Action Plan

for

Plastic Waste Management in the State



29th April, 2019

Directorate of Environment and Climate Change
Department of Science, Technology and Environment,
Government of Punjab

Table of Contents

Chapte	r 1 - Introduction	2
1.1	Waste Management – A key challenge of rapid urbanization	2
1.2	About Plastic Waste	2
1.3	Directions issued by NGT	3
Chapte	er 2 - Management of Plastic Waste	4
2.1	Plastic Waste Management Rules, 2016	4
2.2	Role of Various Stakeholders in Management of Plastic Waste	4
2.3	Current Status of Management of Plastic Waste	6
2.4	Action Plan to Manage Plastic Waste	7
Chapte	er 3: Training and Capacity Building	10
3.1	Importance	10
3.2	Objectives	10
3.3	Need Assessment	10
3.4	Involvement of Institutions and Experts	10
Chapte	er 4 – Monitoring Requirements and Formats	11
4.1	Monitoring Requirements	11
4.2	Monitoring of Management of Plastic Waste	11
4.3	Development of IT system	12
4.4	Performance Assessment of Key Functionaries of the Departments	12
Chapte	r 5 – Governance and Supervision	13
5.1	Monitoring of Progress and Compliance with the Rules	13
5.2	District Level Committee under Deputy Commissioner	13
5.3	State Level Committee under Department of Environment	13
5.4	State Apex Committee under Chief Secretary	14
5.5	Standing Committees	14
Chapte	er 6 – Risk Mitigation Plan	15
6.1	Identification of Major Risks in the Action Plan	15
6.2	Accuracy and completeness of Baseline Data	15
6.3	Completeness of Project timelines	15
6.4	Financial closure and timely releases of funds	15
6.5	Tracking the Progress and program management	16
Annexu	ure A – Monitoring Proforma for Plastic Waste Management	17

Chapter 1 - Introduction

1.1 Waste Management – A key challenge of rapid urbanization

- 1.1.1 There has been quantum increase in generation of solid waste and its quality with rapid population growth and urbanization. The composition of solid waste depends on number of factors such as lifestyle of people, their relative standards of living, general consumer patterns, and the level of technological advancement.
- 1.1.2 The lack of effective solid waste management creates serious health, safety, and environmental consequences. Poorly managed waste serves as a breeding ground for disease vectors, contributes to global climate change through methane generation, and even promotes urban violence.

1.2 About Plastic Waste

- 1.2.1 The rapid rate of urbanization and development has led to increase in consumption of plastic products and plastic waste generation. Its sheer convenience -- lightweight and durable nature has made this man-made material ubiquitous in every sphere of human existence.
- 1.2.2 Much of the growth in plastic production is driven by single use or disposable applications. Nearly 50% of plastics used are single use products such as bottles, plastic bags, packaging material, plates, cups, straws, stirrers, spoons and forks. The use of plastic in packaging both as rigid and flexible forms has been increasing.
- 1.2.3 Plastic bottles, jars, and containers, also known as rigid packaging, find their way into the reusing and recycling economy through informal chain of rag pickers and kabaadi wallahs or scrap dealers.
- 1.2.4 But other single use plastics such as bags, candy wrappers, tobacco and pan masala sachets, soap wrappers and shampoo sachets are either too difficult or not lucrative enough to collect. These plastic items then find their way into landfills, unauthorized garbage dumps, or simply remain uncollected on road berms. Eventually, these single-use plastic items clog rivers and other water bodies. They when consumed by animals find their way into our food systems.
- 1.2.5 Plastics are non-biodegradable and remain on earth for thousands of years. The burning of plastic waste under uncontrolled conditions lead to generation of different hazardous air pollutants (HAPs), depending upon the type of polymers and additives used.
- 1.2.6 Plastics are generally categorized into two types:
 - (i) Thermoplastics: Thermoplastics or Thermosoftening plastics are the plastics which soften on heating and can be moulded into desired shape such as PET, HDPE, LDPE, PP, PVC, PS, etc.

(ii) Thermosets: Thermoset or thermosetting plastics on heating, cannot be remoulded or recycled such as Sheet Moulding Compounds (SMC), Fiber Reinforced Plastic (FRP), Bakelite etc. are the examples of the same.

Thermoplastics shall be channelized to registered plastic waste recycler for recycling. Thermoset plastics shall be processed and disposed off as per guidelines of CPCB.

1.3 Directions issued by NGT

- 1.3.1 NGT vide its orders dated 20.08.2018 in matter of OA No. 606/2018 titled as Compliance of Solid Waste Management Rules, 2016 has constituted Apex Monitoring Committee, Regional Monitoring Committee and State Level Monitoring Committee for monitoring the implementation of Solid Waste Management Rules, 2016, Bio-medical Waste Management Rules, 2016 and Plastic Waste Management Rules, 2016.
- 1.3.2 The NGT vide its orders dated 16.01.2019 in matter of OA no. 606/2018 has directed that Regional Committee may be replaced by State Level Committee in the modified form.
- 1.3.3 The NGT vide its orders dated 07.03.2019 in matter of OA no. 606/2018 has directed to ensure compliance of Rules 22 and 24 of SWM Rules along with compliance of BMW Rules and PWM Rules. Further, NGT has directed to notify at least three major cities, three major towns in the State and at least three Panchayats in every District as model cities/towns/villages, which shall be made fully compliant within next six months. The remaining cities, towns and Village Panchayats of the State may be made fully compliant in respect of environmental norms within one year.
- 1.3.4 The NGT vide its orders to State of Bihar dated 15.03.2019 in matter of OA no. 606/2018 has also directed State of Punjab to develop a system of ranking of cities, town and villages based on level of compliance with environment laws and strengthen IEC strategies.
- 1.3.5 The NGT vide its order dated 12.03.2019 in the matter of OA no 247 of 2017 in EA no 13/2019 has directed all the States and Union Territories to ensure that reports in terms of Rule 13 are furnished to the CPCB positively within one month or 30th April, 2019, for the period the reports are due as per rules and not filed so far. The CPCB may furnish a status report of compliance of PWM Rules after proper analysis to this Tribunal within one month thereafter by e-mail at ngt.filing@gmail.com. It has also been directed that all the States may also prepare their respective action plans for compliance of Rules within one month and furnish the same to the Central Pollution Control Board by 30.04.2019.

Chapter 2 - Management of Plastic Waste

2.1 Plastic Waste Management Rules, 2016

Government of India has notified Plastic Waste Management Rules, 2016 for effective management of Plastic Waste in the country. The salient features of rules for management of plastic waste by the urban local bodies are as under:

- i) Plastic waste, which can be recycled, shall be channelized to registered plastic waste recycler and recycling of plastic shall conform to the Indian Standard: IS 14534:1998 titled as Guidelines for Recycling of Plastics, as amended from time to time.
- ii) Local bodies shall encourage the use of plastic waste (preferably the plastic waste which cannot be further recycled) for road construction as per Indian Road Congress guidelines or energy recovery or waste to oil etc. The standards and pollution control norms specified by the prescribed authority for these technologies shall be complied with.
- iii) Thermo set plastic waste shall be processed and disposed off as per the guidelines issued from time to time by the Central Pollution Control Board.
- iv) The inert from recycling or processing facilities of plastic waste shall be disposed of in compliance with the Solid Waste Management Rules, 2000 or as amended from time to time.

2.2 Role of Various Stakeholders in Management of Plastic Waste

Role/responsibilities of various stakeholder departments in light of the Rules is given below:

(i) Department of Environment through Punjab Pollution Control Board

Enforcement of the provisions of PWM Rules, 2016, relating to registration, manufacture of plastic products and multi-layered packaging, processing and disposal of plastic wastes.

(ii) Department of Local Government and ULBs

- (a) Ensure segregation, collection, storage, transportation, processing and disposal of plastic waste.
- (b) Ensuring channelization of recyclable plastic waste fraction to registered recyclers.
- (c) Ensuring processing and disposal of non-recyclable fraction of plastic waste.
- (d) Creating awareness among all stake holders about their responsibilities.
- (e) Ensuring no open burning of plastic waste.

- (f) Framing of bye-laws incorporating the provisions of Rules.
- (g) Setting up system for plastic waste management within one year.

(iii) Department of Rural Development and Gram Panchayat

- (a) Setting up system, operationalise and coordinate for waste management in the rural areas by ensuring segregation, collection, storage, transportation of plastic waste.
- (b) Channelization of recyclable plastic waste fraction to recyclers having valid registration.
- (c) Creating awareness among all stakeholders about their responsibilities.
- (d) Ensuring no open burning of plastic waste.

(iv) Producers/Importers and Brand Owners under Extended Producers Responsibility

- (a) Ensure collection of used multi-layered plastic (MLP) sachets/pouches / packaging through their own channel or concerned local body.
- (b) Phase out manufacture and use of non-recyclable MLP.
- (c) Maintain record of details of the person engaged in supply of plastic used as raw material to manufacture carry bags, MLP packaging material, etc.
- (d) Apply for obtaining registration from State Pollution Control Board.

(v) Waste Generators

- (a) Minimize generation of plastic waste.
- (b) Ensure segregation of plastic waste at source, storage and handover segregated waste to ULB/Gram Panchayat or agency appointed by them or registered waste pickers/recyclers/waste collection agencies.
- (c) All generators shall pay user fee/charge as specified by local bodies for plastic waste management.

(vi) **Deputy Commissioner or District Magistrate**

To provide necessary coordination and support in enforcement of the Rules to the SPCBs, Deptt. of Local Govt. and Gram Panchayat.

(vii) Non-Government Organizations

- a) Organizing mass awareness campaigns in electronic media and print media.
- b) Organizing/Imparting training to house-holds on management of bio-medical waste in coordination with Deptt. of Local Government.

2.3 Current Status of Management of Plastic Waste

2.3.1 The State generates approximately 54,000 tons per annum of plastic waste. There are around 450 plastic units identified in the State falling in the category of Recyclers, Producers, Manufacturers and Brand-Owners. Out of these 471 plastic units, 117 are recyclers, 242 are producers, 75 are brand-owners and 37 are manufacturers. The status of registration of different category of plastic units is as under:

(i) Recyclers

Total 117 recyclers identified, out of which 19 have valid registration, 8 units have applied for registration, registrations of 31 units has expired and 59 units have not obtained registration.

(ii) Producers

242 producer identified, out of which 13 has valid registration, 9 have applied for registration, 14 units registration have expired and 206 have not obtained registration.

(iii) Brand Owners

75 brand-owners identified, out of which 4 have obtained registration and 3 units have applied for registration and 68 have not obtained registration.

(iv) Manufacturers

37 manufacturers identified, out of which 3 have valid registration, 2 have applied for registration, registration of 1 unit has expired and 31 have not obtained registration.

2.3.2 The Government has amended the Punjab Plastic Carry Bags (Manufacture, Usage and Disposal) Control Act, 2005 in 2016 to enable the Government to completely prohibit, manufacture, stock, distribute, recycle, sale or use of plastic carry bags and containers made of virgin or recycled plastic and plastic items having one time use such as disposable plastic cups, tumblers, spoons, forks and straws after issuing notification in this regard. Department of Local Government and Department of Rural Development and Panchayat have accordingly put a complete ban on plastic carry bags in their respective jurisdictions w.e.f. 1st April 2016.

2.3.3 Disparity of the State Govt. Policy from the Central Govt. Policy

As per Plastic Waste Management Rules, 2016, there is a complete ban on use, sale, manufacture, recycle of carry bag made of virgin or recycled plastic which is less than 50 microns. However, as per notification issued by the Department of Local Govt., Govt. of Punjab, there is a complete ban on use, sale, manufacture, recycling of plastic carry bags of any thickness w.e.f 01.04.2016. Almost 15 states out of 29 States have announced ban on plastic carry bags. But the enforcement and effective implementation of the ban is a major concern.

- 2.3.4 Punjab Pollution Control Board initiated a Pilot Project for collection, sorting, compaction, weighing and storage of Multi-Layered Plastic (MLP) waste in Patiala city. A society namely "Punjab Plastic Waste Management Society" was formed as a Special Purpose Vehicle (SPV) with various stakeholders including Brand Owner Companies as its members for collection & management of multi-layered plastic waste in the State of Punjab. The Board allotted the work to M/s Singla Plastic Industry, D-313, Focal Point, Patiala. About 225 Tons of MLP waste was collected from Patiala City. After Patiala city, the project has also been launched in Holy City Amritsar on 2nd October, 2018.
- 2.3.5 Now, the project is being looked after by the brand-owner companies which are the members of Punjab Plastic Waste Management Society. The Society has made agreement with Indian Pollution Control Association, New Delhi for collection, sorting, compaction, weighing and storage of Multi-Layered Plastic (MLP) waste in the State of Punjab in phased manner. The society has given following timeline regarding collection, compaction and disposal of Multilayered plastic from the State:

Total MLP Gen.	01.10.2018-	2019-20	2020-21	2021-22	2022-23
MT/Ann.	31.03.2019				
5300	550 MT (from	2100 MT	3200 MT	4200 MT	5300 MT
	Amritsar and Patiala)				

- 2.3.6 Further, the Board also explored the possibility of using the MLP waste in road construction and extraction of fuel oil through pyrolysis process.
- 2.3.7 Two Public Interest Litigations regarding implementation on ban on manufacture, use, stock or distribution of plastic carry bags and single use plastic are pending before Hon'ble Punjab and Haryana High Court.

2.4 Action Plan to Manage Plastic Waste

2.4.1 Timeline for ULBs to set up system for plastic waste management was accorded as one year from date of publication of Plastic Waste Management Rules, 2016 i.e by 17.03.2017. However, the time period has already lapsed. The revised timelines for completion of various activities are given below:

Sr.No	Activity	Revised Timelines	Responsible Officer
1	Framing of bye-laws by all ULBs incorporating provision of the Rules, user fee to be charged from waste generators for plastic waste management, penalties/fines for littering, burning plastic waste or committing any other acts of public nuisance	30 th Sep 2019	Commissioners, Municipal Corporations & EOs, Municipal Councils

2	Enforcing waste generators to practice segregation of bio-degradable, recyclable and domestic hazardous waste	31 st Dec 2019	
3	Door to Door collection of plastic waste by all ULBs	31 st Dec 2019	Commissioners, Municipal
4	Setting up of Material Recovery Facilities (MRF) by all ULBs	31 st Dec 2019	Corporations & EOs, Municipal
5	Segregation of Recyclable and Non-Recyclable plastic waste at MRF	31 st Dec 2019	Councils
6	Channelization of Recyclable Plastic Waste to registered recyclers	31 st Dec 2019	
7	Channelization of Non-Recyclable Plastic Waste for use either in Cement kilns, in Road Construction, or as RDF	31 st Dec 2019	
8	Creating awareness among all the stakeholders about their responsibility by all ULBs	Regular activity	
9	Surprise checkings of littering, open burning of plastic waste or committing any other acts of public nuisance	Regular activity	

2.4.2 Timelines for Registration, Inspection and Annual Report

S.	Name of the activity	Prescribed Timelines	Responsible Officer
No.			
1	Grant of Registration to Recyclers, Producers, Importers, Manufacturers and Brand-Owners	90 days from receipt of application as per Rules	Env. Engineers / Regional Officers, PPCB
2	Random inspection of Recyclers, Producers, Importers, Manufacturers and Brand-Owners	Two visits per year of each unit	
3	Submission of Annual Return by ULBs	30 th June of every year	Commissioners / EOs of corporations & councils respectively

2.4.3 Timelines for Producers/Importers and Brand Owners under Extended Producer Responsibility

S. No.	Name of the activity	Revised Timelines
1	Working out modality for waste collection system	30 th June, 2019

2	Submission of Action Plan for collecting back the multi-layered plastic waste and other plastic waste	30 th June, 2019
3	Phasing out manufacture and use of non-recyclable / non-energy	31 st December, 2020
	recoverable multi-layered plastic	

2.4.4 Social Awareness and public education

Awareness / Sensitization campaigns to discourage use of single use plastic shall be organized throughout the State. Focused programmes will be undertaken for students and young adults to inculcate a behavioral change regarding plastic usage and to promote the use of plastic alternate materials such a jute and compostable bags. The ULBs and Gram Panchayats have to play an important role in this field.

2.4.5 Action by Government Offices

State Government should serve as an ideal in the effort to combat single-use plastic by banning the use of single use plastic items/disposable plastic items in all Govt. offices and also discourage the use of plastic products like folders, trays, artificial flowers, PET plastic water bottles. The Government may notify the ban on use of single-use plastic in all State Govt. offices of Punjab to serve as a model for others.

2.4.6 Adoption of Plastic Ban in the bye Laws and provision of penalties

Each ULB shall adopt ban on plastic in its byelaws and provide provisions for penalties against the offenders/violators.

2.4.7 Strengthening of the recycling sector

Recycling, reuse, or alternative use of plastic waste can help reduce the amount of virgin plastic produced. There is a need to support up scaling of recycling of single-use plastic items and promote small scale or micro enterprises. The MoEF & CC through a Central Sector Scheme titled 'Creation of Management Structure for Hazardous Substances' provides financial assistance for innovative technologies and novel treatment options for better management of different waste streams.

2.4.8 Registration under Plastic Waste Management Rules, 2016

Registration of left over Recyclers, Producer, Manufacturer and Brand-Owners under the provisions of the Plastic Waste Management Rules, 2016, shall be done by PPCB on top priority.

Chapter 3: Training and Capacity Building

3.1 **Importance**

It is important to enhance the capability and skills of the officers of stakeholder departments for effective implementation of Plastic Waste Management Action Plan. Therefore, training and capacity building programmes related to various technical aspects are required to be conducted for different functionaries of relevant departments & organizations at various levels of hierarchies.

3.2 **Objectives**

- i) Raising awareness and changing the mindset.
- ii) Building trust and appreciation for the purpose of various Environment Protection Plans, environmental concerns, issues, roles and responsibilities of different stakeholders.
- iii) Improving skills regarding existing practices, procedures and methodologies.
- iv) Promoting an integrated and holistic approach for addressing the concerns.
- v) Enhancing core competencies of concerned stakeholders in relevant areas of environment improvement.
- vi) Strengthening institutional arrangements
- vii) Reinforcing accountabilities and identifying aspects that require improvement
- viii) Understanding new challenges and requirements

3.3 **Need Assessment**

Specific modules for training of nodal and other responsible officers of various line departments involved in implementation of Plastic waste Action Plan are required to be developed, for which need assessment would be carried out.

3.4 Involvement of Institutions and Experts

Organizations of national & international repute having expertise in the area of environment in general and plastic waste management in particular shall be involved for conducting need specific trainings & capacity building programmes for various target groups and officials of stakeholder departments. Experts would also be involved in developing knowledge products and information material on various issues & technologies for creating mass awareness to build a responsible society with an aim of having proper waste management.

Chapter 4 - Monitoring Requirements and Formats

4.1 Monitoring Requirements

There is need to monitor the progress of compliance of waste management as prescribed under various Rules and envisaged under Action Plan for management of different types of waste.

4.2 Monitoring of Management of Plastic Waste

Monitoring of progress on various action items will be done as per the proformas given in **Annexure-A**:

(i) Framing of bye-laws for plastic waste management

Framing of bye-laws for plastic waste management shall be prepared by each ULB and progress regarding each ULB with regard to the date of preparation of action plan and its approval shall be reported by Department of Local Govt on monthly basis.

(ii) Setting up of Material Recovery Facilities

Progress regarding the setting up of the MRFs by each ULB for sorting of the waste shall be reported by Department of Local Govt on monthly basis.

(iii) Monitoring of MRFs for segregation and channelization of plastic waste

Collection and utilization of the segregated fraction of the recyclable as well as non recyclable component shall be reported by Department of Local Govt on monthly basis.

(iv) Monitoring of the awareness programmes to discourage use of single use plastic etc.

The awareness programs which shall be conducted by each ULB through interpersonal communication and print media shall be reported by Department of Local Govt on monthly basis.

(v) Monitoring of littering/open burning of plastic waste

The violators carrying out the open burning and littering of the plastic waste shall be challaned by Department of Local Govt. and the same will be reported by Department of Local Govt. on monthly basis.

(vi) Monitoring of Registration under Plastic Waste Management Rules, 2016

Progress regarding the registration granted under the PWM rules to the producers/brand owners/recycler/manufacturer will be reported by PPCB on quarterly basis.

(vii) Monitoring of random inspection of Recyclers, Producers, Importers, Manufacturers and Brand-Owners

Progress regarding inspections conducted and action taken report will be taken by PPCB on six monthly basis.

(viii) Monitoring of Annual Return to be filed by ULBs.

Annual reports are required to be submitted before 30th June of every year by each ULB. The progress regarding the submission of the same shall be reported by Department of Local Govt. on yearly basis.

(ix) Monitoring of Extended Producer Responsibility

Progress regarding the obtaining of registration and submission of action plan by Brand-Owner/Producer/ Importer shall be reported by PPCB on every six monthly basis.

(x) Monitoring of the ban on plastic carry bags in the State

Progress regarding the no of violators engaged in manufacturing and usage of plastic carry bags in each ULB & district and no of challans issued shall be reported by Department of Local Govt. and PPCB on quarterly basis.

4.3 **Development of IT system**

IT system will be developed with the help of NIC for all the regulatory formats and monitoring information system. The monthly/ quarterly/six monthly/annual data will be incorporated by the stakeholder departments in the MIS, which will be helpful in assessing the progress of the activities w.r.t proposed timelines.

4.4 Performance Assessment of Key Functionaries of the Departments

- NGT in various orders directed the State Governments to ensure timely and speedy execution of various measures outlined in the Action Plans. It has also directed to take disciplinary and penal action against erring officers/officials.
- ii. The performance of key officials of stakeholder departments will be evaluated w.r.t. timelines/targets as given in action plan and certain weightage of KPI scores, as deemed appropriate by the concerned departments, will be included in their overall ACRs.
- iii. The State has already prepared draft KPI proformas for Waste Management for key officials and the same is being finalized.

Chapter 5 - Governance and Supervision

5.1 Monitoring of Progress and Compliance with the Rules

5.1.1 Concerned Departments/ Agencies

Monitoring will be done by the concerned Departments/ Agencies, which are executing or responsible for particular activities and it will be their primary responsibility to ensure compliance of the Rules and other actions.

5.1.2 **Department of Environment**

Department of Environment proposes three level of review to monitor the progress:

- (i) District Level Committee under Deputy Commissioner
- (ii) State Level Committee under Administrative Secretary, Department of Environment
- (iii) State Apex Committee under Chief Secretary

5.2 District Level Committee under Deputy Commissioner

District level Committee under Chairmanship of Deputy Commissioner and comprising of the following:

- (i) Senior Superintendent of Police
- (ii) Commissioner MC/ EO MC
- (iii) Representative of District Legal Services Authority
- (iv) Additional Deputy Commissioner
- (v) Environmental Engineer, PPCB Convener

5.2.3 The Committee shall have the following functions:

- (i) Review of progress of various stakeholders department involved in the implementation of the Waste Management Rules.
- (ii) The Committee shall meet and shall submit its report to State Level Committee on monthly basis.

5.3 State Level Committee under Department of Environment

State Level Committee under Chairmanship of Administrative Secretary, Department of Environment and comprising of the following:

- (i) Director, Health & family Welfare
- (ii) Director, Local Government
- (iii) Director, Rural Development & Panchayats
- (iv) Director, Industries and Commerce

- (v) Director, Environment
- (vi) Chairman, PPCB
- (vii) Joint Director, Environment Convenor

5.3.1 The Committee shall have the following functions:

- (i) Review of Implementation of the Rules and NGT orders
- (ii) The Committee shall give its recommendations to Apex Committee on quarterly basis for effective implementation of the Waste Management Rules.

5.4 State Apex Committee under Chief Secretary

State Apex Committee under Chairmanship of Chief Secretary will be comprising of the following:

- (i) Administrative Secretary, Health & Family Welfare
- (ii) Administrative Secretary, Local Government
- (iii) Administrative Secretary, Rural Development & Panchayats
- (iv) Administrative Secretary, Industries and Commerce
- (v) Administrative Secretary, Housing and Urban Development
- (vi) Administrative Secretary, Environment
- (vii) Chairman, PPCB
- (viii) Additional Secretary, Environment Convenor

5.4.1 The Committee shall have the following functions:

- (i) Taking Policy decisions as per recommendations received from State Level Committee.
- (ii) The Committee shall meet once in six months.

5.5 **Standing Committees**

The above Committees are standing committees. These will also work as Special Task Force or any other name given by NGT or other courts. They may invite any other officer as part of the committee as may be required and similarly the functions can be added as may be required.

Chapter 6 - Risk Mitigation Plan

6.1 Identification of Major Risks in the Action Plan

The Action Plan to manage plastic waste is a complex multi sectoral and multi agency action plan. Successful implementation would face many challenges. Following major risks have been identified:

- i. Accuracy and completeness of Baseline Data
- ii. Completeness of Project timelines
- iii. Financial closure and timely releases of funds
- iv. Tracking the Progress and program management

It is important to devise strategies and plans to mitigate the identified risks. Action plan will remain on paper if the bottlenecks and the risks are not dealt satisfactorily. Mitigation plan for each of the identified risk has been prepared in the following paras.

6.2 Accuracy and completeness of Baseline Data

Due to non-development of IT system for all the regulatory formats and monitoring information system, the information about the plastic waste generation viz a viz its channelization to registered recyclers and segregation & collection system could not be properly validated and there could be gaps in the same, which may lead to substantial alterations in the plans. In order to ensure accuracy and completeness of baseline data, the IT based MIS shall be developed.

6.3 Completeness of Project timelines

In order to ensure accuracy and completeness of proposed timelines, each Administrative Department has been asked to firmly adhere to the timelines for implementation of Action plan after taking into account all the relevant factors ,in compliance to the orders of Hon'ble NGT. Further, the Departments have also been advised to involve civil society for concrete and substantial outcomes.

6.4 Financial closure and timely releases of funds

Availability of funds for completing the activities on time is a major risk. The activities such as setting up of Material Recovery Facilities (MRFs) and processing units for high calorific non-recyclable waste including Refuse Derived Fuel (RDF) and Waste to Energy (WTE) plants and 100% coverage of D2D collection of segregated plastic waste have still not achieved financial closure. In case of non-timely execution of plan, substantial blame has been apportioned to lack of regular release of funds, which resulted in failure of environmentally sound treatment & disposal of plastic waste. In order to overcome the challenges, efforts will be made towards:

- i. Seeking a firm commitment of Department of Finance to release the funds for the activities on priority.
- ii. In case of installation of MRFs and Processing facilities, seeking firm commitment of Deptt. of Local Govt to treat this as committed expenditure on highest priority and release the funds regularly. Further, arrangement may be worked out with the Administrative Department to dovetail resources under other relevant schemes includingSwatchh Bharat Abhiyaan.

6.5 Tracking the Progress and program management

The action plan for management of plastic waste is a complex, multi department and multi agency program and the current capacity available in PPCB is not adequate to track the progress of various milestones and carry out effective program management for successfully implementing the activities. In order to mitigate the risk, a dedicated team with requisite Program Management and IT skills will be positioned to collate data, analyze the same, prepare status updates, escalate issues and assist various committees in review and issue resolution.

Annexure A – Monitoring Proforma for Plastic Waste Management

1. Framing of bye-laws for plastic waste management (monthly basis)

Name of ULB	Date of Preparation of bye- laws	Date of approval of resolution by the House	Date of approval by PMIDC

2. Setting up of Material Recovery Facilities (monthly basis)

Name of ULB	No. of MRFs	No. of MRF	No. of MRFs	No. of MRFs under
	required	constructed	operational	construction

3. Monitoring of MRFs for segregation and channelization of plastic waste (monthly basis)

Name of ULB	Segregation of Plastic Waste into	If yes, Qty. o		Qty. of recycl waste channe	•	•	n- recyclable ste disposed
	Recyclable & Non- Recyclable Plastic Waste started (Yes/No)	Qty. of recyclable plastic waste collected (in kgs)	Qty. of non- recyclable plastic waste collected (in kgs)	Qty. of recyclable plastic waste disposed off to authorized recycler (in kgs)	Qty. of recyclable plastic waste disposed off through another means (in kgs)	Qty. of non-recyclabl e plastic waste used in road construction (in kgs)	Qty. of non- recyclable plastic waste used in cement kilns/RDF (in kgs)

4.	Monitoring of the awareness programmes to discourage use of single use plastic etc. (monthly
	basis)	

Name of ULB	No. of awareness programs conducted					
	Through interpersonal face)/public meetings,	communication (face to etc.	Through electronic/print media			
	Nos. of Programmes	No. of participants				

5. Monitoring of littering/open burning of plastic waste (monthly basis)

No. of violations regarding littering/open burning of plastic	Action taken against violators			
waste observed	No. of challans issued	Amount of fine collected in Rs.		

6. Monitoring of Registration under Plastic Waste Management Rules, 2016 (Quarterly basis)

Category	No. of units identified	No. of units obtained registration	Remaining no. of units yet to obtain registration	Action taken against the violator
Producer				
Brand Owner				
Recycler				
Manufacturer				

7.	Monitoring	of	random	inspection	of	Recyclers,	Producers,	Importers,	Manufacturers	and
	Brand-Owne	ers ((Half year	rly basis)						

Name of Regional	No. of Recyclers, Producers, Importers,	Monitor	ing Status	Action Taken against violators	
Office	Manufacturers and	Required to be	Visited in year		
	Brand-Owners	visited in year			
	identified				

8. Monitoring of Annual Return to be filed by ULBs (Yearly basis)

Name of Regional Office	Name of ULB		Action taken against the ULB for not submitting
		June	Return

9. Monitoring of Extended Producer Responsibility (Half yearly basis)

Name	of	Regional	Name of Brand-	Whether	submi	tted	Whether	obtained	Action taken	against the
Office			Owner/Producer	Action Pla	an to P	PCB	Registrati	on or not	Brand-Owner,	/Producer/
			/ Importer	& ULB					Importer which	ch have not
									submitted act	ion plan or
									not	obtained
									registration	

10. (a) Monitoring of the ban on plastic carry bags in the State (Quarterly basis)

Name of ULB	No. of violators found regarding use of plastic carry bags	Action taken against violators			
		Qty. of plastic carry bags confiscated in kgs.	No. of challans issued	Amount of fine collected in Rs	

10. (b) Monitoring of the ban on plastic carry bags in the State (Quarterly basis)

Name of District	e of District No. of violators found regarding use of plastic	Action taken against violators			
	carry bags	Qty. of plastic carry bags confiscated in kgs.	No. of challans issued	Amount of fine collected in Rs	