



# WASTE PICKERS

Missing Piece in  
India's EPR Puzzle



## WASTE PICKERS: MISSING PIECE IN INDIA'S EPR PUZZLE

Mapping the Challenges Faced by Waste Picker  
Organisations in India's Extended Producer  
Responsibility (EPR) Landscape

### CONSULTATIONS:

This report is a result of primary and secondary research, based on interactions with stakeholders across the EPR and plastics value chain.

The Alliance of Indian waste pickers (AIW) would like to express our gratitude to waste pickers, organizers and other stakeholders who contributed their time and knowledge during the EPR social audit process.

### SUPPORTED BY:

Break Free From Plastic (BFFP)

### DATE OF PUBLICATION:

August 2023

### AUTHORS:



**Haris Najib**

Assistant National  
Coordinator of AIW



**Nikita Patil**

AIW-Maharashtra  
Coordinator

**Copyright © 2023 Alliance of Indian waste pickers.**

Published by AIW. All rights reserved.

No part of this publication may be reproduced, stored in, or introduced into a retrieval system, or transmitted in any form or by any means (electronic, mechanical, photocopying, recording, or otherwise), in part or in full in any manner whatsoever, or translated into any language, without the prior written permission of the copyright owner.

Cover image: Waste picker from Parisar Bhagini Vikas Sangha segregating waste at MRF

Layout Design by [Indu Manohar](#).

**#BreakFreeFromPlastic**

# CONTENTS

ABBREVIATIONS	6
PARTICIPATING ORGANIZATIONS	7
PREFACE	8
<b>What is the EPR?</b>	8
<b>Public to Private: Shifting the Burden of Waste Management</b>	8
<b>The Role of Waste Pickers and Informal Actors</b>	8
<b>The Exclusion of Waste Pickers</b>	9
<b>About this AIW Study</b>	9
LIMITATIONS OF THE STUDY	10
NUANCES OF EXTENDED PRODUCER RESPONSIBILITY (EPR)	11
DEFINITION OF EPR	12
EPR STAKEHOLDERS	13
<b>Were Waste Pickers Considered as Stakeholders in the Formulation of EPR Guidelines?</b>	13
<b>Who are the Stakeholders?</b>	13
<b>Extended Producer Responsibility: Why should waste pickers be included?</b>	14
GAPS IN EPR IMPLEMENTATION	16
<b>Jeopardizing Livelihoods</b>	16
<b>Real Consequences</b>	16
EXTENDED PRODUCER RESPONSIBILITY (EPR) SYSTEMS IMPLEMENTED BY ORGANISATIONS	18
<b>Aasra Welfare Association, Mumbai</b>	19
<b>CARPE, Aurangabad</b>	19
<b>Hasiru Dala, Bangalore</b>	20
<b>Stree Mukti Sanghatana, Mumbai</b>	21
<b>SWaCH, Pune</b>	22
<b>vRecycle, Goa</b>	23
<b>Waste Warriors, Dehradun</b>	24



<b>TOWARDS A COLLABORATIVE FUTURE: OUR ANALYSIS &amp; CONCLUSIONS</b>	<b>25</b>
<b>GOVERNMENT-LED MANDATORY IMPLEMENTATION</b>	<b>27</b>
<b>Drawbacks of GOI's EPR Guidelines</b>	<b>27</b>
<b>Role of CPCB &amp; SPCB</b>	<b>28</b>
<b>Compliance Verification and Oversight Responsibilities</b>	<b>28</b>
<b>Mechanisms for Stakeholder Dialogue and Reporting</b>	<b>28</b>
<b>Poor Monitoring Methods Jeopardize Effective EPR Compliance</b>	<b>28</b>
<b>Working with Urban Local Bodies (ULBs)</b>	<b>30</b>
<b>INTEGRATION OF WASTE PICKERS</b>	<b>31</b>
<b>WPOs and PROs</b>	<b>31</b>
<b>WPOs and Recyclers</b>	<b>36</b>
<b>FULL PAYMENT &amp; RISK PROTECTION</b>	<b>37</b>
<b>Ensuring Fair Compensation and Market Stability</b>	<b>37</b>
<b>Empowering Waste Pickers through EPR</b>	<b>40</b>
<b>Lack of Infrastructure Support</b>	<b>40</b>
<b>Challenges of Collecting MLPs</b>	<b>41</b>
<b>Impact of EPR on Waste Pickers</b>	<b>41</b>
<b>TRANSPARENCY, OVERSIGHT &amp; ADAPTATION</b>	<b>44</b>
<b>EPR Bidding Process</b>	<b>44</b>





GRIEVANCE REDRESSAL & NEGOTIATION	47
CLEAR COMMUNICATIONS & TRAINING ON EPR SYSTEMS	48
PRINCIPLES OF PARTNERSHIP AND DUE CREDIT	50
OUR RECOMMENDATIONS	53
<b>Set Clear Timelines</b>	<b>53</b>
<b>Formulate a Steering Committee</b>	<b>53</b>
<b>Identify a Consulting Agency</b>	<b>53</b>
<b>Allocate Adequate Resources</b>	<b>53</b>
<b>Foster Collaboration and Information Sharing</b>	<b>53</b>
<b>Representation of waste pickers in EPR-related forums</b>	<b>53</b>
<b>Consistent Orders in EPR Programs</b>	<b>54</b>
<b>Other Factors to Consider</b>	<b>54</b>
CONCLUSION	58
<b>Fostering Sustainable Partnerships for Equitable EPR Implementation</b>	<b>58</b>
REFERENCES	59
ENDNOTES	60



# ABBREVIATIONS

CPCB	Central Pollution Control Board
DWCC	Dry Waste Collection Centre
EPR	Extended Producer Responsibility
FGD	Focus Group Discussion
HCCBL	Hindustan Coca-Cola Beverages Private Limited
HDPE	High-Density Polyethylene
HUL	Hindustan Unilever Limited
IAWP	International Alliance of Waste Pickers
ITCL	India Tobacco Company Limited
MBOs	Member Based Organisations
MLP	Multi-Layered Plastic
MoEF&CC	Ministry of Environment, Forest and Climate change
MPCB	Maharashtra Pollution Control Board
NGOs	Non-governmental Organisations
PCB	Pollution Control Board
PCC	Pollution Control Committee
PET	Polyethylene Terephthalate
PF	Provident Fund
PMC	Pune Municipal Corporation
PP	Polypropylene
PPE	Personal Protective Equipment
PROs	Producer Responsibility Organisations
PWM	Plastic Waste Management
SHGs	Self Help Groups
SMS	Stree Mukti Sanghatana
SWM	Solid Waste Management
SPCB	State Pollution Control Board
ULBs	Urban Local Bodies

# PARTICIPATING ORGANIZATIONS



Aasra Welfare Association  
NGO  
Mumbai



Sampurn(e)arth Environment  
Solution Pvt. Ltd  
Waste Management Agency  
Mumbai



CARPE  
Waste Management Agency  
Aurangabad



Stree Mukti Sanghatana  
NGO  
Mumbai



Green Worms  
Waste Management Agency  
Kozhikode



SWaCH  
Waste Pickers' Cooperative  
Pune



Hasiru Dala  
Waste Picker Organisation  
Bangalore



vRecycle  
Waste Management Agency  
Goa



Parisar Bhagini Vikas Sangh  
Waste Picker Organisation  
Mumbai



Waste Warriors  
NGO  
Dehradun



Saahas  
Waste Management Agency  
Bangalore





# PREFACE

## What is the EPR?

Extended Producer Responsibility (EPR) is a relatively new concept that has gained traction in India as a means to enhance the management of plastic waste. It entails holding commercial waste producers accountable for the entire lifespan of their products. On the surface, EPR appears to be a promising policy with the potential to deliver multiple benefits for the country and its workforce. However, it is important to examine the practical implementation of EPR and its significant impact on the well-being and livelihoods of our waste picker workforce. In this report, we aim to shed light on the problematic issues and the reality on the ground concerning EPR and its effects on our workforce.

## Public to Private: Shifting the Burden of Waste Management

The Extended Producer Responsibility (EPR) policy effectively transfers the financial and operational responsibility of waste management from the public sector to private actors. However, successful implementation of EPR necessitates the integration of waste reduction strategies, such as product design for minimal waste and investment in research and development for sustainable alternatives.

## The Role of Waste Pickers and Informal Actors

India's waste pickers form a critical and massive part in India's waste management. According to the International Alliance of Waste Pickers (IAWP), informal waste pickers<sup>1</sup> are responsible for gathering approximately 60% of the world's plastic that is collected for recycling<sup>2</sup>. It's crucial to note that waste pickers are the ones who have traditional knowledge of handling waste and their knowledge can strengthen the EPR system and its implementation at ground level.

## The Exclusion of Waste Pickers

Waste pickers and other informal workers have played a crucial role in various aspects of waste management, including collection and recycling. However, the design of the EPR policy not only excludes waste pickers' participation but also fails to recognize their valuable contributions in the waste management domain. The Solid Waste Management Rules 2016, issued by the Union Ministry of Environment, Forest and Climate Change, explicitly mentions the integration of waste pickers<sup>3</sup>, informal waste workers, and waste dealers in solid waste management. Despite this, the entry of private contractors into the waste management system poses a threat to waste pickers' autonomy over waste.

Waste pickers, who rely on plastic for nearly 40%-60% of their income<sup>4</sup>, perceive EPR as both an opportunity and a threat to their livelihoods and organisations. Integrating waste pickers into EPR can create new opportunities and facilitate a just transition.<sup>5</sup> However, it is crucial to acknowledge the historical contributions of waste pickers in waste management and recycling for a comprehensive EPR policy.

Waste pickers play a vital role in recycling materials and significantly contribute to reducing carbon emissions. Therefore, the EPR policy must recognize waste pickers' role in environmental preservation as they collect, sort, and add value to waste materials.

## About this AIW Study

Given that EPR significantly impacts plastic waste management, which is central to waste pickers' livelihoods, the Alliance of Indian Waste Pickers (AIW) undertook a study to examine the engagement of waste picker organisations with EPR in India. The alliance strongly believes that understanding the perspectives of waste pickers and other informal actors is essential as they are key stakeholders in the recycling chain. Unfortunately, they have been overlooked in EPR policy and other policies in India, leading to their invisibility

The study conducted between February and March 2022 was influenced by the report that the global alliance of waste pickers created to illustrate their position on EPR in October 2016. The Alliance of Indian Waste Pickers (AIW) aims to gain a comprehensive understanding of the specific difficulties encountered by waste pickers in relation to EPR implementation, with a focus on urban areas of India. Additionally, the study seeks to evaluate the current level of integration of waste pickers within the extended producer responsibility framework.

# LIMITATIONS OF THE STUDY

This study has several limitations that need to be acknowledged. Firstly, it only covers waste pickers' engagement with EPR policy in India and doesn't include other important stakeholders like government bodies, or other private actors, whose perspectives are not included in this study.

Another limitation is the difficulty faced in reaching out to producers/brand owners due to the lack of connections. As a result, the report primarily focuses on capturing the voices and experiences of waste pickers and their organisations in the EPR ecosystem, which holds significant importance.

These limitations may affect the generalizability of the study's findings and conclusions. The study's results may not be applicable in other regions or countries where the waste management ecosystem is different from India.

The study's conclusions may also be limited by the absence of the perspectives of all key stakeholders in the EPR ecosystem. Despite these limitations, the study provides valuable insights into the current status of the integration of waste pickers in EPR in India and can help inform future policy development and implementation.

▼ *Green Worms, MRF centre in Calicut*





# Nuances of Extended Producer Responsibility (EPR)

“

When it comes to waste pickers, providing assistance in terms of child education, health care, etc. through EPR doesn't make a significant difference to them if they are still paid lower rates for the materials they collect. Ultimately, what they need is money. So far, the reality of increased income for waste pickers through EPR has yet to materialize.

**Sunita Patil**  
Coordinator, Stree Mukti Sanghatana

# DEFINITION OF EPR

In India, EPR was first introduced in 2011 through the Plastic Waste (Management and Handling) Rules, 2011, and the E-Waste Management and Handling Rules, 2011<sup>7</sup>. In this section we look at policies and the way they define EPR.

## **Plastic Waste (Management and Handling) Rules, 2011**

Extended producer's responsibility as the responsibility of a manufacturer of plastic carry bags, and multilayered plastic pouches and sachets and the brand owners using such carry bags and multilayered plastic pouches and sachets for the environmentally sound management of the product until the end of its life.

## **E-Waste Management and Handling Rules, 2011**

Extended Producer Responsibility means the responsibility of any producer of electrical or electronic equipment, for their products beyond manufacturing until environmentally sound management of their end-of-life products.

## **Plastic Waste Management Rules, 2016**

Extended Producers Responsibility is a principle that seeks to hold the producers of waste accountable and responsible for the end-of-life of their products. EPR is a critical part of a circular economy transition, which seeks to move our economy from a take-make-dispose model to one that closes material loops and minimises waste generation.

## **SMW Rules, 2016**

Extended Producer Responsibility means the responsibility of any producer of packaging products such as plastic, tin, glass and corrugated boxes, etc., for environmentally sound management, till the end-of-life of the packaging products.

## **E-Waste (Management) Rules, 2016**

Extended Producer Responsibility means the responsibility of any producer of electrical or electronic equipment for channelisation of e-waste to ensure environmentally sound management of such waste. Extended Producer Responsibility may comprise implementing take back system or setting up of collection centers or both and having agreed arrangements with authorised dismantlers or recyclers either individually or collectively through a Producer Responsibility Organisation recognised by producer or producers in their Extended Producer Responsibility - Authorisation.

## **Plastic Waste Management Rules, 2022**

Extended Producer Responsibility means the responsibility of a producer for the environmentally sound management of the product until the end of its life.

## **E-Waste (Management) Rules, 2022**

Extended producer responsibility means the responsibility of any producer of electrical or electronic equipment as given in Schedule-I for meeting recycling targets as per Schedule-III and Schedule-IV, only through registered recyclers of e-waste to ensure environmentally sound management of such waste.

# EPR STAKEHOLDERS

## Were Waste Pickers Considered as Stakeholders in the Formulation of EPR Guidelines?

The Extended Producer Responsibility (EPR) guidelines in India identify several stakeholders, including the Central Pollution Control Board, producers, brand owners, industry, industry associations, civil society organisations, and citizens<sup>8</sup>. However, it is unclear from EPR guidelines whether waste pickers or waste pickers' organisations, as representatives of the informal plastic waste recycling sector, were considered as stakeholders during the formulation of the guidelines.

## Who are the Stakeholders?

According to Plastic Waste Management Rules 2022

- 1) Brand Owner means a person or company who sells any commodity under a registered brand label or trade mark
- 2) Importer means a person who imports plastic packaging products or products with plastic packaging or carry bags or multilayered packaging or plastic sheets or like;
- 3) Producer means a person engaged in manufacture or import of carry bags or multilayered packaging or plastic sheets or like, and includes industries or individuals using plastic sheets or like or covers made of plastic sheets or multilayered packaging for packaging or wrapping the commodity
- 4) Recyclers are entities who are engaged in the process of recycling of plastic waste
- 5) Plastic Waste Processors means recyclers and entities engaged in using plastic waste for energy (waste to energy), and converting it to oil (waste to oil), industrial composting.

The EPR guidelines set out targets of recycling and end-of-life disposal for the following entities<sup>9</sup>:

- 1) Producer of plastic packaging
- 2) Importer of all imported plastic packaging
- 3) Brand Owners (BO) including online platforms/marketplaces and supermarkets/retail chains other than those, which are micro and small enterprises as per the criteria of Ministry of Micro, Small and Medium Enterprises, Government of India.
- 4) Plastic Waste Processors.

Unfortunately, waste picker organisations are excluded from the EPR guidelines in India, despite the explicit mention of their inclusion in the Solid Waste Management Rules, 2016.



## Extended Producer Responsibility: Why should waste pickers be included?

The various EPR guidelines issued by the Government of India have failed to acknowledge the essential role that waste pickers play in plastic waste management. This omission overlooks the fact that waste pickers and their organisations are significant stakeholders in the process. It is a significant oversight, considering that waste pickers have been integral to the recycling value chain for many years.

The Solid Waste Management Rules 2016 define “waste pickers” as individuals or groups engaged in the informal collection and recovery of reusable and recyclable solid waste from various sources, such as streets, bins, material recovery facilities, processing, and waste disposal facilities. They sell these materials directly to recyclers or through intermediaries to earn a livelihood.

Waste pickers have migrated to urban centers primarily due to factors like drought, agricultural crisis, lack of opportunities in rural areas, and caste discrimination. For instance, waste pickers in Mumbai have migrated from different regions of Maharashtra due to these circumstances<sup>10</sup>. It is crucial to note that waste pickers primarily come from Scheduled Castes and minority communities, highlighting their social background.

Given their informal work status, waste pickers often lack social protections, including access to healthcare, education, and housing. Recognizing the role of waste pickers in waste management and integrating them into formal waste management systems is crucial for their socio-economic well-being and the sustainable management of waste.

### **Waste pickers are sector experts**

The successful implementation of the Extended Producer Responsibility (EPR) policy relies heavily on the active involvement of waste pickers in the waste management system. Waste pickers possess unique access to areas that producers and recyclers cannot reach, such as slums, streets, and informal settlements, where segregated collection systems may not be established.

They have already established their own efficient systems for waste collection, sorting, and recycling. Waste pickers play a vital role in retrieving and segregating a significant portion of plastic waste, especially in urban areas, leading to a substantial reduction in waste sent to landfills and dumpsites. Building EPR upon their existing contributions is crucial.

Additionally, waste pickers play a crucial role in reducing the environmental impact of waste by actively collecting, sorting, and adding value to waste materials. Their profound knowledge and expertise in waste management are indispensable for the successful implementation of EPR policies. For instance, let's consider the case of e-waste in India, where reports from WIEGO indicate that approximately 90% to 95% of e-waste<sup>11</sup> is handled by the informal sector.

However, the exclusion of waste pickers from the EPR system denies the country access to their valuable knowledge and proficiency in e-waste collection, which has been pivotal in effectively managing and recycling a substantial portion of e-waste. As a consequence, the lack of inclusion results in unfavorable outcomes, such as insufficient e-waste collection infrastructure, decreased recycling rates, and the marginalization of the informal sector.

### **Threat of displacement**

As we know, the entry of new private actors in the waste management sector has a direct impact on the livelihoods of waste pickers, particularly in developing countries where they are drawing more and more competition. This is because waste pickers have historically been the primary collectors and sorters of recyclable waste materials, and their livelihoods depend on the value they can extract from these materials.

However, the entry of private actors, particularly those with modern technology and capital, often leads to the formalization of the waste management sector. These private actors can invest in expensive machinery and offer competitive rates to waste generators, such as households and businesses, which can lead to the marginalization of waste pickers.

As a result, waste pickers are often pushed into more marginal and hazardous forms of waste picking, such as scavenging from dumpsites, which not only exposes them to health risks but also leads to the loss of income and social status. Moreover, in some cases, private players as well as municipal authorities have cordoned off dumpsites from waste pickers and ultimately pushed waste pickers to a more vulnerable position.

▼ *SWaCHs MRF facility in Pune*



# GAPS IN EPR IMPLEMENTATION

The EPR guidelines 2022 published by the Ministry of Environment (Forest and Climate Change) ignored the role of informal waste pickers in waste management and recycling.

Although the Solid Waste Management Rules 2016 mandate the inclusion of waste pickers in municipal solid waste management systems there is a fundamental lack of prioritising waste pickers in solid waste management as per SWM Rules 2016.

## Jeopardizing Livelihoods

In the context of EPR guidelines, another important aspect to consider is the potential impact on the recycling value chain if plastic waste is excluded from the existing system, as suggested by the guidelines. Plastic waste plays a significant role in the income generation of waste pickers and scrap dealers, accounting for approximately 40%-60% of their earnings<sup>12</sup> However, it is essential to note that EPR proposes the inclusion of burning non-recyclable plastic that was not previously collected, ensuring it becomes part of the waste management system and not left in the environment. This could potentially create a new stream of collection. While the recycling industry may not be significantly affected, the current network of waste pickers is likely to experience disruption. According to the Break Free From Plastic-India report, there is a genuine risk that Extended Producer Responsibility (EPR) could redirect materials away from the informal sector and towards a new private sector, thereby jeopardizing the livelihoods of millions of individuals.<sup>13</sup>

## Real Consequences

Excluding plastic waste from the recycling system can indeed have significant implications for the economic viability of recycling other materials like paper, metal, and glass. Scrap shops and waste pickers heavily rely on the income generated from plastic recycling to sustain their livelihoods. It is important to recognize that a growing portion of packaging, especially in the case of plastics, is non-recyclable, making it even more challenging for these stakeholders to maintain their operations. The reduction in profitability from plastic recycling, coupled with the increasing presence of non-recyclable packaging, poses a risk to the entire recycling sector. This situation may lead to reduced recycling rates for various materials, potentially resulting in the collapse of the recycling industry. Such an outcome would have significant environmental and economic consequences, jeopardizing waste management efforts and exacerbating environmental pollution. Therefore, it is essential to carefully consider the potential repercussions of EPR guidelines on the recycling sector and address the complexities surrounding non-recyclable packaging to ensure a sustainable waste management system. While the situation may appear concerning, proactive measures and collaborative efforts can help mitigate the challenges and foster a more resilient recycling ecosystem.



“

Excluding waste pickers from EPR would be unjust, as it would exploit their knowledge and innovation, infringe upon their rights, deprive them of their material and intellectual wealth and property, and threaten their basic livelihoods. Additionally, it would disrupt vibrant recyclable material supply chains and generate disorder and dissatisfaction within the recycling industry.

Lubna Anantakrishnan  
Advisor to SWaCH



▲ MRF centre of Aasra Welfare Association

The Alliance of Indian Waste-pickers firmly believes that integrating waste pickers into the EPR policy would provide hope for their ongoing ability to access waste and its value.



# Extended Producer Responsibility (EPR) Systems Implemented by Organisations

“

Unfortunately, there is no involvement of waste pickers in the planning of EPR-related programs. They don't have any say in deciding the price either. It is vRecycle that negotiates with the EPR partners.

Clinton  
Founder, vRecycle, Goa



## Aasra Welfare Association, Mumbai

Aasra is an NGO operating in the Bandra and Santacruz west area of Mumbai, with a tie-up with the BMC H West ward. Additionally, they cover the Vile Parle East, Andheri East, and Jogeshwari East areas of the BMC K East ward. Aasra, in collaboration with BMC, provides a platform for waste pickers to segregate dry waste brought in by BMC vehicles. The organisation is working with 400 waste pickers in the Bandra ward, and over 300 in the K East ward of Andheri. Aasra have been working voluntarily in EPR for around two years, collaborating with UNDP and Hindustan Unilever. They have two MRFs, one in Bandra and the other in Andheri, with machinery provided by UNDP and Unilever for processing dry waste.

Aasra has been collaborating with UNDP under an EPR project of Hindustan Unilever Limited (HUL) since 2018. This project was an EPR cum CSR project. The mandate of the project was to collect PET (70%), HDPE (10-20%) and LDPE (10%). No MLP was collected under the project. The initial target of PET bottles was 250 tonnes/month in the beginning and later it changed to 450-500 tonnes. 70-80 people are directly associated with the project as segregators. All these workers were waste pickers and currently work with Aasra's MRF. Overall, around 200 waste picker sell their materials under EPR. Waste pickers are not getting any extra payment under EPR. UNDP helped Aasra with the initial start up cost of the centre..

Brihanmumbai Municipal Corporation (BMC) has provided Aasra with vehicles and infrastructure. But the labour (waste picker) is provided by the Aasra Welfare Association. Other than that UNDP has provided Aasra separate vehicle which goes to every building and approaches sweepers. It is a part of this project to onboard sweepers also. UNDP has provided some support to set the centre and also support with the salary of the workers in the centre. These workers get 10000-15000 INR/month.

## CARPE, Aurangabad

### **Hindustan Unilever Limited (HUL)**

In 2018, CARPE began a partnership with Hindustan Unilever Limited (HUL) to recover multi-layered plastic (MLP) waste. The Aurangabad Municipal Corporation collects all types of waste from households, and then it is brought to CARPE's Material Recovery Facility (MRF). Waste pickers at the MRF segregate all the dry waste and sell it to scrap dealers. The remaining MLP waste is then sent to a cement factory for co-processing in baled form. It is estimated that the MRF processes approximately 150 metric tonnes of waste per month in Aurangabad, with approximately 100 waste pickers working under the project.

However, the waste pickers are not receiving any monetary benefit under the Extended Producer Responsibility (EPR) project. CARPE provides grocery items, personal protective equipment (PPE) kits, and first aid kits to the waste pickers from the profit margin they have left after selling the dry waste to scrap dealers. The Municipality has provided space for the MRF, and the company pays Rs 4 per kg of waste to CARPE.

Nevertheless, waste pickers are not receiving any money for MLP. CARPE claims that the money is only sufficient to be used for organisational responsibilities like data collection and oversight

The Municipal Corporation collects waste from residential colonies in their vehicles and brings it to the MRF. Waste pickers then segregate the dry waste, and apart from MLP waste, they sell all other valuable materials to the scrap dealer. Waste pickers give all segregated MLP waste to CARPE organisation.

Overall, the partnership between CARPE and HUL has helped in recovering MLP waste and providing some support to the waste pickers. However, there is a need to ensure that the waste pickers are receiving fair compensation for all types of waste, including MLP waste.

## Hasiru Dala, Bangalore

### **Hindustan Unilever Limited, United Nations Development Program (UNDP), Paperman (PRO)**

Hasiru Dala is a waste picker organisation that operates in Bangalore, India, and works with all types of informal scrap dealers, waste pickers, itinerant buyers, migrant workers, DWCC, and door-to-door collection under Extended Producer Responsibility (EPR). The organisation has been voluntarily implementing EPR programs since 2015 and has collaborated with various organisations, including Hindustan Unilever Limited (HUL), Paperman, and the United Nations Development Programme (UNDP).

Currently, Hasiru Dala operates 58 Dry Waste Collection Centers (DWCCs) and 2 Material Recovery Facilities (MRFs), although only around 38-39 DWCCs and one MRF are functional at present. The organisation works with approximately 13,000 waste pickers in Bangalore, although the number of waste pickers incorporated under EPR is not fixed. To incorporate waste pickers under EPR, Hasiru Dala selects them on a rotational basis and informs them about the project in a meeting.

The EPR project with HUL, 2013-14, aimed at managing multi-layered plastic (MLP) waste. The project involved transporting 5 tonnes of MLP waste per vehicle, with a target of 10 tonnes per month initially in Bangalore and later in tier-2 cities. HUL paid only the operation cost of 6.5 Rs/Kg, with 3.5 Rs/Kg going to waste pickers, 2 Rs/Kg for transportation, and 1 Rs/Kg for coordination work of Hasiru Dala. The DWCCs collected 39-40 tonnes of MLP waste per day, which was then transported to cement companies. Initially, the cement companies provided vehicles for free of cost, and Hasiru Dala was able to provide 4-4.5 Rs/Kg to waste pickers. However, as the quantities increased, the cement companies began to demand payment, starting at 1 Rs/Kg and later increasing to 2 Rs/Kg. Hasiru Dala was forced to cut down the payment to waste pickers from 4.5 Rs/Kg to 3.5 Rs/Kg.

Under the EPR project with Paperman, Hasiru Dala received INR 5.5/kg, out of which INR 2.5/kg went to waste pickers, INR 2.5/kg went to transportation,

and 50 paisa/kg was kept for administration cost. However, the project with Paperman was only for a short period of time, and they required 40 tonnes of MLP per month.

UNDP has provided Hasiru Dala with a start-up cost to set up DWCC and MRF. Bruhat Bengaluru Mahanagara Palike (BBMP) provides a certificate to Hasiru Dala for processing a certain amount of waste in a month, but the organisation has not received any other support from BBMP. All MLP waste is currently being transported to BBMP's plant, and Hasiru Dala has to pay to process it, making it a negative cost for the organisation.

Stree Mukti Sanghatana,  
Mumbai

### **Hindustan Coca Cola Beverages (HCCBL) and Hindustan Unilever Limited (HUL), United Nations Development Program (UNDP)**

The project had two parties i.e 1) UNDP and 2) Stree Mukti Sanghatana(SMS). SMS was the implementation partner. The fund was sourced through UNDP by producers/brand owners such as Hindustan Coca Cola Beverages (HCCBL) and Hindustan Unilever Limited (HUL). The implementation partner has established and managed waste recovery facilities across eight different wards of Mumbai. In order to collect waste, each ward has a different number of vehicles, i.e. some wards have 2 vehicles, some wards have 4 vehicles, and the tempo (vehicle) has been given by the Municipal corporation. The organisation does not have to pay any cost for the vehicles. Municipality has provided electricity and water facilities in the dry waste centres, then the only cost of maintenance has to be borne by the organisation. The role of SMS was to collect, segregate, pre-process, clean and dispatch the waste for further recycling. The target for plastic waste collection was 300 and 50 tonnes per month in HCCBL and HUL projects, respectively. The company does not provide any payment to the waste pickers. Instead, the waste pickers sell their collected material to the MRF and receive the prevailing market rates for their material. The rates they receive depend on the type of material they are selling.

All types of plastic materials were collected under the voluntary EPR projects such as MLP, HDPE, LDPE, PET etc. In comparison, the role of UNDP was to cooperate with the Implementation partner in achieving the objectives of the projects. UNDP provided the funds depending on the timely achievement of deliverables as per the agreement. The UNDP provided resources such as logistics, machinery, safety equipment, salaries, expenditures for government engagements and integration of waste pickers and MRF's operations-related expenditures. It also consists of expenses involved in the purchase of waste.

The waste was collected from residential societies, hotels, industries, and public and private institutions. The waste was dispatched to registered recyclers depending on the material type.

There were around 500 waste pickers were involved in various capacities. Around 250 were directly associated with the project by regularly selling the materials to SMS and around 10 waste pickers as an employee in the material recovery facilities.

These workers had to collect waste on the vehicles provided by MCGM and UNDP. While the remaining waste pickers used to sell their waste at the material recovery facility at market rates. In total, the project gives direct employment to 15-20 workers and they were getting salaries between Rs 10000 - 15000 per month.

### **ITC**

In Pune, ITC Limited has partnered with the SWaCH Plus waste picker Cooperative to collect and recycle multi-layered plastics (MLP). This joint initiative has been in operation since 2019. In this project, ITC pays the viability gap to sustain operations at the breakeven point, net of any payment received from the recycler.

Over the last four years, SWaCH Plus has attempted multiple modes of buying MLP from waste pickers and scrap dealers. The rate for purchase from waste pickers has been agreed at Rs. 4 per kilogram. Currently, MLP is bought from over 500 waste pickers at different “feeder points” across the city on a daily basis through a network of 12 vehicles. This MLP is then taken to one of two storage spaces within the city, after which the stocked material is transported to a sorting and baling facility in Wadki, on the outskirts of Pune. At the facility, 25 waste pickers employed as sorters, sort and bale the materials before sending them to recyclers/cement kilns. MLP is being directed towards cement kilns through ITC’s “wow” program, which operates in select cities. The MLP collected from Materials Recovery Facilities (MRFs) is primarily sent to cement plants. Deluxe, a company involved in this process, shreds the MLP and applies heat to compress it into boards. These boards serve as a replacement for wood particle boards and find applications in various products such as tables, doors, furniture, and roofing sheets.

It is important to note that over the 4 years of operation, SWaCH has recorded an average moisture loss of 8-9% and sorting losses (rejection) of 5-7%. This means that for every 100MT bought from waste pickers, only around 85MT can be sent for recycling, i.e., receive an EPR certificate. Currently, this system buys 90MT per month from waste pickers. At its highest scale (Jan 2019), the system bought 135MT from 1,200 waste pickers. On average, a waste picker sees an income of Rs 500 per month from the sale of MLP in this system.

Apart from the two decentralized spaces, all costs are borne directly by the system, i.e., directly by ITC. This includes the cost of the vehicular collection system, rent, utilities and maintenance of the sorting and baling warehouse, salaries of the waste pickers employed at the warehouse, and partial costs of coordination and management. This amounts to a system cost of 18-19Rs per kilogram, and a recovery of Rs. 4 per kilogram from recyclers. The final cost incidence on ITC is therefore approximately Rs. 14 per kilogram.

### **Feeder point system:**

The feeder system was introduced to overcome the challenges of low-value materials and lack of storage space that have traditionally hindered waste collection efforts.

Under the feeder system, waste pickers who do door-to-door collection gather the waste they collect at designated feeder points and SWaCH sends around a vehicle to collect sorted MLP from the feeder points. These feeder points are essentially temporary storage sites for the waste, where the waste pickers can recover the recyclable materials and sell them at their personal cost/choice. The feeder points are strategically located in the area, making it convenient for waste pickers to deposit their waste, and for ITC to collect it for further processing.

The feeder points help to streamline the waste collection process and improve the efficiency of the EPR program. By having a central location for waste pickers to deposit their waste, it eliminates the need for them to travel long distances to sell their waste, which can be time-consuming and costly. It also reduces the amount of waste that needs to be transported and stored at individual households, freeing up valuable space and reducing the risk of environmental pollution.

## vRecycle, Goa

### **Tetrapack**

vRecycle, a waste picker organisation in Goa, does not directly engage with producers/brand owner under EPR but partners with PROs such as Saahas, Repurpose, and Clean Hub. vRecycle recover MLP and low-value plastic based on the requirements of the PROs, segregate and bail it, transport it to cement companies, and handle paperwork if needed.

Currently, vRecycle is collaborating with Tetrapack on an extended producer responsibility (EPR) project, which involves around 15 waste pickers. vRecycle buys Tetrapack from the waste pickers at INR 3/Kg for quantities below 50 Kg and INR 4/Kg for quantities above 50 Kg. After sorting and baling, vRecycle sells the Tetrapack to aggregators at INR 8/Kg, but the aggregators deduct about 15% for moisture before payment. After all deduction the organisation get a margin of INR 2.5/Kg. Initially, Tetrapack helped vRecycle set up a material recovery facility (MRF) center, but they no longer provide any monetary support to the waste pickers. vRecycle bears the cost of transporting the Tetrapak to the aggregator, and they used to send about 5-6 tonnes of Tetra Pack per month. Tetrapack considers incineration and co-processing as part of their EPR initiatives and approached processing plants directly instead of working with waste picker organisations, which led to them withdrawing their support for vRecycle.



### Tetrapak

Waste Warriors is a registered society and solid waste management organisation which began in 2012 from the littered mountains and valleys of Dharamshala and Dehradun. They have contracts with companies under the Extended Producer Responsibility (EPR) program, including Hindustan Unilever Limited and Coca-Cola, and have recently begun working with Tetra Pak. They work with around 150 active waste pickers and have one Material Recovery Facility (MRF) in Dehradun. Waste Warriors also manages two wards in Dehradun as part of a model project with the Dehradun Nagar Nigam. Under Coca-Cola they have contracts for collecting specific materials, such as PET bottles, and have set a target of 70 mT for collection each month. Waste is collected from households, societies, RWAs, aggregators, local kabadiwalas, safaisathis, and their model wards. All waste collected is brought to the MRF, where a team of 10 workers segregate it into different categories before bailing or shredding it and sending it to end recyclers.

Under the Tetrapak project, the current market rate for tetra packs is Rs 12-13/ Kg, and Waste Warriors provides an extra Rs 1.5-2/Kg for waste pickers who sell to them under EPR. That is Rs 4.5/Kg, higher than the market rate of Rs 3/Kg, and also connecting them to government schemes.

Waste Warriors does not have a specific list of waste pickers working under EPR, and they receive the same benefits as those who are not. There may be multiple recyclers for one material, and the funders can help negotiate rates with the recycler, which is beneficial for Waste Warriors. The Nagar Nigam provides space for the MRF, and Waste Warriors receives resource support, but not necessarily infrastructure support.

▼ SWaCH's feeder point



# Towards a Collaborative Future: Our Analysis & Conclusions

“

Government authorities often lack a solid understanding of EPR systems. I have encountered situations where these authorities have approached us, seeking clarification and guidance on various aspects of EPR. This highlights the urgent need for comprehensive training programs to be provided to government authorities, equipping them with the necessary knowledge and skills to effectively oversee and manage EPR processes.

Krishna  
DWCC operator, Hasiru Dala



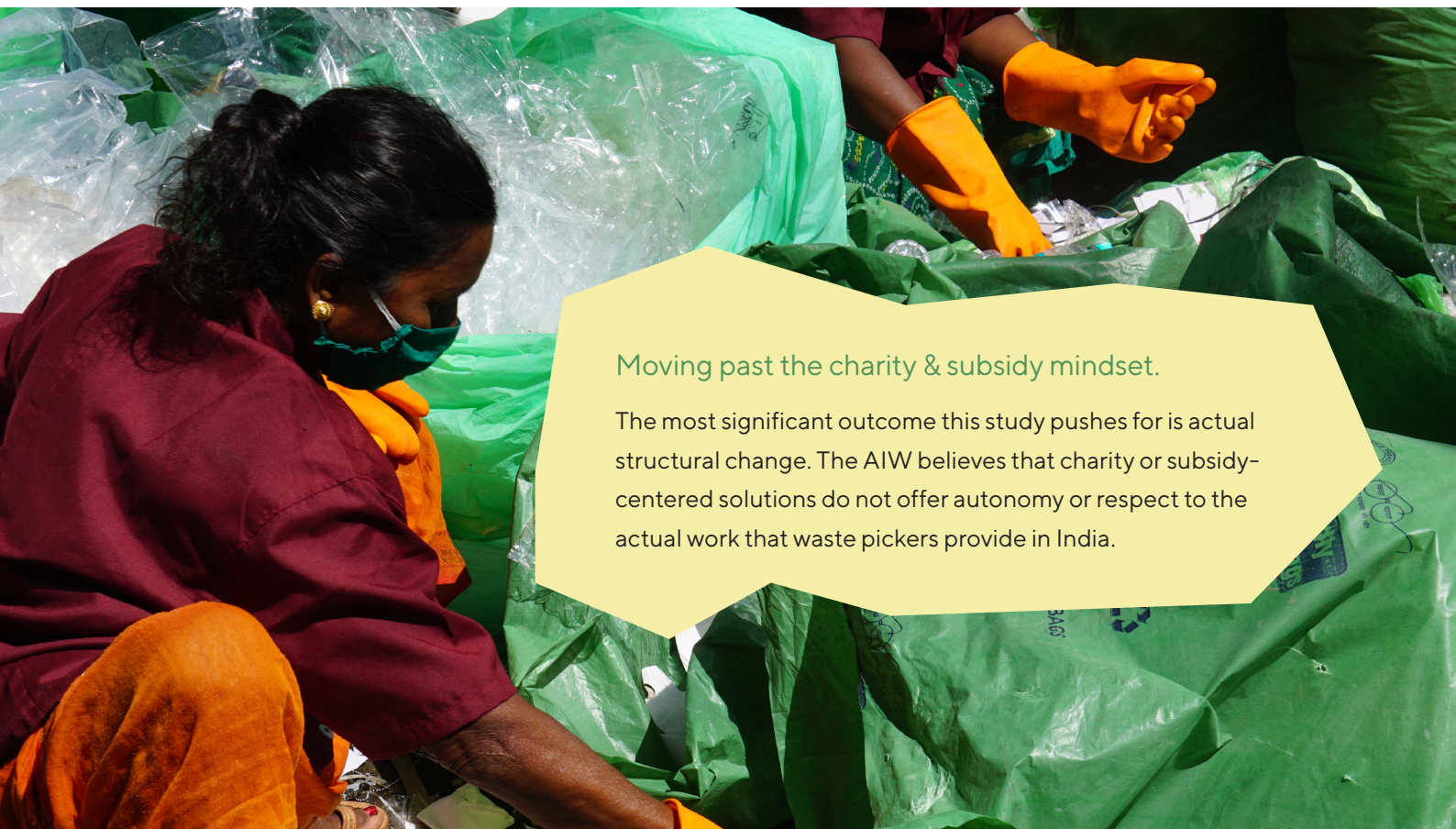
# IAWP EPR GUIDELINES

The International Alliance of Waste Pickers has established a set of guidelines<sup>14</sup> on Extended Producer Responsibility (EPR) to assist waste pickers and their advocates in advocating for more equitable EPR systems on different levels. IAWP's positions on EPR include

1. Government-led mandatory implementation
2. Integration of waste pickers
3. Full payment and risk protection
4. Transparency, oversight and adaptation
5. Clear communication and training on EPR systems,
6. Principles of partnership and due credit.

The IAWP's official stance on Extended Producer Responsibility (EPR) is a flexible and evolving document designed to empower waste picker organisations in advocating for their rights and inclusion within EPR policies and practices. This position has been carefully developed through extensive consultations with waste pickers and field experts, including members of the Alliance of Indian Waste Pickers (AIW). These consultations ensure that the IAWP's stance genuinely represents the perspectives of waste pickers and their vision for the implementation of EPR.

▼ Waste picker from Parisar Bhagini Vikas Sangha segregating waste at MRF



## Moving past the charity & subsidy mindset.

The most significant outcome this study pushes for is actual structural change. The AIW believes that charity or subsidy-centered solutions do not offer autonomy or respect to the actual work that waste pickers provide in India.

# GOVERNMENT-LED MANDATORY IMPLEMENTATION

The International Alliance of Waste Pickers (IAWP)<sup>15</sup> advocates the government bodies to regulate, implement, monitor, and enforce EPR obligations. Waste pickers demand that a tax should be imposed on producers to cover the costs of municipal recycling and waste management programs that include social inclusion. Furthermore, the schemes to integrate waste pickers should not be relegated to charity or subsidy by the government or generating companies but, rather, should be structurally funded as part of the system.<sup>16</sup>

The Solid Waste Management and Plastic Waste Management Rules (SWM & PWM) of 2016, along with the SWaCH Bharat Abhiyaan (SBA) Guidelines 1.0 and 2.0 in India, stressed the importance of involving waste pickers and incorporating informal waste recycling. The Plastics Treaty negotiations led by the United Nations Environment Assembly are also discussing the inclusion of waste pickers and the informal waste recycling sector in the international framework on plastic pollution management and Extended Producer Responsibility (EPR). However, the Government of India's EPR guidelines issued in 2022 overlooked these crucial aspects by neglecting waste workers and actors in the recycling value chain.

## Drawbacks of GOI's EPR Guidelines

Although the EPR framework is a positive step on paper, it fails to explicitly involve waste pickers and incorporate informal waste recycling. The guidelines limit the roles and responsibilities to a specific group, excluding waste pickers, informal waste collectors, Kabadiwalas (itinerant buyers), informal waste traders, aggregators, and others involved in plastic waste collection, sorting, trade, and recycling. Furthermore, the definitions of recyclers and plastic waste processors in the guidelines lack clarity and require further elaboration.

The EPR guidelines also create confusion by merging recyclers and end-of-life processors, undermining the prioritization of recycling over end-of-life processes as outlined in the Solid and Plastic Waste Management Rules of 2016. There is a lack of clarity in the definition of recyclers, leaving uncertainty about whether it encompasses all entities involved in the plastic waste recycling chain or only re-processors and end recyclers. It is crucial to have a clear and inclusive definition of recyclers that encompasses all entities involved.

These concerns highlight the need for explicit definitions and inclusive policies within the EPR guidelines. The uncertainties surrounding the roles and recognition of informal waste workers, as well as the distinction between recyclers and end-of-life processors, pose significant challenges to achieving effective and sustainable waste management.

## Role of CPCB & SPCB

The State Pollution Control Boards (SPCB) and Pollution Control Committees (PCC) are accountable for overseeing EPR initiatives as per the EPR guidelines of 2022 in India<sup>17</sup>. Under the Plastic Waste Management Rule of 2016<sup>18</sup>, both the Central Pollution Control Board (CPCB) and State Pollution Control Boards (SPCB) or Pollution Control Committees (PCC) have responsibilities in monitoring the implementation of Extended Producer Responsibility (EPR) for plastics and also issue EPR certificates.

## Compliance Verification and Oversight Responsibilities

The CPCB, either directly or through a designated agency, is responsible for verifying the compliance of Producers, Importers, and Brand-Owners (PIBOs) through inspections and periodic audits as necessary. They are obliged to ensure that the PIBOs fulfill their EPR obligations. Similarly, the SPCBs or PCCs, either directly or through designated agencies, are responsible for verifying compliance with PIBOs and plastic waste processors within their jurisdiction. They are supposed to conduct inspections and periodic audits to ensure compliance with EPR obligations as outlined in the Plastic Waste Management Rule.

## Mechanisms for Stakeholder Dialogue and Reporting

Both the CPCB and SPCB have the responsibility to establish mechanisms for regular dialogue among relevant stakeholders involved in fulfilling EPR obligations. This aims to facilitate communication and coordination among the stakeholders. The SPCB/PCC must provide an annual report on the EPR portal, concerning the compliance of PIBOs (including plastic packaging material manufacturers) and plastic waste processors in the respective state/ union territory, to both the Central Pollution Control Board and the State Level Monitoring Committee established under the PWM 2016.

## Poor Monitoring Methods Jeopardize Effective EPR Compliance

Existing regulations question the effective implementation of EPR monitoring, raising concerns about the responsibilities of CPCB and SPCB/PCC in monitoring EPR compliance. The absence of specific deadlines for audits and inspections is causing worries about the timeliness and thoroughness of the monitoring process. This lack of clear time frames puts the compliance of PIBOs and plastic waste processors at risk, as delays and inadequate scrutiny may occur. Moreover, the current monitoring system primarily relies on documentation rather than physical observation, limiting its effectiveness. This limited physical observation compromises the true extent of EPR compliance & the identification of potential non-compliance when handling plastic waste. Another concern is the potential for companies to bypass state-level EPR monitoring through national or transboundary registrations.

This refers to the practice of companies registering their products under a national-level EPR system rather than registering separately with each state's EPR monitoring authorities. While a national-level registration may be more convenient for companies, it can create loopholes and challenges for effective EPR implementation at the state level. This loophole can allow corporations to evade scrutiny and accountability at the state level, undermining the effectiveness of the monitoring system.



“

Whatever documents we submit to the brand will get uploaded to the CPCB portal. Separately we submit regular reports to Maharashtra Pollution Control Board (MPCB) as well. As of now, the government's scrutiny is only on the documentation. No physical auditing from the government's side on EPR.

Ritwik Rao

Cofounder and Director at Sampurn(e)arth Environment Solution Pvt. Ltd.





“ ULBs don't have much idea about the EPR. We are only drafting letters for the ULB for the call of expression of interest.

Vishwanath C

Program Manager Livelihood, Hasiru Dala

According to Vishwanath C, Program Manager Livelihood at Hasiru Dala in Bengaluru, Karnataka, it is their organisation that takes the lead in urging Urban Local Bodies to coordinate with cement kilns for waste disposal. However, several waste picker organisations (WPOs) have encountered challenges while dealing with cement kilns, recyclers, and other stakeholders during their compliance with Extended Producer Responsibility (EPR) guidelines.

For instance, the EPR guidelines require WPOs to exclusively sell dry waste to recyclers authorized by the government. However, authorized recyclers often hesitate to accept post-consumer plastic, resulting in wasted time and effort for WPOs and waste pickers. Additionally, the absence of an independent EPR dispute resolution system established by the government further burdens non-governmental organisations (NGOs).

Currently, the sole connection between the two stakeholders, namely NGOs and government agencies, regarding EPR is the monthly submission of data. However, WPOs and NGOs observe a significant gap in communication and coordination between grassroots organisations and bureaucracy, which must be addressed immediately to ensure the effective implementation of EPR programs and SWM.

▼ Aasra Dry Waste Processing Facility

“

The EPR framework is by the corporations and for the corporations. It does not recognize local self-government of any form in India and does not consider local geographies.

Shibu K.N

India Coordinator at GAIA  
(Global Alliance for Incinerator Alternatives)



# INTEGRATION OF WASTE PICKERS

EPR should recognize the essential role of waste pickers and should maintain and expand existing infrastructure while supporting low-barrier pathways to organisations and more formal and decent labour conditions.

## WPOs and PROs

“ We call whoever is working in the waste management as ‘waste workers’. I clearly don’t know the definition of informal waste pickers.

**Arun Murugesh**  
Regional Director, Saahas

There appears to be a lack of clarity and comprehension among PROs (Producer Responsibility organisations) and producers/brand owners regarding the definition of informal waste pickers. While the PWM (Plastic Waste Management) rules do offer a definition for waste pickers, the EPR (Extended Producer Responsibility) guidelines completely omit any mention or inclusion of waste pickers in the document. This ambiguity presents a significant challenge in integrating waste pickers into the EPR framework, and it indicates a failure to adequately address this aspect in the PWM rules.

Producer Responsibility organisations (PROs) and Waste Management Agencies (WMAs) often delegate EPR responsibilities to NGOs or waste picker organisations in areas where they are not operating. In other cases, they collaborate with waste picker groups or contractors who employ waste pickers. However, PROs typically do not engage directly with waste pickers, but rather sign contracts with NGOs or intermediaries. Waste pickers do not have much involvement in the development of EPR mandates. Even the PROs have limited influence in the contract formulation, as the brand owners are the ones who determine the mandate.

Some Producer Responsibility organisations (PROs) contend that waste pickers are not a crucial element of EPR programs because they are not explicitly mentioned in the EPR guidelines. However, they fail to acknowledge that the Solid Waste Management (SWM) rules<sup>19</sup>, which form the basis for EPR guidelines, expressly call for the integration of waste pickers. Unfortunately, certain PROs and companies have chosen to ignore this requirement. There is a pressing need to establish a system that officially recognizes organisations of waste pickers and informal waste collectors, promoting and ensuring their integration into solid waste management, including door-to-door waste collection. Despite the existing rule, the government has not taken adequate measures to enforce compliance, giving certain PROs an opportunity to bypass the provision and operate according to their own interests.

“ EPR is a waste management service and I am unsure about the possibility of waste pickers getting benefitted from it.

**Arun Murugesh**  
Regional Director, Saahas

Arun Murugesh’s statement indicates the systemic understanding of EPR among PROs and how the design excludes waste pickers from EPR in India. Despite informal waste pickers managing a significant portion of waste in developing countries, including India, there appears to be little regard for their contributions to the waste management sector.

According to the International Alliance of Waste Pickers, informal waste pickers handle up to 80% of waste generated<sup>20</sup> in developing countries, emphasizing their importance in waste management. The EPR system places the responsibility of waste management on producers and is expected to lead to better waste management practices. However, it is crucial that the EPR system should acknowledge the principles of just transition<sup>21</sup> and builds upon existing systems. By incorporating informal workers into EPR initiatives, fundamental rights to employment are upheld, facilitating a fair transition, promoting a circular economy, and aligning with the objectives of sustainable development goals (SDGs).<sup>22</sup> However, if the system fails to account for waste pickers and their livelihoods, it may result in their exclusion and further marginalization, exacerbating an already vulnerable group’s situation.

Sampurn(e)arth, a WMA operating in multiple states, prefers to employ daily wage workers rather than informal waste pickers for EPR-related work, which prevents the latter from being included in EPR initiatives. The stated reason behind this preference is that daily wage workers can be more easily hired and managed than waste pickers, who may have less predictable availability and may require more coordination and supervision. For the segregation of non-recyclable plastic, the company pays its labourers, who may not necessarily be waste pickers, a wage. The waste pickers or labourers employed by Sampurn(e)arth receive less payment for collecting non-recyclable plastic and then sorting it, despite making twice the effort of collection and sorting. In Mumbai, they are paid a daily wage of INR 600-700. PROs like Sampurn (e)arth, by employing daily wage workers for waste collection, are effectively denying waste pickers their rightful participation in waste management initiatives, as explicitly stated in the Pollution and Waste Management (PWM) rules.

“ Waste picking and segregation are non-skilled jobs and anyone can learn them at any time. Therefore, it is not necessary to involve waste pickers in EPR projects. There is no mandate from MPCB/CPCB to involve waste pickers in EPR programs. Although it is written in the rules, you can't expect the moon on day 1.

**Ritwik Rao**

**Cofounder and Director at Sampurn(e)arth Environment Solution Pvt. Ltd**

Ritwik of Sampurn (e)arth also stated that they plan to establish self-help groups that would supply waste to their company, operate the machinery, and sell the finished products. The intention is to eventually upgrade these groups to cooperatives. According to Sampurn(e) Earth, this is an effort to include waste pickers in EPR. However, it is unclear whether the workers being incorporated are actually waste pickers. Because EPR guidelines do not incorporate the inclusion of waste pickers or require physical monitoring from the government, PROs can hire anyone to perform EPR-related work.

Waste Management Agencies (WMAs) often meet their monthly targets by purchasing waste from Dry Waste Collection Centers (DWCCs) operated by waste picker organisations. However, they typically pay only market rates for the waste and do not provide any additional support to the waste pickers. Also, most of the WMAs don't provide sufficient capacity-building support to waste pickers. This includes training programs, skill development initiatives, and access to resources that can enhance waste pickers' knowledge and capabilities in waste management practices. This means that while the brand owners or PROs benefit from the EPR services provided by these waste pickers, they fail to offer them the necessary infrastructure support. Another approach adopted by PROs is to collaborate with rented partners such as scrap dealers, Urban Local Body (ULB) collection centers, or waste worker colonies to collect waste. This arrangement allows the PROs to fulfill their waste collection obligations, but it further sidelines the waste pickers involved in the informal sector. In many instances, the waste pickers engaged in EPR projects are unaware that they are actually participating in such initiatives.

In both cases, the brand owners or PROs are not sufficiently providing support to waste pickers in accordance with EPR principles. Waste pickers, who are integral to waste management, encounter difficulties due to inadequate access to infrastructure, resources, and supportive working conditions. Furthermore, it is crucial to highlight that India's EPR law does not result in the expansion of waste collection, particularly in slum communities. While certain materials may be incentivized for collection, comprehensive waste collection coverage in these areas is not adequately ensured, deviating from the intended goal of EPR.





**BALES STACKING**

बाल्स

“

We have a waste worker colony in Bangalore, and we work with Tekedars who buy waste from the waste pickers in the colony. It is difficult for us to directly connect with waste pickers, so we choose to work with a focal point who can manage a group of waste pickers. We pay the Tekedar, who then pays the waste pickers.

**Arun Murugesan**  
Regional Director, Saahas



Green Worms, a Producer Responsibility organisation (PRO) based in Calicut, Kerala, has implemented a unique approach in their EPR project by integrating the 'Haritha Karma Sena' of Kudumbasree<sup>23</sup>, an organisation comprising women waste collectors and sorters. Green Worms has successfully incorporated these women into its waste management operations. As part of their future plans, they aim to train more women to participate in waste collection and sorting activities.

Under this model, the Haritha Karma Sena is responsible for collecting waste from households in areas where Green Worms has contracts with the Panchayath (local governing body). In contrast to traditional payment methods based on the quantity of waste collected, Green Worms provides monthly payments to the members of Haritha Karma Sena.

According to the Green Worms CEO Jabir Karat, in Kerala, the system of informal waste picking is distinct, with contractors bringing labourers from other states to work in Kerala. These labourers are provided accommodation by the contractors and are involved in picking and segregating plastic waste from dump yards. The native waste pickers in Kerala are relatively few in number and are primarily found in locations where high-value plastics or PET bottles are available, such as beaches. When additional workers are required, Green Worms relies on contractors to supply staff on a per-kilogram basis. Accommodation is provided by Green Worms.

Green Worms' integration of Haritha Karma Sena and focus on empowering women waste collectors is commendable. However, their approach to EPR and waste management raises concerns.

1. The model primarily engages with formal waste collection systems, potentially neglecting the involvement of informal waste pickers and scrap dealers.
2. Exclusive reliance on formalized collection may fail to address the needs and contributions of marginalized stakeholders.
3. Concerns exist regarding transparency in payment structure and engagement with contractors.
4. Paying the Kudumbasree workforce as a group may lead to unequal income distribution among members.
5. The arrangement with contractors on a per-kilogram basis raises questions about fair wages and labour rights.
6. Reliance on contractors who bring labourers from other states and provide accommodation may perpetuate an exploitative system with poor working conditions and limited rights for workers.

Waste picker organisations face significant challenges under the EPR mandate that requires selling dry waste only to government-authorized recyclers.

Dealing with government license-holding recyclers is difficult for waste picker organisations, as they impose multiple conditions like:

1. Instances of refusing waste collected without prior notice
2. Unfair Pricing
3. Payment Delays
4. Lack of Transparency
5. Only accept specific types of plastic
6. Inconsistent Orders
7. Limited Market Access
8. Stringent quality control requirements leading to rejections
9. Demands a huge volume of waste in one dispatch

According to Stree Mukthi Sanghatana (SMS), Mumbai and Aasra Welfare Association, Mumbai, government-authorized recyclers are taking advantage of the EPR rules, knowing that organisations cannot comply with the EPR mandate without their certificates, and therefore offering lower than market rates. Furthermore, these recyclers demand huge volumes of good quality plastic in a single dispatch, which smaller organisations may not have the capacity to provide. Consequently, smaller organisations are forced to sell their products at the lowest prices offered by recyclers, or recyclers refuse to take the materials sent by waste picker organisations and do not provide certificates.

Abhishek Yadav, the field coordinator of Stree Mukti Sanghatana (SMS), explains that waste picker organisations face difficulty in convincing their members to sell their waste under EPR because the waste pickers have established relationships with local vendors. Additionally, informal recyclers offer good rates and even provide advances to waste pickers.

Informal recyclers in India face various barriers in getting certified under EPR programs, especially when considering the impact of Goods and Services Tax (GST). The challenges include limited awareness of EPR programs, difficulties accessing information, financial constraints, lack of infrastructure and technology, administrative burden, formalization challenges, and limited representation in decision-making processes. The additional burden of GST can further complicate the certification process for informal recyclers, making it more challenging for them to comply with EPR requirements. Addressing these barriers necessitates tailored support, simplified procedures, financial incentives, and meaningful representation to enable the formal recognition and participation of informal recyclers in EPR initiatives, considering the implications of GST.

Abhishek believes that if MPCB licence holders do not offer a stable price, waste pickers will not benefit from EPR. He states, "If the MPCB licence holder is not giving us the market price then how will we be able to provide the waste picker with a good price? This situation needs to change if EPR has to be beneficial for waste pickers."

# FULL PAYMENT & RISK PROTECTION

## Ensuring Fair Compensation and Market Stability

EPR should develop and institutionalize long-term projects and systems that fund the full cost of system operations and not rely on volunteer or underpaid labour.

In the context of waste management and the Extended Producer Responsibility (EPR) system, it is important to consider the treatment of waste pickers and market fluctuations. Organisations like Saahas rely on waste pickers and contractors (Thekedars) for waste collection, but while compensation is provided, protective equipment and safeguards against market fluctuations are lacking.

Implementing an EPR system involves varying market prices depending on the type of waste. Recycled materials like PET have established market rates that may not account for hidden costs such as living wages, personal protection, and social and statutory compliances. Non-recycled materials, lacking market rates, require estimating the full costs of handling. Without well-documented mandates or support prices, these costs depend on the willingness of producers to pay.

For recyclable materials like PET bottles, the effectiveness of the EPR system depends on the coverage provided. It is crucial to consider whether waste pickers receive the full market rate or only an additional amount. Lubna Anantakrishnan from SWaCH emphasizes the need to calculate additional EPR costs to adequately cover hidden costs like fair compensation, and social protections.

In the case of Saahas, if they are able to sell PET bottles at the viable rate of 30 Rs/kg and the company consistently provides them with an additional 5 Rs as a gap funding, Saahas receives a premium above the market rate whenever it fluctuates. Ultimately, the negotiated rate between the PRO or company and the waste pickers plays a significant role in determining the outcomes of the EPR system. It is crucial to establish fair compensation mechanisms that consider both the market dynamics and the livelihoods of waste pickers, ensuring that they are adequately protected and compensated for their work.



**विभाग**  
**सुका कचरा संकलन केंद्र**  
ब्यवस्थापन : परिसर भगिनी विकास संघ  
संलग्न : स्त्री मुक्ती संघटना



पुढील  
पिढीसाठी चांगली देण  
माझा परिसर  
स्वच्छ ठेवेन

**डला स्वच्छ करूया कचरा वेगवेगळा ठेवूया**



“

Before EPR, we had the freedom and independence to sell our materials as we wished, and no one paid attention to us. There were no rules specifying that waste should be collected from specific societies. Nowadays, there are many conditions due to EPR. We have no freedom to sell materials and can only sell to government-licensed recyclers. Previously, we sold to scrap dealers who gave us good prices. For instance, a license holder pays us only Rs. 30 per kg for Bisleri bottles, whereas a local dealer would pay us Rs. 35 per kg. If a local dealer is paying Rs. 25 per kg of Phugga (mixed plastic), a license holder would pay us only Rs. 20 per kg. License holders always pay us Rs. 5 less.

Anjana Patole

Waste Picker, Member of Parisar Bhagini Vikas Sangh



डा  
जंतू  
रिका

▼ Table: Rates received by waste pickers for different materials under EPR

WPO/NGO	City	Brand/ Producer	Direct/ Indirect	Material	No of WPs involved	Remuneration for WPs
<b>Aasra Welfare</b>	Mumbai	HUL	UNDP	PET, HDPE, LDPE (10%)	200	Market rate. No payment for MLP
<b>CARPE</b>	Aurangabad	HUL	UNDP	MLP	100	Groceries
<b>Hasiru Dala</b>	Bangalore	HUL	UNDP	MLP	34 DWCCs	3 - 4.5 Rs/Kg
<b>SMS</b>	Mumbai	HUL & HCCBL	UNDP	MLP, HDPE, LDPE, PET	500	Market rate. No payment for MLP
<b>SWaCH</b>	Pune	ITC	Direct	MLP	1200	4 Rs/Kg
<b>Waste Warriors</b>	Dehradun	Tetra Pack	Direct	Tetra Pack	150	4.5 Rs/Kg
<b>VRecycle</b>	Goa	Tetra Pack	Direct	Tetra Pack	15	3 Rs/Kg <50 Kg 4 Rs/Kg > 50 Kg

## Empowering Waste Pickers through EPR

According to Aasra Welfare Association, a waste picker Member Based organisation (MBO) based in Mumbai, their participation in an Extended Producer Responsibility (EPR) project for Unilever, with UNDP as a third-party facilitator, has yielded notable improvements in their working practices in terms of formality and efficiency. The project has also facilitated the social empowerment of waste pickers, enabling Aasra Welfare Association to expand its network and bring in more waste pickers. The assistance provided by UNDP includes the provision of essential equipment such as a bailing machine, sorting conveyor belt, and shredding grinding machine. Furthermore, the project has offered valuable technical and financial support, leading to enhanced waste collection efforts by Aasra Welfare Association. Notably, participating companies have supplied vehicles that have enabled them to increase their waste collection capacity. As a result, they have been able to offer waste pickers 1 or 2 Rs more per kilogram compared to other waste aggregators.

In a similar vein, Waste Warriors, a waste management agency operating in eco-sensitive areas in the Himalayas, has collaborated with over 150 waste pickers to improve waste management practices. Waste Warriors has currently established an EPR contract with Tetra Pack and provides an additional 1.5-2 Rs per kilogram to waste pickers. However, it is important to note that no specific contracts have been signed with waste pickers under the EPR framework.

## Lack of Infrastructure Support

Regrettably, not all brand owners or producers are willing to extend infrastructure support to WPOs. Some brand owners selectively engage with organisations that already possess the necessary infrastructure, primarily to minimize costs. WPOs are urging brand owners to recognize that small-scale WPOs and waste picker Self-Help Groups (SHGs) cannot effectively participate in EPR programs without infrastructure support from brand owners or producers, which entails a substantial one-time capital investment.

SMS and Aasra Welfare Association report that many large companies are not effectively fulfilling their obligations under Extended Producer Responsibility (EPR) regulations. These companies prioritize the recovery of recyclable plastics while disregarding multi-layered plastics (MLPs) and other low-value plastics, which constitute a significant portion (approximately 60%) of the collected dry waste<sup>24</sup>. Consequently, they fail to properly manage MLP waste as required by EPR regulations. Only high-value plastics like PET, HDPE, and PP, which make up the remaining 40% of the waste, receive substantial attention within the EPR framework. India faces challenges in processing MLP waste due to a lack of appropriate technologies and recyclers.

Moreover, MLPs require significant storage space and typically fetch lower prices in the market. As a result, SMS resorts to selling MLPs to cement kilns under the EPR framework at whatever price they can secure, and in some cases, waste pickers organisations are forced to give away MLPs to cement kilns for free while companies claim their EPR compliance based on such transactions. Parisar Bhagini Vikas Sangh currently sells 40% of the material to license holding authorized recyclers or cement kilns of the Maharashtra Pollution



Control Board (MPCB), while the remaining 60% of high-volume, low-value plastics are sold to local vendors or informal recyclers.

## Challenges of Collecting MLPs

Hasiru Dala highlights the fact that only a small fraction of Multi-Layer Plastics (MLPs) are being collected under EPR, while the majority of MLPs end up in landfills or informal markets. However, collecting and sorting MLPs is a time-consuming and challenging task, and even after this effort, producers may refuse to accept the waste due to its poor quality. Producers often negotiate with Waste Picker organisations (WPOs) to reduce costs, but they are unwilling to compromise on the quality of the waste. This situation is compounded by the fact that different types of MLPs require specific sorting techniques, which WPOs must be trained on. Despite these efforts, when producers refuse to accept the collected MLPs, waste pickers are forced to sell them for a lower price, or in some cases, even give them away for free to cement factories.

The EPR system faces another challenge in delayed payments from brand owners or producers, according to WPOs. They claim that producers often impose short deadlines for waste recovery and frequently delay payments.

Waste pickers typically avoid collecting MLPs or other non-recyclables, and it is difficult to convince them to do so for a monthly payment, as most of their daily expenses come from selling scrap. Such delays in payment further discourage waste pickers from collecting MLP. For example, SWaCH, a WPO from Pune, had to pay waste pickers out of their own pockets for about six months because ITC was not paying on time. Despite WPOs' efforts to make payments to waste pickers more sustainable, delays in payment from companies render their efforts futile.

## Impact of EPR on Waste Pickers

Arun Murugesh, Regional Director at Saahas, shared that their impact surveys have shown positive changes for waste pickers under EPR. According to him, waste pickers now have a better understanding of MLP and are earning a dependable regular income, which allows for a more planned life. Initially, he expressed uncertainty about whether waste pickers would benefit from the waste management service. However, in a later statement, he acknowledged that impact surveys have shown positive changes for waste pickers under EPR. This contradictory perspective raises questions about the reliability and generalizability of the impact surveys mentioned by Arun Murugesh.

However, Waste Picker organisations have a different perspective on the matter. Lubna Anantakrishnan, Advisor to SWaCH, shared,

“ There is a lot of effort put in by the waste pickers every single day to give in one sack or two sacks full of MLP every day. And because of that, the expectation is very high that the cost recovered at the end of the month should be quite high. But at the end of the day, it is a low-value and high-volume material, so that doesn't add up

to a huge amount. For having to make the compromise of getting the payment once a month. Even if you get 20 Rs every day it is still fine because you are putting in that effort and you are getting paid immediately. But there was an issue of perceiving it to be not enough if you are getting 600-700 Rs at the end of a month. It has been a constant point of friction for the WPOs if the payment is very late and by any chance, there is an issue with the amount, cross-checking is extremely challenging.

**Lubna Anantkrishnan**

Advisor to SWaCH

Sunil Chandak from CARPE, a waste management agency working with HUL, was asked about the additional benefits waste pickers receive under the EPR program. He responded that they distribute groceries to waste pickers from the remaining amount. However, some argue that this approach reduces waste pickers' integration to a mere act of charity rather than engaging them on an equal level<sup>25</sup>.

“ Suppose X Company pays us 4 Rs per kilogram for MLP, then we will be responsible for managing the transportation costs and the payment for whatever manpower is needed. Whatever profit margin we have left, we provide grocery and PPE kits to waste pickers. Besides that, we provide them with sarees, a water jar at the shed, and tea twice a day. Additionally, we provide a first aid kit.

**Sunil Chandak**

Program Manager, CARPE

Another major challenge faced by Waste Picker organisations (WPOs) and Producer Responsibility organisations (PROs) in EPR projects is the inconsistency in orders from companies. Arun Murugesh, Regional Director of Saahas, stated that the consistency of EPR projects is highly dependent on government policy changes. If the Central Pollution Control Board (CPCB) or State Pollution Control Boards (PCBs) propose a new policy that the brand owner finds unacceptable, the brand owner may choose to withdraw from the project. As a consequence, this withdrawal would lead to a delay of two to three months before they resume the auction process again. The uncertainty and potential back-and-forth between the regulatory authorities and the brand owner could impact the project's timeline and create additional challenges for WPOs. Some brand owners want the entire waste collection target to be achieved in a short period of time. They would start late and then ask PROs to complete the task within a shorter time period, which poses a challenge for waste pickers and organisations involved in the project.

“ Since contracts cannot be consistent, we have to keep stopping and starting the projects. We won't be able to source the materials immediately, and when there is enough capacity/quantity, there won't be any vendor available.

**Clinton**  
Founder, vRecycle

This observation sheds light on the challenges faced in maintaining continuous operations within the waste management industry. As a consequence of the inconsistent nature of contracts and material availability, waste management systems may tend to rely more on workers in the informal economy rather than formalized workers. Informal workers often demonstrate greater flexibility with their labor, enabling them to adapt to the varying demands and fluctuations in waste collection and processing.

In the context of Extended Producer Responsibility (EPR) systems, it is mandated that Producers/Brand owners are responsible for providing the necessary infrastructure for waste processing, collection, and transportation. However, there are instances where producers fail to fulfill their obligations, violating the agreements in place. As a result, Waste Picker organisations (WPOs) find themselves in the position of continuously negotiating with producers to obtain the required support.

Furthermore, another challenge arises when transporters suddenly increase their rates without prior notice, creating additional financial burdens for WPOs. In such cases, brand owners may hesitate to reimburse the increased costs, further exacerbating the situation.

While some Municipal Corporations in cities like Mumbai and Pune, have established Dry Waste Collection Centers (DWCCs) and provide free vehicles through municipal corporations, not all cities receive this level of support. The provision of such support, although limited to specific locations, does offer some relief to WPOs and NGOs operating in those areas.

Overall, the inconsistency and violation of agreements by producers, coupled with unexpected cost escalations and the lack of uniform support across cities, pose significant challenges for WPOs involved in EPR projects.



# TRANSPARENCY, OVERSIGHT & ADAPTATION

There should be more transparency in the whole process of EPR from bidding to the final data. Waste Pickers should be consulted in each stage and there should be clear and accessible grievance and dispute resolution mechanisms.

## EPR Bidding Process

Despite its introduction in 2016, the process of securing Extended Producer Responsibility (EPR) projects in India remains ambiguous and unclear for small waste picker organisations. Waste Picker Member Based organisations (MBOs), as highlighted by Stree Mukti Sanghatana (SMS), often face unfavorable conditions when navigating EPR procedures.

“Transparency and traceability are not necessary for Indian EPR. In Indian EPR, brands do not care much about workers’ benefits, they just need documents. But EPR is very much concerned about the labourer’s rights. They conduct audits to check whether workers are getting the mandated benefits under EPR ( PF, PPE, social audits, right to join trade unions etc). All these points would be there in the mandate and a third party will conduct audits on behalf of the global brand. No such mandate for workers’ benefits would be there in the Indian EPR. Brands just want to meet compliance at the lowest possible cost. Across India, the cost under EPR is coming down. Moreover, the EPR document itself is only talking about compliance and has not mentioned anything about workers’ welfare. For the namesake, certain organisations do awareness campaigns or health check-ups but these are not mandatory in Indian EPR.

**Jabir Karat**

CEO, Green Worms PRO, Calicut

Eg for best practice globally\* USA’s new EPR (Extended Producer Responsibility) for packaging law requires processors at “commingled recycling reload facilities” to provide their workers with a living wage and supportive benefits. This progressive approach aims to ensure that workers in the recycling industry receive fair compensation and essential benefits, promoting a more equitable and sustainable waste management system<sup>26</sup>.

According to Hasiru Dala, Waste Picker organisations (WPOs) are facing significant challenges in bidding for Extended Producer Responsibility (EPR) projects due to the favorable relationships between larger companies and recyclers. Recyclers, who have access to a diverse range of waste types including door-to-door, post-production, and post-consumer waste, enjoy the advantage of obtaining waste for free. On the other hand, waste picker organisations primarily have access to door-to-door and post-consumer waste.

Furthermore, recyclers tend to quote lower prices compared to waste picker organisations, creating an unsustainable pricing scenario for the latter. This puts waste picker organisations at a disadvantage in competing for EPR projects. Also, without labor standards under EPR, it is too easy for companies with poor labor standards to outcompete (by providing cheaper services) those with good labor practices. Hasiru Dala highlighted that waste picker organisations differ from Producer Responsibility organisations (PROs) in their approach to waste, as they do not view it as a free resource for processing. While organisations like Hasiru Dala Innovations have access to waste without cost, they still compensate waste pickers for segregation, making their pricing less competitive within the realm of EPR projects.

Not even NGOs/WPOs, but PROs also face issues while bidding.

“ Many companies gives contracts to the vendors who quoted the least commercial. More responsible companies would do their due diligence and give it to the people who would actually work. It depends upon the brand and its objective.

**Ritwik Rao**

**Cofounder and Director at Sampurn(e)arth Environment Solution Pvt. Ltd**

The following are two statements made by Karthik, Recycling Program Manager, Hasiru Dala, regarding the challenges faced by waste pickers in EPR projects:

If you are collecting waste in Bangalore, your closest disposal point is a cement factory somewhere in Andhra. We send waste to cement factories in Wadi and Muddapur. Wadi is the closer and more convenient one for us to send our waste to. Our base price without charging for anything will be between 5.5-6.5 Rs/Kg which makes it really difficult for us to compete with the recyclers who quote much lesser prices.

For the Britannia EPR project, there was an online bidding process. You have to be available for auction at a particular time and you put in your prices and you get

your bid number and again you put in a lower price. In online bidding, we never really crossed the first round of the process. For Britannia, we started bidding at 1.75 rupees per kg and it went lower than that.

**Karthik Natarajan**

Recycling Program Manager, Hasiru Dala

In recent years, there has been a notable increase in the participation of private players in Extended Producer Responsibility (EPR) bidding processes. Companies like Shakti Plastic, which are primarily recyclers, have secured a significant number of tenders. This trend has reduced the opportunities available to Waste Picker organisations (WPOs) in the EPR space.

For these companies, EPR projects serve as an additional benefit to their main operations, which focus on recycling and waste management. By participating in EPR initiatives, these companies can enhance their waste sourcing capabilities and access a diverse range of materials, including those covered by EPR regulations. This allows them to expand their recycling operations and maximize their efficiency in processing various waste streams.

The established infrastructure, expertise, and resources of private recycling companies give them an advantage in winning EPR tenders. They often have established networks with producers and possess the necessary technology and capacity to handle large volumes of waste. This competitive edge makes it challenging for WPOs to compete with them in the bidding process.

“ Recyclers are already processing plastic and companies can get the EPR certificate just by providing them one rupee per kg for processing. But we are not already processing plastic. We are an aggregator at best. We only have intermittent contracts for EPR. Suddenly they would require like a hundred tons and there won't be any demand. It's not a large volume sent out over a period of time. EPR is mostly a volume game. We need like 10 tons of containment in one place at a particular time when their vehicle comes. Which is very difficult at the dry waste collection centre. If I have a large aggregation centre where I can store 10 tons of MLP. Then that's a different story. With the dry waste collection centre, the decentralized collection system works really well but for recycling, you need a centralised facility.

**Karthik Natarajan**

Recycling Program Manager, Hasiru Dala



# GRIEVANCE REDRESSAL & NEGOTIATION

NGOs have highlighted the lack of consistency in the EPR system, particularly in terms of dispute resolution and price negotiation, which seems to vary depending on the company involved.

According to Hasiru Dala, negotiation may take place in person in some cases, adding to the overall lack of uniformity in the EPR bidding and pricing process.

SWaCH, an organisation that works with waste pickers, highlights the unequal bargaining power of brand owners under the EPR system. When SWaCH received an EPR project from ITC for MLPs in 2019, the initial rate offered was only 2.5 Rs/Kg, which required a lot of effort from SWaCH to renegotiate the price and increase it to 4Rs/Kg. However, during the pandemic, SWaCH was able to negotiate with ITC to cover the cost of warehouses and staff even when there was no output. On the other hand, Hasiru Dala had to raise concerns to the brand owner during COVID when waste pickers were asked to collect waste while wearing PPE kits. Eventually, the brand owner agreed to Hasiru Dala's concerns. NGOs also point out that dispute resolution and price negotiation can vary depending on the company, and there is no uniformity in the EPR system, either in bidding or pricing.

However, instances where NGOs/WPOs have successfully negotiated fair prices with brand owners are uncommon. In most cases, NGOs/WPOs struggle to secure fair pricing through negotiations with brand owners. Some WPOs have even lost contracts due to unsuccessful negotiations during the renewal period. Similarly, PROs also face challenges during project renewals. Certain cases may force WPOs/PROs to approach distant cement factories if local ones shut down, resulting in increased costs. While WPOs/PROs attempt to negotiate with brand owners, the inability to negotiate during the contract period is a significant flaw in the EPR system, placing a burden on WPOs. There is a fear that if WPOs negotiate during the contract period, they may not obtain the EPR project for the following year. NGOs/WPOs have pointed out that brands always choose those who offer the lowest prices. To ensure that waste pickers receive the intended benefit from EPR projects, a government-involved grievance redressal mechanism is crucial, according to WPOs.

“ EPR has no set rate, has nothing to do with rates, and is only concerned with quantity.

**Imran Sheikh**  
Field Coordinator, Aasra

# CLEAR COMMUNICATIONS & TRAINING ON EPR SYSTEMS

EPR should fund training and comprehensive engagement to enable all affected stakeholders to plan, implement, and renew a system. The EPR model needs to be described in detail. All stakeholders should receive training on EPR before and during the planning and implementation of a new system.

“

We visit waste pickers regularly. But, making them understand EPR is a strenuous task. Due to the constant changes in plastic categorization by the CPCB, we have to continuously train or remind them. The waste pickers are angry with us because they think they are getting less money due to the organisations. It seems to them that the organisation comes up with new rules every day and that is why they earn less. Providing frequent training to waste pickers requires proper support from brand owners and PROs.

**Sunita Patil**  
Coordinator, SMS

Out of the waste pickers interviewed for the study, only a small minority were found to be familiar with EPR even though they were working on EPR projects. Below are some of the responses that we gathered from the waste pickers who had some knowledge of EPR:

“

It is the responsibility of the MLP producers to retrieve it back from the society.

**Kumutha**  
Former Waste Picker and DWCC operator, Hasiru Dala

“

I know that EPR means the organisation receives money from UNDP for sending all collected plastic for recycling. I know that if the organisation gave the proper information about material which was sold to license holders for recycling then the organisation would get benefits from UNDP.

**Anjana Patole**  
Waste Picker, Stree Mukti Sanghatana

Organisations such as Hasiru Dala and SMS arrange monthly meetings where waste pickers, slum leaders, and DWCC entrepreneurs come together to discuss various EPR projects and address any concerns related to work. Before taking up a project, Hasiru Dala conducts FGDs with waste pickers and DWCC entrepreneurs to gather their opinions and suggestions, which are then communicated to the brand owner/producer.

According to Saahas, they provide training to waste pickers from different colonies at various levels. While the EPR contract mandates that the PRO should provide training to waste pickers, WPOs claim that the training only focuses on waste segregation and lacks any knowledge-sharing on EPR.

▼ SWaCH's MRF Facility in Pune

“

For me personally, EPR is structured in a way which incentivizes polluting. It is just like the previous Sinner's Tax method. The fine is never as big as the cost of the crime itself. As of now, the EPR mandate is structured in a way in which you can get away with a fine. The better thing is to look at it as a larger ecosystem. Most of these materials don't exist in isolation. Since we are dealing with waste, I would say that it's a lot more complex. E-waste is a better example of how EPR should be handled. It doesn't look at the material, it looks at the products. Imagine similarly if you look at products and not look at plastics as a specific thing. I think it will become a stronger way of recovering plastic.

**Karthik Natarajan**

Recycling Program Manager, Hasiru Dala





# PRINCIPLES OF PARTNERSHIP AND DUE CREDIT

Principles of partnership and credit must be developed collectively and adhered to between key stakeholders. Waste picker organisations should be made aware of and given the chance to influence or develop, and approve or disapprove of official communications and publicity related to an EPR system that involves them.

“ In India, recycling is taking place more in the informal sector than in the formal sector. Still, the informal sector gets absolutely no representation in that. They are regulated in a way that collection receipts from the DWCC are acceptable in the EPR supply chain. Whereas disposable receipts from an informal recycler mean nothing. Informal recyclers are the stakeholders who make entry-level plastic products like buckets, mugs etc. They are typically down cyclers by blending multiple plastics and making them into products.

**Karthik Natarajan**

**Recycling Program Manager, Hasiru Dala**

While WPOs play a crucial role in collecting and sorting waste, they often encounter difficulties when dealing with low-quality plastics, multi-layered plastics (MLPs), and other materials that may not meet the stringent quality requirements of recyclers or cement kilns.

One major issue is that recyclers and cement kilns may impose strict regulations on the quality and moisture content of the waste they accept. This can make it challenging for WPOs to find suitable outlets for certain types of waste they have collected. As a result, WPOs may have to dispose of the waste at their own cost or even give it away for free to these stakeholders.

In such scenarios, WPOs may not receive due credit or financial benefits for the efforts they have invested in collecting the waste. The stakeholders who claim EPR credits for the waste collected by WPOs might not adequately compensate or acknowledge the contribution of waste pickers.

WPOs highlighted that formal recyclers are accepting only specific types of plastics such as HDPE, PPE, etc. They do not accept the vast range of blended plastics that exist. Consequently, a significant amount of society's waste, particularly food containers, is downcycled in the informal sector<sup>27</sup>.

Despite recycling the bulk of the day-to-day waste, informal recyclers receive no representation in the EPR system. If the informal recyclers are also acknowledged and included in the EPR system, they can also benefit in the long term.

Informal recyclers typically use a downcycling process to blend multiple plastics to create new products. However, formal recyclers only accept monotype plastics such as HDPE, PPE, etc. and do not consider blended plastics. As a result, informal recyclers have no representation in the EPR program, which means the bulk of waste generated from food containers is not considered in EPR.

Unfortunately, only less than 20% of recyclers are government authorized and provide EPR certificates according to MPCB rules. The remaining 80% are unregistered and work in illegal ways. Therefore, if the EPR mandate and other government rules force the informal sector to shut down their businesses, the regulated sector will not be able to handle the waste that is generated.

In addition, waste picker organisations are currently confronted with a significant challenge. Authorized recyclers, who are eligible to claim Extended Producer Responsibility (EPR), are now asserting their own right to claim EPR and consequently refusing to accept materials from waste picker organisations. This poses a threat to waste picker organisations in obtaining EPR projects. Aasra, for instance, has been selling PET bottles to Unitech Fiber for a long time. However, Unitech Fiber is now offering a lower rate for bottles while claiming to provide an EPR certificate. The organisations are concerned that in the future, large companies may start doing EPR themselves, which could further impact waste picker organisations.

“ The number of authorized recyclers is limited and the demand is increasing year after year. So only a limited amount of credit can be availed each year. And the availing parties are increasing. So unless the general pool increases, it is like a bidding war to take the credits.

**Ritwik Rao**  
Sampurn (e)arth

To efficiently process and manage the collected waste, EPR stakeholders, including producers or brand owners, seek partnerships with waste processors like cement kilns. Cement kilns have the capability to use waste as a fuel substitute in their operations, making them a viable option for waste management.

The challenge arises for Waste Picker organisations (WPOs) when it comes to negotiating with cement kilns for waste processing. Some cement kilns demand payment for accepting the waste from EPR stakeholders, including WPOs. This payment can take the form of a charge, usually ranging from 3Rs/kg to 5Rs/kg,

for providing an EPR certificate or attestation that the waste has been properly processed.

The issue here is that the WPOs, which are often informal or community-based organisations, may face financial constraints in paying these charges to cement kilns. This obstacle affects the smooth functioning of the EPR system, as WPOs play a crucial role in waste collection and handling, especially for lower-value items.

In summary, some cement kilns require payment from waste management stakeholders, such as WPOs, for processing the collected waste and providing the necessary EPR certificate. This payment can be a significant challenge for WPOs, hindering their ability to effectively participate in the EPR system and manage waste efficiently. Addressing this issue and finding suitable solutions for such payment challenges are vital to ensuring the success and inclusivity of the EPR system

“ 15 to 20 years ago the recyclers and cement kilns purchased waste from us and now they are taking money from us. The cement kiln owners say that we are getting money through EPR and they are processing hence they also want money.

**Imran Sheikh**  
Field Coordinator, Aasra

WPOs are urging the government to intervene and find a solution to the issue of payment to cement kilns for processing waste in the EPR system. If this issue is not resolved, it will continue to be a burden for waste picker organisations, and ultimately, it will have a negative impact on the EPR system. The additional fees charged by cement kilns for EPR certificates further exacerbate the problem.





# OUR RECOMMENDATIONS

At AIW we've resonated largely with the recommendations that have been detailed in the IAWP report. We present our Indian contextualized version of these in this section. This will take a collaborative effort from all stakeholders in the ecosystem.

## Set Clear Timelines

The Ministry of Environment, Forest and Climate Change (MoEFCC) should establish specific timeframes for audits and verifications by the Central Pollution Control Board (CPCB). This will ensure timely assessments and regular monitoring.

## Formulate a Steering Committee

Create a dedicated steering committee, as proposed in the EPR policy guideline, consisting of representatives from CPCBs, SPCBs, industry experts, waste management organisations, and waste picker associations. This committee will oversee the implementation, monitoring, and supervision of the EPR framework.

## Identify a Consulting Agency

Due to workload and resource constraints, the government should appoint a consulting agency, either from the public or private sector, to serve as a monitoring and verification sub-agency under the CPCB's supervision. This agency will conduct inspections, audits, and verifications required under the EPR.

## Allocate Adequate Resources

Ensure that the identified consulting agency receives sufficient resources, including manpower and infrastructure, to effectively carry out monitoring and verification tasks.

## Foster Collaboration and Information Sharing

Encourage collaboration and information sharing among the CPCB, SPCBs, consulting agency, and other stakeholders involved in EPR implementation. Sharing best practices, data, and insights will streamline the monitoring process and enhance its effectiveness and efficiency.

## Representation of waste pickers in EPR-related forums

All forum committees which have been constituted to monitor and review the implementation of EPR guidelines (mentioned in Section 18) and must have mandatory representation of waste-pickers organisations, this suggestion is in line with the prescription made in both Solid Waste Management & Plastic Waste Management Rules 2016.

## Consistent Orders in EPR Programs

One of the challenges faced by Waste Picker organisations (WPOs) in Extended Producer Responsibility (EPR) programs is the inconsistency in orders from companies. To address this issue, it is suggested that orders should be done on an annual basis rather than monthly, which would allow WPOs to spread out their orders throughout the year.

Clinton from vRecycle emphasized the importance of consistent orders, stating that "It could be 5 tonnes a month or 50 tonnes a month, just keeping the figure constant is more helpful". Consistency in orders helps Waste Picker organisations (WPOs) and waste pickers by providing a stable and reliable source of income, contributing to the success of Extended Producer Responsibility (EPR) programs.

To ensure such consistency, Clinton suggested that companies should have alternatives in place, such as having two cement vendors. This approach allows producers to switch to another vendor if one refuses to accept the waste materials. By having multiple options available, companies can avoid disruptions in waste management operations and guarantee a continuous outlet for waste materials.

Furthermore, to enhance the effectiveness of EPR programs, a recommendation could be made for producers to ensure the existence of some end market within a reasonable distance. This means that producers should identify various potential waste processing facilities or end markets that can accept the waste materials generated from their products. In the event that no suitable alternatives are available within the specified distance, the producers would have to take responsibility for the waste themselves.

By making this recommendation, producers are encouraged to proactively explore and establish relationships with waste processors and end markets within a feasible radius. This would prompt them to identify and develop various options for responsible waste management, fostering a more sustainable and inclusive waste ecosystem.

## Other Factors to Consider

### **Streamlining EPR and Standardizing Rates**

The WPOs emphasize the need for streamlining EPR to create a fair market for everyone, including waste pickers. Currently, different values exist for EPR in various regions, leading to a demand versus supply situation.

In the context of Extended Producer Responsibility (EPR) for waste management, the demand versus supply situation refers to the varying rates or values set for EPR in different regions or states. Each region may have its own unique rate for EPR, leading to inconsistency and confusion within the waste management system.

On one hand, the demand for waste management services under EPR arises from producers or brand owners who are obligated to fulfill their EPR

responsibilities by managing the waste generated from their products. They seek suitable waste processing options, such as Waste Picker organisations (WPOs) or other waste processors, to meet their EPR obligations.

On the other hand, the supply of waste management services is provided by WPOs and other waste processors who are capable of handling and processing the waste materials. These entities offer their services to producers seeking to comply with EPR regulations.

The demand versus supply situation becomes an issue when different regions set different rates for EPR. For example, one region may have a higher EPR rate, while another region has a lower rate. This disparity in rates can create imbalances in the waste management system. Producers might prefer regions with lower EPR rates, resulting in an overflow of waste to those areas, while other regions with higher rates may experience a shortage of waste materials for processing.

This variation in EPR rates can lead to confusion for producers, waste processors, and waste pickers alike. A lack of standardization may hinder the creation of a fair market for everyone involved, including waste pickers who rely on a stable and consistent income from waste collection.

To address this issue and streamline the EPR system, stakeholders, including government authorities and waste management organisations, could work together to establish a standardized rate for EPR across regions, similar to how certain materials like PET or plastic bags have uniform rates. This standardization would promote fairness, consistency, and a more balanced waste management market, benefiting all stakeholders and ensuring a more effective implementation of EPR initiatives.

Tetra packs have only one corporation, making it easier for WPOs and PROs to explain the cost using a bottom-up approach. In contrast, MLPs have multiple producers, making it challenging to streamline the rates. By having a uniform value, waste pickers will be able to sell their collected waste at a fair price, and companies will have a consistent rate for their EPR obligations. This will benefit the waste management system as a whole, creating a more sustainable and efficient model.

### **The Need to Include Informal Recyclers in EPR Programs:**

It is important to find ways to involve informal recyclers and waste pickers in EPR programs. This could include providing them with training to improve their processes, creating incentives for them to join the formal sector, and setting up a system to accept disposable receipts from them. The inclusion of informal recyclers will not only ensure a fair market for everyone but also contribute to a sustainable waste management system.



Improving EPR by Prioritizing Post-Consumer Waste Collection  
Waste pickers organisations (WPOs) have been advocating for a more significant emphasis on post-consumer waste in Extended Producer Responsibility (EPR) programs. Currently, the recycling industry tends to favor post-production waste received from companies over post-consumer waste. This preference is primarily due to the ease and cost-effectiveness of retrieving post-production waste, which includes scraps and rejected products generated during the manufacturing process.

Recycling companies find post-production waste appealing as it is produced in controlled environments, such as factories, and is generally of higher quality with fewer contaminants compared to post-consumer waste. However, this imbalance has raised concerns, especially among WPOs, who stress the need for a fairer distribution of attention and resources towards post-consumer waste in EPR programs.

WPOs argue that post-consumer waste deserves greater attention for several reasons. Firstly, post-consumer waste constitutes a significant portion of landfill waste and environmental pollution, making its proper management crucial for sustainable waste practices. Secondly, by prioritizing post-consumer waste, there is an opportunity to empower waste pickers, who often work in the informal sector, and provide them with livelihood opportunities through waste collection and recycling initiatives.

To create a more effective EPR system, WPOs propose distinguishing between post-production and post-consumer waste, with a stronger mandate for the latter. They believe that placing a higher emphasis on collecting post-consumer waste would encourage recyclers to focus more on processing this type of waste, leading to improved recycling rates and the optimal utilization of resources.

Prioritizing post-consumer waste in EPR programs would contribute to a more environmentally friendly, inclusive, and socially responsible recycling industry in the long run. By implementing measures that encourage the proper collection and management of post-consumer waste, EPR programs can play a more significant role in reducing waste, promoting sustainable practices, and supporting the livelihoods of waste pickers in the recycling ecosystem.

### **Inclusion of Non-Recyclable Plastics, Textiles and Footwear in EPR**

WPOs are advocating for the inclusion of non-recyclable plastics, textiles, and footwear under Extended Producer Responsibility (EPR). They argue that since recyclable plastics are already recovered and recycled, EPR should apply only to non-recyclable plastics. The WPOs have also reported that low-value plastics, such as PE and PP plastic trays, are being widely used for packaging products that cannot be recycled. HUL, one of the major producers of Multi-Layered Plastics (MLP), does not handle MLP waste, according to WPOs.

Additionally, the WPOs have identified textile and thermocol waste as serious issues that need to be addressed under EPR. Asra's field coordinator, Imran Sheik, has emphasized the need for support for thermocol waste since the cost of working on these materials is extremely high. Overall, the WPOs are pushing for a broader scope for EPR to ensure that the responsibility for waste management is shared by all producers, including those of non-recyclable plastics, textiles, and footwear.

### What is a model that has integrated some of these concerns?

ITC Limited's EPR project with SWaCH+ in Pune can be considered as a best practice for the inclusion of non-recyclable plastics into EPR. By focusing on multi-layered plastic (MLP) waste and working directly with a waste pickers organisation, ITC and SWaCH+ have taken a decentralized approach and managed to operate with almost zero subsidies from the municipality. The project has built a network of waste pickers and informal waste collectors, whom they have trained in the segregation and collection of MLP waste.

▼ MRF of Parisar Bhagini Vikas Sangha supported by Municipal Corporation and UNDP.



# CONCLUSION

## Fostering Sustainable Partnerships for Equitable EPR Implementation

The implementation of the Extended Producer Responsibility (EPR) framework in India presents opportunities and challenges for Waste Picker organisations (WPOs). Challenges include imbalanced bargaining power, limited representation, and fluctuating waste material prices. The support provided by organisations like UNDP and Tetrapak in establishing Material Recovery Facilities (MRFs) and Dry Waste Collection Centers (DWCCs) is commendable but needs to address the fluctuating prices faced by WPOs.

To ensure the sustainability of WPOs and the livelihoods of waste pickers, brand owners and producers must provide fair monetary compensation in line with EPR principles. Successful partnerships like that between ITC Limited and SWaCH Plus in Pune showcase the importance of fair compensation and sustainable models.

Fair compensation, equitable negotiations, and sustainable partnerships are crucial for successful EPR initiatives. Waste pickers' value in the recycling process must be acknowledged, and their remuneration should reflect their efforts. Equitable negotiations and involving waste pickers in decision-making processes are essential for protecting their rights. Sustainable partnerships among stakeholders can create a robust waste management system and provide waste pickers with access to essential services and benefits.

By working together, the government, brand owners, PROs, WPOs, and informal recyclers can leverage their strengths to create a supportive ecosystem. This ecosystem should provide waste pickers with training, education, healthcare, and social security benefits. Collaborations can also facilitate the development of infrastructure and technology for effective waste collection and recycling.

Ultimately, sustainable partnerships will help achieve the full potential of EPR in India, ensuring equitable and inclusive waste management while improving the lives of waste pickers.

# REFERENCES

Chaturvedi, Bharati, and Vinay Gidwani. "The right to waste: Informal sector recyclers and struggles for social justice in post-reform urban India." In *India's New Economic Policy*, pp. 137-165. Routledge, 2010.

Dias, Sonia Maria. "Waste pickers and cities." *Environment and Urbanization* 28, no. 2 (2016): 375-390.

Shankar, V. Kalyan, and Rohini Sahni. "The inheritance of precarious labor: Three generations in waste picking in an Indian city." *Women's Studies Quarterly* 45, no. 3/4 (2017): 245-262.

Percot, Marie. "'Picking up the neighbours' waste': migration of Bangladeshi villagers to India metropolises." *Migration and Development* 9, no. 1 (2020): 43-55.

Chikarmane, Poornima, and Lakshmi Narayan. "Formalising livelihood: case of wastepickers in Pune." *Economic and political weekly* (2000): 3639-3642.

Cass Talbott, Taylor, Pinky Chandran, Cecilia Allen, Lakshmi Narayan and Owusu Boampong. 2022. *Extended Producer Responsibility (EPR) and Waste Pickers*. WIEGO Technical Brief No. 15. Manchester, UK: WIEGO.





# ENDNOTES

1 “waste picker” means a person or groups of persons informally engaged in collection and recovery of reusable and recyclable solid waste from the source of waste generation the streets, bins, material recovery facilities, processing and waste disposal facilities for sale to recyclers directly or through intermediaries to earn their livelihood.

2 <https://globalrec.org/2022/07/15/globalrec-participation-waste-pickers-plastics-treaty-uruguay/>

3 SWM Rules 11.(c) state policies and strategies should acknowledge the primary role played by the informal sector of waste pickers, waste collectors and recycling industry in reducing waste and provide broad guidelines regarding integration of waste picker or informal waste collectors in the waste management system.

4 [https://niua.in/c-cube/sites/all/themes/zap/assets/pdf/WASTE%20MANAGEMENT/Purple%20WMM1%20-%20CHINTAN\\_Manual.pdf](https://niua.in/c-cube/sites/all/themes/zap/assets/pdf/WASTE%20MANAGEMENT/Purple%20WMM1%20-%20CHINTAN_Manual.pdf)

5 Just transition refers to a fair and equitable shift from current waste practices to more sustainable alternatives. It prioritizes social equity, decent work, inclusivity, and environmental sustainability. The concept aims to protect the rights and interests of waste pickers and marginalized communities, create dignified work opportunities, involve stakeholders in decision-making, and promote environmentally friendly waste management practices. A just transition requires supportive policy frameworks to ensure a sustainable and equitable waste management system.

6 <https://epr.globalrec.org/position-on-epr/>

7 <https://hasirudala.in/wp-content/uploads/2021/06/Extended-Producer-Responsibility-and-Informal-Waste-Workers.pdf>

8 India. The Gazette of India. NEW DELHI :Published by Authority, 2021, pp-20

- 9 India. The Gazette of India. NEW DELHI :Published by Authority, 2021, pp-22
- 10 <https://www.SWaCHcoop.com/pdf/CAWAsianWastepickersPCLN.pdf>
- 11 <https://www.wiego.org/sites/default/files/publications/file/technical-brief-no15-ENG.pdf>
- 12 [https://niua.in/c-cube/sites/all/themes/zap/assets/pdf/WASTE%20MANAGEMENT/Purple%20WMM1%20-%20CHINTAN\\_Manual.pdf](https://niua.in/c-cube/sites/all/themes/zap/assets/pdf/WASTE%20MANAGEMENT/Purple%20WMM1%20-%20CHINTAN_Manual.pdf)
- 13 <https://SWaCHcoop.com/assets/2021-unwrapped.pdf>
- 14 The Global Alliance of Waste Pickers Position on EPR.<https://epr.globalrec.org/position-on-epr/>
- 15 <https://globalrec.org/>
- 16 <https://epr.globalrec.org/position-on-epr/>
- 17 <https://cpcb.nic.in/uploads/plasticwaste/2-amendment-pwmrules-2022.pdf>
- 18 <https://cpcb.nic.in/displaypdf.php?id=cGxhc3RyY3dhc3RlL1BXTV9HYXpldHRILnBkZg==>
- 19 [https://cpcb.nic.in/uploads/MSW/SWM\\_2016.pdf](https://cpcb.nic.in/uploads/MSW/SWM_2016.pdf)
- 20 <https://iopscience.iop.org/article/10.1088/1748-9326/ac6b49/pdf>
- 21 Just transition refers to a fair and equitable shift from current waste practices to more sustainable alternatives. It prioritizes social equity, decent work, inclusivity, and environmental sustainability. The concept aims to protect the rights and interests of waste pickers and marginalized communities, create dignified work opportunities, involve stakeholders in decision-making, and promote environmentally friendly waste management practices. A just transition requires supportive policy frameworks to ensure a sustainable and equitable waste management system.
- 22 <https://hasirudala.in/wp-content/uploads/2021/06/Extended-Producer-Responsibility-and-Informal-Waste-Workers.pdf>
- 23 <https://www.kudumbashree.org/pages/347>
- 24 <https://cpcb.nic.in/displaypdf>

The Alliance of Indian Wastepickers is a decade-old national coalition of organizations working with waste-pickers and other informal waste collectors. The alliance includes waste-pickers organizations, cooperatives, self-help groups, and trade unions, and has an outreach of over 100,000 members across 10 states and more than 25 cities in India. The Alliance's Secretariat is currently hosted by Hasiru Dala, Bangalore, Karnataka.

**Secretariat:**

Hasiru Dala, Room No. 13,  
2nd Floor, Lakshmi Building Old No.11/6,  
New No. 14, J C Road, Bangalore-560002

**National Coordinator:**

Kabir Arora  
qabeer.jalandhari@gmail.com

**Assistant National Coordinator:**

Haris Najib  
haristnajib@gmail.com