

**AGENDA ITEMS FOR 82nd TRC MEETING OF THE TECHNICAL REVIEW
COMMITTEE (TRC)**

Dated: 8th November, 2023

Time: 2:00 PM-4:00 PM

Venue: Through Video Conferencing (VC)

Agenda 1. Representation from Tyre and Rubber Recyclers Association of India (TRRAI) for amendment in grant of permission of import of 50,000 Mt/Annum of used tyre scrap for M/s Finster Black Private for manufacturing of recovered carbon black.

In 76th Meeting of TRC, the committee after detailed deliberation upon the issue recommended that the permission for import of 50000 MT of Used tyre scrap in baled/multicut form for production of Recovered Carbon Black (RCB) which will replace the virgin Carbon Black in manufacturing Industry, may be granted initially for a period of 3 years on pilot basis with following conditions to be levied while granting permission:

- i) The process should be result in a yield of RCB comparable to the yields being obtained in other well established plants for manufacture of RCB. 100% of the RCB produced by the units should be sold to manufacturer for replacing the virgin carbon black. The recovered other byproducts during the process should conform to relevant specifications and no part of the recovered carbon should go for energy recovery or any other use or to landfill.
- ii) The units should have commensurate electricity consumption.
- iii) The sale to the manufacturing units shall be verified through GST paid and other supporting evidence.
- iv) The permission will be issued only after verification from CPCB which will be carried out annually.
- v) Fresh Investment of minimum Rs. 25 crore from 1.4.2022 onwards.
- vi) Minimum land area of 5 acres of the unit.
- vii) The process should be completely automated and environment friendly with zero emission of carbon black particle in environment.
- viii) The RCB end product should be in the form of granule to check the dispersion in the environment.
- ix) Whole process of production of RCB form waste/scrap tyre should be completed in the same premises.

The above recommendation of TRC was approved by the competent authority in the Ministry. Subsequent to the above decision, TRRAI vide letter dated 6th April, 2023 has raised their concerns on the recommendations of TRC and requested Ministry to revisit the decision of TRC w.r.t. to the following points: -

- (i) Fresh Investment of minimum Rs. 25 crores from 1.4.2022 onwards.
- (ii) Minimum land area of 5 acres of the unit.

- (iii) Whole process of production of RCB form waste/scrap tyre should be completed in the same premises.

TRRAI has further requested that no permission for import of waste tyre for production of Recovered Carbon Black (RCB) should be granted till the decision on the above points.

The committee in its 78th Meeting, after detailed deliberation on the issue recommended that TRRAI may submit the basis for their representation to revisit the above policy, especially regarding requirement of fresh investment of minimum Rs. 25 crores, minimum land of 5 acres and the whole process of production of RCBs form waste/scrap tyre should be completed in the same premises for further deliberation on the matter. The Committee also recommended that regarding the presence of Silica content in the Indian tyres, Automotive Tyre Manufacturers Association (ATMA) may be asked to provide the details. Till then, the matter is deferred. Certain other issues raised by the TRRAI do not pertain to policy and may be referred to the appropriate authorities.

TRRAI has submitted the details. Accordingly, the matter is placed before the TRC for deliberation/decision.

Agenda 2. Matter related to implementation of Hazardous and other waste (Management and Transboundary Movement) Rules, 2016 – representation by Central Pollution Control Board (CPCB)- reg.

CPCB informed that a meeting with operators of Common Hazardous Waste Treatment, Storage and Disposal Facilities (TSDF) was held on 23rd August, 2022 to discuss issues related to effective operation and maintenance of TSDFs. Thereafter, a meeting with SPCBs/PCCs was held on 1st November, 2022 to discuss the suggestions and comments received during the meetings with operators of TSDFs. The key issues are as follows:

- a) One time registration to the units exempted from authorization, so as to track hazardous waste even in small quantities [Rule 6 (1A)]
- b) Extension in time period for storage of hazardous waste by small generators (beyond 90 days). [Rule 8(1)]
- c) Provision for the generation and reporting of incidental hazardous waste not specified in authorization. [Rule 6 and Form 2]
- d) Provision for the registration of Collection Centres which receives domestic hazardous waste in ULBs [New provision at Rule 6]
- e) Inclusion of residues generated from concentration or evaporation of industrial wastewater in Schedule I [at Sl. No. 35] of the Rules.
- f) Inclusion of Escrow account (as per the MoEF&CC O.M. dated 16/04/2009) for the post closure monitoring of the CHWTSDFs and occupiers of captive SLFs [Rule 16(4) and Rule 21 – Schedule VII- (4)]

CPCB has requested that these issues may be referred to TRC for inputs/comments.

Agenda 3. Request for inclusion of indigenously generated Non-Hazardous Industrial Waste in the definition of “Other waste” in the Hazardous and other waste (Management and Transboundary Movement) Second Amendment Rules, 2021 and allowing its utilization thereof in Waste-to-Energy Projects – representation by M/s Abellon Cleanenergy Limited, Ahmedabad, Gujarat- reg.

M/s Abellon Cleanenergy Limited, Ahmedabad, Gujarat has stated that as per Hazardous and other waste (Management and Transboundary Movement) Second Amendment Rules, 2021 *“other wastes” means wastes specified in Part B and Part D of SCHEDULE III for the purpose of import and export and include such indigenously produced wastes as may be notified from time to time*, due to that they are facing problem in usage of indigenous non-hazardous “other-waste” in Waste to energy projects. They have requested the following:

- i. To notify indigenously produced wastes as listed in Schedule-III Part-B & Part-D of HWM Rules, 2016 so that the same are covered by the definition of “other wastes”
- ii. To direct CPCB to issue a clarification to SPCBs for granting consent to utilize indigenously generated non-hazardous industrial waste in Waste to energy projects having adequate emission control mechanism.
- iii. CPCB may also clarify and prescribe the procedure to be followed under the HoWM Rules, 2016, by the SPCBs while granting such consent.

Agenda 4. 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 last 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.

Agenda 5. Any other item(s) with permission of the chair.
