*, so we request you to present our matter seriously at concerned central agencies and ministry.

Thanks.

Plastic Processors (Gujarat) Association

President



president GCCI <president@gujaratchamber.org>

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**Fwd: New Doc 2019-09-14 15.21.20**

1 message

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GSPMA <gspma1970@gmail.com>  
To: president@gujaratchamber.org

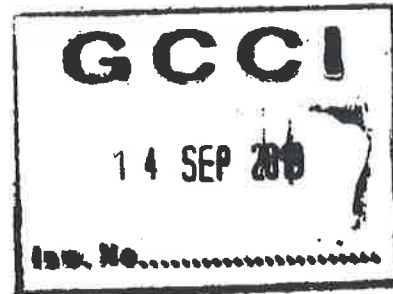
Sat, Sep 14, 2019 at 3:47 PM

The President,  
Gujarat Chamber of Commerce & Industry,  
Ahmedabad.  
Dear Sir,

plz find attached scanned copyof letter addressed to vijaybhai rupani

Thanks & Regards.

SHAILESH PATEL  
President-GSPMA  
GUJARAT STATE PLASTIC MANUFACTURERS ASSOCIATION  
7th floor, Span Trade Centre,  
Opp. Kochrab Ashram,  
Paldi, Ellisbridge,  
AHMEDABAD 380 006  
Tel: 91-79-26578227/26579204



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Founder Member :



PLASTINDIA FOUNDATION

## GUJARAT STATE PLASTIC MANUFACTURERS' ASSOCIATION

7th Floor, Span Trade Centre, Near Paldi Char Rasta, Ellisbridge, Ahmedabad-380 006.  
PHONE : (91-79) 2657 9204, 2657 8227, 6663 0339, 6663 0340  
Email : gspma1970@gmail.com Website : <http://www.gspma.in>

Date: 13.09.2019

Shri Vijay Rupaniji,

Hon'ble Chief Minister of Gujarat,  
3<sup>rd</sup> Floor Swarnim Sankul-1 Sachivalaya,  
GANDHINAGAR – 382010

Sub: Plastic Waste Management – SHS 2019. Gujarat largest producers of Plastic Raw Materials, Plastic Goods and Machinery, PWM, EPR, SUP, etc.

Respected Sir,

In continuation to communication of 27.06.2019 on the subject and further interaction with Policy Makers at GOI and GOG this is to submit as under as discussed during joint Meeting of GCCI, GSPMA and GPCB in presence of GSPMA at GCCI on 26.06.2019:

1. Gujarat Stakeholders fully support SHS 2019 and will be glad to provide any assistance for the Event on 02.10.2019 at Gujarat in presence of Hon'ble Prime Minister.
2. We have requested Government of India to Notify common new PWM and EPR Rules as well other matters with time period of 180 Days for compliance.
3. GPCB may conduct Zone wise awareness Seminars for the Plastic Industry.

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4. The Notices of closure issued by GPCB under PWM for EPR etc .to be kept on hold till the time fresh directions and guidelines not issued by GOI. Also no power connection to be disconnected as it will lead to heavy losses of Employment and Revenue , Plastic Industry is in MSME and needs support from GOG to continue production .

Sincerely yours,

  
Jigish Doshi

President, Plastindia Foundation.

  
Shailesh Patel  
President-GSPMA.

Copy :

- Shri Nitin Patelji, Hon'ble Deputy Chief Minister, GOG , Gandhinagar.
- Shri Saurabh Patelji, Hon'ble Energy Minister, GOG, Gandhinagar.
- Dr. J.N Singhji, CS, GOG, Gandhinagar.
- Dr. Rajiv Guptaji, Chairman GPCB, GOG, Gandhinagar.



# Gujarat govt to clamp down on single-use plastics from October 2

## Manufacturing And Distribution Likely To Be Banned

Kapil Dave@timesgroup.com

**Gandhinagar:** The state government is setting the stage to launch a frontal attack on single-use plastics, from Oct 2, to mark the 150th birth anniversary of Mahatma Gandhi. Apart from a likely ban on single-use plastic, the state government has drawn up a comprehensive plastic collection and segregation plan for the state.

At Thursday's cabinet

meeting, it was decided to announce a comprehensive policy to regulate plastic production and use. Civic bodies have been asked to launch a drive to segregate plastic. More importantly, consultations with plastic manufacturers have been initiated with the aim of halting production of single-use plastics. Gujarat is the largest manufacturer of single-use plastics in the country.

A key government official said the state government has decided to take up the drive against plastic use as relentlessly as it proposes to implement the new traffic rules. "The PM has taken up this cause and the state government will formulate a

## NO PLASTIC AT PUBLIC FUNCTIONS

> No plastic bottles, wrappers, plates and containers in all public functions soon

> Plastic material recovery centre (MRC) in all civic bodies to collect and segregate plastic

> Government offices, schools, colleges, corporates, NGOs, religious groups will be requested to join the campaign

> Use of plastic in cement plants and for road building will be made compulsory



comprehensive policy to regulate plastic use. Manufacture and distribution of single-use plastic is likely to be banned altogether," the official said. Top officials of the

urban development, forest & environment and roads & buildings departments have been directed to chalk out a joint plan to deal with the plastic menace.

As part of a multi-pronged approach to deal with plastics, the government has asked all urban civic bodies to start plastic collection centres.

Plastic collected by civic bodies will be segregated and depending on their grade, will be used for road construction, as fuel in cement factories or be sent for recycling.

Municipal corporations and other urban civic bodies will launch a drive against plastic from October 2 under the 'Swachhata EJ Seva' project. All urban local bodies (ULBs) have been directed to create a separate force to monitor implementation of the new plastic rules."



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FOR MORE INFORMATION VISIT

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GSPMA/2019-20/  
13<sup>th</sup> September, 2019

Shri M. K. Das,  
Principal Secretary,  
Industries & Mines Dept.,  
Government of Gujarat,  
Gandhinagar.

Dear Sir,

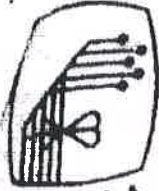
Greetings from Gujarat State Plastic Manufacturers Association.

This is with further reference to the meeting held on 9<sup>th</sup> September, 2019 in your office at Gandhinagar.

We are glad to introduce ourselves as one of the leading association, having 2500 plus members, representing and working for the cause of Plastic Industry since 1970. One of our main objective is to enhance the image and growth of plastic processing industry in the country. India's plastic industry expected to touch Rs. 5 lakh cr mark by 2025 and employ 6 mn people to become one of the largest employers in the country. The fast growing plastic industry will help India in becoming a \$ 5 trillion economy in near future. The industry is contributing significantly to the government exchequer. There are huge export potentials also. If government ensures favourable policies and support, MSMEs in Plastic Industry would play a major role in India in achieving its goal.

We appreciate the Swachhta Abhiyaan of Hon'ble PM. On the Independence Day address to the Nation PM announced to make India free from Single Use Plastic. We at GSPMA fully support the Swachhta Abhiyaan initiated on the celebration of 150th year of Mahatma Gandhi.

We understand that Government of India is planning to ban single use plastic from 2<sup>nd</sup> October, 2019 in the country. We have attended number of meetings and forums held to discuss this issue recently and represented the voice of the industry. We had already sent



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**Plexpo**  
2022  
Property through Plastics India



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memorandum to Hon'ble Prime Minister, Ministry of MOEF, Urban Development Department, Ahmedabad Municipal Corporation, etc.

Kindly note, the banning is not the solution. Instead we should think over other probable options. We suggest single use plastic should be phased out gradually giving due time to industry to switch over and plan their business operations. There are huge inventory involved and large considerable bank finance involved. Immediate ban will certainly effect the industry at large and we fear that there will be havoc following large scale unemployment, leading to increasing in NPA.

Briefly, our submissions are as under :-

- \* As announced earlier on the World Environment Day 2018, Single Use Plastics will be phased out by 2022. We reiterate that about two years period should be given to industry to switch over & exploring viable alternatives to Plastic & settle rest of the matter
- \* Total banning will ultimately loss of revenue to the government from both the sides (production & recycling) & unemployment also
- \* Recycling Industry should be promoted to tackle pollution problem. Recycling industry is also providing employment to common men and helping earning their bread.

At present, when there is worldwide recession, such step will prove disastrous and will adversely effect on GDP.

Thanking you,

Sincerely yours

  
**SHAILESH PATEL**  
(President)