A Mirage

Assessment of Swachh Bharat Abhiyan and SWM Rules 2016:
Wastepickers Perspective Across India
A Mirage

Assessment of Swachh Bharat Abhiyan and SWM Rules 2016:
Wastepickers Perspective Across India

Executive Summary
September 2019

Prepared by:
Solid Waste Management Round Table (SWMRT), Bengaluru

Commissioned by:
The Alliance of Indian Waste-pickers
Preface

Mirage: an optical illusion caused by atmospheric conditions; especially the appearance of a sheet of water in a desert or on a hot road caused by the refraction of light from the sky of heated air. The Oxford Dictionary

“Wastepickers integration”, has become a catchword with policymakers, post the Solid Waste Management Rules 2016, and the introduction of the Swachh Survekshan - a survey to rank cities on various sanitation and cleanliness parameters under Swachh Bharat Mission (Urban) in January 2016. In the race to be number one, are cities being true to the spirit of inclusion and integration, or is it just playing safe and attempting a bureaucratic tick box exercise? Is understanding and interpretation of the Rules and the Rankings uniform across different stakeholders? What is the level of comprehension?

These were some of the questions that needed to be answered among the members of the Alliance of Indian Wastepickers (AIW), an all India Network of organisations working with and for wastepickers empowerment. They approached the Solid Waste Management Roundtable (SWMRT), in May 2018, to conduct a study to assess the perception of the SBA with respect to solid waste management among the wastepickers and suggest appropriate interventions. SWMRT is registered trust consisting of SWM practitioners working towards the cause of sustainable decentralised waste management in Bangalore, since 2009.

Twenty cities were surveyed, and a total of 1869 wastepickers were interviewed by the member organisations of AIW. At SWMRT, we felt that in order to understand wastepickers inclusion into the country’s waste management system, it is essential to go beyond only studying the perception of wastepickers. It was important to also visit a few cities, hold discussions and meetings with partner organisations, wastepickers groups and municipality officials vis-à-vis the SBA Guidelines, SWM Rules 2016 and the Swachh Survekshan.

We also believe that no study of waste pickers can be done without understanding the existing system of dry waste management practices at two levels: The formal system led by the municipality and the way the informal waste sector have been organised around the dry waste collection, outside or complimenting the existing municipal services. The study has aimed to take a holistic view of a city level, particularly those that have been ranked in the top five consistently like Indore and Mysore.

Our journeys through the visits to different cities and our personal experiences of Bengaluru have led us to question if a mirage exists? Embracing a concept “integration of wastepickers” is a long way from actually being implemented in practice. Acceptance is the first step towards change, and there needs to be continued and focused approach to move from “paper” to “participation”. The question also arises if ULB efforts are being retrofitted, to tick the box of becoming the best performing city in the National Rankings of SS? What is it that we are actually
seeing? A rising tide (read inclusion) or is it a mirage? What are the new practices and developments that are emerging?

This Report seeks to look past the narratives of the rankings, looks closer at the letter and spirit of the Rules, dwells on the efforts made so far, explores the possible reasons for actions not happening and presents both an overview and a detailed discussion on the realities of the implementation and the present day status of the wastepickers in India.

Pinky Chandran, Sandya Narayanan, Dr Umashankar Subramanian, from the Solid Waste Management Round Table (SWMRT), Bengaluru
Acknowledgements

Waste is “complicated” and the term “integration”, is a contested word. As authors, we have found ourselves questioning terminologies, questioning complications and correlations and articulating our understandings. This has been made possible because of the many people who have shared their time, knowledge and practice with us.

And in no particular order we wish to thank Priyanka, Vijaya, Pooja, from Radio Active 90.4 MHz and Tejaswini Thethi for the transcription of the focus group discussions (FGDs) and the interviews of Mysore and Mumbai respectively.

We are grateful to Dr. Suman Attiwilli, our research assistant for helping out with the presentation of the data analysis.

Our deepest gratitude to the Hasiru Dala Team in Bengaluru and Mysore, for agreeing to be a part of the pilot testing at different levels – Survey Design, field testing of sample questionnaires, pre and post the app launch in Bengaluru and the FGD, city tour, interviews with different stakeholders in Mysore. The pilot testing helped us refine our questions, evaluate the feasibility, time and improve upon the study design, while providing with valuable insights.

We would also like to acknowledge the AIW partner organisations Action Aid, Jaipur; Bal Vikas Dhara, Delhi; Dalit Bahujan Resource Centre (DBRC), Guntur, Tenali and other cities of Andhra Pradesh; Hasiru Dala, Bengaluru, Mysore, Chamrajnagar and Tumkur; Jan Vikas Society, Indore; Kagad Kach Patra Kashtakari Panchayati (KKPKP), Pune; Iainehskhem Self Help Group (SHG), Shillong; Lok Adhikar, Delhi; Parivar Bhagini Vikas Sangha (PBVS), Navi Mumbai; Parivar Sakhi Vikas Sangathan (PSVS), Thane; Samman, Bhopal; SEVA, Nashik; Stree Mukti Sanghatana (SMS), Mumbai, Yavatmal, Wardha; Social Action for Literacy and Health (SALA), Kalyan and Wainganga Trust, Balaghat for their time in undertaking the field survey.

We are thankful to the team members Hasiru Dala, Jan Vikas Society, Nidan, Sahaas, Chintan- Safai Sena, Bal Vikas Dara, VRecycle, SMS, KKPKP, DBRC, and Iainehskhem SHG Shillong, for facilitating some of the site visits, interviews and focus group discussions and accompanying us, translating, recording and sometimes doubling up as photographers.

We acknowledge the role of Indo Global Social Service Society (IGSSS) in supporting the research project financially, intellectually and by developing the app for the survey. We are thankful to Women in Informal Employment Globalizing and Organizing (WIEGO) for financially supporting the research project, a special thanks for WIEGO’s Delhi Focus City team for reviewing the first drafts of the report.

Special thank you to Radhika Motani for designing the report.
We are extremely grateful to Dr. Manisha Anantharaman, Assistant Professor, Justice, Community and Leadership, St. Mary's College of California, USA for going beyond just a critical peer review, to picking up on nuances and subtleties.

We were fortunate enough to benefit from the working space provided by Radio Active- Jain University, during the course of the research. We have a special gratitude towards Shakunthala and Kamali from Radio Active-Jain University and Hasiru Dala, for providing us with endless tea/coffees, lunch, snacks and print outs.

We also express our deep appreciation to Kabir Arora and Karishma Lokhandwala, who coordinated this project and all the alliance members.
What We Know?

A step back into history and one sees a pattern of indifference, denial, rejection or ignorance of the existences of wastepickers. As a consequence, wastepickers have been socially and economically marginalised, with low earnings, lack of social status and access to finance, technology or other social security.

Waste pickers integration: A catch word

- The Solid Waste Management (SWM) Rules 2016 and the Plastic Waste Management (PWM) Rules 2016, in a first of sorts acknowledged ‘waste pickers and other informal waste workers’ by defining them and their role in recycling

- Prior to the Rules, the Ministry of Housing and Urban Affairs launched the Swachh Survekshan (SS) - a survey to rank cities on various sanitation and cleanliness parameters under the Swachh Bharat Mission- Urban (SBM-U) to promote health competition towards the concept of ‘swachhata’. Within this rating the Urban Local Bodies (ULBs) are also rated on the Percentage of Informal Waste Pickers formally integrated into Sustainable Livelihoods through Self Help Groups/Cooperatives/Contractors/NGOs

- The 2019 SS results proudly states 83,898 informal workers across the whole country have been formally integrated into sustainable livelihoods.
Historical Context

- SMS in Mumbai, (late eighties), KKPKP in Pune (early nineties), and Chintan in Delhi (early 2000) spearheaded mobilization of waste pickers for livelihood development, the need for formal recognition and have championed methods of integrating waste pickers into the city’s solid waste collection directly or through partnerships.

- Informal waste workers have been collectively mobilising for rights including:

  - **Right to Identity and Recognition** (occupational identity cards)
  - **Right to Sorting Spaces** (Earmarking infrastructure spaces in the city)
  - **Right to Organising** (Formation of collectives, Trade unions, cooperatives, SHGs, social enterprises etc.)
  - **Right to Training, Capacity Building and Skill Building**
  - **Access to social security** (medical insurance, scholarships for children, access to credit etc)
  - **Right to Sorting Spaces** (Earmarking infrastructure spaces in the city)
  - **Right to Waste** (Access to clean, segregated dry waste)
  - **Right to Representation** (Governments to ensure that waste pickers are consulted and are part of various boards, or committees that make policy or recommendations)
Numerous committees, commissions, reports and legislation have acknowledged the contribution of waste pickers and have made recommendations:

Despite the legislations that point towards the apparent ‘integration of waste pickers’ by the Municipalities, the intent it would appear has not translated into implementation. This Study is therefore an effort in order to clearly understand if this is indeed a rising tide (read inclusion) or is it a Mirage
About the Study

Snapshot

The Study presents a very detailed information across participating cities reflecting not just individual attributes of the waste pickers but also takes into account the external influences (historical, social, cultural) of the city that they live in, tempered with other influences that the environment exerts on the waste pickers and their practices. The approaches include surveys, focus group discussions, one-to-one interviews, key informant interview, observations, literature review, field tour which have lead up to this report.

Objectives of the Study

Twenty cities were surveyed, and a total of 1869 wastepickers were interviewed by the member organisations of AIW. Two broad focus areas were identified- waste pickers and waste practices. Under each of them two and three objectives were identified, respectively. The objectives were designed with a focus on assessing the ground realities vis-à-vis the compliance of the Municipalities to the requirements prescribed to them by the SBA and the SWM Rules 2016:

<table>
<thead>
<tr>
<th>Perception &amp; Knowledge of Waste pickers on SBA</th>
<th>Assessment of Waste Practices of the City</th>
</tr>
</thead>
<tbody>
<tr>
<td>• To assess the knowledge of SBA among waste pickers</td>
<td></td>
</tr>
<tr>
<td>• To assess the perception of SBA among waste pickers</td>
<td></td>
</tr>
<tr>
<td>• To assess the practice of waste collection and segregation among waste pickers</td>
<td></td>
</tr>
<tr>
<td>• To enumerate the factors influencing the practice of waste collection</td>
<td></td>
</tr>
<tr>
<td>• To assess the prevalence of informal waste pickers formally integrated into SWM in respective city and India as whole</td>
<td></td>
</tr>
</tbody>
</table>
What We Did?

- Formal Survey to gauge waste pickers profile and knowledge of SBA: Cross sectional study across cities where AIW partner organisations are located. Cities were categorised based on the Ministry of Finance, Department of Expenditure 2015 that is, Category X (City with population 50 lakh and above), Category Y (City with population 5 to 50 lakh, Category Z (Cities with Population less than 5 lakh).

- Focus Group Discussions with waste pickers on perception and knowledge of SBA across seven cities – Mysuru, Panchkula (conducted in Bengaluru), Indore, Guntur, Shillong and Mumbai.

- Site Visits, Photo documentation, in-depth interviews and field observations, to document waste practices.

- Desk Review, which includes published research articles, newspaper reports, key legislations – national, state and municipality level.
What We Learnt?

Literature Review

In this segment we look at the legislations in chronological order from the year 2014, as the SBM sets the tone for this chapter. We have also looked at different bye laws prescribing inclusion and integration of wastepickers.
2014: Swachh Bharat Mission

- The guidelines did not provide any concrete guidelines on the workings of this priority focus, leaving the state governments a clear hand in interpretation, design and implementation.

- It also makes no mention of the need to strengthen the informal recycling industry through the implementation of Extended Producers Responsibility.

- The guidelines instead incentivise waste to energy and are technological solutions oriented.
The emphasis of the 2016 Rules was on the phrase “authorised for picking recyclable plastic waste”. This questions if only those who are authorised can pick plastic waste.

The Rules are thus restrictive allowing access of only registered waste pickers and recyclers to segregated waste (Plastic), overlooking the more inclusive direction of the Karnataka High Court directions in December 2015 which states that ALL wastepickers have first right to waste (recyclables).

The Rules make a clear distinction between registered and unregistered manufacturing or recycling units, making informal recycling illegal and unauthorised, and thereby criminalising existing operations.

What is needed is an appreciation of the informal recycling pyramid and the actors and the need for co-existence as stated in the National Environmental Policy (NEP) that “there should be efforts to give legal recognition to, and strengthen the informal sector systems of collection and recycling of various materials [and] in particular, enhance their access to institutional finance and relevant technologies.”
2016 Solid Waste Management Rules 2016

- The Rules for the first time recognised the terms “waste pickers” and other “informal waste collectors”.

- Section 11 of the Rules seeks to include representatives of waste pickers in the State Policy consultations and in the State Level Advisory (SLA) committee. The Rules advise on starting a scheme to register waste pickers and waste dealers and to strengthen implementation;

- Section 4- Under duties of waste generator, it states; “All resident welfare, market association, gated communities, institutions, bulk generators, hotels and restaurants shall handover segregated recyclable material to authorised waste pickers or recyclers, which is significant step in providing access to waste.

- Sec 15 again puts the focus on the ULB /Village Panchayats to recognise establish a system to integrate waste pickers and facilitate their participation in SWM, including door to door collection. A significant clause under 15, (h) is that directs ULBs to set up material recovery facilities or secondary storage facilities with sufficient space for sorting of recyclable materials to enable informal or authorised waste pickers and waste collectors to separate recyclables from the waste provide easy access to waste pickers and recyclers for collection of segregated recyclable waste such as paper, plastic, metal, glass, textile from the source of generation or from material recovery facilities.”
2016: Swachh Bharat Mission Manual on Municipal Solid Waste Management by CPHEEO, MoUD, GoI

The Part 1 of the manual draws attention to the relevance of informal waste workers laying down the steps involved in preparing the solid waste management plan and highlights the need for stakeholder consultations.

- A section is devoted to the role of the informal sector where it clearly recognises the valuable role they place in subsidizing costs, environmental impacts and highlight the need to integrate into the formal SWM system.

- In the key message for decision makers, it specifies that informal sector should be encouraged to work in either centralised or decentralised MRFs, while ensuring environmental, health and safety safeguards, with social identity, social security, health care benefits and stable livelihoods. It goes on to mention that they should be engaged in door-to-door collection. Further in the classification of MRFs recognises that small scale units are typically owned, operated and managed by the informal sector.

- Within the IEC programme, one of the key target groups includes the informal sector and also stresses that for effective communication community participation is a must.

Part 2 of the Manual on Municipal Solid Waste Management which provides guidance to ULBs in planning, designing and monitoring of municipal solid waste management systems. talks about integration of the informal sector with the need to empower them to work as entrepreneurs so that in future, they can own small recycling facilities.

- It also suggests the Matrix for Collection of Baseline Information which includes list of known recyclers in the ULB, approximate number of wastepickers and persons involved in the kabadi system within the ULB jurisdiction and identification of NGOs, voluntary groups, SHGs involved in SWM.

- Arrangements for Informal Sector Integration suggests how the same can be carried out through linkage to National Urban Livelihoods Mission”. and recommends the activities of: Door-to-door collection, Sorting of recyclable waste, Collection and segregation of recyclable material, and various other activities.

- Capacity Building and Training of Informal Sector for Providing Municipal Solid Waste Management Services looks at Training in sorting, processing, recycling techniques, and value added services, Formalisation requirements for waste worker organisations, Environmental and health aspects of waste management activities, Occupational hygiene and safety, Business support services linked to large scale formal recycling industries.

- Highlighting the role the informal sector plays in recycling, resource recovery, including supplementing the formal system, making their various different types of waste, employment, the linkages with formal economy through the recycling chain offsetting carbon emissions and like the earlier sections mentions the need to organise them, provide them with an identity card and access to social security.
Draft Model Municipal Solid Waste (Management & Handling, Cleanliness and Sanitation Rules/Bye-Laws in September 2016)

- The SWM Rules 2016, 15 (e), directed the ULBS to frame Bye-laws to notify the rules within one year of the announcement of the Rules.
- The draft model byelaw is inadequate and has not kept up with the progressive suggestions detailed by the SWM Rules 2016 or the Manual on Municipal Solid Waste Management 2016 by CPHEEO.
- There is no mention of wastepickers registration in the bye law, assuming that the State/ City policy will take it into account.
- Section 5.4, under of delivery of segregated premises waste, and 6.5 under point-to-point waste collection service state; “deliver waste to wastepickers / waste collector of others”, without explicitly ensuring access to waste, thereby leading to interpretation which opens up competition from non-wastepickers into the sector.
- Section 5.10 acknowledging the need for a separate vehicle for dry waste, makes no mention of wastepickers operating or accessing them.
- Section 6.9 talks about Dry waste Sorting Centers being manned/ operated by registered cooperative societies of waste-pickers, not in line with the Manual or the SWM Rules 2016.
Swachh Survekshan 2017 to 2019

The Swachh Survekshan 2017 was conducted among 500 cities with a population of 1 lakh and above and had six components in Part 1 for a total score of 900. There was no requirement on waste picker integration as a separate assessment criterion. In its recommendation to the ULB to maximise scores, all that was recommended for integration identifying waste pickers and recyclers so that recyclable waste may be handed over and issuing of identity cards, medical insurance.

The SS 2017 Report marked The top 9 cities green, as compliant. (Indore, Bhopal, Surat, Mysuru, Tiruchirappalli, NDMC, Navi Mumbai, and Tirupati)

Swachh Survekshan 2018, was significant as for the first time, the Survekshan rated cities based on the Percentage of Informal Waste Pickers formally integrated into SWM in the city, as per SWM 2016 Rules and awarded up to 32 Marks, if 100% were integrated specifying the means of verification which included not just the survey report identifying waste pickers in the city, but also copy of contract and list of ward allocations to the waste pickers, total number of waste pickers in the dry waste collection centres in the city, with an independent validation by verifying with waste pickers directly. In the National Fact Sheet of the SS 2018, only 7% percent of all ULBs had registered informal waste pickers and issued ID cards. The SS 2018, in a way set the tone, for visible cleanliness, capital intensive models over sustainable waste management practices and citizen driven decentralised initiatives.

EMPOWERING MARGINALISED GROUPS- CONVERGENCE BETWEEN SBM AND DAY-NULM

In March 2018, the Ministry of Housing and Urban Affairs released a document titled “Empowering marginalized groups- Convergence between SBM and DAY-NULM”, which could be seen as an example of a win-win narrative. The aim is better utilisation of resources and to expedite the achievements of two national missions. Recognising the critical role of the informal sector in the sanitation and waste management value chain, the SBM Urban, made the integration of wastepickers into the city’s SWM as one the scoring parameters.
The Swachh Survekshan 2019 increased the scoring in the parameter that looked at percentage of Informal Waste Pickers formally integrated into Sustainable Livelihoods through SHGs/Cooperatives/Contractors/NGOs to 40 points. It graded ULBs that demonstrated convergence between SBM (U) and NULM and Skill Development. The means of verification though is not substantial; it lists copy of the survey report of on field assessment of waste pickers in the city and specifies that the survey must be not more than a year old. What would be interesting to look into is a comparative of the survey undertaken by the ULBs for the three year period and tracked the integration progress against the parameters listed in the Convergence Document of SBM-U and Day- NULM.

The National Fact Sheet of the SS 2019 lists “537 ULBs have identified & integrated 1.2 Lakh Informal Waste Pickers within their cities into sustainable livelihoods”. The report does not acknowledge the convergence document, nor does it state integration as an important criterion, again falling back on visual cleanliness. Again with the 100% integration there are no best practices that are showcased.
BYE Laws/State Policies/Action Plans

Based on the information in public domain we could only find Bye Laws of Indore, Mysuru, NDMCM, Navi Mumbai and Tirupati. In addition we chose Chandigarh, Chennai that were judged as Best State Capital/UT in ‘Solid Waste Management’ and Fastest Mover’ State Capital/UT respectively. We chose Uttarakhand, as Gauchar was adjudged as the Cleanest Ganga City for the first time. Even though, according to the CPCB report, Uttarakhand was classified as one of the worst states in the country in terms of solid waste management. Lastly we also chose Pune and West Bengal, as Pune has been a champion of waste picker integration and West Bengal as an example for complete exclusion.

The Bye Laws were assessed for The three specific rules of the SWM Rules which address the inclusion of waste pickers Rule 11, 15 and 4. The outcome of the assessment is as given below

<table>
<thead>
<tr>
<th>High Integration</th>
<th>Total Exclusion</th>
<th>Reference made to WP, but no strategy of integration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pune, Uttarakhand</td>
<td>West Bengal, Surat</td>
<td>Chennai, NDMC and Chandigarh</td>
</tr>
</tbody>
</table>
Key Concerns

- Lack of uniform appreciation in understanding the informal sector structures
- Lack of adherence to SWM Rules 2016
- Lack of data on waste generated and characterisation
- Need for enforcement of segregation of waste at source
- Ambivalence in roles of different stakeholders and lack of inter departmental coordination.

What We Learnt- Our Findings

This section summarises the findings, compares and contrasts individual approach finding wherever possible with other literature, to present insights that informs our final recommendations. This chapter is presented in four broad themes: Socio-demographics, Waste practices, Social Security, Knowledge and Perception of SBA for each waste pickers type, representing their individual differences and by city. The findings concludes with a discussion on key points

A. Socio Demographics

AGE

- 2019: 28% 21-40 years, 62% 40-60 years
- 2014: 26% 21-40 years, 64% 40-60 years
- 2010: 21% 21-40 years, 77% 40-60 years
- 2001: 42% 21-40 years, 53% 40-60 years

13-83 years overall age span
GENDER

By WP Type (2019)

By City

Males in Delhi

2019  2003
### Social Distribution

#### Social Distribution in all cities (2019)

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>All cities</td>
<td>SC: 46%</td>
<td>ST: 8.75%</td>
</tr>
<tr>
<td>Andhra</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SC</td>
<td>54.3</td>
<td>28</td>
</tr>
<tr>
<td>ST</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>47.6%</td>
<td></td>
</tr>
</tbody>
</table>
PLACE OF STAY & LOCATION DWELLING

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2017</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tent</td>
<td></td>
<td>68% (Andhra)</td>
<td></td>
</tr>
<tr>
<td>Slum Colony</td>
<td></td>
<td></td>
<td>38% (Pune)</td>
</tr>
<tr>
<td>Govt land</td>
<td></td>
<td>76% (Indore)</td>
<td></td>
</tr>
<tr>
<td>Pvt land</td>
<td></td>
<td>100% (Shillong)</td>
<td></td>
</tr>
</tbody>
</table>
MONTHLY INCOME

Monthly income in all cities (2019)

Monthly income in all cities (2017)
Wt. Avg Monthly Income

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2017</th>
<th>2014</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly income</td>
<td>Rs. 10,393</td>
<td>Rs. 6325</td>
<td>Rs. 4,354</td>
<td>Rs. 3,375</td>
</tr>
<tr>
<td>Earnings as % of Minimum wage</td>
<td>81%</td>
<td>48%</td>
<td>70%</td>
<td></td>
</tr>
<tr>
<td>Minimum wage Low</td>
<td>Rs. 11,190</td>
<td>Rs. 10,500</td>
<td>Rs. 3600</td>
<td></td>
</tr>
<tr>
<td>Minimum Wage High</td>
<td>Rs. 16,740</td>
<td>Rs. 15,690</td>
<td>Rs. 6210</td>
<td></td>
</tr>
</tbody>
</table>

Average Income of Door to Door Collector

<table>
<thead>
<tr>
<th></th>
<th>Low</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rs. 10,000</td>
<td></td>
<td>Rs. 15,000</td>
</tr>
</tbody>
</table>

Indore

<table>
<thead>
<tr>
<th></th>
<th>10-15k/P.M. (38%)</th>
<th>Unemployed (43%)</th>
</tr>
</thead>
</table>
FINALCIAL ACCESSIBILITY

City Profile (2019)

<table>
<thead>
<tr>
<th>City</th>
<th>Financial Accessibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maharashtra</td>
<td>+70%</td>
</tr>
<tr>
<td>Karanataka</td>
<td>+40%</td>
</tr>
<tr>
<td>Pune</td>
<td>94%</td>
</tr>
<tr>
<td>Indore</td>
<td>87%</td>
</tr>
<tr>
<td>Mumbai</td>
<td>85%</td>
</tr>
<tr>
<td>Bangalore</td>
<td>50%</td>
</tr>
<tr>
<td>Delhi</td>
<td>50%</td>
</tr>
</tbody>
</table>

(ID cards- Aadhar, PAN, Ration card)

Pune, Mumbai, Bangalore (Waste picker organisation, Municipal contractual agreement)
Indore (Municipal sanitation staff)
Delhi (informal door to door collectors)
### B. Waste Practices

<table>
<thead>
<tr>
<th>Inclusion of waste pickers in the Municipal system</th>
<th>Overall, Very low inclusion of waste pickers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pune</td>
<td>Contractual agreement with the Municipality exists 79% collection by push cart, 23% collection by auto</td>
</tr>
<tr>
<td>Bengaluru, Delhi Pune</td>
<td>Full day Collection from households, shops, apartments</td>
</tr>
<tr>
<td>Shillong, Thane, Kalyan</td>
<td>Full day collection from Landfill</td>
</tr>
<tr>
<td>Pune, Indore</td>
<td>Restrictions from the Municipality</td>
</tr>
<tr>
<td>Bengaluru, Pune</td>
<td>Restrictions from Households</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Waste Practices</th>
<th>Cities</th>
<th>Requirements</th>
<th>Findings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy – Bye laws</td>
<td>Field visit: 10 Cities: Indore, Patna, Mysuru, Gurugram, Bengaluru, Shillong, Guntur, Mumbai, Pune, Delhi Survey Findings from 20 Cities</td>
<td>1)Issue of Bye Laws Notification for 2)Mandatory Segregation at source</td>
<td>30% of the Cities</td>
</tr>
<tr>
<td>Landfill</td>
<td>Except Bengaluru</td>
<td>Waste Pickers at the Landfill</td>
<td>9 of 10 cities</td>
</tr>
<tr>
<td>Door to Door Collection</td>
<td>Indore, Patna, Mysuru, Gurugram, Bengaluru, Shillong, Mumbai, Pune, Delhi</td>
<td>Arrangements are in place</td>
<td>9 of 10 cities</td>
</tr>
<tr>
<td>Dry waste system</td>
<td>Mumbai, Pune, Indore, Bengaluru</td>
<td>Collection of dry waste from source</td>
<td>4 of 10 cities</td>
</tr>
<tr>
<td></td>
<td>Mumbai, Pune, Bengaluru</td>
<td>Collection of dry waste from source by waste pickers</td>
<td>3 of 10 cities</td>
</tr>
<tr>
<td>Dry waste system</td>
<td>Indore, Mysuru, Bengaluru, Shillong, Mumbai, Pune, Delhi</td>
<td>Municipality set up MRF, DWCC, sorting sheds</td>
<td>7 of 10 cities</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------------------------------------------</td>
<td>-------------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td></td>
<td>Bengaluru, Mumbai, Pune, Mysuru</td>
<td>Operated by Wastepickers</td>
<td>4 of 10 cities</td>
</tr>
</tbody>
</table>

| Waste pickers registration with Waste picker organisations (member based organisations, trade unions, waste picker network organisation, non-government organisations) | Pune, Nashik | 50% of the wastepickers are registered with organisations 27% are registered with Municipality 17% of the total are registered both with Organisation and Municipality |
| Waste picker organisations | Mumbai | 100% of the wastepickers registered with organisations/Municipality |
| Activity Level – High | Maharashtra, Karnataka, Gujarat | Parisar Bhagini Vikas Sangha, Maharashtra at 19%, Hasiru Dala, Karnataka at 17% and SEVA, Gujarat at 11%. |
| Highest waste picker registration | Pune at 24% followed by Mysuru at 12%, Amaranth, Guntur, Nanjangud and Bengaluru between 7 to 8%. |
| Outcome of registration | Uniforms received | 16% |
| | Provided by Organisation | 54% |
| | Provided by Municipality | 41% |
Where do wastepickers pick in the cleanest cities in India

The findings from the survey in the cities of Indore and Mysore show the Municipalities have streamlined processes to achieve the clean tag, but have not been inclusive in the process.

In Indore: 32% collect from areas other than where they stay, 22% collect anywhere, 11% collect from the areas they stay in, 14% collect from the garbage heaps, 4% collect from households, 5% collect from factories, 2.4% collect from shops, malls and landfills. This collection is carried out by 82% for the full day and only 5% in the early morning. This can be attributed to the long distance of the city from the waste picker present place of stay after their recent relocation by the municipality.

In Mysore: 20.2% collect from areas other than where they stay, 16% collect from anywhere, 15% collect from the same area, 11% collect from households, 6% collect from garbage heaps, 5.7% collect from shops/ malls and slum colony and 3.4% collect from landfill. This collection is carried out for the full day by 47% and in the early morning by 42%.

C. Social Security

<table>
<thead>
<tr>
<th>55% have received benefits of which</th>
</tr>
</thead>
<tbody>
<tr>
<td>36% received it from the wastepickers organisations that they are associated with</td>
</tr>
<tr>
<td>15% received it from the Govt</td>
</tr>
</tbody>
</table>
TYPE OF BENEFITS RECEIVED

Access to health facility

- Yes: 28.3%
- Can’t say: 8%
- No: 63.8%

Access to educational facility

- Yes: 30.3%
- Can’t say: 7.3%
- No: 62.4%
<table>
<thead>
<tr>
<th>Service</th>
<th>Benefit received from Government</th>
<th>Benefit received from NGO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medical Facility</td>
<td>22%</td>
<td>22%</td>
</tr>
<tr>
<td>Skill development</td>
<td></td>
<td>12%</td>
</tr>
<tr>
<td>Scholarship</td>
<td></td>
<td>7%</td>
</tr>
<tr>
<td>Pension</td>
<td>0.6%</td>
<td></td>
</tr>
<tr>
<td>Ration</td>
<td>8.7%</td>
<td></td>
</tr>
<tr>
<td>Educational Facility</td>
<td>7.5%</td>
<td></td>
</tr>
<tr>
<td>Housing</td>
<td>12%</td>
<td></td>
</tr>
<tr>
<td>PF-ESI</td>
<td></td>
<td>1.6%</td>
</tr>
</tbody>
</table>

**OCCUPATIONAL CHOICE OF WASTE PICKING / COLLECTION**

- **Only job they knew**: 41%
- **Did not get any other job**: 27%
- **Felt it was a secured job**: 4.3%
- **Easy entry and low skill requirement**: 21%
- **Desire to continue in the waste collection profession**: 62%
- **Do not want to continue**: 20%
D. Knowledge of SBA

| Wastepickers had heard about Swachh Bharat Abhiyaan | 38% of the total wastepickers surveyed |
|-----------------------------------------------------|____________________________________|
| SBA was associated with Toilets, clean surroundings and waste segregation | For wastepickers in 11 of 20 cities who had heard of SBA |
| Government officials had approached wastepickers to seek their participation for SBA | For wastepickers in 4 of 20 cities |
| Benefits of SBA | Perception of 575 wastepickers who had heard about SBA |
| • Public perception of wastepickers had improved | |
| • A sense of protection because of recognition from SBA | |
| • Training would be beneficial | |
| • Small positive impact on the waste practices | |

Key Findings

3 categories of wastepickers, Based predominantly on waste practices

- The free roaming independent wastepickers who is either a local or a migrant who works anywhere and anytime,
- The landfill/dump yard wastepickers who works mainly in the landfills
- The door to door collector category which includes the door to door collectors, itinerant buyers and the waste sorters who assist them.
Free roaming wastepicker

SOCIO DEMOGRAPHIC

Women dominate 75%
Upto the age of 40 years 63%
Having Bank account 53%

Availed loans: From SHG, Scrap dealers, for house and health

Collection: On foot

Access waste: In and around the areas they live in

Source of income: Only waste picking

Monthly Income

Rs. 1000-5K p.m. 50%
Rs. 5K-10K 44%
Rs. 10K-15K 6%
Working hours

5-6 hours a day: Majority

10% 12 hours a day

30% 8 hours a day

WASTE PRACTICES

Access to waste

17% From Households

Restrictions from Municipality, Households, Contractors, Police

Sorting, storing, selling
Sorting at home or front of shop
Do not store
Sell the same day
Sell to Scrap dealers

Association

> 25% < 25% = 5%

With Municipality Have ID cards Received uniforms
SOCIAL SECURITY

Access to facility

Benefits received

Through: Health facility

Waste picker: insurance

Organisations:
skill development & training
scholarship for children

Through Government Benefits:

Free hospital
Pension
Ration
Educational facility
Housing facility

Occupational ease:
low skill requirement
low entry barriers
Flexibility of timings

KNOWLEDGE ABOUT SBA

30%

Heard about SBA

Landfill Wastepickers

WASTE PRACTICES

Collect from Landfills: 10% of wastepicker community

Access control: Some or no explicit permissions to Landfill from Municipality for access

Occupational hazards:
Exposure to fumes, rotting material
Physical sorting
Housing colonies set up in temporary shelters for proximity to landfill
Exposure of the families to contaminated ground water, poor ambient air quality, smell, mosquitoes, outbreak of fire

Sorting, storing, sale:
Long periods of storage because of distance from city
Additional overheads of transportation for sale

SOCIO DEMOGRAPHIC + SOCIAL SECURITY + KNOWLEDGE ABOUT SBA

Similar to Free roaming waste pickers, no special findings in this category
Door to door collector

Age
- 75% Upto the age of 40 years
- 22% 40-60 years

Gender
- 50% Male
- 50% Female

Bank account
- 75% Door to Door collector
- 58% Waste sorter
- 83% Itinerant buyer

Type
- 92.5% Informal waste collectors
- 7.5% Municipal waste collectors
Monthly income

- **Rs. 1000-5000**: 23%
- **Rs. 5000-10k**: 55%
- **Rs. 10k-15k**: 11%
- **> Rs. 20K**: 4%

Features

Informal waste collection system

Work as: Micro entrepreneurs- Self employed
Responsible for: Organising vehicles for own collection and transportation, hiring of waste sorters, land for sorting and storage and final disposal

Formal waste collection system

Work as by Municipality
a. Hired directly
b. Contractual- concessionaire agreement with vehicles allotted, fixed timings of operations, municipal sorting areas
c. Allotted a geographical area by Municipality and authorised to collect user fee which pays for cost of operations. No other compensation from Municipality
Registration

a. Registrations have become synonymous with issue of ID cards which is the process by which the wastepicker identity is created in the municipal system and an occupational identity card is provided.

b. The process of registration in the legislations is ambiguous. The process of registration in the guidelines is suggestive and is not binding. In effect there is no uniformity.

c. Status of registration

SS 2019 states 537 ULBs identified and integrated 1.2 lakh informal waste pickers
SS207 states 35 ULBs carried out registrations
d. It was found that there were no standardized norms for renewal and the validity differed from city to city, between 1 to 10 years.

e. NULM, NSKFDC and GSCJ provide for various social benefits, finance schemes and skill development. They also provide for linkages and associations through social mobilisations.

### Integration

a. The purpose of integration is interpreted, to create a thrust to ensure the wastepickers and other informal waste collectors and other actors in the recycling value chain are treated on par with other workers, while eliminating negative characterisation and promoting protection.

b. The SWM Rules 2016 prescribes the integration of the wastepickers and the informal waste collectors at various levels:
   - At the policy and planning level through Rule 11 and Rule 23
   - At the implementation level through Rule 15 and Rule 4

c. Status of Integration was assessed based on the bye laws of some major cities/states published in 2017-18 based on the compliance to the following indicators:
   - Definition of wastepicker
   - Registration of wastepickers
   - Plan for dry waste management including wastepickers
   - Wastepickers integrated in the door to door collection
   - Access provided to wastepicker by the Municipality

<table>
<thead>
<tr>
<th>1 state</th>
<th>Maharashtra</th>
<th>14.3%</th>
<th>&gt; 10,000 wastepickers were registered</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Rajasthan</td>
<td>9.3%</td>
<td></td>
</tr>
<tr>
<td>5 States</td>
<td>Andhra Pradesh</td>
<td>9.3%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Madhya Pradesh</td>
<td>8.7%</td>
<td>5000 to 10,000 wastepickers were registered</td>
</tr>
<tr>
<td></td>
<td>Uttar Pradesh</td>
<td>6.7%</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Punjab</td>
<td>6.9%</td>
<td></td>
</tr>
<tr>
<td>29 states</td>
<td></td>
<td></td>
<td>&lt; 5000 wastepickers per state</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>State</th>
<th>Percentage</th>
<th>Number of wastepickers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maharashtra</td>
<td>14.3%</td>
<td>&gt; 10,000</td>
</tr>
<tr>
<td>Rajasthan</td>
<td>9.3%</td>
<td>&gt; 10,000</td>
</tr>
<tr>
<td>Andhra Pradesh</td>
<td>9.3%</td>
<td>5000 to 10,000</td>
</tr>
<tr>
<td>Madhya Pradesh</td>
<td>8.7%</td>
<td>5000 to 10,000</td>
</tr>
<tr>
<td>Uttar Pradesh</td>
<td>6.7%</td>
<td>5000 to 10,000</td>
</tr>
<tr>
<td>Punjab</td>
<td>6.9%</td>
<td>5000 to 10,000</td>
</tr>
</tbody>
</table>

- 1 state
- 5 States
- 29 states
High Integration: Pune, Uttarakhand
Total Exclusion: West Bengal, Surat
Reference made to WP, but no strategy of integration: Chennai, NDMC and Chandigarh

4. Integration for all should be the end purpose, for which it is necessary for the municipalities to provide for integration options of all waste picker types based on their existing waste practices to the maximum extent possible.
Conclusion

The objective of the study is to present the status of wastepickers and evaluate the performance of implementation of the existing legislations by the cities through their waste practices.

A Mirage or a Rising Tide

These conclusions are presented keeping in mind that the SWM Rules 2016 have recognized that a wastepickers means a person working independently or engaged, directly or through an agency, whether for wages or not, in the collection of reusable and recyclable solid waste from source of generation, streets, bins, containers, processing-material recovery or disposal facilities for the purpose of segregation, sorting and sale of waste to recyclers and who may be additionally engaged in activities such as handling, cleaning, composting and bio-methanisation plant maintenance. Further that the municipality shall endeavor that the wastepickers are given priority to upgrade their work conditions and are registered and integrated into the formal system of solid waste management as waste collectors.

It can be conservatively said that the state of registration and integration of the wastepickers is at a very preliminary stage of implementation. The understanding and the unwillingness of the municipalities, to address the status of wastepickers from the perspective of social equity within the scope of public policy, to highlight their role within the scope of environmental objectives and the need to address their needs within the framework of public health at best represents a poor and meager effort.

State and Status of Wastepickers

Waste Practices

a. Municipal sanitation workers in most cities compete with the wastepickers for the dry waste.

b. Weak door to door collection systems, prevalence of mixed waste leads to wastepickers to pick from all other areas, garbage points, landfills, secondary storage and transfer points.

c. Landfill dumping is still the most convenient thereby limiting access to recyclable waste.

d. Private lands, godowns, vacant spaces are used to sort door to door collection waste as too little municipal support and infrastructure is in place for secondary storage and sorting.

e. Other institutional intermediaries, authorised recyclers and agencies are competing to set and manage the MRF.
Socio Demographics

f. Women form a large part of the vulnerable population who need to earn their livelihood or supplement the family income. It is important to provide them necessary skilling and security of livelihood.

g. The house acquires an occupational status as it is closely linked with the ability of the waste pickers to carry out their daily activities. The stability of housing without threat of eviction or dislocation is key.

h. The socio economic status reflects the influence of the level of linkages to the Municipality or wastepicker organisations on the monthly incomes, financial accessibility to bank accounts and loans.

i. The gap between the monthly incomes earned by the wastepickers and the minimum wages still remains.

<table>
<thead>
<tr>
<th>Benefits from SBA</th>
<th>Perception of SBA</th>
</tr>
</thead>
<tbody>
<tr>
<td>• 9% are part of the Municipal door to door collection</td>
<td>• 59% have not heard of SBA</td>
</tr>
<tr>
<td>• 12% use a municipal facility</td>
<td>• 70% SBA is not for wastepickers</td>
</tr>
<tr>
<td>• 6% received training</td>
<td>• 77% SBA has no benefits for waste pickers</td>
</tr>
<tr>
<td>• 16% received government benefits</td>
<td>• 35% registration with municipality is beneficial</td>
</tr>
</tbody>
</table>
Recommendations

A. Understanding and Defining the Process of Registration and Issuance of Occupational ID Cards:

The SWM Rules 2016 15 (c) states that the duty of local authorities is to “establish a system to recognise organisations of waste pickers or informal waste collectors...” In order to do so, the following steps are recommended:

a. **Identify organisations of waste pickers** - formal and informal and invite them for a consultation.

b. **Consultation or FGD:** In absence of such organisations of waste pickers, a short consultation /focus group discussion with waste pickers, informal waste collectors, scrap dealers and traders can be held to understand the size and diversity of the informal waste economy in the city. (Include academic institutions, individuals and organisations working with waste pickers from outside the state).

c. **Collection of Baseline Information and Centralised Database,** as listed in the Swachh Bharat Municipal Solid Waste Management Manual. In order to institutionalise the process, the Municipal Commissioner must:

   • Issue a circular detailing the registration process, how to identify, what forms to be filled, the format of the survey, methodology, enlisting of technical experts, appointment of nodal officer, identifying of facilitators, cross-verification process and entry into the database and management of database.

   • It is important that for enlisting of technical expert, only those individuals or organisations with organising and mobilising wastepickers with more than 8 years of experience be listed for guidance. (Chandran, Shekar, et al. 2014) Please refer BBMP Circular No.: A/PSR/509/11-12, for a detailed guidance note.

   • It is important that the ULB allocate a budget to undertake this exercise, which includes designing the form, app development to capture data, cross checking data for authenticity, maintaining a central database, issuance of smart card-bar code enabled, training surveyors, payment to surveyors and IEC component and set clear timelines.

d. **Data Analysis, Identification of the Informal Recycling Value Chain and Mapping waste related work within the ULB limits:**

   • Post data collection, it is important to understand the landscape, of the informal waste economy to be able to plan for different types of waste related work with ULB limits for example- gardening, composting, door-to-door collection, management of MRF, sorting at MRF, service to bulk waste generators, and other government and institutional generators. (Mapping waste related work is possible, if the ULB has accurate data of waste generation and the characterisation of waste in current terms).

   • Data Analysis could be outsourced to an organisation of waste picker, or an academic institution/civil society of repute with similar experience with informal waste workers.
EXAMPLE FOR IDENTIFICATION OF THE INFORMAL RECYCLING VALUE CHAIN AND SNAPSHOTS OF REQUIREMENTS EXCERPT FROM VALUING URBAN WASTE: THE NEED FOR COMPREHENSIVE RECYCLING POLICY (CHANDRAN, ARORA, ET AL. 2018)

Bengaluru reveals a complex thread of inter-connections at all levels within the traditional linear recycling pyramid. Embedded in each category of actors are multiple sub actors performing similar jobs but varying in either quality or type of material, scale, method of collection or processing. It’s important that the mapping of the actors is undertaken across the country to capture its trans-regional nature. It is also important to capture the colloquial names used for each actor.

SNAP SHOT OF REQUIREMENTS

<table>
<thead>
<tr>
<th>A snapshot of requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Actors</strong></td>
</tr>
</tbody>
</table>
| Waste pickers               | By the State Government and the ULB | • Registration by the Municipality  
• Issue of occupational ID cards | • Local neighbourhoods  
• Place of sorting to be provided by municipality  
• Regularize waste-picker colonies |
| IB                          | By the State Government and the ULB | • Registration by the Municipality  
• Issue of occupational ID cards | • Local neighbourhoods         |
| Scrap Shop                  | Central Government, State Government, ULB | • Enumeration of Scrap Dealers and issuance of occupational ID Cards  
• Registration of Shops and Establishments not compulsory | • Local neighborhoods  
• Selection of space on market principles |
| Wholesaler                  | By the State Government and ULB     | • Enumeration  
• Registrations of Shops and Establishment | • Designated or Natural Waste Markets around the city and within the city must be protected  
• And spaces must be earmarked within the city must be earmarked |
| Reprocessors/Manufacturers  | By the State Government and ULB and Pollution Control Board | • Enumeration  
• Registrations of Shops and Establishment | • Designated or Natural Waste Areas around the city and within the city must be protected  
• Recycling Hubs to be created /designated on the lines of a cluster approach |
<table>
<thead>
<tr>
<th><strong>Taxation and access to finances</strong></th>
<th><strong>Comments</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>- Special loan scheme by the state</td>
<td>- Scrap dealers to be considered as micro-enterprises and hence, it was expected that they should find their own space to set up shop, within a residential area.</td>
</tr>
<tr>
<td>- GST Exemption</td>
<td>- Further state to decriminalize the profession</td>
</tr>
<tr>
<td>- Tax break for five years</td>
<td>- To be named as green workers or green collar workers</td>
</tr>
<tr>
<td>(Limited liability)</td>
<td></td>
</tr>
</tbody>
</table>

- Existing waste trading markets to be protected, with upgradation in infrastructure by the municipality
- Decriminalizing the profession and
- Dedicated space in industrial townships
- According informal recycling as a green industry status would make it easier to avail bank loans and other financial aids
- Assign green industry status to make it easier to avail bank loans and other financial aids
- Opportunities for technology upgrade must be made available through government grants, along with required training
Bangalore's Material Flow Value Chain.
Value Chain Interpreted
e. **Issuance of Occupational ID cards:** The occupational ID card must be in smart card format, to avoid duplication of registration, and to track and cross-verify against both the Annual Reports submitted to State Pollution Control Boards and the SS. The card should be durable and similar to ones issued by the RTO. The details must include:

<table>
<thead>
<tr>
<th>Front Side of the Card:</th>
<th>Back Side of the Card:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Logo and Name of the Municipality</td>
<td>• The card is issued as per Solid Waste Management Rules, 2016 &amp; Unorganized Workers Social Security Act, 2008.</td>
</tr>
<tr>
<td>• Occupational ID Card as title</td>
<td>• The holder of this card has a Right to Collect Waste.</td>
</tr>
<tr>
<td>• Name of the Waste picker</td>
<td>• This card is not valid for workers below 18 years of age.</td>
</tr>
<tr>
<td>• Date of Birth /Age approximated, if not available</td>
<td>• No child labour involved.</td>
</tr>
<tr>
<td>• Gender</td>
<td>• Wastepickers are not employees of the Municipal Corporation/or any other issuing authority.</td>
</tr>
<tr>
<td>• Address and Contact Number if any</td>
<td>• This card will be used for accessing schemes specific to wastepickers and informal workers.</td>
</tr>
<tr>
<td>• Ward Number/Locality Name (where they stay)</td>
<td>• If you lose the card, you are eligible for a duplicate card by paying the necessary amount fixed by the ULB.</td>
</tr>
<tr>
<td>• Identity Card Number</td>
<td>• Organization or Municipal body is not responsible if the waste picker with the identity card engages in any form of nuisance or theft.</td>
</tr>
<tr>
<td>• Date of Issue and Validity – Ten Years</td>
<td>• If the card is found lost, please contact the organization of wastepickers-contact number written or the local ULB office, or City Livelihood Center and deposit the same</td>
</tr>
<tr>
<td>• Signature of Commissioner (or a person at similar position in local bodies)</td>
<td></td>
</tr>
</tbody>
</table>

f. **Linkage with City Livelihoods Centers:** In order to bring in convergence, while the database must be centralised with ULB, the details of the registered informal waste workers must be shared.
B. Understanding Integration:

The term inclusion and integration are often used interchangeably, but for the purpose of our report, we are looking at understanding “Integration” for an Inclusive Approach in the City’s SWM. The implied takeaway is that integration does not mean hiring them as permanent employees, though this is just one aspect, it means understanding the economy and creating enabling conditions and supportive actions to facilitate their participation in the city’s SWM.

The SWM Rules 2016 (c) promote and establish a system for integration of these authorised waste-pickers and waste collectors to facilitate their participation in solid waste management including door to door collection of waste; (d) facilitate formation of Self Help Groups, provide identity cards and thereafter encourage integration in solid waste management including door to door collection of waste; (h) setup material recovery facilities or secondary storage facilities with sufficient space for sorting of recyclable materials to enable informal or authorised waste pickers and waste collectors to separate recyclables from the waste and provide easy access to waste pickers and recyclers for collection of segregated recyclable waste such as paper, plastic, metal, glass, textile from the source of generation or from material recovery facilities; specify ways of integration.

In order to be able to do so, the following actions are required:

a. Legislative Action – Through Policies an Byelaws and thereafter through Circulars, Memos: The State Policies and Bye Laws must explicitly recognise and acknowledge the informal waste economy, and detail the process of registration as stated above, provide legal identity and enable options to access waste as first right, allow rights to organise, bid for contracts at all levels – individual, collective, SHG, Cooperative, trade union, civil society, or a company, as legitimate service providers. Include the organisations of wastepickers and other informal waste workers in participatory policymaking processes like the State Level Advisory Committees and other equivalent committees formed by the Government.

From a decent work perspective, transition to formality is cast within each of the four pillars of (1) rights at work, (2) employment promotion, (3) social protection and (4) social dialogue, but its intrinsic value is essentially in the integration and the interaction amongst the policy actions covered under each them.

b. **Facilitative Action:** An important point to note is there is no one size fits all solutions to facilitative actions but care must be taken to provide and include a wide range of actions, solutions, and approaches to enable integration.

- **Correlation of waste practices and Waste picker types**
  
  It is recommended that the correlation of waste practices of waste picker types within the formal SWM system be established between the waste picker type and the scope of work in various settings.
  
  - In respect of the Free roaming wastepickers, retain the essential character of independent self-employed workers who have the flexibility of work areas and timings through linkages to commercial and bulk generators for collection, registration at the City livelihood centres for providing the services of collection from generators.
  
  - In respect of Landfill wastepickers, retain the essential character of sorting and retrieval through engagement in manual sorting at the conveyor belts in material recovery facilities, preprocessing facilities or dry waste collection centres, as wage earners.
  
  - In respect of door to door collectors, Retain the essential character by engaging within the formal system of collection, handling and disposing of garbage, either as wage earners or through contractual agreements.

- **Access to Infrastructure Services:** As outlined by the SWM Rules 216, setting up of MRF, or secondary storage facilities with sufficient space for sorting of recyclable materials is an important aspect of integration of wastepickers. The State and ULB will have to ensure that they are operated by wastepickers and scrap dealers, and ensure setting up of contract terms that are fair.

- **Access to Waste:** If ULB has contracted waste services to private company, then it is important to ensure tangible and measurable inclusion in the terms of employment, minimum wages, assurance on keeping recyclables for sale in markets rather than to the company, ensure proper work conditions, safety equipment, training and rehabilitation into other waste services with timely payments.

- **Training Capacity Building and Skill Development:** Every effort must be made by all ULB to set a nodal officer who will carry out the necessary integration between the SWM departments and then Green Council and NULM schemes, which offers the necessary modules for training and skill building. All registered wastepickers must be exposed to these trainings.

- **IEC:** Every effort should be made by the ULB to create an IEC strategy for wastepickers and other informal waste collectors keeping in mind that they are not exposed to traditional communication medium, but engage in more of outreach, community radio and other radio and hoardings as the literacy levels of the wastepickers is low. Therefore any strategy must take into account these limitations and attempt to plan for face-to-face engagements through the resource organisations who are best placed to reach out to them and educate them.

- **Relook at data presented in SS Ranking System:** The SS ranking system runs a real risk of presenting a mirage if the accountability of the data submitted is not backed by annual report submission to the CPCB. The scrutiny of the data submission should result in non-compliance and action proceedings for erroneous reporting. Cities have to be viewed as either as inclusive or excluding cities and must move...
away from anecdotal reporting that ‘100% of the identified informal waste pickers are integrated by the ULB in the formal system and are deployed in all the wards’ but must be demonstrative and comparable and must have a degree of regularity.

- **Coordination between Ministries, Departments, Missions and Pollution Control Board**

  From a holistic policy perspective, it is important that all rules, policies, directions are aligned and converged. Implementation on the ground should be laid out clearly, with all stakeholders responsibility elucidated, from a convergence point of view.
Note on the Authors and Organisation

**Pinky Chandran** has over two decades of experience spanning careers across international education, research, training, community mobilization, waste management, livelihood development, policy advocacy, communication and strategy, and community media. Pinky is an active campaigner for decentralized community based waste management and is a founder member of the Solid Waste Management Roundtable, (SWMRT) Bengaluru, since 2009.

**Sandya Narayanan**, was a stock broker by profession and is now an environmental activist. She has been part of the founding member team of Solid Waste Management Roundtable (SWMRT) Bengaluru since 2009 and was a facilitator for the My Clean Malleswaram – Smart Swachh Malleswaram (2013-2016) and has been a member of several city and state expert advisory committees.

**Dr. Umashankar Subramanian** is Public Health Informatics Specialists with over 16 years of experience in clinical and public health. He is currently working as the Principal of Padamshree School of Public Health. He is also an Adjunct Faculty at Texila American University and Texila International University, Guyana, South America. He is also a member of SWMRT.

**Solid Waste Management Roundtable (SWMRT) Bengaluru** is a public interest collective of SWM practitioners working of decentralised, sustainable and inclusive waste management. Launched in 2009, the group’s main goal is the adoption of sustainable waste management practices by citizens and municipalities, for improving public health, safe food, clean air and water and inclusive livelihoods.
About the Alliance of Indian Wastepickers

The Alliance of Indian Wastepickers is more than a decade old national coalition of organizations working with waste-pickers and other informal waste collectors. The alliance was created to have coordinated efforts to ensure inclusion of waste pickers in various national level programmes. Organizations/members of the alliance represent more than 40000 waste-pickers and other informal waste-pickers in India. Secretariat of the alliance has been rotating amongst member organizations starting from Kagad Kach Patra Kashtakari Panchayat (KKPKP), Pune. After that, Bangalore based organization of wastepickers- Hasiru Dala hosted the secretariat for 3 years. Currently, the Secretariat of the coalition is hosted by Stree Mukti Sanghatana.

About IGSSS

Indo-Global Social Service Society (IGSSS) is a non-profit organisation working with the mandate for a humane social order based on truth, justice, freedom and equity. Established in 1960, IGSSS works for development, capacity building and enlightenment of the vulnerable communities across the country for their effective participation in development. With its presence in 25 states and one Union Territory of India, IGSSS has set its thematic focus on promoting sustainable livelihood, energising the youth as change makers, protecting lives, livelihood and assets from the impact of hazards, advocating for the rights of CityMakers (Urban Poor Residents) and developing cadre of leaders from the community and civil society organisations. Gender and Youth are underlining theme across all its interventions.