

**AGENDA ITEMS FOR 84th MEETING OF THE TECHNICAL REVIEW
COMMITTEE (TRC)**

Dated: ***07th February, 2024***

Time: ***2:00 PM - 4:00 PM***

Venue: ***In Hybrid Mode***

***Satluj Conference Hall, Jal Wing, Ground Floor, Indira Paryavaran
Bhawan, New Delhi***

Agenda-1. Gold recovered from exported Printed Circuit Boards (PCBs) to be considered for generation of EPR Certificates under E-Waste (Management) Rules, 2022 – Matter referred by the Central Pollution Control Board -reg.

CPCB informed that Steering Committee constituted under E-Waste (Management) Rules, 2022 in its meeting held on 26.10.2023 discussed the issue of consideration of EPR Certificate for gold generated from exported printed Circuit Boards (PCBs) raised by the recycler's associations. Extract of relevant part of minutes of Steering Committee are as under:

- Material Recycling Association of India (MRAI) & Recycling and Environment Industry Association of India (REAI) made joint submission w.r.t consideration of exported PCBs for generation of EPR certificates. As per the Recyclers Associations due to better recovery & profits and limited capability of gold recyclers in the country, PCBs are getting exported on the basis of NOC issued by MoEF&CC. For the fulfilment of gold obligations, Recyclers Associations requested for considering PCB recycling done in the foreign land and crediting of corresponding EPR certificates into the account of recyclers based on supporting documents such as export bills, recovery of foreign currency etc.
 - As per the committee, generation of EPR credits on exported PCBs will hinder the growth of gold recycling infrastructure in the country. Also CPCB has taken into consideration limitation of gold recycling while developing framework for generation of EPR certificates and have made provisions accordingly.
 - It was decided that CPCB will forward above request of recyclers associations to MoEF&CC for decision on the same.
2. In view of the above, CPCB has requested Ministry for consideration of the issue of generation of EPR Certificate from exported PCBs and give direction to CPCB for further action in this regard.
3. The same has been examined in the Ministry and decided to refer the matter to TRC for deliberation/decision.

Agenda-2. Representation from Petroleum Re-refiners Association of India (PRAI) for use of bottom residue for road making (obtained in the process of re-refining of used oils) as a non-hazardous material - reg.

Petroleum Re-refiners Association of India (PRAI) stated that in the re-refining process, distillation is employed to recover useful lubricants from the used oils. In this process, bottom residue (undistilled portion) of around 10% of feed is recovered as a by-product. The undistilled part is the bottom residue, which is nothing but additives and bright stock. Due to the dark colour it cannot be used as lubricant oil, but can be very well used as a masticating agent in rubber production, and balance quantity used as an asphalt extender in road construction.

2. They have submitted following in favour of use of bottom residue:

- (i) PRAI commissioned Central Road Research Institute (CRRI) to study its feasibility and the report received is very encouraging. Bottom residue has been got tested several times, by PRAI and observes that the by product does not contain any heavy metals or waste constituents in concentration above threshold limit nor does it have any hazardous characteristics to qualify it as a hazardous waste of HoWM Rules 2016.
- (ii) Final report of High Power committee submitted to Supreme Court acknowledges the fact that "Used Oil need not be hazardous". Also A.P. Lube Oil Processors Association later tested number of samples of Used Oil for lead content, all of which was found to be within acceptable limits. Also research conducted at international level in United States for leachate tests too indicate there is no significant leachate difference between the original asphalt and the bottom residue blend etc.
- (iii) Other Uses of Bottom Residue is as under
 - a. Lots of rubber industries are using it in Kerala as a Masticating agent
 - b. It has use in the waterproofing and tar felt industry.
 - c. India is a net petroleum importer and if your goodselves could approve this product for blending with bitumen, the country could save huge amount of foreign exchange and in the process, help conserve finite resources.

Accordingly, the matter is placed before the TRC for deliberation/decision.

Agenda 3. Representation on Ministry's Office Memorandum (O.M.) vides F.No. 23/107/2022-HSMD dated 10.01.2023 regarding prescribed limits in waste paper imports

- (i) **From NCR Paper Mill Association with request to delete/ withdraw condition of submitting quarterly certificate to the Customs Authority at the time of clearance of Import Consignment after obtaining from SPCB regarding disposal of waste Plastic to Waste to Energy Plant or cement Kilns.**

NCR Paper Mill Association has mentioned that Paper Mills importing Waste paper are facing difficulties in clearance of their import consignments of Waste Paper as the Paper units are not getting certificates issued by SPCBs and Custom Authorities are holding the clearance which is resulting in heavy detention charges at ports & shortage of raw material in Paper mill.

They have further mentioned that SPCBs are already monitoring the proper disposal of waste plastics arising from the paper units falling in their Jurisdiction in scientifically proper manner and taking proper action against the defaulters and the condition of submitting quarterly certificates by SPCB should not be imposed as this condition is creating unnecessary compliance burden.

(ii) From Gujarat Paper Mill Association with request to delete/ withdraw condition of submitting SPCB certificate confirming scientific disposal of non-paper received in imports of waste paper for the preceding quarter.

Gujarat Paper Mill Association (GPMA) has mentioned that following issues are being faced by paper mills during waste paper import:-

- i. It is not possible that all waste paper imported would be consumed within a quarter. Depending on various factors, there would be some material in stock.
- ii. GPCB has informed that they do not have enough manpower to manage this activity on quarterly basis.
- iii. If there are procedural delays, consignments get stuck at port creating issues for both the port & importer.
- iv. State Pollution Control Board's are already monitoring the proper disposal of waste.

Presently, importers are uploading the acknowledged copy of annual return filed with concerned SPCB on ICE Gate website (Indian Customs EDI Gateway) on a yearly basis. GPMA has further requested to continue the present condition and delete the condition mentioned in the OM dated 10th January, 2023.

The matter was discussed in 80th TRC meeting and the committee recommended that NCR Paper Mill Association/ Gujarat Paper Mill Association may submit the details of industries/units where the quarterly certificate is not being issued/delayed by respective SPCBs in respect of compliance of para vi of Ministry's O.M. dated 10.01.2023 for further necessary action. The Committee also recommended that the concerned State Pollution Control Boards (SPCBs) may be invited in the next meeting to understand the issue in details.

The matter was last discussed in 82nd TRC meeting and the committee recommended that GPCB may submit the details of industries/units regarding quantity of waste paper imported, quantity of plastic sent to cement kiln as per yearly manifest system, also the quantity of balance plastic with units and its mode of disposal, for better understanding. Committee also asked the Paper Mills Association to provide the details of sorting out of plastic waste from waste paper before putting it into pulper.

GPCB had provided the following details through e-mail dated 1st February, 2024 as under:

- As per data received from Gujarat Paper Mill Association (GPMA), Quantity of waste paper imported during April 2023 to September 2023 is 16,38,551.857 MT.

- Total plastic waste received from pulp and paper industries by Cement industries of Gujarat for co-processing during April 2023 to September 2023 is 40,868.4 MT.
- Thus, the percentage of paper waste imported to the quantity of plastic waste sent to cement kiln for co-processing works out to be 2.49%.

GPCB also highlighted that, it is understood that paper industries might not be using only imported paper all the time but might also be using paper waste domestically procured in different proportion.

Accordingly, the matter is placed before the TRC for deliberation/decision.

Agenda 4: ANY OTHER ITEMS WITH PERMISSION OF THE CHAIR
