

4P

AHP 19/13/15

**IN THE HON'BLE NATIONAL GREEN TRIBUNAL,
PRINCIPAL BENCH AT NEW DELHI**

O.A. NO. 199 OF 2014

IN THE MATTER OF:

Almitra H. Patel

...Applicant

Versus

Union of India and ors.

...Respondents

**WRITTEN SUBMISSIONS AND SUGGESTIONS ON BEHALF
OF THE APPLICANT**

1. Haryana may not have any city "where MSW is collected in its entirety segregated and disposed of in accordance with MSW Rules 2000." But Kolar pop 1.5 lac pop with about 52 tpd total waste is indeed fully compliant. It has 100% door-to-door collection, with 70% waste handed over unmixed and the rest sorted at the doorstep into dry fractions owned and sold by the doorstep collectors. All the wet waste goes into "stack composting" on wooden frames raised off the ground, max 8" (0,2m) layers a day upto 2.5 m height. No labour or power is needed to stabilize it at five decentralized inner-city locations in full compliance with MSW Rules. Farmers eagerly lift it in auctions (Rs. 20,000/- for first 25 stacks). This system, working well for 10 months since June 2014 is modeled on the Zero-waste town of undivided Andhra Pradesh like Warangal (2012, pop 7 lac), Guntur (2013 pop 7 lac) and 16 other towns.
2. This KOLAR MODEL is worth recommending for Haryana's 67 out of total 78 towns with daily waste below 100 tpd and also for the

entire country's predominantly small and medium towns. The present Andhra Pradesh model plan is in the Applicant's view the very best plan of all those received to date and deserves to be recommended in preference to the Haryana model commented upon below.

3. GOOD POINTS OF HARYANA MODEL:

- a) Proposed State Level MSW Committee.
- b) Doorstep collection.
- c) Full cost recovery for trade and commercial wastes.
- d) Weekly collection of garden waste, which should be composted in parks.
- e) Primary Collection Centres for sorting 'only dry' waste. No wet waste should go there.
- f) Tractor-trailers are good for transport of waste, but in bins or bags, to avoid manual handling.
- g) Smaller towns doing composting. RDF should be only from combustible non-recyclables.
- h) It is good that Haryana proposes to set up all waste processing facilities in "lands owned by ULBs", to ensure responsible operation and maintenance.
- i) Setting of timelines is good.

ASPECTS NEEDING IMPROVEMENT:

- j) Insist on receiving and collecting wet and dry waste unmixed.
- k) Insist on transporting wet and dry waste unmixed to different destinations

- l) Allow doorstep collectors and waste-pickers to have full ownership of all dry waste.
- m) Dry waste need not be collected daily but weekly.
- n) Domestic sanitary waste (diapers, sanipads) should go daily to nearest biomedical-waste pickup point for autoclaving or incineration along with hospital waste.
- o) Avoid community bins and strengthen doorstep collection instead, with suitable timings for commercial areas.
- p) Avoid night movement of market wastes which must move within 6 hours of generation, preferably as animal feed.
- q) No user charges to be collected from those managing their wet waste onsite and dropping off their dry waste to designated locations or to waste pickers with identity cards.
- r) No double handling of wet waste at PCCs or elsewhere. Do decentralized biometh or composting
- s) No dumper placers for transport as they are a failure in all the 162 ulbs i have personally visited.
- t) Four trips are wildly unrealistic except to decentralized mini-locations within ward or zone. Even two trips to a 50-km-distant location are doubtful, and certainly unsustainable and wasteful.
- u) No wet waste to clusters.
- v) Only fully-inert wastes and non-compostable non-recyclables to clusters.
- w) Non-recyclable polymers to be shredded for roads or use plastics-to-fuel (p2f) at clusters for eco-safe depolymerizing below 400oc.
- x) RDF should go to cement kilns for safe dioxin-free combustion above 1400oc

- y) Incineration only as a last resort.
- z) Only one incinerator per state if any is at all needed and only if its technology and emission standards have been approved by CPCB after studying its performance in Developing Countries.
- aa) Currently the Hon'ble Supreme Court has allowed only 5 pilot projects for Waste to Energy to receive any kind of Government support. Their conditional permission will be relaxed after receiving MNRE report on satisfactory outcome of these five pilots.

New Delhi
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