

A LAYERED AFFAIR



Did you know that the packet of chips, biscuits or that *namkeen* you bought was not just plastic? That the glittery layer of silver inside was in fact aluminum foil?

Such material called the **multi-layered packaging (MLP)** has been defined by Central Pollution Control Board (CPCB) as *any packaging having at least one layer of plastic as the main ingredient in combination with one or more layers of materials such as paper, paper board, polymeric materials, metalized layers or aluminum foil, either in the form of a laminate or co-extruded structure.*

With a multifold growth in pre-packaged food industry, MLP has been attracting a lot of attention of not just the packaged food manufacturers but also the environmentalists. To manufacturers, it offers numerous benefits by being light weight, low cost, graphic friendly, and by extending the shelf life of the goods they carry.

For environmentalists, however, it's been a centre of attention for all the wrong reasons. Along with being non-biodegradable, this kind of packaging is also non-recyclable. But the concern emanates from the sheer quantity in which they are flooding the FMCG markets, and consequently the landfills and our fragile ecosystems. Latter, because, there are no takers of MLP waste and thus there is no incentive for waste pickers to collect it.

From government's end

In response, Ministry of Environment, Forests and Climate Change (MoEFCC) in Plastic Waste Management Rules of 2016 made two exclusive provisions pertaining to MLP. Rule 9(1) puts the responsibility on manufacturers to establish a mechanism of collection of MLP waste generated due to their products within two-three years of notification of the rules.

Rule 9 (2) was, however, amended in 2018 from phasing out all non-recyclable MLPs in two years' time to phasing out all MLPs that are non-recyclable, non-energy recoverable or those which cannot be put to any alternate use. Which effectively means none.

While two years to phase them out might have been an ambitious target in the absence of viable alternatives, the amendment also removed all pressure from manufacturers to invest in exploring more environment friendly packaging solutions.

CPCB also launched Public Responsibility Organisation (PRO) guidelines for plastic waste recently in August 2018. These guidelines are meant to enlist PROs/ agencies which facilitate brand owners in complying with the rules.

Action on the ground

At present, there are three organisations in India facilitating Extended Producer Responsibility (EPR) for brand owners exclusively for MLPs. These are Indian Pollution Control Association (IPCA) and Nepra Recyclers Pvt. Ltd serving in Northern and Western India, and Saahas focusing on South India.

These organisations assist the partner brand owners like PepsiCo, Dabur among others in meeting the MLP processing targets set out by CPCB. In the current model being adopted by IPCA, brand neutral MLP are collected by waste pickers in operational states. IPCA purchases them from informal waste aggregators or *kabadiwaalas* and send them for processing in three states of Delhi, Maharashtra and Himachal.

There are also some offbeat strategies being adopted by brands to implement EPR. Nestle, for instance, recently started a project in the hill states where it offers a free pack in exchange for 10 empty packets of Maggi under the banner *2 minute safai ke naam*. Through this it aims to address the massive litter of Maggi wrappers in fragile ecosystem of the hills. Their target is mostly eateries which sell cooked Maggi to visitors. And yet one is compelled to ask- is offering an extra packet of Maggi in exchange of wrappers actually the best way to address the problem?

There have also been instances of civil society raising their voice. In Thoothukudi, Tamil Nadu, [school children facilitated by the city corporation sent back more than 20,000 packets of MLP to manufacturers like Britannia](#).

What happens to this waste?

However, except for Tetra Paks, other kinds of MLPs currently are either being fed into waste-to-energy plants or are used as fuel in cement kilns. Both of which are cases of incineration, which comes at the bottom of the plastic waste recovery ladder, just above open disposal and open burning for reasons like loss of a resource and pollution caused due to burning.

There have been [some isolated cases](#) of extracting oil or even recycling. However, their cost effectiveness and viability remains an issue.

Then what are the solutions?

Use of single or mono-materials can be an alternative that manufacturers can explore, but without simply substituting one plastic for the other. However, it is expected that not all kinds of multilayer packaging can be substituted by monomaterials, for practical reasons.

What really needed at this juncture is a dedicated investment in packaging R&D and innovation in all fields ranging from product design, delivery to marketing such as to minimize and eventually eliminate reliance on problem materials like MLPs.

Along these lines **Louise Edge, senior oceans campaigner for Greenpeace UK, in an interview suggests**“So we would hope for a world where marketers use pixels rather than paper or plastic to advertise their products, and packaging should be primarily about safe storage and transport, rather than catching the consumer’s eye. Once product designers accept that minimising resource use and pollution is central to their jobs, many improvements will follow logically.”

Thus producers need to do much more than simply collect and incinerate the problem material- and invest in systems which are enablers of circular economy.



Photo Source: The Better India


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environmental research and action group

