

Decision of Ministry of Environment, Forest and Climate Change with respect to discussion on issues pertaining to clarifications sought on Hazardous and Other Wastes (Management & Transboundary Movement) Rules, 2016, as approved by the Competent Authority on the basis of recommendation of the 93rd Meeting of the Technical Review Committee (TRC) held on 27th March, 2025.

PROCEEDINGS

93rd Meeting of the Technical Review Committee (TRC) for discussion on issues pertaining to clarifications sought on Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016, held on 27th March, 2025 through Online mode under the chairmanship of Shri Sudhir Srivastava.

Opening Remarks of the Chairman: The Chairman extended welcome to members and other participants and requested to start the proceeding as per the agenda adopted for this meeting.

Consideration of Proposals: The TRC considered the proposals as per agenda adopted for the meeting. The details of deliberations held and decisions taken in the meeting are as under:

Agenda.1. Crumb rubber modifier to be blended in bitumen for use in road construction in view of the recommendation given in circular Economy Report on ‘Tyre and Rubber Recycling Industry’ and subsequent Circular Economy Action Plan Finalized by NITI Aayog.

The use of crumb rubber modifier to be blended in bitumen for use in road construction at refinery level and also took opinions of various stakeholders on its production, constraints, facility upgrades, techno-economic viability issues, safety, extent of limit for blending etc. The views and recent updates on R&D were taken from various delegates of organization like Ministry of Road, Transport and Highways (MoRTH), BPCL, IRC, NHAI etc.

According to NHAI, in India, around 3 Lac MT/ annum of CRMB (mostly grade 55 & 60) are used as per IRC 107 specification i.e. for Bitumen Concrete (BC) and are being projected for more use. It was also informed that MoRTH has already issued guidelines regarding the usage of CRMB, PMB etc. for construction of roads in August, 2023 in consultation to the CRRI and other stakeholders.

The matter was last discussed in 92nd meeting of TRC, and after deliberation upon the issue the committee felt that more discussion is required on the matter and asked representative of NHAI to share the actual data of consumption of CRMB and PMB during construction of roads with some documentary support as also the experience with respect to non-refinery sources of CRMB and PMB.

Deliberation: The committee requested the representative of BPCL and IOCL to share their views on the issue of crumb rubber modifier to be blended in bitumen for use in road construction, its production constraints, facility upgrades, regarding the availability of CRMB and the use of the product being sold in drums on online portals as it is not allowed to be marketed as per technical guidelines of MoRT&H. Representative from BPCL informed that the online portals are taking it from private players and then only they are selling in a small quantity to the people. Further, representative from IOCL also informed that there is no market or demand of CRMB as they are underutilized and the sales is less than the production capacity. Further, representative of IOCL and BPCL also informed that the availability CRMB is not an issue.

Recommendation: The committee still felt that more discussion is required on the matter and asked from representative of MoRT&H to create a proforma detailing the potential demand for CRMB, how much and where it is being used and coordinate with NHAI to share the actual data of consumption of CRMB and PMB during construction of roads with some documentary support. Committee also requested MoRTH to share experience with respect to non-refinery sources of CRMB and PMB. Till then the matter is deferred.

Agenda 2. Request to not to allow import of Baled Bottle waste/PET Bottles Flakes in India - Representation from Recycle India Foundation.

Recycle India Foundation *vide* letter dated 13th March, 2025 mentioned that there have been many representations to the ministry by the industry to allow baled bottles into India but Recycle India Foundation believes that there would be a lot of contamination and non-recyclable waste like labels caps etc. in the baled bottles which are not recyclable. Such type of waste is subsidised by foreign countries as they want to dump their waste into foreign land.

Presently, there is no shortage of PET Waste/Flakes as India presently consumes 17-19 lac tons of PET. The recyclers are pushing imports because the costing of the imports is much cheaper than the domestically available waste. Further, allowing its import reduces the domestic consumption by 15%. It also reduce the income of waste picker by 30 to 40%.

The allowance of such baled bottles waste imports badly impacted the price that unorganized sector (waste pickers) gets out of collecting and selling such type of waste as shown in the table below:

Price range, Rs/kg	Price before 15 th Nov, 2021 Notification (in Rs)	Price after 15 th Nov, 2021 Notification (in Rs)
PET Bottle waste to Waste picker	18 to 23	12 to 16
PET Baled Bottles	50 to 61	42 to 45
PET Flakes	71 to 82	60 to 70

In view of the above, it is requested to consider restricting imports of PET Flakes waste as there is ample waste available in India.

Deliberation: The representative from Recycle India Foundation requested the committee to reconsider the decision on allowing import of PET bottle flakes based on the excess capacity of PET flakes in India.

Recommendation: The committee noted the concerns expressed by the representative of Recycling Foundation. It felt that more discussion is required after obtaining latest data regarding actual capacity of PET flakes in India and availability of the respective raw material, imports made so far against the permission granted & export quantity. The committee noted that there is another matter before TRC regarding import of PET waste. The two matters may be taken up together after receipt of requisite details. Till then the matter is deferred.

AGENDA ITEM No. 3: ANY OTHER ITEMS WITH PERMISSION OF THE CHAIR
