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To  
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**1) Segregation at household level** At the very outset, SWM 2024 sets itself for failure by imposing an onerous responsibility on the household waste generator, namely to segregate and hand over 4 (four) segregated waste streams to the waste collector viz. wet waste, dry (recyclable waste), sanitary waste and "special" or bio-medical or other hazardous waste, and also requires the householder to separately store and dispose of horticultural/ garden waste and construction and demolition waste (CDW)! Even now, India is struggling to ensure that households (HH) even segregate into 2 streams (wet and dry waste). One understands that technically, garden waste is different from kitchen/ food waste but again to expect HH to segregate these is too much. 2 Streams from HH are adequate, and the rest should be left to the Segregation/Pre-processing/ Waste Processing facilities as further defined in the Draft Rules.

**2) Segregation after Collection at Waste Collector/Processing Facilities** is the achilles' heel of SWM systems. Improper segregation causes multiple problems at Dumpyards, Waste to Energy (WtE) plants etc. This is not emphasized enough in the Rules. Payments to Waste pre-processing Contractors (the system most Urban Local Bodies (ULBs) are following these days) should be linked to the extent of Segregation achieved, not total quantity of Solid Waste handled as provided for.

**3) Waste pickers** can play a significant role in proper segregation, and have not been adequately emphasized in the Draft SWM2024. Peculiarly, their role has been stressed in Rural Areas, where even the role of CSOs in organizing them has been mentioned, but not in Urban Areas! New clauses should be inserted calling upon ULBs to actively involve Waste Pickers organised in SHGs or other collectives, hopefully with CSO assistance, and incentivize them through payments for segregation achieved and share from sale of recyclables to recycling units as provided for in the Rules.

**4) Waste to Energy (WtE) Plants** There is huge confusion in the Rules regarding WtE or other methods of processing dry/recyclable waste. Chapter II.9.1 says that non-recyclable waste with high Calorific Value shall only be used to produce Refuse-Derived Fuel (RDF) or given to a facility producing RDF, but

various other parts of the Draft SWM Rules 2024 appear to suggest that WtE Plants would be directly using such wastes. Simultaneously, Ministry of Housing and Urban Affairs (MoHUA) is encouraged (Chapter VII(2)(xii) to "drive" setting up of "adequate numbers" of WtE plants by 2028, contradicting other parts of the Rules underplaying WtE and speaking only of RDF. This appears to be a thinly disguised attempt at making WtE plants using the Incineration method a mainstay of the SWM system. Although the Draft Rules specify standards for emissions from WtE Plants, which are close to EU standards, experience from Delhi so far clearly testifies to highly inefficient, non-conforming and polluting WtEs, often if not mostly using unsegregated solid waste. Without going into details, Incineration-based WtE Systems have been a total disaster in India and should be avoided altogether, or strictly defined and monitored as regards process, technology, temperature, emissions etc.

**5) Sanitary/Operational Landfills & Existing Dumpsites** A similar situation obtains regarding Sanitary/ Operational Landfills (Chapter III.1) and Existing Dumpsites (Chapter III.2). Both these very different systems are spoken of in different places of the Draft SWM2024 with various different specifications, technologies and standards. Chapter III.1.(4) states that "only non-recyclable and non-energy recoverable dry wastes and inerts shall be disposed of" in Sanitary/Operational Landfills," while Schedule I governing Specifications for Sanitary Landfills say Landfill gas including collection and utilization "should be considered," (Schedule I(F)(i) to (iii), incidentally without specifying methane emission limits, clearly implying that Landfills can also be used for wet/bio-degradable wastes! Further, the Draft Rules in III.1(5) and 1(6) provide for charging fees for dumping unsegregated solid wastes "till the time" proper Sanitary Landfills are built and made operational, without specifying any outer time limit! This is not acceptable. Especially so, since provisions for Existing Dumpsites speak only of Mapping by 2026 (III.2(a)) and talk of bio-mining and bio-remediation only "as practicable." If the current provisions in the Draft SWM2024 remain, it suggests that unsanitary Dumpyards will likely continue well into the future. Some time may be given to Local Bodies to shift completely away from Dumpyards, but Sanitary Landfills should be unambiguously defined in the Rules.

**6) Over-centralization** The Draft SWM2024 calls for vast amounts of information including monitoring details to be uploaded into a Centralized portal. This is an unnecessary over-burdening of a single Portal and an unnecessary degree of over-centralization. It is suggested that all Information be uploaded in State portals and then also compiled into a single National-level portal. This will make

State Governments more partners of SWM processes than they appear to be at present.

**7) Monitoring in public domain and Penalties** Most of the penalties and fines seem aimed at the first rung of the waste-management chain namely the household, who can be penalized even by the Waste Collector (!), or contracted (private) facility operators for simple or obvious infractions. For example, the Draft speaks of heavy penalties for anyone burning horticultural or garden wastes (IV(7)). However, there is no mention of monitoring of performance of Local Bodies (LB) or their licensed operators and penalties for failures to adequately or properly collect, segregate, handle, treat etc. For example, if a LB continues to run Dumpsites with unsegregated waste, or a WtE Operator does not ensure conformity to air pollution standards, what will be the penalties? There is also no provision for making public the data from Monitoring of pollution levels of air, ground, water bodies or sub-soil water. Without provisions for these, and without strict timelines for the Rules, the Draft SWM Rules 2024 will remain a paper tiger with a set of pious expectations.

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