

**BEFORE THE NATIONAL GREEN TRIBUNAL  
PRINCIPAL BENCH, NEW DELHI**

**ORIGINAL APPLICATION NO. 237 OF 2020  
IN**

**ORIGINAL APPLICATION NO. 180 OF 2017(WZ)**

*(Matter transferred from Western Zone Bench, Pune to Principal Bench, New Delhi vide order dated 19.10.2020)*

**IN THE MATTER OF:**

Ms. Purva Pravin Bora & Ors.

...Applicant

Versus

Ministry of Environment, Forest  
and Climate Change & Ors.

....Respondent(s)

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**THROUGH:**

*Abhinav*

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**DATED: 22.01.2021**

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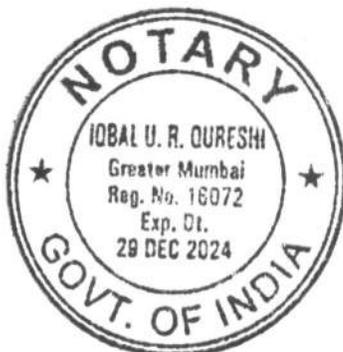
....Respondent(s)

**COUNTER AFFIDAVIT ON BEHALF OF RESPONDENT NO. 8**

**JOHNSON & JOHNSON PRIVATE LIMITED**

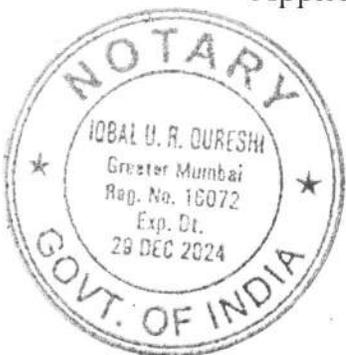
**MOST RESPECTFULLY SHOWETH:-**

1. I, Shri Mayur Vasani, S/o Shri Chandrakant Vasani, aged about 42 years working as Director and Company Secretary of Johnson & Johnson Private Limited, a company incorporated in India under the Companies Act, 1956 and having its registered office at L.B.S Marg, Mulund(West), Mumbai 400080, do hereby solemnly affirm and state as follows.
2. That I, in my official capacity of Director and Company Secretary, Johnson & Johnson Private Limited is fully conversant with the facts and circumstances of the present case and as such is competent



referred to as answering respondent).

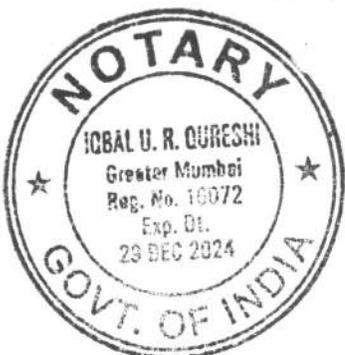
3. That I have read and understood the present Original Application before filling of the present counter affidavit.
4. That the contents of the present Original Application which have not been specifically admitted hereunder are either a matter of record or are denied and the fact that the Answering Respondent may not have separately denied each such allegation, assertion, averment and/or statement should not be read as an admission of the contents of the Original Application in any manner whatsoever, unless anything specific has been admitted herein under.
5. That the answering respondent craves liberty to raise any further submissions or to file additional affidavits if the need arises during the pendency of the present proceedings.
6. That the answering respondent had earlier filed a short counter affidavit in response to the Original Application filed by the Applicants due to paucity of time as explained in the earlier affidavit and the answering respondent is filing the present detailed affidavit. It is submitted that the contents of the earlier short affidavit dated 07.11.2020 are reiterated and the same are not repeated for the sake of brevity.
7. That the present Original Application has been filed by the Applicants under section 14, 15 & 20 of the National Green



pertaining to implementation of several rules of the Solid Waste Management, Rules 2016 (hereinafter referred to as 'SWM Rules') more specifically to Rule 17(1), 17 (3) and 17(4) of the SWM Rules. 3

8. That the Answering Respondent herein has been arrayed as one of the Respondent *vide* order dated 14.11.2017 passed by the Ld. National Green Tribunal, Western Zone Bench, Pune. However, it is submitted that the Answering Respondent was served with the copy of the present Original Application *vide* email dated 22.10.2020 through the Ld. Counsel on behalf of the Applicants. It is further submitted that the Answering Respondent had **not** been served with the complete copy of the Original Application as the annexures as filed along with the Original Application had not been supplied to the Answering Respondent which is the reason that the answering respondent was unable to file its detailed response in the present proceedings in the first place and the same has been elaborately explained by the answering respondent in its earlier short affidavit.

9. That the Answering Respondent herein, shall place on record essential facts and circumstances leading to the present dispute, which are germane for proper adjudication by this Ld. Tribunal. The Answering Respondent is placing on record its preliminary submissions and legal objections to the Original Application filed by the Applicants. The fact that the Answering Respondent may not have separately denied each such allegation, assertion, averment



of the Original Application in any manner whatsoever, unless anything specific has been admitted herein under.

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**PRELIMINARY OBJECTIONS/ LEGAL OBJECTIONS**

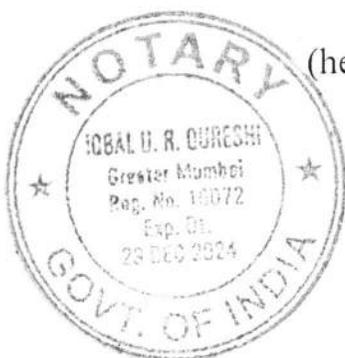
10. That the present Original Application deserves to be dismissed and the Answering Respondent herein wants to put preliminary submissions/ legal objections as well as brief facts before this Ld. Tribunal:

a. It is submitted that the Applicants have filed the present Original Application under section 14 of the NGT Act read with section 15 & 20 of the NGT Act. It is pertinent to note that section 14(3) reads as follows:

*“No Application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute arose:*

*Provided that that the Tribunal, may, if it is satisfied that the applicant was prevented by sufficient cause from filling the application within the period, allow it to be filled within a further period not exceeding sixty days”*

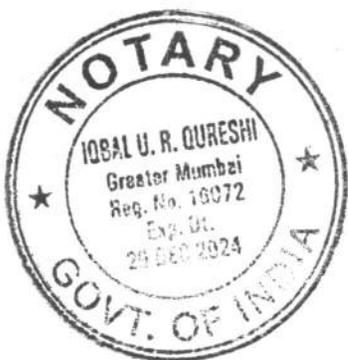
It is submitted that the cause of action first arose when the Ministry of Environment, Forest and Climate Change (hereinafter referred to as ‘MoEF’)/ Respondent No. 1 had



It is further submitted that MoEF/ Respondent No. 1 in its additional affidavit dated 16.10.2020 (specifically in Para 9 and 17) filed before the Hon'ble Tribunal has clarified that the SWM Rules came into force on the date of their publication in the official gazette i.e., 08.04.2016. Hence, the period of filing the application under section 14 of the NGT Act expired at best in December 2016. The present application only came to be filed on 10.11.2017 and the same is hopelessly time barred as per Section 14(3) of the NGT Act and the same is liable to be dismissed on this ground alone. Further, the present Original Application has been filed without any accompanying application seeking condonation of delay and hence, the same is liable to be dismissed on this ground as well. Further, the Hon'ble Supreme Court has categorically held in a catena of cases that this Hon'ble Tribunal does not have the power to condone delay beyond the time provided under the NGT Act.

- b. It is submitted that the Ld. National Green Tribunal, Central Zonal Bench, Bhopal in O.A. No. 30/2015 (CZ) titled as *PC Sharma vs Procter and Gamble Home Products Limited & Ors.* vide order dated 03.08.2017 gave the direction:

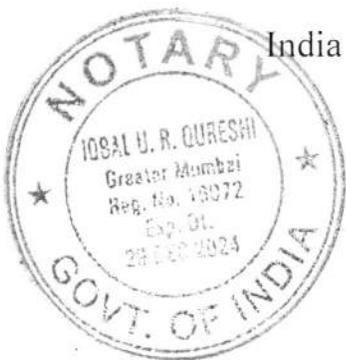
*"26. So far as the disposal of sanitary items is concerned, since the sanitary waste has been classed as Municipal Solid Waste by the CPCB / MoEF the*



*applicable to the Respondent No. 1. Therefore, we also direct that the Respondent No. 1 shall comply with the Solid Waste Management Rules, 2016 by providing a disposal pouch or wrapper along with the packaged sanitary products for safe and proper disposal of used sanitary napkins and diapers. It shall also be obligatory for the Respondent No. 1 to undertake public awareness measures for disposal of used napkins and diapers in prescribed manner.”*

c. It is further submitted that the said order dated 03.08.2017 was challenged by Procter and Gamble Home Products Limited, (Respondent No. 11 in the present proceedings) the Respondent therein by way of Review Application No. 08/2017. The Ld. National Green Tribunal, Central Zonal Bench, Bhopal found no ground to interfere with its order dated 03.08.2017 and dismissed the same.

d. It is further submitted that the order dated 03.08.2017 passed by the Ld. National Green Tribunal, Central Zonal Bench, Bhopal in O.A. No. 30/2015 (CZ) & the order dated 03.12.2019 passed by the Ld. National Green Tribunal, Central Zonal Bench, Bhopal in R.A. 08/2017 in O.A. No. 30/2015 (CZ) have been challenged by Procter and Gamble Home Products Limited before the Hon'ble Supreme Court of India in Civil Appeal No. 835 of 2020 titled as *M/s Procter*



*and Gamble Home Products Private Limited) versus PC Sharma & Ors.* wherein the Hon'ble Supreme Court *vide* order dated 27.01.2020 has directed that *status quo* to be maintained by the parties. It is therefore submitted that the subject matter of the present matter which is the implementation and interpretation of Rule 17(3) of SWM Rules is *sub-judice* before the Hon'ble Supreme Court, however, the answering respondent is not a party to those proceedings.

- e. It is submitted that the Applicants have made a prayer [IV (i)] that manufacturers and suppliers of sanitary napkins may kindly be directed to provide a pouch or wrapper for disposal of each napkin along with the packet of their sanitary products; and educate the masses for wrapping and disposal of their products, as per Rule 17(3) of the Solid Waste Management Rules, 2016. It is specifically stated that the answering respondent currently provides either a pouch or a wrapper with its sanitary napkins in compliance with Rule 17(3) of SWM Rules.
- f. It is further submitted that there are two parts to Rule 17(3) of SWM Rules the fact which seems to have been overlooked by the Applicants. Rule 17(3) states as under:

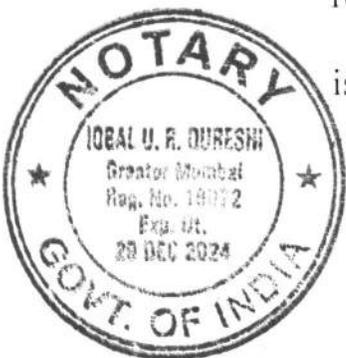
*"17(3): Manufacturers or brand owners or marketing companies of sanitary napkins and diapers shall explore the possibility of using*



*they shall provide a pouch or wrapper with the packet of their sanitary pads”*

g. It is submitted that the first part of Rule 17(3) is with regards to the onus of the Manufacturers or brand owners or marketing companies of sanitary pads to explore the possibility of using all recyclable materials in their products. With regards to the first part of Rule 17(3) it is submitted that the answering respondent has not only complied with it i.e., “exploring the possibility of using recyclable materials” but answering respondent has gone ahead and has introduced recyclable material to the extent possible. Consequently, the answering respondent is pleased to confirm that up to 95% of the materials contained in its entire range of sanitary pads, are currently recyclable.

h. The second part of the Rule 17(3) relates to the onus of the Manufacturers or brand owners or marketing companies of sanitary pads to provide wrapper or pouch along with their sanitary pads for disposal of the sanitary pads. With regards to the second part of the Rule 17(3) it is submitted that answering respondent is fully compliant with it as the answering respondent is currently either providing (a) a pouch with certain variants of sanitary napkins, or (b) a wrapper with the remaining other variants of sanitary napkins. Currently, there is just one variant, i.e., Carefree belted napkins which



the answering respondent where a pouch/wrapper is not currently made available but is planned to be introduced shortly.

While some variants of sanitary napkin of the answering respondent has 'pouch' for disposal, the other variants have 'wrapper' for the purposes of disposal. The wrapper solution works as follows: the sanitary napkin has an adhesive based release paper which is used to wrap the used pad for disposal. The release paper acts as a 'wrapper' and has clear instructions written on it to aid ease of disposal of used sanitary napkin. This also makes the used sanitary napkins identifiable to the waste picker, safeguard their health and hygiene while also reducing the need to add more plastic or paper to the environment.

True Copies of the pouch and wrapper that are provided along with various variants of the answering respondent are annexed herewith and marked as **ANNEXURE R-1** at Page No. 37 to 38 of the present reply.

At present, about 99% of the variants of sanitary napkins of the answering respondent already have either a pouch or a wrapper for disposal of sanitary napkins. Hence, it is submitted in *toto* that answering respondent is fully compliant with both parts of Rule 17(3) of SWM Rules independently and has actually gone beyond the letter of the law under the SWM Rules by complying with both parts of Rule 17(3) whereas the



- i. It is also submitted that answering respondent is also fully compliant with Rule 17(1), Rule 17(2) & Rule 17 (4) of SWM Rules and the details regarding the same are given in the below paragraphs.

#### COMPLIANCE WITH RULE 17(1) OF SWM RULES

- j. It is submitted that Rule 17(1) of SWM Rules relates to providing necessary financial assistance to local authorities for establishment of waste management system. With regards to the same it is submitted that under the said Rule the manufacturers/ brand owners shall provide financial assistance to the local authorities for establishment of waste management system. It is submitted that establishment of waste management system shall entail a system of effective waste management being introduced by the local authorities for which financial assistance shall be provided by the manufacturers/ brand owners. It is humbly submitted that it is the responsibility of the local authorities to request/demand the required financial assistance for establishment of any sort of waste management system clearly laying down the amount and mode of such financial assistance. It is further submitted that Rule 17(1) only relates to necessary and one-time assistance for establishment of waste management system and



recurring assistance. It is submitted that under the said Rule only necessary financial assistance can be sought from the manufacturers or brand owners, however, the entire burden of establishment of waste management system cannot be put on the shoulders of the manufacturers or brand owners. It is humbly submitted that there are no guidelines from the Central or the State Government for collection of the financial assistance or any mechanism so established. There cannot be generic demand for financial assistance without there being a specific and objective standard laid down by executive order passed under the SWM Rules. It is further submitted that as per provisions of SWM Rules the primary duty of establishment of Waste Management System is on the Local Authority. Under the SWM Rules the brand owner's duty has been enumerated as one-time financial assistance for the establishment of the Waste Management System. It cannot be the intention of the legislature that the Role and Functions of the Local Municipal Corporations such as Public health, sanitary conservancy, solid waste management, etc. for which they collect taxes through property tax, tax on trade, tax on advertisement, service charge, water tax, electricity tax, tax under solid waste management act , etc. and have a dedicated budget cannot abdicated towards the brand owners under these Rules. The assistance contemplated under this Rule is for



**COMPLIANCE WITH RULE 17(2) OF SWM RULES**

k. It is submitted that Rule 17(2) of SWM Rules relates to brand owners putting in place a system to collect back the packaging waste generated by it which is essentially non-biodegradable in nature. It is humbly submitted that the answering respondent has entered into agreements with Third party vendors/recyclers who help the answering respondent in buying back and recycling plastic waste. The answering respondent has achieved more than of its target of buy-back and recycle of the share of the plastic waste that was introduced. It is submitted that answering respondent being a strong believer in a Sustainable Environment is fully compliant with the extended producer responsibility not just under the SWM Rules but also under the Plastic Waste Management Rules, 2016 (hereinafter referred to as PWM Rules). It is submitted that answering respondent in its bid to help the environment at large is constantly taking on the challenges in front of it. It is submitted that answering respondent was mandated by CPCB to collect at least 70% of plastic waste it produced in the Financial Year 2019-20. It is submitted that answering respondent through their efficient waste management system has brought back and recycled approximately 73% of the plastic waste (basis actual



which is evident from the letter dated 30.07.2020 submitted by the answering respondent with CPCB. It is further submitted that answering respondent is on course to collect and recycle 100% of the plastic waste (basis actual invoicing to market) for the financial year 2020-21 through its efficient plastic waste management system which is evident from the letter dated 21.12.2020 submitted by the answering respondent with CPCB regarding its revised EPR plan for financial year 2020-21.

The True Copy of the letter dated 30.07.2020 sent by answering respondent to CPCB regarding EPR details for Financial Year 2019-20 is annexed herewith and marked as **ANNEXURE R-2** at Page No. 39 to 44 of the present reply.

The True Copy of the letter dated 21.12.2020 sent by answering respondent to CPCB regarding EPR details for Financial Year 2020-21 is annexed herewith and marked as **ANNEXURE R-3** at Page No. 45 to 49 of the present reply.

#### **COMPLIANCE WITH RULE 17(3) OF SWM RULES**

1. It is submitted that there are two parts to Rule 17(3) of SWM Rules the fact which seems to have been overlooked by the Applicants. Rule 17(3) states as under:

*“17(3): Manufacturers or brand owners or marketing companies of sanitary napkins and diapers shall explore the possibility of using all recyclable materials in their products or they shall provide a*



It is submitted that the first part of Rule 17(3) is with regards to the onus of the Manufacturers or brand owners or marketing companies of sanitary pads and diapers to explore the possibility of using all recyclable materials in their products. The second part of the Rule 17(3) relates to the onus of the Manufacturers or brand owners or marketing companies of sanitary pads to provide pouch or wrapper along with their sanitary pads for disposal of the sanitary pads. Both the parts are options that have been given to the brand owners which can be adhered to by the brand owners in compliance of Rule 17(3). The brand owner either has to be complying with the first part or the second part of the Rule. However, the answering respondent has gone beyond the basic compliance requirement and in the spirit of rules has complied with both parts.

With regards to the first part of Rule 17(3) it is submitted that the answering respondent has not only complied with it i.e., *“exploring the possibility of using recyclable materials”* but answering respondent has gone ahead and has introduced recyclable material to the extent possible. Consequently, the answering respondent is pleased to confirm that up to 95% of the materials contained in its entire range of sanitary pads, are currently recyclable.



submitted that answering respondent is fully compliant with it as the answering respondent is currently providing either (a) a pouch with certain variants of sanitary napkins, or (b) a wrapper with the remaining other variants of sanitary napkins, for disposal. Currently, there is just one variant, i.e., Carefree belted napkins which constitutes just about 1.5% of total sanitary napkins sales of the answering respondent, where a pouch/wrapper is currently not made available but is planned to be introduced shortly. It is submitted that as on 1<sup>st</sup> of January 2021 answering respondent is currently providing either a pouch or a wrapper with its entire range of sanitary pads, (except for one variant, i.e., Carefree belted napkins which constitutes miniscule sale of about 1.5% of total sanitary napkins sales of the answering respondent, where a pouch/wrapper is currently not made available but is planned to be introduced shortly). Hence, it is submitted in *toto* that answering respondent is fully compliant with both parts of Rule 17 (3) of SWM Rules independently and hence, the allegation of the Applicants that answering respondent is not complying with Rule 17(3) of SWM Rules is false and contrary to the factual position.

#### COMPLIANCE WITH RULE 17(4) OF SWM RULES

m. It is submitted that Rule 17(4) relates to the duty of the manufacturers, brand owners educating the masses with



to the same it is submitted that answering respondent through its various advertisements, website, social campaigns is educating the masses at large regarding safe wrapping and disposal of sanitary waste. It is further submitted that the answering respondent in collaboration with UNICEF has initiated a drive on menstrual management with dignity and the same is evident from screenshot of the website of the answering respondent annexed at Page no 54 to 55 of the present reply.

The True copy of grab of TVC commercials, sanitary pads packaging, print advertisement, screenshots of website of the Johnson & Johnson Private Limited showing various campaigns being run by the answering respondent are annexed herewith and marked as ANNEXURE R-4 (Colly) at page 50 to 55 of the present reply.

**PARA WISE REPLY**

11. In response to Para I-IV of the present application it is submitted that the answering respondent is compliant with the provisions of SWM Rules.



12. It is submitted that the contents of Para 1 of the present application as far as they are a matter of record need no reply, however, the contents of Para 1 as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted by the applicants that *“No manufacturers of sanitary napkins or sellers is providing any disposable bags with the purchase of sanitary napkins and this is adding to mismanagement of Solid Waste Management which is already a mess”*. It is submitted that the answering respondent is currently either providing a pouch or a wrapper along with its sanitary pads and the same has been elaborately explained in the above paras.
13. It is submitted that the contents of Para 2 of the present application as far as they are a matter of record need no reply.
14. It is submitted that the contents of Para 3 of the present application as far as they are a matter of record need no reply.
15. It is submitted that the contents of Para 4 of the present application as far as they are a matter of record need no reply.
16. It is submitted that the contents of Para 5 of the present application as far as they are a matter of record need no reply.
17. It is submitted that the contents of Para 6 of the present application as far as they are a matter of record need no reply. However, it is



18. It is submitted that the contents of Para 7 of the present application as far as they are a matter of record need no reply. However, it is submitted that the answering respondent is fully compliant with the SWM Rules in entirety.
19. It is submitted that the contents of Para 8 of the present application as far as they are a matter of record need no reply. However, it is submitted that the answering respondent is fully compliant with the SWM Rules in entirety.
20. It is submitted that the contents of Para 9 of the present application as far as they are a matter of record need no reply. However, it is submitted that the answering respondent is fully compliant with the SWM Rules in entirety.
21. It is submitted that the contents of Para 10 of the present application as far as they are a matter of record need no reply. However, it is submitted that the answering respondent is fully compliant with the SWM Rules in entirety.
22. It is submitted that the contents of Para 11 of the present application as far as they are a matter of record need no reply. However, the contents of the instant para as far as they relate to non-compliance of certain provisions of SWM Rules by the answering respondent



fully compliant with the provisions of the SWM Rules.

- A. It is submitted that the contents of the instant para being verbatim of Rule 3(46) of SWM Rules being a matter of record need no reply.
- B. It is submitted that the contents of the instant para being verbatim of Rule 3(41) of SWM Rules being a matter of record need no reply.
- C. It is submitted that the contents of the instant para being verbatim of Rule 4(1)(b) of SWM Rules being a matter of record need no reply. However, it is submitted that answering respondent as already explained in detail in the above paras is providing pouches/ wrappers for the disposal of the sanitary pads with its sanitary pads throughout the country.
- D. It is submitted that the contents of the instant para being verbatim of Rule 17 of the SWM Rules being a matter of record need no reply. However, it is submitted that answering respondent as already explained in detail in the above paras is fully compliant with Rule 17 in its entirety.
23. It is submitted that the contents of the Para No. 12 being explanation of Rule 17 of the SWM Rules being a matter of record need no reply. However, it is submitted that answering respondent as already explained in detail in the above paras is fully compliant with Rule 17 in its entirety.



24. It is submitted that the contents of Para 13 of the present application as far as they are a matter of record need no reply, however, the contents of Para 13 as far as it relates to answering respondent is explained in above paras. The applicants have submitted that *“The Applicants wish to mention that whenever they purchased sanitary napkins, they were not provided with ay pouch or wrapper for disposal of sanitary napkins”*. It is submitted that the answering respondent is currently providing either a pouch or a wrapper with its sanitary pads and the same has been elaborately explained in the above paras.
25. The applicants have submitted under Para 14 of the present application that *“In Mumbai, Pune and Nagpur no manufacturers or Brand Owners are providing any pouch or wrapper for disposal of each napkin or diaper along with the packet of their sanitary products as it is mandated by the new Solid Waste Management Rules, 2016. And the Situation is same in all cities in Maharashtra as well as in India.”* It is submitted that the answering respondent is currently either providing a pouch or a wrapper with its sanitary pads and the same has been elaborately explained in the above paras.
26. It is submitted that the contents of Para 15 of the present application as far as they are a matter of record need no reply.
27. It is submitted that the contents of Para 16 of the present application as far as they are a matter of record need no reply. However, it is



Sustainable Environment is fully compliant with the extended producer responsibility not just under the SWM Rules but also under the PWM Rules. It is submitted that answering respondent in its bid to help the environment at large is constantly at taking on the challenges in front of it. It is submitted that answering respondent was mandated by CPCB to collect at least 70% of plastic waste it produced in the Financial Year 2019-20. It is submitted that answering respondent through their efficient waste management system has brought back and recycled approximately 73% of the plastic waste (basis actual invoicing to market) for the financial year ending 2019-20 which is evident from the letter dated 30.07.2020 submitted by the answering respondent with CPCB. It is further submitted that answering respondent is on course to collect and recycle 100% of the plastic waste (basis actual invoicing to market) for the financial year ending 2020-21 through its efficient plastic waste management system which is evident from the letter dated 21.12.2020 submitted by the answering respondent with CPCB regarding revised EPR plan for financial year 2020-21.

28. It is submitted that the contents of Para 17 to 22 of the present application as far as they are a matter of record need no reply. However, it is submitted that answering respondent being a strong believer in a Sustainable Environment is fully compliant with the extended producer responsibility not just under the SWM Rules but also under the PWM Rules as explained in the above para.



29. It is submitted that the contents of Para 23 of the present application as far as they are a matter of record need no reply. It is also submitted that answering respondent through various advertisements, website, social campaigns is educating the masses at large regarding safe wrapping and disposal of sanitary waste. It is further submitted that the answering respondent in collaboration with UNICEF has initiated a drive on menstrual management with dignity as explained in the above paras.
30. It is submitted that the contents of Para 24 of the present application as far as they are a matter of record need no reply.
31. It is submitted that the contents of Para 25 of the present application as far as they are a matter of record need no reply.
32. It is submitted that the contents of Para 26 of the present application as far as they are a matter of record need no reply.
33. It is submitted that the contents of Para 27 of the present application as far as they are a matter of record need no reply. However, contents of para 28 are reiterated.
34. It is submitted that the contents of Para 28 of the present application as far as they are a matter of record need no reply. However, it is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same has been elaborately explained in the above paras.



as far as they are a matter of record need no reply. However, contents of para 28 are reiterated.

36. It is submitted that the contents of Para 30 of the present application as far as they are a matter of record need no reply. It is submitted that answering respondent in its bid to help the environment at large is constantly at taking on the challenges in front of it. It is submitted that answering respondent was mandated by CPCB to collect at least 70% of plastic waste it produced in the Financial Year 2019-20. It is submitted that answering respondent through their effect waste management system has brought back and recycled approximately 73% of the plastic waste (basis actual invoicing to market) for the financial year ending 2019-20. It is further submitted that answering respondent is on course to collect and recycle 100% of the plastic waste (basis actual invoicing to market) for the financial year ending 2020-21 through its efficient plastic waste management system as explained in the above paras.
37. It is submitted that the contents of Para 31 of the present application as far as they are a matter of record need no reply. However, it is submitted that answering respondent is using all possible recyclable material to the extent of up to 95% of the component used in its entire range of sanitary pads as has been elaborately explained in the above paras.



as far as they are a matter of record need no reply. It is further submitted that the task of garbage collection in Pune City and other cities does not fall within the jurisdiction of ambit of the answering respondent and hence, no reply is being put forth by the answering respondent. It is further submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same have been elaborately explained in the above paras.

39. It is submitted that the contents of Para 33 of the present application as far as they are a matter of record need no reply. It is further submitted that the task of waste management does not fall within the ambit of the jurisdiction of the answering respondent and the same is undertaken by the local authorities/ municipal corporations and hence, no reply is being put forth by the answering respondent. It is further submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same have been elaborately explained in the above paras
40. It is submitted that the contents of Para 34 of the present application as far as they are a matter of record need no reply.
41. It is submitted that the contents of Para 35 of the present application as far as they are a matter of record need no reply. It is further submitted that the contents of the present Para are not related to the answering respondent and hence, no reply is being put forth by the answering respondent.



stating that "*The Applicants state and submit that the manufacturers or brand owners are not providing presently any pouch or wrapper for disposal of each napkin or diapers along with the packet of their sanitary products and so it results the sanitation and sewage workers, who have to deal with the open menstrual blood, are exposed to disease causing pathogens.*". It is submitted that the contents of Para No. 12 of the present reply are reiterated.

43. It is submitted that the contents of Para 37 of the present application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that the answering respondent is currently either providing a pouch or a wrapper with its sanitary pads and the same has been elaborately explained in the above paras.
44. It is submitted that the contents of Para 38 of the present application as far as they are a matter of record need no reply. It is further submitted that the contents of the present Para are not related to the answering respondent and hence, no reply is being put forth by the answering respondent.
45. It is submitted that the contents of Para 39 of the present application as far as they are a matter of record need no reply.
46. It is submitted that the contents of Para 40 of the present application as far as they are a matter of record need no reply.



application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that the answering respondent is currently providing either a pouch or a wrapper along with its sanitary pads and the same has been elaborately explained in the above paras. The contents of above paragraph 36 are reiterated.

48. It is submitted that the contents of Para 40-B of the present application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. The primary duty of establishment of Waste Management System is on the Local Authority. Under the Rules the brand owner's duty has been enumerated as one-time financial assistance for the establishment of the Waste Management System. It cannot be the intention of the legislature that the Role and Functions of the Local Municipal Corporations such as Public health, sanitary conservancy, solid waste management , for which they collect taxes through property tax, tax on trade, tax on advertisement, service charge, water tax, electricity tax, tax under solid waste management, etc. and have a dedicated budget cannot abdicated towards the brand owners under these Rules. The assistance contemplated under this Rule is for establishment of waste management system, however, it seems that the petitioner has incorrect understanding of the Rules. It is submitted that answering respondent is fully compliant with the



explained in the above paras.

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49. It is submitted that the contents of Para 41 of the present application as far as they are a matter of record need no reply. However, it is submitted that as suggested by the Applicants in Para E, answering respondent is already using the Red Dot Programme of using the wrapper (release paper) with a red dot drawn on it to differentiate it for the waste pickers to know what it contains and make sure that it is not accidentally opened by them. It is further submitted that answering respondent is using all possible recyclable material to the extent of up to 95% of the components in its entire range of sanitary pads as has been elaborately explained in the above paras.

True Copy of one such packaging adopted by the answering respondent is annexed herewith as marked as **ANNEXURE R-5** at Page No. 56 to 57 of the present reply.

#### **REPLY TO GROUNDS**

50. That the contents of ground A does not pertain to the answering respondent and needs to reply. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same have been elaborately explained in the above paras.
51. That the contents of ground B as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules including Rule 17 and the same has been elaborately explained in the above paras.



52. That the contents of ground C as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules including Rule 17 and the same has been elaborately explained in the above paras.

53. That the contents of ground D as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules including Rule 17 and the same has been elaborately explained in the above paras. It is further submitted that answering respondent is using all possible recyclable material to the extent of up to 95% of the components, in its entire range of sanitary pads as has been elaborately explained in the above paras.

54. That the contents of ground E as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that a detailed reply regarding the same has been provided in the above paras and the same is not repeated for the sake of repetition.

55. That the contents of ground F does not pertain to the answering respondent and needs to reply.

56. That the contents of ground G as far as it relates to answering respondent are false, contrary to the factual position and hence,



been provided in the above paras and the same is not repeated for the sake of repetition.

57. That the contents of ground H as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same has been elaborately explained in the above paras and the same is not repeated for the sake of repetition.
58. That the contents of ground I as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same has been elaborately explained in the above paras and the same is not repeated for the sake of repetition.
59. That the contents of ground J as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same has been elaborately explained in the above paras and the same is not repeated for the sake of brevity. It is further submitted that the submission of the Applicants that usage of vending machines in all cities will address effective implementation of SWM Rules is beyond comprehension of the answering respondent as the main



not availability of sanitary napkins. Further, it is humbly submitted that it ought to be the final decision of the local/ municipal bodies as to how they wish to utilise the financial assistance under Rule 17(1).

60. That the contents of ground K does not pertain to the answering respondent and needs to reply.

### REPLY TO LIMITATION CLAUSE

61. That the contents of the Para (i) are false, without any basis and hence, denied. It is pertinent to note that section 14(3) reads as follows:

*“No Application for adjudication of dispute under this section shall be entertained by the Tribunal unless it is made within a period of six months from the date on which the cause of action for such dispute arose:*

*Provided that that the Tribunal, may, if it is satisfied that the applicant was prevented by sufficient cause from filling the application within the period, allow it to be filled within a further period not exceeding sixty days.”*

It is submitted that the cause of action first arose when the Ministry of Environment, Forest and Climate Change (hereinafter referred to as ‘MoEF’)/ Respondent No. 1 had notified the SWM Rules *vide* S.O. 1357 (E) dated 08.04.2016. It is further submitted that MoEF/ Respondent No. 1 in its additional affidavit dated 16.10.2020



clarified that the SWM Rules shall come into force on the date of their publication in the official gazette i.e., 08.04.2016. Hence, the period of filing the application under section 14 of the NGT Act expired at best in December 2016. The present application only came to be filed on 10.11.2017 and the same is hopelessly time barred as per Section 14(3) of the NGT Act and the same is liable to be dismissed on this ground alone. Further, the present Original Application has been filed without any accompanying application seeking condonation of delay and hence the same is liable to be dismissed.

62. That the contents of the Para (ii) are false, without any basis and hence, denied. It is submitted that Section 15 of the NGT Act is not applicable in the present proceedings and hence, the present Original Application is liable to be dismissed. It is pertinent to note that section 15 of the NGT Act reads as follows: -

*“Section 15: Relief, compensation and restitution.*

*(1) The Tribunal may, by an order, provide, --*

*(a) relief and compensation to the victims of pollution and other environmental damage arising under the enactments specified in the Schedule I (including accident occurring while handling any hazardous substance);*

*(b) for restitution of property damaged;*

*(c) for restitution of the environment for such area or areas,*

*as the Tribunal may think fit.*



environment referred to in clauses (a), (b) and (c) of subsection (1) shall be in addition to the relief paid or payable under the Public Liability Insurance Act, 1991 (6 of 1991).

(3) No application for grant of any compensation or relief or restitution of property or environment under this section shall be entertained by the Tribunal unless it is made within a period of five years from the date on which the cause for such compensation or relief first arose:

Provided that the Tribunal may, if it is satisfied that the applicant was prevented by sufficient cause from filing the application within the said period, allow it to be filed within a further period not exceeding sixty days.

(4) The Tribunal may, having regard to the damage to public health, property and environment, divide the compensation or relief payable under separate heads specified in Schedule II so as to provide compensation or relief to the claimants and for restitution of the damaged property or environment, as it may think fit.

(5) Every claimant of the compensation or relief under this Act shall intimate to the Tribunal about the application filed to, or, as the case may be, compensation or relief received from, any other court or authority.”

It is submitted that in the present proceedings none of the provisions of Section 15 of the NGT Rules gets triggered and hence,



limitation. It is submitted that answering respondent is fully compliant with the provisions of the SWM Rules and the same has been elaborately explained in the above paras and the same is not repeated for the sake of brevity.

#### REPLY TO PRAYER CLAUSE

63. It is submitted that the contents of Prayer I of the present application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that the answering respondent is currently providing either a pouch or a wrapper along with its sanitary pads. Currently, there is just one variant, i.e., Carefree belted napkins which constitutes just about 1.5% of total sanitary napkins sales of the answering respondent, where a pouch/wrapper is currently not made available but is planned to be introduced shortly. Hence, no such directions may be passed against the answering respondent.
64. It is submitted that the contents of Prayer II of the present application does not pertain to the answering respondent and needs to reply. However, it is submitted that the answering respondent is currently providing either a pouch or a wrapper along with its sanitary pads and the same has been elaborately explained in the above paras and hence, no such directions maybe passed against the answering respondent.



application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that the answering respondent is currently providing either a pouch or a wrapper along with its sanitary pads and the same has been elaborately explained in the above paras. It is further submitted that answering respondent being a strong believer in a Sustainable Environment is fully compliant with the extended producer responsibility not just under the SWM Rules but also under the PWM. It is submitted that answering respondent in its bid to help the environment in large is dealing with the challenges in front of it. It is submitted that answering respondent was mandated by CPCB to collect at least 70% of plastic waste it produced in the Financial Year 2019-20. It is submitted that answering respondent through their effect waste management system has brought back and recycled approximately 73% of the plastic waste (basis actual invoicing to market) for the financial year ending 2019-20 as explained in the above paras. It is further submitted that answering respondent is on course to collect and recycle 100% of the plastic waste (basis actual invoicing to market) for the financial year ending 2020-21 through its efficient plastic waste management system as explained in the above paras and hence, no such directions maybe passed against the answering respondent.

66. It is submitted that the contents of Prayer IV of the present application does not pertain to the answering respondent and needs



compliant with the provisions of SWM Rules in *toto* and hence, no such directions maybe passed against the answering respondent.

67. It is submitted that the contents of Prayer IV(i) (Prayer IV seems to be repeated twice) of the present application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is submitted that the answering respondent is currently providing either a pouch or a wrapper along with its sanitary pads and the same has been elaborately explained in the above paras and hence, no such directions maybe passed against the answering respondent.

68. It is submitted that the contents of Prayer IV (ii) (Prayer IV seems to be repeated twice) of the present application as far as it relates to answering respondent are false, contrary to the factual position and hence, denied. It is further submitted that answering respondent being a strong believer in a Sustainable Environment is fully compliant with the extended producer responsibility not just under the SWM Rules but also under the PWM. It is submitted that answering respondent in its bid to help the environment in large is constantly facing the challenges in front of it. It is submitted that answering respondent was mandated by CPCB to collect at least 70% of plastic waste it produced in the Financial Year 2019-20. It is submitted that answering respondent through their effect waste management system has brought back and recycled approximately 73% of the plastic waste (basis actual invoicing to market) for the



course to collect and recycle 100% of the plastic waste (basis actual invoicing to market) for the financial year ending 2020-21 through its efficient plastic waste management system and hence, no such directions maybe passed against the answering respondent.

69. It is submitted that the contents of Prayer V of the present application does not pertain to the answering respondent and needs to reply.

70. It is submitted that the contents of Prayer VI of the present application ought not to be allowed. The answering respondent is fully compliant with the provisions of the SWM Rules *in toto*.

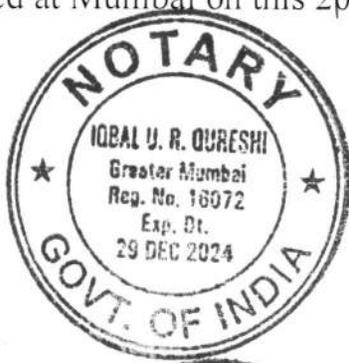
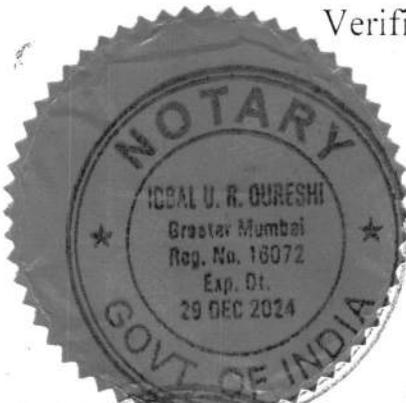
71. It is submitted that the contents of Prayer VII of the present application ought not to be allowed. The answering respondent is fully compliant with the provisions of the SWM Rules *in toto*.

  
DEPONENT  
[MAYUR VASANI]

**VERIFICATION**

I, the abovenamed deponent, verify that the contents of this affidavit are true to the best of my knowledge and nothing material has been concealed therefrom.

Verified at Mumbai on this 20<sup>th</sup> of January 2021



  
[MAYUR VASANI]  
DEPONENT  
BEFORE ME

  
IQBAL U. R. QURESHI  
NOTARY  
Government Of India  
Greater Mumbai Maharashtra  
NOTED & REGISTERED  
S. No. 8455 Page No. 101  
Date: 21 JAN 2021

Details of the product variants in which Pouch film wrapper is provided by Johnson & Johnson Private Limited.



- Stayfree Dry-max Ultra Dry
- Stayfree Dry-max Ultra Dry XL
- Stayfree Dry-max All Night Ultra Dry XL
- Stayfree Advanced Ultra-Comfort XL
- Stayfree Advanced All Night Ultra-Comfort XL
- Stayfree Secure XL Ultra-thin
- Carefree Liner

Details of the product variants in which release paper is being introduced by Johnson & Johnson Private Limited.



- Stayfree Secure Cottony Regular
- Stayfree Secure Cottony XL
- Stayfree Secure Dry Regular
- Stayfree Secure Dry XL

*Abhinav*

To,

30<sup>th</sup> Jul 2020

The Member Secretary

Central Pollution Control Board

Parivesh Bhawan, East Arjun Nagar,

Delhi-110032

Subject: Submission of EPR details for the FY 2019-20

Sir / Ma'am,

This has reference to our CPCB registration number B-17011/7/UPC-II-PWM(MLP)/2018(JJPL)/15553 dated 22.01.2018 where in we are required to collect at least 70% of plastic waste in FY 2019-20.

In this reference please find herewith details of plastic waste generation and their buyback from market and disposal through Pollution Control Board registered recycling for the Financial Year 2019-20.

(A) Actual Quantity of Plastic Waste generated through Invoice to Customers/ Consumers is 10704MT

State	MLP	LDPE	HDPE	PET	PP	Total FY 19-20
Andaman & Nicobar	0.42	2.35	1.08	2.04	0.95	6.84
Andhra Pradesh	522.52	218.93	34.30	69.63	116.53	961.92
Arunachal Pradesh	3.70	2.31	1.37	3.30	2.39	13.08
Assam	380.73	166.80	60.61	103.06	115.87	827.08
Bihar	101.46	128.33	127.67	142.60	75.06	575.12
Chandigarh	1.45	3.27	1.85	6.38	2.64	15.60
CHHATISGARH	7.73	45.31	12.90	37.39	14.05	117.39
Dadra, Nagarhaveli	0.54	1.11	0.73	0.90	0.53	3.81
Daman & Diu	0.25	0.60	0.28	0.48	0.25	1.87
Delhi	35.59	65.11	45.97	130.70	55.38	332.74
GOA	2.08	9.00	6.44	9.58	5.07	32.18
Gujarat	23.21	65.33	38.36	91.38	38.17	256.45
Haryana	27.07	53.51	39.05	110.19	50.29	280.11
Himachal Pradesh	5.30	8.04	6.53	11.65	6.22	37.74
Jammu & Kashmir	12.18	16.49	10.97	34.78	14.54	88.96
Jharkhand	48.09	62.90	30.57	55.92	32.00	229.48
Karnataka	164.42	192.85	85.21	151.25	103.42	697.16
Kerala	5.23	129.44	9.39	57.56	18.68	220.30
Madhya Pradesh	31.33	79.65	38.55	82.96	36.36	268.85
Maharashtra	121.35	218.48	116.96	279.39	134.91	871.10
MANIPUR	71.56	21.48	5.24	8.66	16.52	123.46

MEGHALAYA	31.07	13.87	15.57	9.97	14.77	85.25
Mizoram	17.56	12.78	0.30	2.33	3.52	36.50
Nagaland	72.68	18.57	4.37	12.44	16.28	124.35
Orissa	46.04	71.63	29.78	57.26	26.77	231.49
Pondicherry	0.93	9.19	1.35	3.99	2.00	17.47
Punjab	20.44	51.28	37.87	105.91	40.33	255.84
Rajasthan	17.03	74.42	32.02	86.74	32.31	242.51
Sikkim	1.28	1.51	0.74	1.77	1.15	6.45
Tamil Nadu	82.59	291.75	49.59	157.44	75.60	656.98
TELANGANA	289.89	431.64	49.05	114.20	89.70	974.48
TRIPURA	15.59	11.32	4.86	11.20	7.64	50.62
Uttar Pradesh	95.50	195.07	217.43	318.91	150.98	977.89
UTTARANCHAL PRADESH	11.94	21.59	15.97	36.01	15.81	101.32
West Bengal	209.31	218.25	131.15	267.32	155.17	981.19
<b>Category Total</b>	<b>2478.07</b>	<b>2914.18</b>	<b>1264.09</b>	<b>2575.33</b>	<b>1471.90</b>	<b>10703.57</b>

(B) Quantity of Plastic Waste required (70%) to buyback from market for recycling – 7493MT

State	MLP	LDPE	HDPE	PET	PP	Total FY 19-20
Andaman & Nicobar	0.29	1.65	0.76	1.43	0.66	4.79
Andhra Pradesh	365.77	153.25	24.01	48.74	81.57	673.34
Arunachal Pradesh	2.59	1.62	0.96	2.31	1.67	9.16
Assam	266.51	116.76	42.43	72.14	81.11	578.96
Bihar	71.02	89.83	89.37	99.82	52.54	402.58
Chandigarh	1.02	2.29	1.30	4.47	1.85	10.92
CHHATISGARH	5.41	31.72	9.03	26.18	9.84	82.17
Dadra, Nagarhaveli	0.38	0.78	0.51	0.63	0.37	2.67
Daman & Diu	0.18	0.42	0.20	0.34	0.18	1.31
Delhi	24.91	45.57	32.18	91.49	38.76	232.92
GOA	1.46	6.30	4.51	6.71	3.55	22.52
Gujarat	16.25	45.73	26.85	63.97	26.72	179.51
Haryana	18.95	37.46	27.34	77.14	35.20	196.08
Himachal Pradesh	3.71	5.63	4.57	8.15	4.35	26.42
Jammu & Kashmir	8.53	11.54	7.68	24.35	10.18	62.27
Jharkhand	33.66	44.03	21.40	39.14	22.40	160.64
Karnataka	115.10	134.99	59.65	105.88	72.40	488.01
Kerala	3.66	90.61	6.57	40.30	13.07	154.21
Madhya Pradesh	21.93	55.75	26.99	58.07	25.46	188.19
Maharashtra	84.94	152.93	81.88	195.58	94.44	609.77
MANIPUR	50.09	15.04	3.67	6.06	11.56	86.42
MEGHALAYA	21.75	9.71	10.90	6.98	10.34	59.68

Mizoram	12.29	8.95	0.21	1.63	2.47	25.55
Nagaland	50.88	13.00	3.06	8.71	11.40	87.04
Orissa	32.23	50.14	20.85	40.08	18.74	162.04
Pondicherry	0.65	6.43	0.95	2.79	1.40	12.23
Punjab	14.31	35.90	26.51	74.14	28.23	179.09
Rajasthan	11.92	52.09	22.42	60.71	22.62	169.76
Sikkim	0.89	1.06	0.52	1.24	0.81	4.52
Tamil Nadu	57.81	204.23	34.72	110.21	52.92	459.88
TELANGANA	202.92	302.15	34.33	79.94	62.79	682.13
TRIPURA	10.91	7.93	3.41	7.84	5.35	35.43
Uttar Pradesh	66.85	136.55	152.20	223.23	105.69	684.52
UTTARANCHAL PRADESH	8.36	15.11	11.18	25.21	11.07	70.93
West Bengal	146.52	152.77	91.80	187.12	108.62	686.83
<b>Category Total</b>	<b>1734.65</b>	<b>2039.93</b>	<b>884.86</b>	<b>1802.73</b>	<b>1030.33</b>	<b>7492.50</b>

(C) Details of Quantity of Plastic Waste buy back from the market and recycled at registered recyclers for the Financial year 2019-20 are as below:

State	MLP	LDPE	HDPE	PET	PP	States Total	Post Consumer Usage Plastic Waste collected from locations	Recycling of Post Consumer Usage Plastic Waste at
Andaman & Nicobar	6.3	0.0	0.0	0.0	0.0	6.3	Andaman & Nicobar	Om Vir Sai Consultancy - Recycled in Constructions Industry
Andhra Pradesh	315.5	162.1	67.9	0.0	97.6	643.1	Vijayawada, Chittoor	Biyani Polymers - SRO-JALGOAN/CONSENT/1812000913 Bharat Industries - RO/Aurangabad/consent/1910000506 The Shakti Plastic industries - RO-THANE/CONSENT/1809000348/TR-11
Assam	413.9	172.9	39.7	105.6	55.4	787.5	Bongalgaon, Guwahati	Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Bihar	75.7	96.0	89.1	72.4	57.4	390.6	Gaya, Patna, Begusarai, Muzaffarpur, Bettiah, Darbhanga, Siwan, East Champaran, Katihar, Ara, Purnea, Buxar	Arti Plastics - 373952 Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Chandigarh	1.0	2.4	0.9	13.5	1.9	19.7	Chandigarh	Jyothi Plastics - CTOW/Fresh/LDHKH/2018/7239106 Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
CHHATISGARH	5.4	32.7	6.0	14.9	4.4	63.3	Raipur, Bilaspur	Badri Ecofiber PVT (PET) - TS/MPPCB/2014 The Shakti Plastic industries - RO-THANE/CONSENT/1809000348/TR-11
Dadra, Nagarhaveli	0.4	0.8	0.4	0.0	0.2	1.7	Silvassa	The Shakti Plastic industries - RO-THANE/CONSENT/1809000348/TR-11
Daman & Diu	0.2	0.5	0.1	0.0	0.1	0.9	Silvassa	The Shakti Plastic industries - RO-THANE/CONSENT/1809000348/TR-11

State	MLP	LDPE	HDPE	PET	PP	States Total	Post Consumer Usage Plastic Waste collected from locations	Recycling of Post Consumer Usage Plastic Waste at
Delhi	23.4	47.8	34.4	289.7	41.3	436.5	Bawana, Nangloi, North Delhi, Mundrka, Patparganj, Tikri Kalan, Nangloi, Delhi	Sunrise Polymer - DPCC/CMC/2018/124206 Badri ECO Fiber PVT Ltd (PET) - TS/MPPCB/2014 BLS ECOTECH LTD - F(Tech)Jaipur(kotputli) /1148(1) / 2012-2013/2286-2287 Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
GOA	1.5	6.4	2.7	0.0	1.6	12.3	Margao, Ponda	The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Gujarat	16.9	46.2	16.2	0.0	31.5	110.7	Kheda,Vapi	Prakash Industries - AWP-73530 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Haryana	20.4	43.2	17.5	111.2	33.6	226.0	Gurugram, Rohtak, Sonapat, Faridabad	Sunrise Polymer - DPCC/CMC/2018/124206 BLS ECOTECH LTD - F (Tech)Jaipur(kotputli) /1148(1) / 2012-2013/2286-2287 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Himachal Pradesh	3.9	6.1	3.2	0.0	4.6	17.8	Una, Mandi	Jyothi Plastics - CTOW/Fresh/LDHKH/2018/7239106 Jabalpur MSW Ltd - Consent No. - AW-50616.
Jammu & Kashmir	8.7	12.3	5.5	0.0	4.0	30.4	Samba, Jammu and Kashmir	Jabalpur MSW Ltd - Consent No. - AW-50616.
Jharkhand	32.3	45.9	15.1	0.0	24.5	117.8	Lohardaga, Ranchi, Hazaribagh	Arti Plastics - 373952 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Karnataka	119.6	148.5	52.9	107.2	77.4	505.5	Mysore, Bangalore	R.A.Traders- KSPCB/EO/MYS/DEO-1/AEO-1/ F.NO-2343/2011-12/3575 Bharat Industries - RO/Aurangabad/consent/1910000506 J B Ecotex LLP - GPCB/PWMR15/SRT/124/2017 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Kerala	3.3	91.9	141.2	41.0	138.1	416.1	Cochin, Ernakulam, Palakkad, Calicut	Hamara Plastics - DISERNA CVO-129247 Bharat Industries - RO/Aurangabad/consent/1910000506 J B Ecotex LLP - GPCB/PWMR16/SRT/124/2017 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Madhya Pradesh	20.7	56.0	18.3	115.0	21.1	231.1	Chhindwara, Harda, Bhopal, Jabalpur, Indore, Ujjain	Prakash Industries - AWP-73630 Badri EchoFiber PVT LTD(PET) - TS/MPPCB/2014 Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Maharashtra	82.3	159.7	50.5	178.8	97.4	568.6	Ahmed Nagar, Nagaur, Bhiwandi, Pune	Kapil Enterprises - MPCB/SRD/A NAGAR/1909001020 Biyani Polymers - SRO-JALGAON/CONSENT/ 1812000913 Badri ECO Fiber PVT Ltd (PET) - TS/MPPCB/2014 The Shakti Plastic Industries - RO-THANE/CONSERNT/1809000348/TR-11
Orissa	31.3	49.2	13.5	0.0	9.5	103.4	Balasore, Puri, Rouckela	Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Pondicherry	0.0	0.0	0.6	1.8	0.0	2.4	Pondicherry	J B Ecotex LLP - GPCB/PWMR16/SRT/124/2017 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Punjab	14.7	37.6	18.8	0.0	29.0	100.1	Amritsar	Jyothi Plastic - CTOW/Fresh/LDHKH/2018/7239106 Jabalpur MSW Ltd - Consent No. - AW-50616.
Rajasthan	12.2	51.7	17.6	8.5	23.5	113.5	Alwar, Kushkera, Kota, Jaipur	Sunrise Polymer - DPCC/CMC/2018/124206 Jabalpur MSW Ltd - Consent No. - AW-50616, The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Tamil Nadu	62.4	207.5	34.3	116.4	51.8	472.3	Kanyakumari, Madurai, Vellore, Theni, Tirupur, Chennai	Shree Sai Plastics - SRO-JALGAON/CONSENT/1812000929 J B Ecotex LLP - GPCB/PWMR16/SRT/124/2017 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
TELANGANA	153.4	317.3	47.9	81.3	73.5	673.4	Hyderabad	Ramky Reclamation and Recycling Ltd - ORDER NO. 128/PCB/MSW/CFE/2012-4224 J B Ecotex LLP - GPCB/PWMR16/SRT/124/2017 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Uttar Pradesh	68.4	146.0	120.6	409.4	35.0	779.3	Barabanki, Kanpur, Maharajganj, Lucknow, Shahjahanpur, Varanasi, Ballia, Moradabad	Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
Uttarakhand	8.4	15.8	14.0	105.8	11.5	155.5	Kashipur, Haridwar, Bazzpur, Jaimaur, Rudraprayag, Nanital, US Nagar	Sunrise Polymer - DPCC/CMC/2018/124206 Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
West Bengal	174.8	155.1	91.0	203.9	160.1	784.9	Koikatta, Darjeeling, Siliguri, Malda, Kashipur	Arti Plastics - 373952 Uma Industries - 895/DIC/S-24PGS Pashupati Polytex Pvt limited - UEPPCB/HO/Con/P-95/2018/1717 Consent No. - 38976/972 Jabalpur MSW Ltd. - Consent No. - AW-50616 The Shakti Plastic Industries - RO-THANE/CONSENT/1809000348/TR-11
<b>Category Total</b>	<b>1677.3</b>	<b>2111.2</b>	<b>919.9</b>	<b>1976.3</b>	<b>1086.1</b>	<b>7770.9</b>		

Registered Office : Johnson & Johnson Private Limited, L.B.S. Marg, Mulund (W), Mumbai 400 080,

T: +91-22-2564 4441 F: +91-22-2564 8410

Web: www.jnjindia.com CIN:U33110MH1957PTC010928

We state that through EPR we have buy backed and recycled 73% of our committed plastic waste (basis actual invoicing to market) for the Financial Year ending 2019-20 from the market and recycled with the Pollution Control Board registered recyclers details of the destruction certificates from the PRO and recyclers are attached for your reference.

Thanking you

Yours sincerely



Johnson & Johnson Private Limited

Attachment:

1. Collection and Destruction certificates of Post-consumer Usage Plastic collected across various states.

CC:

1. Andaman and Nicobar Pollution Control Committee  
Dolly Gunj, Port Blair, Andaman and Nicobar – 744102
2. Andhra Pradesh Pollution Control Board  
D. No. 33-26-14 D/2, Near Sunrise Hospital  
Pushpa Hotel Centre, Chalamalavari Street  
Kasturibaipet, Vijayawada - 520010
3. Pollution Control Board Assam,  
Bamunimaidam, Guwahati - 21
4. Bihar State Pollution Control Board  
Parivesh Bhawan  
Mall Rd, Patliputra Industrial Area, Digha, Patna, Bihar 800010
5. Chandigarh Pollution Control Board  
4th Floor, UT Secretariat, Sector 9, Chandigarh UT – 160009
6. Chattishgarh Environment Conservation Board  
Paryavaran Bhawan North Block Sector – 19 Atal Nagar, Distt. Raipur Chattisgarh - 492002
7. Pollution Control Committee  
Ground Floor, Secretariat, Fort Area,  
Moti Daman, Daman (U.T.) - 396220.
8. Delhi Pollution Control Committee  
4th & 5th Floor ISBT Building, GT Karnal Rd, Kashmere Gate, New Delhi, Delhi 110006
9. Goa State Pollution Board  
Dempo Towers 1<sup>st</sup> Floor Panaji, Goa - 403001
10. Gujarat Pollution Control Board  
Paryavaran Bhawan, Sector 10A Opposite Bij Nigam, Gandhinagar, Gujarat – 382010
11. Haryana Pollution Control Board  
C-11, SEC- 6, PANCHKULA Haryana - 160062

12. Himachal Pradesh Pollution Control Board  
Him Parivesh, Phase – III, New Shimla Himachal Pradesh – 171009
13. JK Pollution Control Board  
Sheikh – UI – Alam Campus, Behind Govt. Silk Factory, Rajbagh, Srinagar (J&K) - 190008
14. Jharkhand State Pollution Control Board  
H.E.C., Dhurwa, Ranchi-834004 (Jharkhand)
15. Karnataka Pollution Control Board  
"Parisara Bhavan", #49, 4th & 5th Floor,  
Church Street, Bangalore-560001
16. Kerala State Pollution Control Board  
Head Office, Pattom. P. O, Thiruvananthapuram – 695004
17. Madhya Pradesh Pollution Control Board  
E-5, Link Rd Number 3, Ekant Park, Arera Colony,  
Bhopal, Madhya Pradesh 462016
18. Maharashtra Pollution Control Board  
Kalpataru Point, 3rd and 4th floor,  
Opp. PVR Cinema, Sion Circle,  
Mumbai-400 022.
19. Odisha State Pollution Control Board  
Paribesh Bhavan  
A/118, Nilakantha Nagar, Unit – VIII, Bhubaneswar – 751012, Odisha
20. Puducherry Pollution Control Committee  
3rd Floor, PHB Building, Anna Nagar, Puducherry-605005
21. Punjab Pollution Control Board  
Vatavaran Bhawan, Nabha Road, Patiala - 147001
22. Rajasthan Pollution Control Board  
4, Jhalana Institutional Area. Jhalana Doongri, Jaipur (Rajasthan) Pin: 302 004
23. Tamil Nadu Pollution Control Board  
76, Mount Salai, Guindy, Chennai - 600 032
24. Telangana State Pollution Control Board  
A-3, Paryavaran Bhavan, Sanath Nagar Rd, Sanath Nagar Industrial Estate,  
Sanath Nagar, Hyderabad, Telangana 500018
25. UP Pollution Control Board  
Building.No. TC-12V  
Vibhuti Khand, Gomti Nagar, Lucknow – 226010
26. Uttarakhand Environment Protection & Pollution Control Board, Dehradun  
Gaura Devi Bhawan, 46 B IT Park Sahastradhara, Dehradun, Uttarakhand"  
Pincode- 248001 Ph No- 0135-2658086 Fax- 0135-2718092
27. West Bengal Pollution Control Board  
Paribesh Bhavan  
10A, LA Block, Sector III, Bidhannagar, Kolkata, West Bengal 700106

*Abhinav*

**TRUE COPY**

Registered Office : Johnson & Johnson Private Limited, L.B.S. Marg, Mulund (W), Mumbai 400 080.

T: +91-22-2564 4441 F: +91-22-2564 3410

Web: www.jnjindia.com CIN: U38110MH1957PTC010928

Date: 21/12/2020

From

Johnson &amp; Johnson Private Limited,

LBS Marg Mulund West,

Mumbai- 400080.

To,

The Member Secretary,

Central pollution control board,

Parivesh Bhawan,

East Arjun Nagar,

Delhi – 110032.

Subject: Submission of Revised EPR (Plan for 2020-2021)

Dear Sir/Madam,

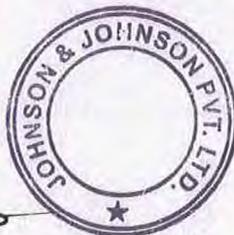
This is to inform you that we, Johnson and Johnson is having a registration certificate for Brand Owner issued by your good office vide Reg No B-17011/7/UPC-II-PWM(MLP)/2018/JJPL/15553 dated 22.01.2019.

We are hereby submitting the revised EPR plan for 2020-2021 in the prescribed format "Format for Framing Action plan for PWM" as Annexure I.

We hope the details are in line with the requirements

Thanking you,

Yours sincerely



Johnson &amp; Johnson private limited



SPEEDPOST

केन्द्रीय प्रदूषण नियंत्रण बोर्ड 46

CENTRAL POLLUTION CONTROL BOARD

पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार

MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

### Registration Certificate for Brand Owner

(Under Rule-13(2) of the Plastic Waste Management Rules, 2016, as amended 2018)

Regn. No. – B-17011/7/UPC-II-PWM(MLP)/2018(JJPL)

Dated: 22/01/2019

To,

M/s. Johnson & Johnson Pvt. Ltd.,  
L.B.S. Marg, Mulund (W),  
Mumbai 400 080

With reference to the application dated 08/01/2019 regarding registration as a Brand Owner. Your application has been processed and found in order. Now, therefore, Central Pollution Control Board is pleased to grant the registration in favour of M/s. Johnson & Johnson Pvt. Ltd, vide registered address L.B.S. Marg, Mulund (W), Mumbai 400 080, as a Brand Owner operating in States & UTs namely; Andhra Pradesh, Assam, Bihar, Chhattisgarh, Dadra & Nagar Haveli, Delhi, Gujrat, Haryana, Himachal Pradesh, Jharkhand, Karnataka, Kerala, Orissa, Madhya Pradesh, Maharashtra, Punjab, Rajasthan, Tamilnadu, Telangana, Utter Pradesh, Uttarakhand, and West Bengal for disposal of multilayered plastic waste generated due to their products as per your EPR.

This certificate of registration shall be valid for a period of **Three (3) years** from the date of issue of the letter unless revoked, suspended or cancelled. The Registration granted subject to the following terms & conditions: -

1. The Registration as a "Brand Owner" shall comply with the provision of 13(2) of the Plastic Waste Management Rules, 2016 as amended 2018, notified under the Environmental (Protection) Act, 1986.
2. The brand owner shall have to establish a system for collecting back the plastic waste or multilayered packagings generated due to their products (**Extended Producer Responsibility**) as per the provisions of 9 (1 &2) of the Plastic Waste Management Rules, 2016 as amended 2018.
3. Every Brand Owner should submit year-wise collect back system (at least **30% in 2019**) and its safe disposal. The complete (100%) collect back system shall be carried out by **March, 2021**.
4. Recycling recovery or disposal of plastic waste shall be carried out as per rules, regulations and standards by the Central Government from time to time.

Contd...2

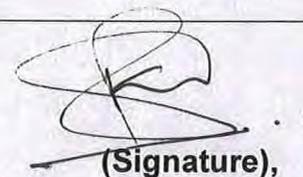
'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032  
Parivesh Bhawan, East Arjun Nagar, Delhi-110032  
दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

**Format for framing Action plan for PWM**

Sl.No	Item	Description
1	Name & Address of the Unit	Johnson & Johnson Private Limited, LBS Marg, Mulund West 400 080
2	Quantity & Type of Plastic Consumed	10704 MT (Basis Actual Invoicing of FY 2019-20) MLP – 2478.07MT LDPE – 2914.18 MT HDPE- 1264.09 MT PET- 2575.33 MT PP – 1471.90 MT
3	Estimated quantity of Plastic Waste to be generated	10704 MT (Basis Actual Invoicing of FY 2019-20)
4	Action Plan for Own Waste/ Equivalent quantity of Waste	Waste generated from Manufacturing plants is being sent to Pollution Control Board registered recyclers.
5	In case of Equivalent Quantity of Waste, source of waste generation to be identified	NA
6	Action Plan based on: a) Own Distribution Channel b) Engagement with ULBs c) Engagement of Agency d) Any Other (please provide details)	a) Not applicable b) Not applicable c) Agreement in place with Agencies d) Not applicable
6a	<b>Own Distribution Channel</b>	<b>NIL</b>
i	Details of Distribution Network	
ii	Does the Network have Pan- India coverage	
iii	Estimated Qty of Waste to be Collected	
iv	Mode of Reusing/Recycling Waste (Recycler/ Road Making / Coprocessing/ Others (please specify)	
v	Details (including registration details) of Recycler / Coprocessor/ Agency engaged in Road making/ Others (please specify)	
vi	Break-up of quantity proposed to be sent to Recycler / Coprocessor/ Agencies engaged in Road making/ Others (please specify)	
6b	<b>Engagement with ULBs</b>	<b>NIL</b>
i	List of ULBs to be engaged with for PWM	
ii	Does the above list ensure Pan India coverage	
iii	Break up of Waste to be collected in association with the ULBs	
iv	Document supporting engagement with ULBs	
v	Mode of Reusing/Recycling Waste (Recycler/ Road Making / Coprocessing),	
vi	Engagement with Recycler / Coprocessor/ Agency engaged in Road making	

vii	Details (including registration details) of Recycler / Coprocessor/ Agency engaged in Road making	
viii	Break-up of quantity proposed to be sent to Recycler / Coprocessor/ Agencies engaged in Road making	
ix	Document supporting engagement with Recycler / Coprocessor/ Agency engaged in Road making	

6c	Engagement of Agency											
i	List of Agencies to be engaged with for PWM	1) Ramky Reclamation & Recycling Ltd 2) RAPIDUE TECHNOLOGIES PRIVATE LIMITED 3) Gemcorp Recycling & Technologies 4) Shakti Plastics										
ii	Does the above list ensure Pan India coverage	Yes										
iii	Document supporting engagement of the Agency by the ULBs/ Bulk Waste generators	Refer Annexure 1										
iv	Break up of Waste to be collected/segreated by the Agency	For J&J, it is 100% for financial year 2020-2021 <table border="1" data-bbox="946 613 1458 831"> <thead> <tr> <th data-bbox="946 613 1155 687">Agency</th> <th data-bbox="1155 613 1458 687">Waste to be collected/segreated</th> </tr> </thead> <tbody> <tr> <td data-bbox="946 687 1155 725">Ramky</td> <td data-bbox="1155 687 1458 725">Approx. 40% of 100%</td> </tr> <tr> <td data-bbox="946 725 1155 763">Rapidue</td> <td data-bbox="1155 725 1458 763">Approx. 20% of 100%</td> </tr> <tr> <td data-bbox="946 763 1155 801">Gemcrop</td> <td data-bbox="1155 763 1458 801">Approx. 10% of 100%</td> </tr> <tr> <td data-bbox="946 801 1155 831">Shakti Plastics</td> <td data-bbox="1155 801 1458 831">Approx. 30% of 100%</td> </tr> </tbody> </table>	Agency	Waste to be collected/segreated	Ramky	Approx. 40% of 100%	Rapidue	Approx. 20% of 100%	Gemcrop	Approx. 10% of 100%	Shakti Plastics	Approx. 30% of 100%
Agency	Waste to be collected/segreated											
Ramky	Approx. 40% of 100%											
Rapidue	Approx. 20% of 100%											
Gemcrop	Approx. 10% of 100%											
Shakti Plastics	Approx. 30% of 100%											
v	Mode of Reusing/Recycling Waste (Recycler/ Road Making / Coprocessing)	MLP – Co-processing through registered Cement Industry Other plastics – Recycling through registered Recyclers										
vi	Engagement with Recycler / Coprocessor/ Agency engaged in Road making	Agreement in place between waste collectors/segreators and the recyclers/coprocessors.  Documents attached as Annexure 1  Recycling Agencies engaged in Road making to be explored										
vii	Details (including registration details) of Recycler / Coprocessor/ Agency engaged in Road making	Annexure 1										
viii	Break-up of quantity proposed to be sent to Recycler / Coprocessor/ Agencies engaged in Road making	10704 MT for Recyclers and Co-Processors  For Agencies engaged in Road Making needs to be explored.										
6d	Any Other Options (Please specify and provide details on PWM as per 6 a-c above)	NIL										



(Signature),

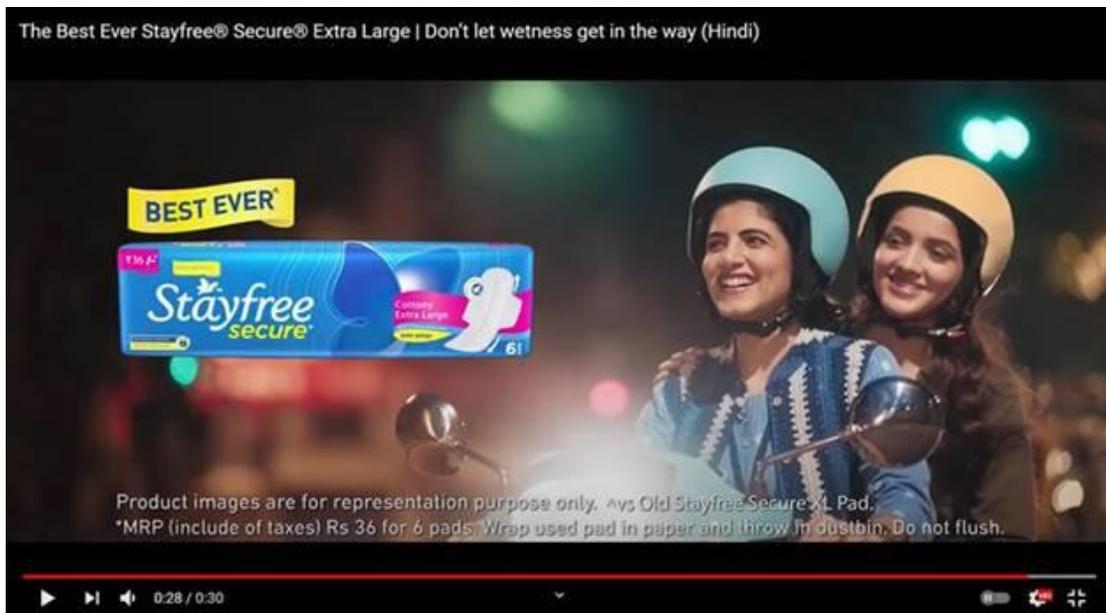
Manager EHS

(Name & Designation of Authorized person)

Abhinav

TRUE COPY

**Disclaimer in the advertisements of Johnson & Johnson Private Limited on how to dispose the sanitary pad.**



**Packaging artworks of Johnson & Johnson Private Limited enumerating disposal guidelines of sanitary pads.**



**Disposal guidelines as available on the website of Johnson & Johnson Private Limited.**



## WHAT IS A SANITARY NAPKIN?

You are first introduced to the concept of “periods” during puberty. This is the age when you (like almost every other girl) are likely to start menstruating, and a basic understanding about the what’s and how’s of periods can certainly come in handy at this juncture. Perhaps this is also the first time you’ll hear the words “sanitary pads” or “sanitary napkins” that you will need on a monthly basis to manage periods. During this time, an obvious question is - what is a sanitary pad?

### Usage of Sanitary Napkins | STAYFREE®



It’s a strange term, but a “sanitary napkin” or “sanitary pad” just means an absorbent pad that you wear on your panties during your period in order to absorb menstrual blood. Made out of cotton to avoid rashes and skin irritation, sanitary napkins (or pads) come in a number of varieties and sizes. Depending on your menstrual flow and preference, you need to choose a sanitary napkin of appropriate thickness, length and absorbency. Don’t worry, after the first few times of trying to understand your body’s response to periods, you will eventually settle on the right ‘[type of sanitary pad](#)’ However, another question that pops up at this point is - how to use sanitary napkins?

## HOW TO USE SANITARY NAPKIN?

Using a sanitary napkin is pretty easy. Here are a few basic steps on how to wear a sanitary napkin:

- Remove the paper on the back side of the pad and place it on your panty
- Remove the paper from wings. Wrap the wings around both sides of the panty and press firmly

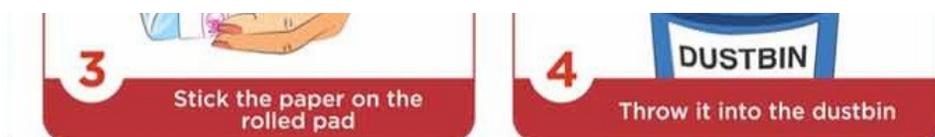
Remember, it’s equally important to know how to dispose after use.

## HOW TO DISPOSE SANITARY NAPKIN?

- Remove the paper on the back side of the pad and place it on your panty
- Remove the paper from wings. Wrap the wings around both sides of the panty and press firmly

By following the right steps for disposal, you can help waste collectors easily identify and segregate sanitary waste. This waste can now be handled in a hygienic manner and be recycled to ensure minimal impact on the environment.





## WHEN TO CHANGE SANITARY PADS?

Now that the part on how to use napkin during periods is clear, here is a word of caution! For your comfort and to avoid odour, one thing you need to do is change your pad every few hours. This is very important considering that the blood, vaginal mucus and other material that your body is throwing out should not be in contact with your skin for too long! Hence, changing your pad every 4-5 hours is considered ideal.

As a young girl who has just started with her periods, it can certainly be a stressful time. This guide from STAYFREE® is meant to walk you through these days and how best to manage periods.

You can download the Menstrual Hygiene Guide by clicking on your choice of language below:

[English](#) | [Hindi](#) | [Marathi](#) | [Bengali](#) | [Gujarati](#) | [Oriya](#) | [Tamil](#) | [Telugu](#) | [Kannada](#) | [Malayalam](#)

You could also check the below links for more information -

- [Periods, puberty, stages of the menstrual cycle and how it impacts you](#)
- [How to manage periods – The Do's and Don't's](#)

With answers to some of the most common questions such as how to use pads during periods, we hope to make this crucial part of growing up easier and stress-free for you! With STAYFREE®, take on each day as a new adventure, any time of the month.

## RELATED ARTICLES

### THERE ARE SO MANY KINDS, HOW DO I CHOOSE A NAPKIN FOR ME?

The first thing to know is there's no right or wrong way to handle menstruation. That's why there are so many pads to choose from...

[GET ANSWERS](#)



### HOW OFTEN DO I CHANGE MY NAPKIN?

Like most things, it depends. Just so you know it may seem like you bleed a lot during your period, but most girls normally lose between 4 and 12 teaspoons of blood during an average period, which really isn't a lot...

[GET ANSWERS](#)



### WHY WOULD I NEED A DIFFERENT NAPKIN AT NIGHT?

As you sleep, you move around a lot more than you might think.

[LEARN MORE](#)



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Disclaimer: Health information and advice is provided solely as a general educational aid. It is not intended as medical or healthcare advice, or to be used for medical diagnosis or treatment, for any individual problem. It is also not intended as a substitute for professional advice and services from a qualified healthcare provider familiar with your unique facts. Always seek the advice of your physician or other qualified healthcare provider regarding any medical condition and before starting any new treatment.

# Stayfree<sup>TM</sup> secure<sup>®</sup>



## 6 PADS

COTTONY SOFT COVER



ODOUR CONTROL SYSTEM



\*यह ऑफर सीमित समय के लिए उपलब्ध है। ऑफर सिर्फ स्टॉक रहने तक उपलब्ध है। \*एमआरपी (सभी टैक्स सहित) 6 पैड्स के पैक के लिए सिर्फ ₹ 30

\*पैड की बनावट और जून 2011 में किए गए लैब टेस्ट पर आधारित AC Nielsen Dec 2012 द्वारा किए गए कंप्यूटर स्क्रीन पर आधारित।

व्यक्तिगत तरीके अलग हो सकते हैं। इस्तेमालकर्ता उचित पैड का इस्तेमाल करें और बहाव के अनुसार उसे बदलें।

इस्तेमाल किये गये मैग्जिन को कागज में लपेटकर, कचरा पेटी में ही फेंकिये। पलस नहीं करें।



## **STAY TOGETHER: FOR YOU AND THE PLANET**

+SHARE

By pioneering the launch of disposable sanitary pads, STAYFREE® helped women change their habits and brought them the option of feeling comfortable during their period. This freedom has empowered women over generations, but it has also brought the responsibility to take care of the planet so that future generations of women can also continue to progress. STAYFREE® is always evolving in the development of its products to support women's progress and the care for the planet, whether in the rigorous choice of raw materials for our products, in the development of more sustainable solutions or in supporting social causes.

## **MADE WITH MORE THAN 75% RENEWABLE SOURCE MATERIALS**

To ensure your health and your safety, STAYFREE® products undergo an extensive, robust, and judicious process for evaluation, starting from choosing the raw material until the final product. STAYFREE® thick pads are made with about 75% renewable source materials in line with our sustainability roadmap.

## **PLASTIC WASTE MANAGEMENT**

STAYFREE® being an environmentally responsible brand has always adhered to effective plastic waste management guidelines. When the Central Pollution Control Board regulation mandated all plastic to be at 50 micron, STAYFREE® changed its packaging from 35 micron to 54 micron to facilitate better segregation at the rag pickers end and to get plastic back into the recycling fold. This transition began in June 2019 and as of Jan 2020, all STAYFREE® sanitary pads packaging plastic has moved to 54 micron.

## **EXTENDED PRODUCER RESPONSIBILITY (EPR)**

Being a responsible corporate citizen STAYFREE® has ensured adherence to EPR guidelines

STAYFREE® is committed to getting 100% of its total post-consumer waste to be recycled in FY 20-21. In FY 19-20, 70% of the post-consumer waste generated from STAYFREE® sanitary pads has been recycled.

## **SUPPORT FOR WOMEN'S PROGRESS**

Taboos, lack of information and access to sanitary napkins are just some of the reasons why menstruation still limits the lives of women in many places. STAYFREE® believes that together we can make a difference and for that is leading a series of initiatives to transform the reality of those who need it most. Key initiatives driven through external partnerships include:

1. **"It's Just a Period" Campaign:** About 15 million girls enter the menarche cycle every year in India, yet more than 71% of them have no knowledge of menstruation before their periods. STAYFREE® has always strived to normalize periods for women across the nation and feels that making the girl period ready will not suffice and wants to push the envelope and rather build a society that is period ready where the girl feels absolutely normal having her periods. For this apart from media campaigns on this narrative, STAYFREE® is also partnering with other organizations to further this cause. Encouraging families to be supportive of the girls during their periods, STAYFREE® also had a clear call to action to Menstrupedia content on normalizing periods

2. **Partnering with Menstrupedia to disseminate menstrual education:** STAYFREE® truly wants to be an enabler for family members to have the

conversation. STAYFREE understands that the period conversation is not an easy one, and so just highlighting the need to talk will not make people talk about this to the girl. STAYFREE via Menstrupedia will be sharing self-help guides for family members wanting to talk about this but did not know how to. This guide in a comic book format covers various softer aspects like choosing the right time to talk, how to prepare for the conversation, how to create a menstruation friendly environment for the daughter etc. More than 15000 comic books on menstrual education have been distributed in 3 months since the initiation of this partnership in June 2020

**Collaborating with UNICEF to drive menstrual management with dignity:**

3. Through this collaboration, STAYFREE wants to strengthen its brand purpose of enabling young girls have a healthy relationship with periods by participating in UNICEF led activities on MHM (menstrual hygiene management). This partnership has managed to reach out to 460000 adolescent girls in Bihar, Jharkhand and Gujarat. More than 10,000 front line workers and 60,000 women from self help groups have been trained and sensitized in subject. 525 wardens of Kasturba Gandhi Balika Vidhyalaya and 315 Auxiliary Nurse Midwives (ANM's) have been trained.

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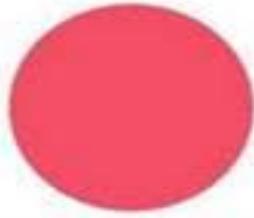
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ANNEXURE R-5

Release paper artwork as introduced by Johnson & Johnson Private Limited in its range of sanitary pads.



**FOR PAD DISPOSAL**



**ROLL THE USED PAD**



**WRAP THIS PAPER AROUND THE ROLLED PAD**



**THROW IN DUSTBIN**



*Ashirvar*

TRUE COPY

**Purva Pravin Bora vs MoEF & CC & Ors. O.A. No. 237 of 2020, Principal Bench, NGT**

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1 message

**Karan Kohli** <karan.kohli@gslc.in>

22 January 2021 at 18:48

To: secy-moef@nic.in, Rahul Garg <rahul.garg@mgklegal.com>, adv.manasi.joshi@outlook.com, pmcmcu@gmail.com, sameer.khale@mgklegal.com, kapil.arora@cyrilshroff.com, ganesh.r@pg.com, paralikar.amogh@gmail.com, ropune@mpcb.gov.in  
Cc: Abhinav Shrivastava <abhinav.shrivastava@gslc.in>

Dear All,

In pursuance of the earlier directions passed by the Hon'ble National Green Tribunal in the captioned matter, please find attached the counter affidavit on behalf of our client, Johnson & Johnson Private Limited which has been arrayed as Respondent No. 8 in the captioned Original Appeal.

In case of any query, you may contact the undersigned or Mr. Abhinav Shrivastava, Partner, GSL Chambers at + 91 9811954243.

Thanks &amp; Regards

Karan Kohli

GSL Chambers

On behalf of Johnson &amp; Johnson Private Limited/ Respondent No. 8

--

Thanks &amp; Regards

**Karan Kohli**

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