

Developing and Implementing Sub-National Level Circular Economy Action Plan

Case Study from Gujarat

Knowledge Partners for Gujarat State Action on Circular Economy:
Environmental Management Centre Pvt Ltd (EMC) and Gujarat Cleaner
Production Centre (GCPC)



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Why Circular Economy Matters at Sub-National Level

Why Circular Economy Matters for Indian States

- States and Cities face mounting pressures from rapid urbanization, industrial growth, and resource scarcity.
 - Circular economy offers solutions to multiple challenges simultaneously - reducing waste generation, creating employment opportunities, minimizing environmental impact, and enhancing resource security.
- Circular economy models can significantly reduce material footprint while creating new economic opportunities.
 - Economic benefits include reduced material costs, new revenue streams from waste valorization, job creation in green sectors, fostering of resilient supply chains and enhanced competitiveness of local industries.
 - Environmental benefits encompass reduced greenhouse gas emissions, decreased pollution, conservation of natural resources, and improved ecosystem health.
 - Social benefits include improved public health, enhanced quality of life, skill development opportunities, and strengthened community resilience.
- Given the vastness and diversity of a country like India, developing sub-national Circular Economy Action Plans presents a vital opportunity to localize national priorities into region-specific pathways for sustainable growth.
- State and city-level CE strategies can address local resource flows, waste management challenges, industrial ecosystems, and socio-economic conditions more effectively than a one-size-fits-all approach.
- **By grounding CE principles in sub-national contexts, these action plans can position sub-national entities as pivotal accelerators in India's circular economy transition.**

Implementation Framework

- Successful circular economy implementation requires a structured approach encompassing policy frameworks, institutional mechanisms, financing arrangements, and stakeholder engagement.
- States and Cities need to develop comprehensive action plans with clear targets, timelines, and accountability mechanisms.
- The framework should include regulatory reforms, incentive structures, capacity building programs, technology adoption support, and monitoring systems.
- Public-private partnerships and multi-stakeholder collaborations are essential for scaling circular economy initiatives effectively.
- States and Cities must begin with baseline assessments to understand current resource flows, waste generation patterns, and circular economy potential. This foundation enables development of targeted interventions and measurable outcomes.
- Implementation challenges include institutional coordination gaps, unclear responsibility allocation across departments, financing constraints, and inadequate data flows for tracking material consumption and resource recovery. These barriers stem from fragmented governance structures where multiple agencies oversee different CE aspects without clear integration mechanisms.

Case of Gujarat

Gujarat
Leading the way



About Gujarat

8.2%
of National GDP

31.75%
of India's Exports

3rd highest (10.09%)
FDI inflow in India

72%
of the world's processed diamond production

80%
of the India's diamond exports

62%
of India's petrochemical production

53%
of India's chemical output

45%
of India's pharmaceutical production in 2022-23

Highest (45912 MW)
Installed Capacity of Power

Highest (28.30%)
Hazardous Waste Generation in 2021

10373.79 Tons Per Day
Solid Waste Generated in 2021

Total Hazardous Waste Generation 56,54,264 MT (in 2023-24)

Good practices at all levels of governance in Gujarat

- **Atul village in Valsad, Gujarat –**
 - Successfully altered its waste disposal techniques to address the problem and has set an example of successful waste management at the local level
- **Surat Municipal Corporation (SMC) Tertiary Treatment Initiative –**
 - Recycles ~33% of 1,400 MLD sewage, supplying treated water to Pandesara Industrial Estate.
 - Operates 11 STPs with a 1,072 MLD capacity, including a 40 MLD Tertiary Treatment Plant at Bamroli using advanced filtration.
 - Expanding with an additional 40 MLD TTP at Dindoli due to rising demand for treated water by industries.
 - Surat has pioneered textile waste recycling through industry-waste processor collaboration.
- **Surat Clean Air Market –**
 - World's first market for particulate pollution in Surat launched in 2019.
 - 24% measured pollution reduction, 36% projected plant savings vs. abatement equipment, 8.6 lakhs average projected increase in industry profits per year

Good practices at all levels of governance in Gujarat

- **Gujarat Waste Exchange Centre (WEC) –**

- Set up by Gujarat Environment Management Institute (GEMI) to manage and lead a virtual platform for waste exchange.
- Aggregates waste generators, users, processors, and disposal agencies, reducing waste disposal, preventing virgin material extraction, and offering cost-effective resources to consumers.

- **Vatva GIDC Waste Exchange Bank –**

- Focuses on recycling spent acid from gypsum washeries for use in textile units and processing chemicals for the cement industry in industrial estates of Odhav and Naroda.

- **eXtended Green Node (XGN) Hazardous Waste Cell 2020 –**

- Offers services related to online environmental clearance, prevention, control, and pollution abatement.

- **Across the State**

- Success in co-processing plastic waste in cement kilns and promoting circular economy

Specific circular economy relevant work/projects by Gujarat Cleaner Production Centre (GCPC)

Projects

- Implementation and management of eco-industrial parks in India
- Eco-Industrial Park in Naroda industrial estate of Gujarat with technical cooperation of GIZ under IGEP
- Industrial Symbiosis project in Dahej and Panoli regions

Resource Efficient Cleaner Production Practices

- Application of cleaner production practices in dairy, chemical, textile, etc. Industries
- Resource efficiency in steel Re-rolling mills, Electroplating, Fisheries and Stone Quarrying
- Project for implementing Environment Friendly Techniques in Textile and Pulp & Paper Sectors in industrial estates of Gujarat
- Water efficiency projects in industries such as chemical, textile, and dyeing
- Energy efficiency options for Industrial parks

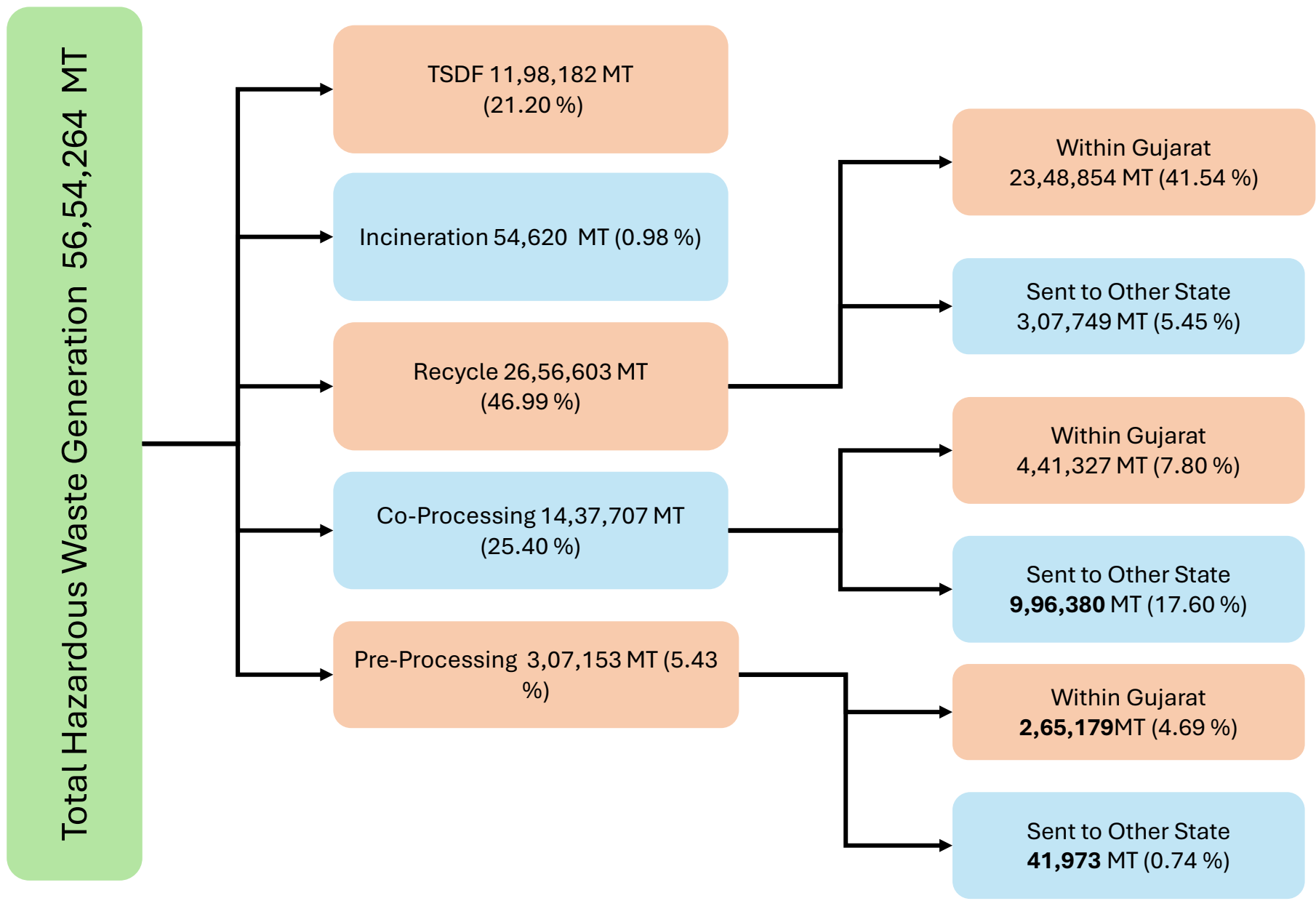
Technical Assistance

- Best Available Techniques Reference (BREF) document for textile sector in Indian Context
- Project for implementing Environment Friendly Techniques in Textile and Pulp & Paper Sectors in industrial estates of Gujarat
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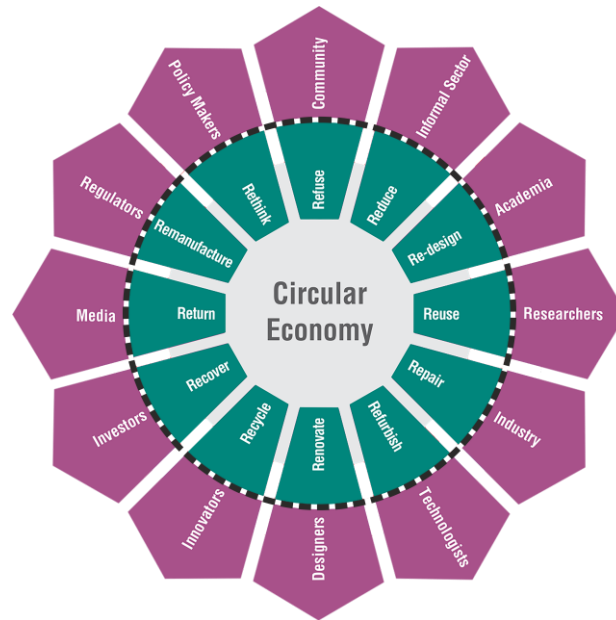
Capacity Building

Circular economy workshops and training

Waste management in Gujarat: Case of Hazardous Waste in 2023-24



Circular Economy Action Plan envisioned to greatly help to accelerate Gujarat's progress towards the SDGs and help in enabling contribution of the State to India target of NetZero by 2070.



Co-Creation Approach to preparation of the Action Plan



Policy to Action

Circular Economy Policy- provides the vision and guiding principles that the Gujarat Government aims to follow

Principles of the CE policy and its focus got translated into **formulation of strategies and goals for the Circular Economy Action Plan** .

Strategies guided the **determination of actions-** legislative and non-legislative actions **needed to achieve the identified goals** . Priorities on actions to be determined by stakeholders.

Circular Economy Policy Statement

Key Objectives

Achieve leadership in sustainable management of resources for a resource efficient economy

Promote green growth through sustainable consumption and production patterns

Promote GHG reduction measures/ decarbonization efforts

Promote entrepreneurship and job creation through innovation

Deliver positive economic, social, and environmental outcomes

Vision Statement

“To promote sustainable development, green growth, and net zero economy that minimizes waste production, adopts clean energy sources and increases resource efficiency. This policy will encourage collaboration, knowledge sharing, and the adoption of sustainable practices across sectors, driving environmental stewardship.”

Guiding Principles

Reduce primary resource consumption to ‘sustainable’ levels, towards achieving the SDGs

Promote high quality, consistent recycling

Create employment opportunities beneficial to the cause of environment protection, social welfare, and restoration

Create SMART common circular infrastructure

Capture value from recycling resources designing out waste and pollution

Set sectoral benchmarks of performance and efficiency to ensure compliance with competitiveness

Create research and technology development ecosystem across sectors and institutions

About the Circular Economy Action Plan for Gujarat

- Based on **life cycle thinking** as the foundation for identifying key actions- **NOT JUST A RECYCLING ACTION PLAN**
- Recognizes the need to follow the **waste hierarchy for managing waste**
- Focus on **waste avoidance**
- Focuses on **certain priority sectors and key waste streams** identified by NITI Aayog.
- Implementation of the Plan will require **cross-departmental cooperation** in the government departments, and **non-governmental stakeholders** including industry, academia, informal sector, R&D institutes.
- Adopts a **phased approach** for the Vision to Actions, with actions distributed over Short-Term (2024-25), Medium-Term (2026-28) and Long-Term (2029-33).
- Actions under strategies have been structured using a **'4P' (Policy, Plan, Project, and Program) perspective** where possible. The '4P' perspective enables one to look at each strategy comprehensively

Close the Loops

Integrate with Informal Sector or be **I**nclusive

Regenerate resources and ecosystems

Coordinate, catalyse and leverage partnerships

Utilise waste as a resource

Lessen consumption of virgin resources

Augment product lifespans

Rethink

Goals of the Action Plan

- Increase the **circular use of materials** and promote reuse, repair, remanufacture, and recycling across products and waste streams.
- Reduce harm from **waste and pollution** and improve **residual waste management**.
- Promote **innovation, infrastructure, and skill**.
- Collaborate to create **systemic change** toward a circular economy.
- Enable the conditions needed to **develop and scale circular outcomes** - financing, capacity building and entrepreneurship.

Waste Streams and Sectoral Focus

Challenging and emerging waste streams

Toxic and
Hazardous
Waste

Used Oil

Lithium-ion
Batteries Waste

Waste Tyre

Gypsum
waste

Ferrous and
Non-ferrous
metal waste

E-Waste

Key economic sectors with high circularity potential

Plastics

Textiles

**Building and
Construction**

**Chemicals and
Pharmaceuticals**

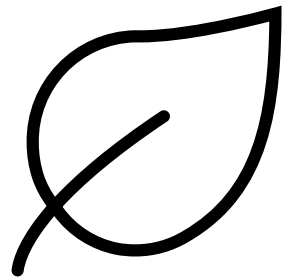
Strategies for Circular Economy Guiding the Action Plan

Strategies

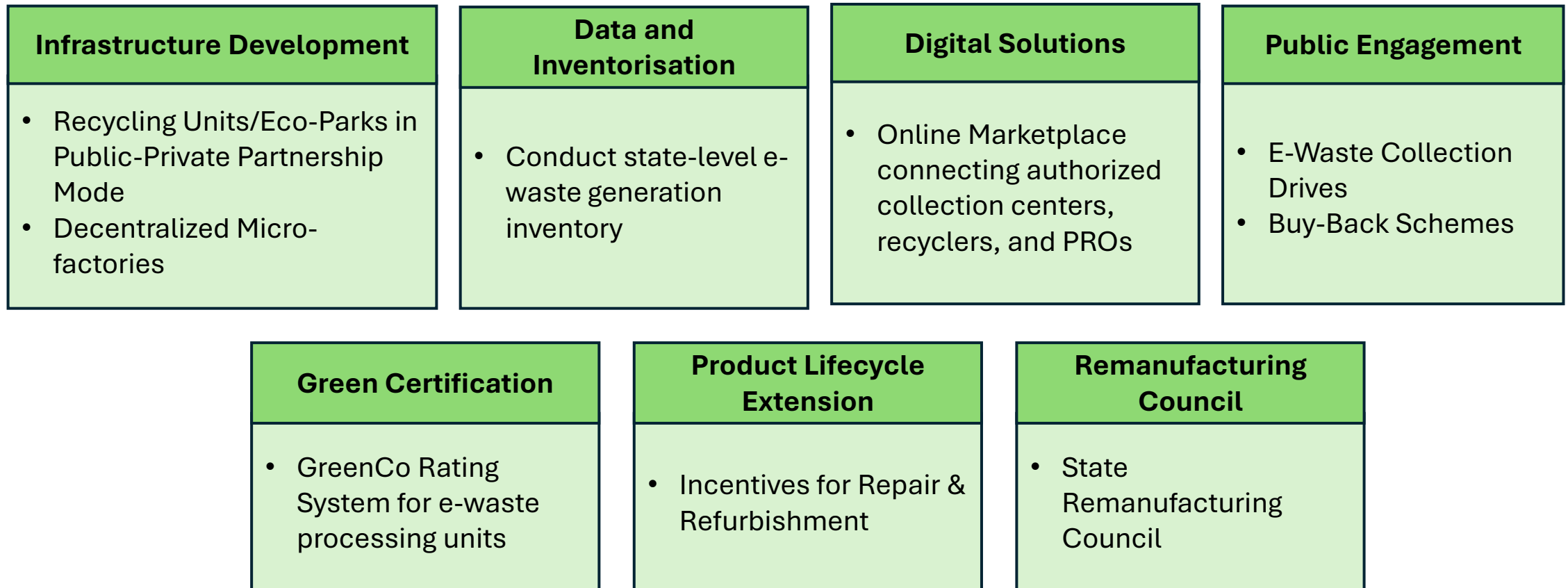
S 1	Focus on challenging and emerging waste streams and applying principles of waste hierarchy
S 2	Mainstreaming circularity in key economic sectors with high circularity potential
S 3	Facilitating industrial symbiosis and strengthening common environmental infrastructure
S 4	Awareness raising, capacity building and entrepreneurship
S 5	Stakeholder engagement, partnerships, collaboration and networking
Crosscutting Strategy	Developing financing strategies for implementing the circular economy action plan

More than 200 **actions post discussions at the workshop**, multi-stakeholder (public and private sector) responsibility, and phased timelines (Short-Term, Medium-Term and Long-Term)

Key high priority actions identified across sectors and waste streams through the discussions at the workshop



Key Actions Identified for Enhancing Circularity in E-Waste in Gujarat



Some other highlights from the Actions

Institutional

- Industry status to recycling
- Expediate authorization process under Rule 9
- Training and Capacity building for relevant stakeholders
- Setting up Material Recycling Zones/Parks
- SoPs for utilization of new and emerging by-products and waste streams
- Strengthening monitoring of recycling and processing units

Addressing gaps in waste management

- Complex and heterogenous wastes, new product wastes
- Need for avoidance of contaminated materials usage in product manufacturing
- Formalization of informal sector handling waste
- Learnings /Projects from waste management plants in other states
- Strengthening last mile connectivity for waste generated/collected to processing facilities

Economic instruments

- GST Reduction
- Financing schemes- subsidies for capital set up
- Strengthening corporate environmental responsibility
- Financing R&D

R&D and Innovation

- To identify alternatives to hazardous and toxic materials
- Collaborate between academia and industry to drive technological innovation in waste management processes and technologies

Behaviour change

- Individual behavior change needs to be guided
- Awareness generation
- Sensitization
- Guidance and facilitation of potentially recoverable material- like aluminium from foils and medicine strips

Digital Technology

- Market places
- Stakeholder connect
- Data flow
- Knowledge exchange
- B2B connect to facilitate industrial symbiosis

Skilling

- Green skills-focus on Rs beyond Recycling
- Handling new and complex waste streams
- Tie-ups with vocational training institutes, Short courses steered by associations

Building Awareness and Sensitization

E-waste Management

7 CRITICAL POINTS

That You Must Know To Promote Circular Economy In E-Waste Management

E-waste means discarded electrical or electronic items like phones, computers, TVs, or appliances that need electricity or batteries to work.

1 Key Features of E-Waste (Management) Rules, 2022

- Extended Producer Responsibility (EPR)**: Producers must meet recycling targets through registered recyclers only, ensuring environmentally sound management.
- Solar Panel Management**: Special provisions for solar photovoltaic modules/panels/cells with storage requirements until 2034-35.
- End-Product Focused Recycling**: Specific targets based on valuable materials recovered: gold, copper, aluminum, and iron.
- Comprehensive Coverage**: 106 electronic equipment items across 7 categories included under regulation.

3 Entities to be Registered on EPR Portal

5 End of Life Pathways for E-waste

Least Sustainable practices → **Most Sustainable practices**

7 Online EPR Registration Process

- Start Registration**
 - Go to the E-Waste Portal & click "Sign-up"
 - Select your stakeholder type: Producer / Recycler / Donor/Re / Bulk Consumer
- Fill Registration Form**
 - Enter basic business/company details (name, GST, CIN, IEC, PAN, as applicable)
 - Fill corporate address & contact info
 - Verify mobile number & official email (OTP verification)
- Authorized Person Details**
 - Enter name, mobile, email, & PAN of authorized representative
 - Fill in the address of authorized person
- Create Password**
 - 8-30 characters, At least 1 uppercase, 1 lowercase, 1 digit, 1 special character
- Review & Submit**
 - Check all details in the preview
 - Click "Submit"/confirmations and the mail/SMS

2 Key Stakeholders

4 Key stakeholders responsibilities

Responsibilities of the Bulk Consumer <ol style="list-style-type: none"> 1. Bulk consumers of electrical and electronic equipment listed in Schedule I shall ensure that systems generated by them shall be handed over only to the registered producer, refurbisher or recycler. 	Responsibilities of the Manufacturer <ol style="list-style-type: none"> 1. Register on the portal 2. Collect return generated during the process of manufacturing and business as per requirements 3. Ensure that the refurbished equipment shall be in compliance with the requirements of the Bureau of Electronics and Information Technology and Ministry of Electronics and Information Technology 4. File annual and quarterly returns in the last quarter of the year or in the last quarter of the month immediately preceding the quarter on or after the due date for submission of returns.
Responsibilities of the Refurbisher <ol style="list-style-type: none"> 1. Register on the portal 2. Collect return generated during the process of manufacturing and business as per requirements 3. Ensure that the refurbished equipment shall be in compliance with the requirements of the Bureau of Electronics and Information Technology and Ministry of Electronics and Information Technology 4. File annual and quarterly returns in the last quarter of the year or in the last quarter of the month immediately preceding the quarter on or after the due date for submission of returns. 	Responsibilities of the Producer <ol style="list-style-type: none"> 1. Register on the portal 2. Collect return generated during the process of manufacturing and business as per requirements 3. Ensure that the refurbished equipment shall be in compliance with the requirements of the Bureau of Electronics and Information Technology and Ministry of Electronics and Information Technology 4. File annual and quarterly returns in the last quarter of the year or in the last quarter of the month immediately preceding the quarter on or after the due date for submission of returns.

6 Do Your Part: E-waste is a Shared Responsibility

⚠️ DON'T LET E-WASTE GO TO WASTE
Dumping electronics in the trash is illegal and harmful.

✅ What YOU Can Do

- Return old electronics to the brand's authorized take-back service or collection centers.
- Ask retailers where to drop off your e-waste, many offer return options
- Join e-waste drives by schools, housing societies, or municipalities
- Never give e-waste to unauthorized scrap dealers, it causes pollution and health risks

🌱 Why It Matters

- E-waste contains toxic materials like lead, mercury, and cadmium.
- Improper disposal pollutes soil, air, and water.
- Responsible recycling recovers valuable resources and protects health.

Building Awareness and Sensitization

Used Oil Management

7 CRITICAL POINTS

That You Must Know To Promote Circular Economy In Used Oil



1

WHAT IS USED OIL?

Used oil refers to any petroleum-based or synthetic oil that has been previously used and, as a result, is contaminated by physical or chemical impurities. It includes oils refined from crude or synthetically produced.

3

RULES, USED OIL



2016 Rules for Used Oil

Second Amendment Rules, 2023 Used Oil Provisions

5

WHO COLLECTS OIL?



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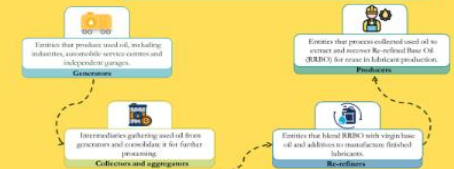
EPR PORTAL REGISTRATION

- Sign-Up on EPR Portal**
 - Access: <https://eprusedoil.epchgmta.com/>
 - Provide: Entity type, GST, PAN, IEC, CIN, TIN, company details, authorized person details.
 - Receive login credentials via email; set a secure password.
- Submit Registration Form**
 - Documents: GST, PAN, IEC, CIN, TIN, authorized person PAN, CA-certified data (Producers), agreements (Collection Agents), consents/authorizations (Recycler/CA-2).
 - Sections:
 - Producers:** General details, producer type (PI/P), procurement/sales data, EPR target, declaration, payment (INR 25,000-75,000).
 - Recyclers/Co-Processors:** General details, facility info, equipment/fab, geo-images, pollution control, declaration, payment (INR 25,000-75,000).
 - Collection Agents:** CA-1 (collection/transport), CA-2 (collection/storage/transport); capacity, vehicles, storage (CA-2), transfer arrangements.
 - Solicit via portal with undertaking.

- Application Processing**
 - CPCB reviews within 21 days; incomplete applications returned for resubmission.
 - False info leads to rejection, fee forfeiture, and fresh application.
 - Approved entities receive digitally signed certificate.
- Additional Notes**
 - Compliance:** Producers fulfill EPR via certificates; Recyclers/CA-2 adhere to HOWM Rules, 2016; CA-1/CA-2 register on NHWTS.
 - Fees/Amendments:** Late fees for delayed resubmission (TBD); amendments free within 21 days, INR 10,000 after.
 - Revocation:** False info may lead to 5-year ban after hearing.

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KEY STAKEHOLDERS



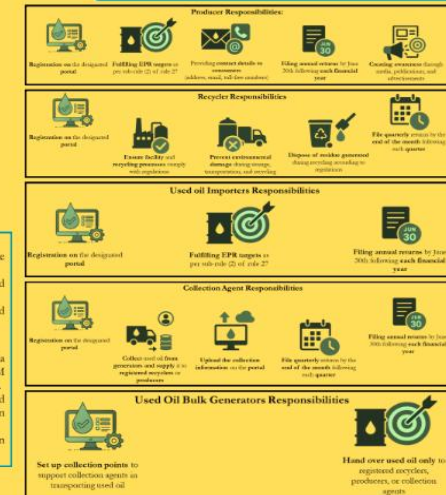
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REGISTRATION PROCESS

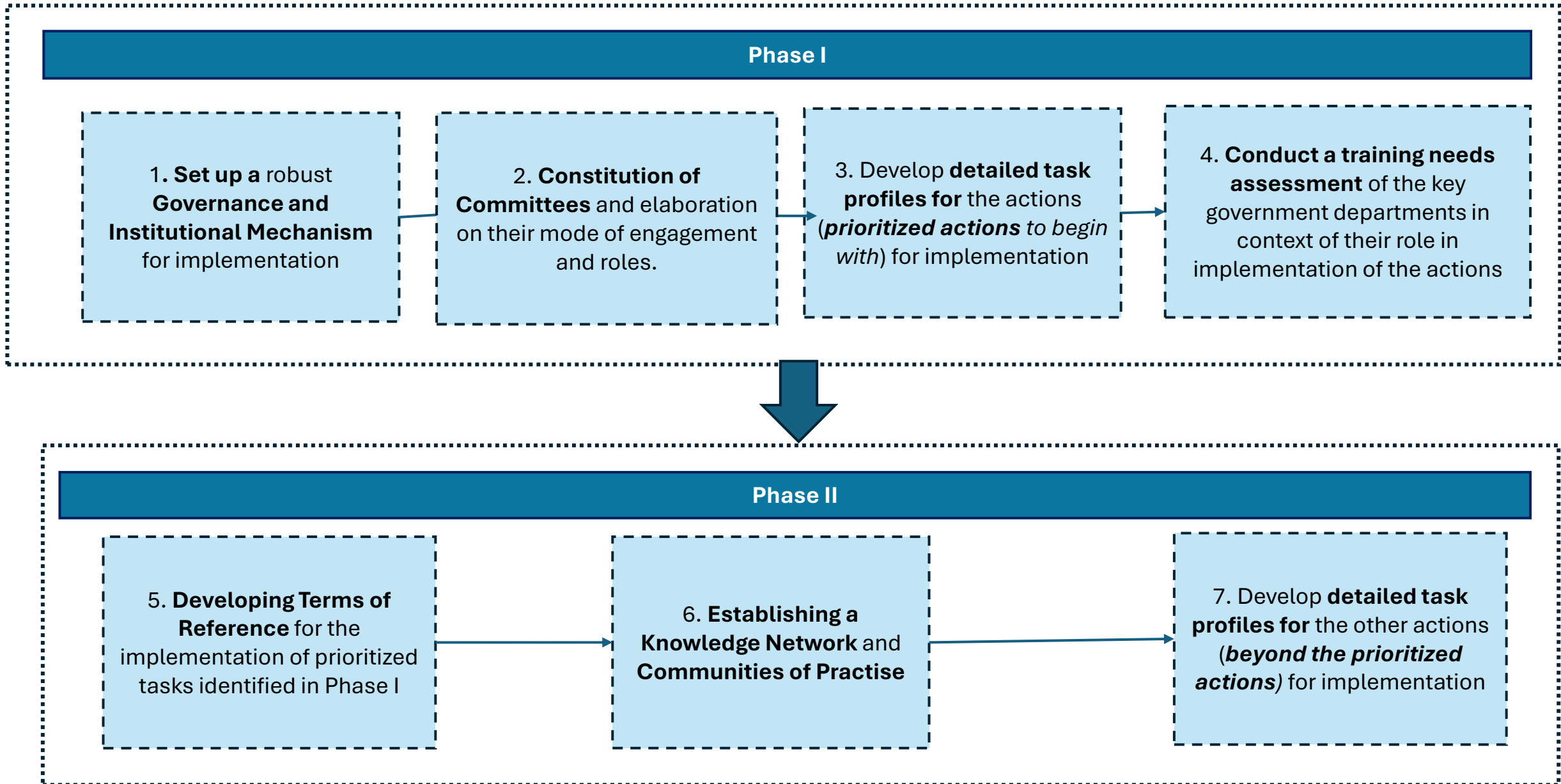


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KEY STAKEHOLDERS RESPONSIBILITIES



Roll out of the Action Plan





emc



Thank you!

Environmental Management Centre Pvt. Ltd.

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