<u>Category-wise Executive summery of the comments /</u> Feedback on Expert Committee Document:

Feedbacks Received from:

Citizens

Advocacy

BBMP Vendors

Subject and Matter experts

Summary of Feedback Received:

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- 1. Need for Monitoring System for polluter pay principles exist now as displayed by the BDA/BBMP.
- 2. Integrate different audiences to monitor, to be implemented in each wards atleast quarterly and its report shall be submitted by the contractor to the BBMP office.
- The end of report to showcase some successful case studies in the country atleast best 10 which does effective SWM and with what technology
- 4. To consult MoEF or CPCB or KSPCB before implementing Bio-mining technique especially with its impacts on environment and environmental management issues.
- 5. Organic waste to be managed on site and not sent out.
- 6. Insist that sanitary waste and rejects are given to the BBMP collection system.
- 7. For multi-storied buildings for sanitary waste, a more economical option than the existing ones provided by Maridi/ Ramky should be made available.
- 8. Leaf litter and garden waste from independent houses should be composted at the closest park. Burning of leaf waste should be prohibited. Sweepers/ pourkarmikas/ supervisors need to undergo training and education about this.
- 9. Penalties for throwing garbage and debris into lakes, storm water drains, raja kaluves, and other water bodies should be imposed and strictly enforced.
- 10.To encourage Segregation at source, Policies like cash for trash, and creating awareness
- 11. Use of colored bins and clarity in communication.
- 12. Private companies should be roped in for waste collection & transportation.
- 13. Bulk generators should make provisions for reducing and handling their own waste. Bio waste from restaurant can be sent to a Biogas facility. Good bakery goods donated to homeless at the end of the day. Hotels using excessive water should have greywater recycling to prevent waste water. Hotels using plastic plates and mugs be charged a penalty. Fee charged for plastic shopping bags. etc.
- 14. Phasing out night collection is a very BAD idea. Encourage Insitu processing.

- 15. Littering and urination on public places and road side to be declared criminal offence
- 16. Tipping fee to be replaced by a support price for the end product is highly appreciated.
- 17. Strict follow up for Non-compliance
- 18. Mentoring and assessing work of service providers
- 19. Numbers and contact details of service providers in each ward to be made available for common public.
- 20. Separate tender for collection and transport for bulk generators

General Suggestions: By Citizens

- 21. Advertisement on polluter pays in large extent to be given in the urban wards with penalty amount.
- 22. Dedicated BM waste vehicles are designated to collect wastes and to dispose to processing sites even from the government end/through contractors vehicles (at least 5% of the vehicles used for MSW collection).
- 23. To encourage more e-wastes collection centres and household hazardous waste collection centres in wards both together at the same spot with manned security.
- 24. The contractor himself should compulsorily engage 1 environmental engineer/solid waste management expert atleast for every 2 wards to monitor/supervise effective manifest. This should be mandated in Tender document.
- 25. Monitoring agency shall be from the team of experts from other states only to avoid biased decisions/favour decisions.
- 26. Personnel protective equipments to be mandatorily provide by the contractors to be supplied to respective pourakarmikas or those engaged in processing- as this is also one of the social factor and it indicates healthy workers, healthy environment.
- 27.BBMP to make rule that every household utilizes their own domestic waste by using a DOMESTIC BIOGAS plant which gives about 2 hours of cooking gas every day with their domestic degradable material.
- 28. No garbage Chutes at all to be allowed. Even if builders say they will make one for organic and one for other waste.
- 29. Encourage local informal waste sector by selling their dry waste either at the collection centers or at recycling guru shops.
- 30. Insist that E-waste and Bulbs are collected and stored safely and disposed off once a month/six months by each builder/RWA.
- 31. All multi-storied buildings should provide a garbage sorting area along with a composting area. If there is insufficient space at ground level, terrace/ topmost floor/ basement can be considered. It has been found that the terrace (or top most floor) is an ideal location for composting. It should also be ensured that the space is approved by the fire department.
- 32. Slums should be provided with door-to-door garbage collection.
- 33. Plastic bag ban / charging for plastic bags by shops needs to be strictly enforced.
- 34. To encourage technologies available to incinerate MSW under control combustion and best technologies to treat the flue gases and capture harmful elements in the flue gases.
- 35. Large steel/aluminium containers with lid should be kept in every street for disposal of waste, Use of compactors to be encouraged instead of

- Open garbage collection vehicles.
- 36. Tree pruning is a concern as Nobody takes responsibility of clearing the roads or footpath off the brances and twigs. Pks, to clean drains on regular intervals preventing it from clogging.
- 37. Color code vehicles and workers for different streams of waste.
- 38. Roles and responsibilities of service providers for waste collection and transport
- 39. Vehicles to have GPS system for tracking and a separate color code.
- 40. Penalties to apartment association for not segregating waste.
- 41. Solutions needed for coconut waste?
- 42.BBMP to have their own collection and transport instead of working with private contractors to save cost.

Reccomendations

- 43. Ground water quality assessment from MoEF recognized/NABL accredited laboratory only approved for all the drinking water quality parameters in the context of health and safety. This shall be enforced to the contractor in the tender document and he shall display the results on thier company's website (applicble for waste processing agency)
- 44. Several contradictions in the recommendations of the expert committeefor handling MSW waste like Doing away with tipping fee and going away from incineration, which is agains the recommendations of the NLEC (National level expert committee) as approved by Hon'ble Supreme Court
- 45. Use of "integrates Sustainable Waste Management" in place of Zero waste as "Zero waste" id not possible ideally.
- **46.** Emphasis on Reduce, Reuse, Recycle, Recover and Dispose in the order of priority.
- 47. Including Incineration as a part of recommended safe disposal of waste in order to reduce volume and weight of waste, stop chemical and biological reactivity and recover its content by producing electricity.
- 48. Upcycling of waste to be encouraged, Advertisement and publicity to encourage best practices, Use of Garbage bins instead of dumping yards, May be underground bins like practiced in Johannesburg.
- 49.To avoid construction debris to clog the storm water drains, The Owner/ Contractor should be required to obtain a clearance certificate from the concerned RWA prior to issuing occupancy certificate or any other clearance by BBMP.

50. Some major deficiencies pointed out:

- Critical recommendations made by the NMSH (National Mission on Sustainable Habitat) are not included.
- Several principles of the National Environment Policy 2006 are not considered.
 - This covers up the fact that they are being violated at present, affecting a significant part of the population.
- There is no mention of how to make BBMP staff accountable.
 The entire cost/responsibility is passed to the public for any lapses/failures/problems.

- The committee recommends a budgetary cut to a ward if it does not meet SWM goals. However, cuts cannot be applied to a budget that is allocated randomly; and when many areas are neglected for years.
- The arguments made for decentralization are not convincing at all. Are we letting go of a major economical advantage in chasing an unrealizable theory?
- There is no supporting data behind the proposal to decentralize the waste-processing.
 - Rather than hard-core data, the proposal is based on a single idealistic/flimsy notion.

The "centralized vs decentralized" comparison should be based on:

- o pex+capex required for different SWM approaches (for the given volume)
- Resultant COO (Cost Of Ownership) projections. Which is most economical?
- Which approaches are (more) suitable for Bangalore's topography/weather?
- Do all wards have sufficient space for the waste-processing and transportation?
 (The sites must meet all selection criteria.)
- Supply chain logistics for all six types of waste (Source --> interim destinations (e.g. for sorting) --> final destinations)
- How much of population is exposed to the potential hazards?
- How to compensate each complex for its local wasteprocessing?
 (This includes collection, segregation, recycling, and conversion)
- 51. Garbage Cess Waiver for the apartments and other Bulk generators. 52. Issues Not addressed:
 - The Expert Committee reports are not able to address to the specific references

for which they have been constituted by the Government. POINT BY POINT FOCUS ON THE MANDATES OF THE COMMITTEE ARE NOT AVAILABLE.

• There is no Vision, Agenda or any specific Initiatives based on Environmental Impact Studies that is IMPACTS on – Health, Resources and Ecological

Considerations are not attempted.

• Environmentally Sound Technologies (ESTs) based on UN evaluation criterion for

MSW are ignored, there by a big lapse of evaluation of technology is seen. EOI

application evaluation is totally inadequate.

• Best practices available in ULBs in Karnataka and time tested have been not considered for providing the required guidelines in the reports.

One of the most important issue of <u>Laibility for 13 years of continued non</u> compliance to msw rules 2000 & possible paths to progress

	From msw has not been addressed.				
	53. Missing Points: Landfills and their management and way forward. Outcomes and targets with timelines Recognise and identify roles of informal sector in collection and recycling. Tax waivers for Bulk generators.				
	 54. Health safety of waste workers need to be addressed. 55. Recommendation to include waste to energy to achieve Zero waste to landfills. 56. Need for a Back up plan 57. Need to define the Criteria for vendor empanelment 58. The report of Expert committee does have a passing mention of waste pickers, but some more clarity on their specific role can be obtained by explicitly specifying the role of waste-pickers in the sections of 'Policy & Legislative' as well as 'Technical / Operational.' 59. Using Offsite Real-Time Monitoring system that leverages Information and Communication Technologies to streamline and monitor progress of waste management. following Hyderabad Municipal Corporation 				
Technical Committee Report:	60. Clarifications requested: The Quantity of the Old Garbage mentioned in the Newspaper; Times of India, dated Wednesday, June 12, 2013 is 922.45 Laks MT lying in 6 Landfills (attached) And in the Letter issued by the BBMP commissioner dated 11/6/2013 is also 922.45 Laks MT in 6 Landfills (attached) This is not matching as per the "Technical committee Recommendations on EOI application", REPORT-Date 03-01-2013, page 2 Preface; mentioned quantity of 22Laks MT only distributed in 7 Landfills (attached)				
	1. In-case if the quantity is only 22 Laks MT then; 'as per the daily statistics of 3900TPD of garbage the landfills at six or seven locations was created only within a period of 1.54Years which does not show in reality when the sites are visually seen; Clarification is important with the realistic figure to avoid burdens on the contractor in future				
	 Whereas, as per the Table 2, page 15 (current Landfill sites – Location details -"Technical committee Recommendations on EOI application", REPORT-Date 03-01-2013); it is mentioned that; at 7 Locations quantity of waste collected is 22Laks (that took almost 11829 days which constitutes 1275 TPD only) 				
	 Whereas, Table 1 (list of present contractors of BBMP operating landfills - "Technical committee Recommendations on EOI application", REPORT-Date 03-01-2013) page 11; states that 8 contractors among which 3 contractors are already operating total quantity of 2600tpd + present land filling operation is 4000MTPD 				

Secretary, BHCS Layout Residents' Progressive Welfare Association	.Its creat Off late us helple
T 1550 CTALLOIN	Waste is no
	No collection region, Banga
	Garbage is b

.Its creating bad stench and also lot of health issues for the residents. Off late due to rain, all these waste gets spread throughout, leaving us helpless.

Waste is not been cleared regularly here on Pipeline Road, Prasanth Nagar, Dasarahalli

No collection service in Chandapura region region, Bangalore.

Garbage is being dumped very close to residential area in Trinity Christina Layout by trucks at midnight.

Raghu Nath: Citizen

1. Payment of wages/salaries to PK's to be regularly made, as presently 2/3 months' wages are in arrears.

Ashutosh Mohan: Citizen 2. DWC/SC in layouts and the same to be at a corner/side of the layout away from Children's Park/Playground/Walkers' Zone, which is unfortunately not so, in our layout just to protect the land-grabber/Politician behind, at the cost of 1000/1200 residents. We Strongly Object to its location.

Subrata Dutta

B V Mahesh Kumar