

Sub: Draft National Resource Efficiency Policy - reg.

Dear Ma'am and Sir,

I write to you from Citizen consumer and civic Action Group (CAG), a 33 year old non-profit, non-political and professional organisation that works towards protecting citizens' rights in environmental, consumer and civic issues, and promoting good governance processes including transparency, accountability, and participatory decision-making.

I am attaching the file with our comments on the Draft National Resource Efficiency Policy. The National Resource Efficiency Policy, whose draft was published by the Ministry of Environment, Forest and Climate Change in July 2019, is a welcome step in the direction of promoting sustainable and efficient use of our natural resources. However, the Policy and the Action Plan it envisages for its implementation, raise several questions on its intent and efficacy to adequately address the issue.

The Policy and plans carry the objectives and vocabulary one would expect from the industry than from the MoEFCC, which is mandated with protecting our environment and resources. The Policy bestows undue focus on creating a market-based ecosystem to utilise waste, and fails to incorporate a critical pathway to address resource exploitation- of reducing consumption to sustainable levels. Its obsession with creating a secondary market proffers a perverse incentive for indiscriminate exploitation of our resources. Market-based solutions do not account for issues of equity, as the Policy claims, with history replete with instances showing us the contrary. In an abject display of its disengagement with conserving our natural resources, the document limits natural resources to air, cropping land and freshwater, not recognising the others like wetlands, seawater and commons, as valuable.

Without clarity on the stakeholders and operational aspects of the National Resource Efficiency Board and Authority to be constituted for this purpose, the Policy runs the risk of being a tokenistic effort at best. These details are especially important when industry bodies and state governments are to be involved, making this a massive effort with multiple stakeholders operating with criss-crossing objectives. Absence of clarity and transparency about funding for its activities, and the interests and motivations of the funders, is worrisome, and requires to be addressed to repose faith in this effort.

Regards,
Om Prakash

Comments on the Draft National Resource Efficiency Policy

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Comments:

S.No.	Page no.	Line no.	Original text	Revised text (and comments)
1	i	16	Reduction in primary resource consumption to 'sustainable' levels	Please include a clear definition of 'sustainable' levels, as keeping it vague might lead to different interpretations by the respective stakeholders
2	i	38	These rules are viewed as first step for mainstreaming resource efficiency in the country and provide for review after 10 years, following which a restructuring could be carried out, including that of the institutional mechanism, if needed.	On what basis has 10 years been decided as review period when action plans with a timeframe of 3 financial years are being prepared?
3	1	152	Minimum negative impacts on environment	Revised text: It is thus, imperative for India to charter and take the path of economic development supported with efficient use of resources and avoid negative impacts on environment, ultimately leading to sustainable development.
4	2	BOX B1	Much lower recycling rate at 20-25% vis-à-vis of as high as 70% in developed countries (Europe)	Is the data about all recycling materials combined?

5	4	BOX B3. Definitions	Recycle means transformation of the good into raw material that can be reshaped into a new item	Revised text: Recycling means returning a resource to a previous stage in its cyclic process. Recyclability is the ability of a product to be recycled and can only describe products that can be collected and recycled through an established process.
6	6	BOX B4	Cost savings from the reduced material use and regulatory instruments as polluters pays-principle, precautionary principle, differential pricing of virgin raw materials, landfill taxes/ban etc. will provide economic impetus to resource efficiency.	Is this assumption based on any successful examples?
7	7	197-198	India has around 4% of the world's fresh water, out of which 80% is used in agriculture.	The definition of water resources should not be restricted to freshwater. There are other water sources that are also being used as a resource, such as oceans.
8	7	206	3.1.2. Land and Soil	Wetlands degradation should be included in the section
9	8	IMAGE	Raw material extraction stage (Not limited to has been mentioned)	Land and water degradation has not been mentioned under the raw material extraction stage
10	9	263-265	Sectors	Only renewable energy has been mentioned and not the fossil fuel energy sector
11	9	266-267	Wastes	Solid Wastes should include municipal solid waste, plastic packaging, waste electrical and electronic equipment, industrial waste (both hazardous and non-hazardous), agro-waste, bio-medical waste. Liquid wastes and gas emissions should also be added as a separate category.
12	11	333-335	Establish resource efficiency targets in consultation with the	Revised text: Establish resource efficiency

			concerned government agencies and stakeholders for material recycling, reuse and landfilling targets for various sectors.	targets in consultation with the concerned government agencies and stakeholders to reduce primary consumption, for material recycling, reuse and landfilling targets for various sectors.
13	11	359	5.2.1 Role of Government	There should be an additional point on finding gaps in implementation and bringing necessary remedies.
14	11	368-369	Facilitate data compilation on resource efficiency relevant datasets for their concerned sector/region	Revised text: Facilitate data compilation on resource efficiency relevant datasets for their concerned sector/region. This data shall be made publicly available.
15	12	373-375	Facilitate industrial symbiosis through setting up of industrial parks and clusters that enable the utilisation of the waste of one sector or industry as secondary raw material in another	Revised text: Facilitate industrial symbiosis through setting up of industrial parks and clusters that enable the utilisation of the waste of one sector or industry as a secondary raw material in the same industry as far as possible, and to another industry only in case it is not possible to use in the same industry
16	12	391-392	Create a Research & Development Fund to acquire technology for resource efficient design, production and management of waste	Revised text: Create a Research & Development Fund to support the development or acquisition of resource efficient designs, production, and management of waste solutions
17	13	444-446	Engage in multi-disciplinary research and development, establishment and testing of developed frameworks and tools to address the implementation and challenges of resource efficiency	Revised text: Engage in trans-disciplinary research and development, establishment and testing of developed frameworks and tools to address the implementation and challenges of resource efficiency
18	13	452	sharing, and to involve all stakeholders, such as businesses, consumers, communities,	Definition of communities has to be included

19	15	483	instruments have the potential to take into account issues of equity and competitiveness	Revised text: Market based instruments have the potential to take into account the issue of competitiveness concerns in its design and help in transforming economies to become greener.
20	iv	Table 4 , S.No. 3	Cement, Limestone, Clay bricks, Steel, Aluminium, Copper	Cement, Limestone, Clay bricks, Sand (including M-Sand), Steel, Aluminium, Copper
21	iv	Table 4 , S.No. 3		Add: Relevant import dependency
22	iv	Table 4	S.No. 8: Add a row for energy	provide data for coal, lignite, raw materials for nuclear power plants, etc.,
23	ix	128	Life cycle stages	It should consider the social impacts of the product (plastic herein) apart from the environmental and economic concerns.
24	ix	128	Lifecycle stages	The end of life cycle stage should be more comprehensive and detailed in that it considers the environmental and social impacts of all the different types/processes of plastic waste disposal be it incineration, dumping in the landfill, recycling etc.
25	ix	135	Needed Interventions	Add an intervention in the form of a complete ban on Polystyrene and Polyvinyl chloride plastic.
26	ix	143	Strengthen capacities of CPCB and SPCBs in order to monitor and evaluate the implementation of Plastic Waste Management Rules.	Revised text: Strengthen capacities of CPCB, SPCBs and PCCs (Pollution Control Committees) in order to monitor and evaluate the implementation of Plastic Waste Management Rules.

Other comments (if any)

1. The Policy specifies that targets for environment restoration will be made, along with those for resource efficiency. However, Line No 292-294: 'Finalising targets on environment restoration' is not included in the 3-year action plan, which is limited to Resource Efficiency Targets. Given the climate crisis that we are facing, this must be included in the first 3-year action plan itself instead of postponing it to future
2. Please add 'Provide recognition to informal workers in the waste sector' in Role of Government (Line 360-394)
3. The term 'stakeholder' should be clearly defined. While there is a wider definition- industry, policy makers, government agencies, academic, civil society organisations including non-profit institutions, think tanks and business groups, consumers, and technology developers (Line 357-358), the Policy should specify who they are in the context of each of the Activities proposed in the Action Plan, and the basis for selecting the stakeholder/s.
4. Organisational structure, constituents and working of the NREA and NREAB have to be clearly specified
5. Clarity required about the primary funding agency for the implementation of the activities detailed and the 'other funding agency' mentioned in the Action Plan. The Action Plan also does not include steps for identifying the resources required and process of securing the funding
6. The Policy acknowledges that the list of sectors and resources is non-exhaustive (Line 260). Preparing a comprehensive list of resources and sectors should be undertaken, and included in the first Action Plan
7. Annexure B specifies that the brief strategies provided for the seven sectors 'are provided mainly to illustrate and mainstream the life cycle approach as a key element of developing any of such strategies' (Line 95-96). However, the sector-specific strategies do not illustrate the lifecycle approach as indicated, and limit themselves to the end-of-life stage
8. Land & Soil (Line 206-211) to not be restricted to agricultural land, but to include all land types, including grasslands, wetlands, sand dunes, beaches, forest land and all forms of commons
9. A clear definition for words 'sustainable levels' should be provided so as to avoid misinterpretation