

CONSULTATION REPORT ON THE DRAFT SWM BYE-LAWS 2025



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EXECUTIVE SUMMARY



2738

Responses from
Mumbai residents and
business-owners

This report summarises Civis’ consultation efforts to gather feedback on the Draft Brihanmumbai Municipal Corporation Solid Waste Management Bye-laws 2025, which aims to regulate solid waste management, ensuring effective implementation and improved urban cleanliness. The consultation engaged participants across multiple channels to ensure comprehensive and diverse inputs.

Activities Undertaken	Responses Received
WhatsApp Chatbot facilitating responses	2418
Platform responses and responses through partner organisations	161
Emails received directly by the BMC	102
Citizens engaged through townhall meetings	25
Experts consulted through townhall meetings	26
Slum-dwelling citizens engaged	6
Social Media Posts uploaded with BMC’s channels	22

Civis facilitated responses on its platform, collected insights through our platform, a WhatsApp chatbot, and conducted both Citizen Town Hall Meetings and Expert-Led Town Hall Meetings, along with On-Ground Interviews with slum communities. **In total, Civis gathered 2636 responses from Mumbai residents and business-owners through these diverse methods.** 102 citizens also sent in their comments directly to the BMC via email.

Some key recommendations and objections that have emerged from our feedback gathering and analysis include concerns regarding the practicality of daily source segregation and effective collection, issues with existing infrastructure like bins and toilets, and mixed sentiments on user fees. Stakeholders also raised critical points about fine enforcement and the functionality of composting systems.

This report presents a compilation of the key concerns and suggestions gathered during the consultation, reflecting the perspectives of individuals and experts. The findings offer valuable insights into what stakeholders appreciate in the Draft Bye-Laws and where they see opportunities for improvement.



INTRODUCTION

The Brihanmumbai Municipal Corporation (BMC) is in the process of updating the bye-laws that govern the solid waste management ecosystem in the city. The earlier version of the bye-laws were passed in 2006. In order to update and align the bye-laws with several national and state environment and sanitation-based regulations, along with streamlining the waste management cycle for better recovery and utilisation of waste, a new draft version has been released by the BMC on April 1, 2025.

The Draft Brihanmumbai Municipal Corporation Solid Waste Management Bye-laws, 2025, aims to significantly improve Mumbai's cleanliness and waste management. They encourage citizens and businesses to segregate waste at the source into designated categories. Specific provisions address Construction and Demolition waste, requiring segregation and collection via a BMC helpline. Plastic waste must be separated, not burned or drained, with manufacturers also held accountable.

Financially, a new monthly user fee will cover BMC's waste services, payable with property tax. Increased fines are proposed for offenses like littering, with higher penalties for repeat offenders, aiming to enforce civic duty.

The draft was open for suggestions and objections from the public until May 31, 2025 – where the BMC partnered with 'Civis' to facilitate the public consultation, including outreach support to reach the most impacted stakeholders, organising and facilitating town-hall meetings with enthusiastic citizens and experts in the domain for a larger deliberative approach, along with technology support to gather and analyse the feedback received.

Civis employed a variety of modalities to conduct the consultation process, including harnessing up web-based tools like our flagship platform, and WhatsApp chatbot for simple and effective response gathering, organising on-ground interviews and webinars, along with mapping out stakeholders for more detailed feedback in focus group discussions and townhall meetings.

METHODOLOGY

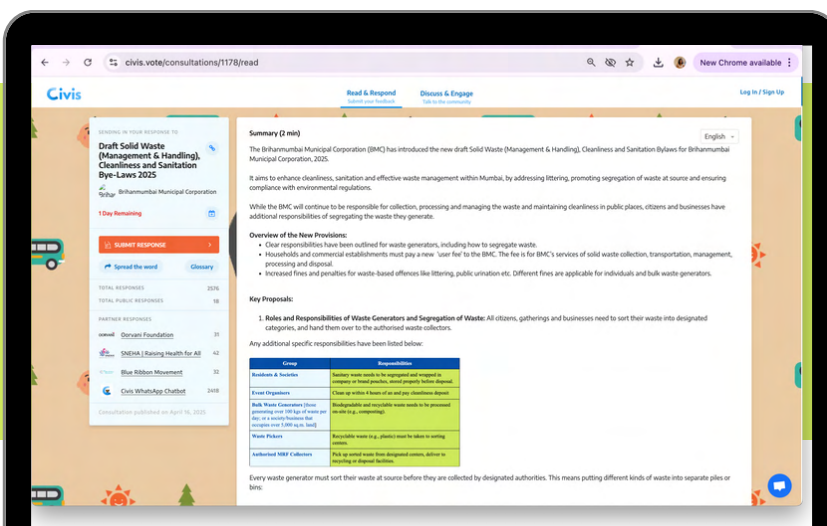
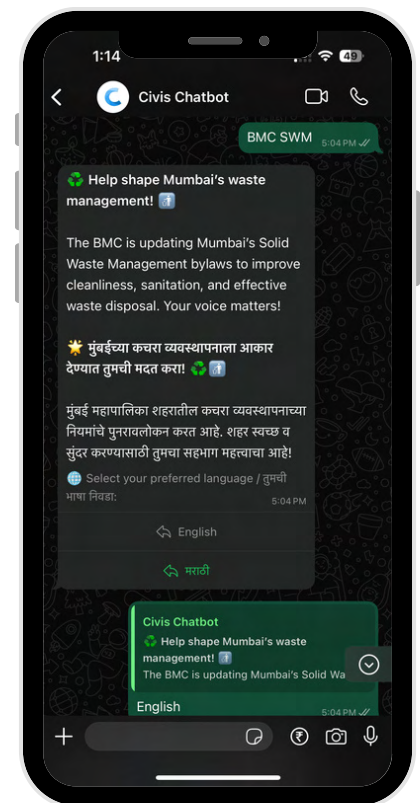
The consultation on the Draft Bye-Laws was designed to engage a wide range of stakeholders, ensuring that diverse voices were heard and considered in the feedback process. Civis employed a multi-channel approach to gather input, utilising digital platforms, social media outreach, and direct engagement with stakeholders.

Summarization, Dissemination, and Response Collection

Civis facilitated feedback through its platform [civis.vote](#), where the draft policy was simplified for every stakeholder to comprehend and respond to. A summary of the draft policy was made available in English, Hindi and Marathi.

In addition to the platform, feedback collection was also enabled through a WhatsApp chatbot, developed by the team at Civis. The chatbot facilitated feedback and featured information about the consultation in English and Marathi, with its key proposals and changes from the 2006 bye-laws.

The bye-laws were broadcast to Civis members in Mumbai, but also made available to the larger public through its publication and dissemination across social media - including Civis' social media channels, as well the BMC.



Outreach and Media

In order to make the citizens and stakeholders of Mumbai aware of the consultation on the Draft Bye-laws, Civis undertook outreach efforts through social media as well as engaging some civic on-ground partnerships.

On social media, Civis partnered with the BMC to design posts which were disseminated through the social media accounts of the BMC as well as that of the SWM Department. These posts drove up engagement and responses on the WhatsApp chatbot significantly and also allowed for better quality responses – as active citizens on Twitter and other social media applications could come in and share their suggestions and objections.

Some of these active citizens were also invited to the citizen townhalls organised at the BMC Office, which helped drive longer, more detailed deliberations to improve the Draft Bye-laws.



Apart from social media engagement, communities that may not be as digitally enabled, were reached out through civic organisations working with such communities. Civis partnered with organisations like SNEHA, Oorvani, the Blue Ribbon Movement and EkSaath for this process. SNEHA allowed Civis to tap into lower-income communities, while Blue Ribbon and Oorvani enabled responses from EkSaath facilitated responses from a slum community in Wadala.



Image: Webinar with SNEHA facilitators

With SNEHA, Civis conducted an informative webinar in Hindi that explained the provisions of the Draft Bye-Laws to SNEHA facilitators, who then were in turn able to engage their urban slum communities to respond to its provisions. With Eksaath, Civis engaged in interviews and discussions in Tamil, Marathi and Hindi, languages that the citizens were comfortable with, to allow for the most meaningful interaction where the community could share their local-level problems regarding solid waste management.



Image: Interviews with slum residents in collaboration with EkSaath

KEY SUGGESTIONS AND OBJECTIONS

KEY SUGGESTIONS

1. Improving Waste Segregation and Collection Infrastructure:

- Ensuring that collection and transportation mechanism is well maintained, including **introduction of colour-coded trucks per waste stream** or potentially retrofitting or **procuring new multi-bin vans and trucks to ensure compartmentalised waste collection as per the segregated categories.**
- Another suggestion echoed is having **night-time pickups** for ease of citizens, and **weekly pickup of hazardous and bio-medical waste** with a safer treatment process. This can involve piloting night-shift corridors on busy arterial roads for 22:00-02:00 pickups using multi-compartment compactors with a noise limit of < 65 dB.
- Bulk waste generators (BWGs) can also **appoint an empaneled company or NGO for on-site composting and segregation** to improve downstream material recovery facilities (MRFs).
- For non-BWGs, decentralised, neighborhood composters/biogas plants can be installed,, potentially utilising parks for this purpose.

2. Civic Awareness Drives and Incentives:

- Several citizens primarily suggested actions to **increase civic awareness and community engagement on waste disposal and cleanliness.** Suggestions include having **long-term, multi-lingual drives in schools and housing societies, and having local volunteers and school ambassadors for waste management oversight.**
- Incentives for positive actions can include tax rebates and recognition for cleanest localities, including **publishing ward-level performance metrics publicly.** They also suggest having a **public dashboard which is digitally accessible,** as well as **quarterly audits and KPIs at the ward-level, and annual cumulative reports on compliance, recycling and diversion rates being made public.** Offer property-tax rebates (5%) for societies with six-month verified 90%+ segregation compliance.
- Examples have also been provided for this model including – **year-long Information, Education, and Communication (IEC) campaigns** with 60-second multilingual public service announcements (PSAs) in cinemas, OTT platforms, and local FM, or **organising quarterly inter-ward "Clean-Ward league tables,"** offering winners a "community improvement grant" and public felicitation.

3. Supporting Workforce and Informal Sector

- Suggestions strongly echo improving local level waste management and the condition of sanitation workers, citizens suggest having **micro-contracts and PPE suits for ragpickers and safai karmacharis**.
- Examples include providing a PPE stipend per worker, renewed bi-annually, and group accidental cover, and integrating rag-pickers by providing city ID cards, micro-contracts guaranteeing buy-back rates for PET, HDPE, and metals, and access to ward MRFs for drop-off.

4. Enhancing Circular Economy and Producer Responsibility

- Enforcing EPR for FMCG, textile, gutka, and e-waste firms by **financing ward-level take-back kiosks, with penalties equal to twice the uncollected tonnage disposal cost**.
- Pilot **plastics-to-pavement and textile-to-fiber initiatives, converting multilayer plastics into road binder and creating two up-cycling hubs for garment off-cuts**.
- **E-commerce companies must be encouraged or mandated to use reusable packaging** and manage reverse logistics, with minimal associated costs.
- Mandating **bottled drinks to be in reusable, BPA-free plastic bottles** with a **deposit scheme** to cover costs.
- **Prohibiting restaurants, hotels, hospitals, and offices** from using **single-use packaging materials, including MPL sachets**.

5. Monitoring and Compliance:

- To make reporting waste concerns seamlessly and with ease, citizens suggest having **mobile app/website for real-time reporting & tracking of offences and displaying facilities like public bins and toilets**.
- **Ensure a litter bin every 50 meters and a gender-inclusive toilet every 1 km, with a real-time "working/out-of-order" map available in the BMC app**.
- Strengthen Extended Producer Responsibility (EPR) monitoring to address over-reporting.
- Shift to **digital-only penalties** where marshals issue challans via QR/NFC, disallowing cash transactions and auto-posting receipts to an open data portal.
- Publish **ward KPI scorecards, including segregation rates, complaint resolution times, and fine collection**, with red/yellow/green flags triggering supervisor bonuses or penalties.
- Implement **random GPS/photo checks to audit truck integrity**, ensuring wet and dry chambers remain sealed until discharge, and publish audit reports weekly.



6. Strengthening Composting and Waste Management Infrastructure:

- **Creating** decentralised processing of waste using **community/home composters** and **ward-level biogas plants**, along with **local dry-waste recovery and processing** to cut transportation costs.
- The BMC can **empanel a number of vendors for Mumbai who commit to installing and operating composting equipment daily and conducting weekly checks.**
- **Developers should provide a suitable space for composting in societies.** They should also create a **fund, based on expected occupancy and average composter costs**, and hand it over to the society instead of installing composters.
- BMC **should not allow heat/burning-based "24-hour" composters to be installed**, and **mandate every ward to install a micro-composter or biogas digester** and redirect compost to civic gardens and medians.



Image: Waste collection bins in Kokari slum, Wadala

KEY OBJECTIONS

1. Practicality of Daily Source Segregation

- Nearly half of the respondents believe daily source segregation is not practical.
- High-rises cite challenges with chute retrofits, and slums point to narrow lanes, yet both desire doorstep collection or micro-vehicles.
- Several respondents noted that segregated waste is often recombined during pickup by contract workers and waste collection facilities.

2. Challenges with Collection Logistics and Infrastructure

- Concern exists regarding the need for more bins, toilets, and efficient collection methods.
- Another concern is trucks mixing segregated waste streams on collection.
- There is little clarity on the funding model for fleet retrofitting or bin-maintenance contracts.
- Public bins are often overflowing, completely absent, or poorly maintained.
- The issue of public waste management seemed to be pronounced in high-density, informal settlements like slums.
- Drainage problems, odour, and mosquito risks are significant concerns, especially in relation to public sanitation and flood readiness.
- Delays in desilting gutters and nullahs and resulting floods before monsoon are frequently mentioned.
- Citizens raised concerns that a lack of public toilets drives open defecation/urination, and increasing their number and quality of maintenance is essential to effectively deal with it.

3. User Fee Imposition Concerns

- There is polarised sentiment on fees, with fairness and "double taxation" being key issues. Even supporters of user fees worry about "billing confusion".
- Flat fines are seen as disproportionately affecting daily-wage workers compared to wealthier individuals.
- Citizens showed a reluctance towards newly proposed SWM user fees, citing that they already pay several other taxes to the government.
- There are suggestions to implement user fees only for businesses and bulk generators.
- Another concern was whether the quality of waste management services would be high and consistent after this fee is imposed.

4. Inadequate Composting Systems and Practices

- Many buildings do not install proper composting systems.
- Composters installed during construction often fail due to low initial occupancy and cheap, under-capacity equipment. BMC officers may overlook these issues during occupancy certificate (OC) approval due to corruption.
- Installed composters are often incapable of handling the volume of waste generated by buildings.
- Composters are frequently mislabeled with inflated capacities. The actual capacity of composters is often only 15-20% of the waste generated.
- In complexes with multiple buildings, the same composter may be moved between buildings to obtain OCs.
- Heat/burning-based "24-hour" composters, discouraged by NGT, should not be allowed by BMC.

5. Concerns regarding Implementation of Fines:

- A significant concern regarding the collection of fines is the pervasive distrust among citizens, as evidenced by frequent mentions of bribe-taking marshals. The current system, where marshals often take bribes, undermines the effectiveness of fines.
- Consequently, citizens often stipulate that any new fines must be coupled with digital systems for challans and enforcement through CCTV to neutralise this issue. There is also a strong sentiment that fines should be income-indexed or replaced with community service, as flat penalties disproportionately burden daily-wage workers while being negligible for wealthier individuals.

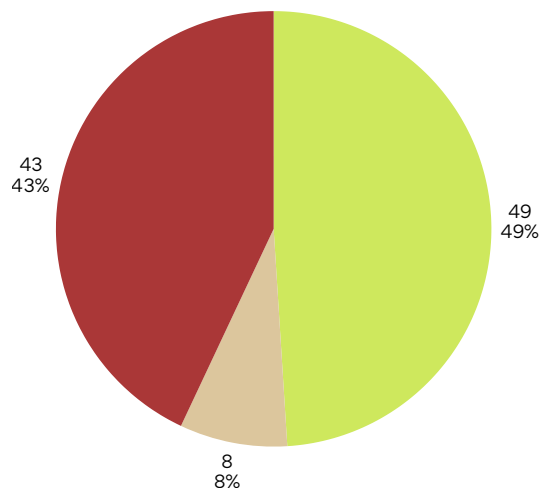


RESPONSES ANALYSED: WHATSAPP CHATBOT

In order to optimise and ease response collection on the draft bye-laws, Civis facilitated responses through a WhatsApp chatbot. The chatbot included three quantitative, multiple-choice questions targeting the key provisions of the bye-laws including user fees, segregation and increased fines. The chatbot also allowed citizens and business owners in Mumbai to share their broader views, concerns and suggestions with respect to the bye-laws.

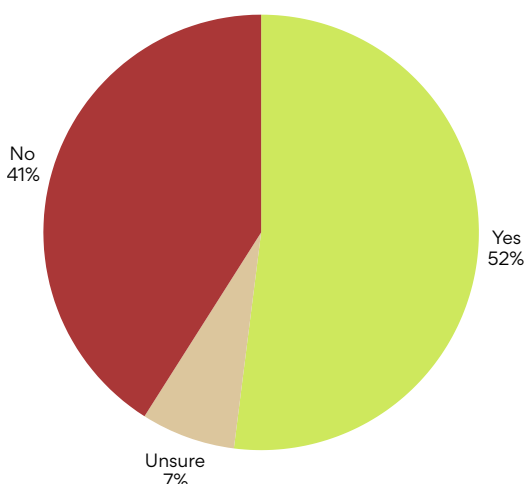
Q1. SHOULD THE USER FEE VARY BY SIZE/TYPE OF HOMES OR BUSINESSES?

A significant chunk of respondents (49%) agree that user fee should vary by size and type of premises, followed by a close number of respondents who disagree (43%). Those disagreeing seem to be okay with paying the fee, however a larger concern is aligning the fee with real waste output of a household (i.e. larger size homes may not be generating as much waste as a smaller business-running premises.) Concerned citizens also say transparency of how the fee is utilised is necessary.



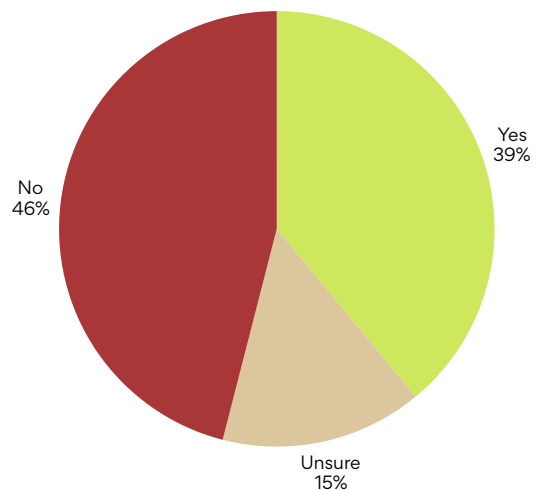
Q2. WILL FINES FOR SPITTING, LITTERING, PUBLIC URINATION ETC. HELP IMPROVE CIVIC BEHAVIOUR?

A majority of respondents (52%) agree that fines can work for their intended benefit. About 66% of respondents, including both those agreeing and disagreeing, highlight that fines should be imposed only if sufficient toilets and bins exist first. They also suggest having CCTV cameras and digital challans to avoid any chance of bribery. Another suggestion is having community service as penalties or income-proportionate fines.



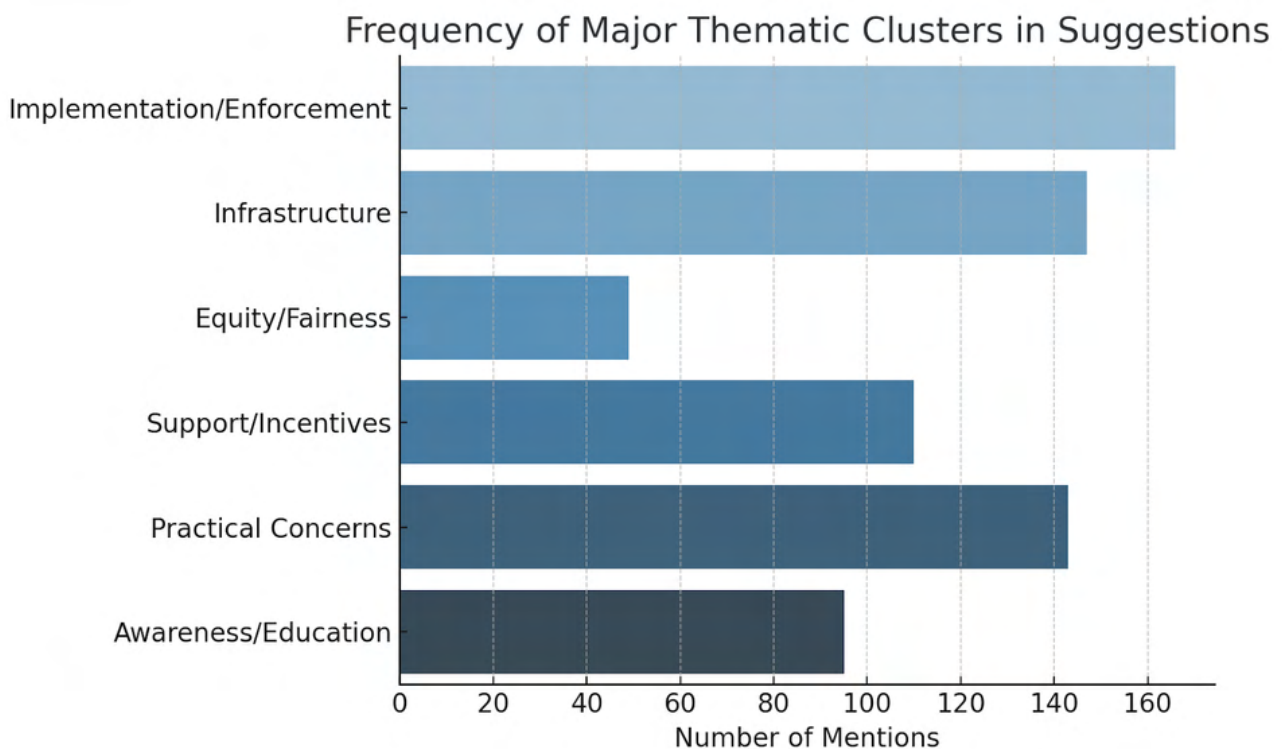
Q3. IS DAILY WASTE SEGREGATION PRACTICAL FOR HOMES/BUSINESSES?

A large chunk of people believe it is impractical for households and establishments every day (46%). The issues cited are lack of space, narrow lanes especially in slums, and minor issues with retro-fitting chutes in high-rise buildings. Door-to-door collection is demanded by the BMC for such segregation to be possible. Respondents also mention issues like collection trucks mixing segregated waste together – and having compartmentalised trucks to counter this concern.



In addition to the three questions, citizens have responded in depth, which has been distilled in the previous section containing the key suggestions and objections. A longer list of all responses is also attached in Annexure A. Across these responses, we have analysed the following themes having arisen the most:

- Issues regarding implementation and enforcement of these bye-laws, particularly with respect to fines
- Having sufficient infrastructure, particularly toilets and bins to avoid public sanitation issues
- Practical limitations like having segregated collection trucks, space limitations, etc.
- Awareness within citizens to maintain public sanitation and the means to do so.



ANALYSIS OF THE CITIZEN TOWNHALL MEETINGS

In order to gather feedback from active citizens on the draft bye-laws, two citizen townhalls were organised and facilitated by the BMC in partnership with Civis. These townhall meetings helped gauge the citizens notions about solid waste management in the city, the problems and concerns they encounter on a day-to-day basis, suggestion they have to improve the solid waste management in the city of Mumbai and their opinion on the new draft bye-laws and its provisions.

The first meeting was conducted on **April 23, 2025** and the second on **May 14, 2025**. About 25 concerned citizens and community leaders were convened from across Mumbai, including representatives from local ALMs (Advanced Locality Management groups), active residents from Dadar, Andheri, Malabar Hill, Worli, Sion, Marine Drive, and Bhandup.

Civis first facilitated in simplifying the BMC SWM Byelaws 2025 by providing an overview of its provisions, following which the floor was opened for discussion. Citizens then shared experiences, concerns, and suggestions on topics such as waste segregation, infrastructure gaps, awareness efforts, and the need for better enforcement.

Key takeaways included widespread distrust in BMC's implementation, strong opposition to user fees, and a call for stricter enforcement, better education through schools and youth participation, and improved infrastructure like dustbins, signage, and public toilets.



Image: Citizen townhall on May 14, 2025

A diverse range of inputs were received from citizens:

1. Improve Enforcement & Accountability:

- A Malabar Hill resident recommended that enforcement of segregation must be undertaken strictly; municipal workers should refuse unsegregated garbage. Authorities must stop turning a blind eye due to political connections.
- Two Dadar Parsi Colony residents recommended that the BMC should implement penalties consistently. Currently, violators go unpunished even when photographic evidence is presented. The BMC must actively fine violators; laws exist but lack implementation and that stronger enforcement will change behavior.

2. Better Awareness through Direct Engagement:

- A Worli resident suggested that the door-to-door and peer-based awareness campaigns work better than hoardings. Evening sessions can be more effective to catch working citizens.
- Another resident recommended using sarcasm and humour in public messaging (e.g., "You're not a hero, you're a zero" posters) to shame violators and change behaviour.
- Currently, citizens highlighted that there is also confusion over the registration process for waste generators and a lack of clarity for the newly proposed yellow bag sanitary waste collection. Citizens seek mandatory, consistent service and better communication from BMC to be able to implement these policies on ground.

3. Objection to User Fees and Improving Implementation

- Most citizens strongly opposed the new user fee. Citizens claimed they already pay high taxes and get poor services in return. They suggest focusing on improving service before introducing new charges.
- Citizens from the eastern suburbs specially mentioned that despite there being existing laws banning plastic bags and mandating segregation, violations continue unchecked. Fines and bans are rarely implemented. Even with policies against mixing waste, municipal vans accept unsegregated garbage—this undermines citizen efforts.

4. Strengthen Infrastructure like Public Bathrooms and Bins:

- Several citizens highlighted that the public often does not comply with sanitation laws because there are no nearby bins or toilets. Hence, penalising without providing facilities would be unjust.
- Several residents believe increasing the number of well-labeled public bins will be beneficial. Current ones are few, stolen, or unlabeled.
- Another important move would be to Install more public toilets in busy areas (e.g., Five Gardens) to prevent public urination.
- A resident pointed out that Dustbins should have clear icons for illiterate populations and be more durable and theft-resistant.

5. Improving Education & Youth Involvement:

- Multiple residents shed light on the importance of Integrating civic education on waste into school curricula. Involve college students in community outreach and campaigns.
- A resident from Dadar Parsi colony recommended the use competitions, art, and school projects to engage children in promoting segregation and civic responsibility.

6. Leveraging Technology for Monitoring:

- A citizen suggested the use of CCTV and data to identify dumping hotspots and repeat offenders.
- Citizens also recommended implementing digital tracking of violators and provide proof-based penalties.

7. Pilot Projects & Zone-Based Implementation:

A suggestion echoed by multiple citizens was starting with select wards (e.g., Five Gardens) as clean zones with strict enforcement and higher penalties to create replicable models.

8. Improve Worker Welfare:

Multiple residents also echoed the need to provide informal workers PPE, gloves, better tools, and dedicated training to municipal sanitation workers. Facilitate better coordination among sweepers, collectors, and disposal teams.



Image: Citizen townhall on April 23, 2025



Image: Citizen townhall on May 14, 2025

ANALYSIS OF EXPERT-LED TOWNHALL MEETING

The expert townhall on BMC's Draft Solid Waste Management Byelaws 2025 was brought together **26 participants** from across the waste management ecosystem. The 1.5 hour long meeting was conducted across a virtual medium, to ensure maximum inclusivity and access.

The meeting opened with a contextual introduction to the draft bye-laws along with a summary of its provisions delivered and facilitated by Civis, whose

team laid out the objectives of the consultation: to gather constructive, cross-sectoral feedback that could strengthen the final policy.

Attendees included representatives from civil society organisations, waste management practitioners, legal and policy experts, private sector recyclers, and informal worker groups, ensuring a diverse and grounded discussion. Organisations engaged include:

- Vidhi Centre for Legal Policy
- Green Communities Foundation
- Project Mumbai
- Green Practices
- Saahas Zero Waste
- Shakti Plastics
- Waste Warriors
- ReCircle
- Academicians from institutions like Tata Institute of Social Sciences and NMIMS School of Liberal Arts

The conversation was dynamic and solution-oriented, with participants sharing both critiques of the current draft and actionable recommendations rooted in ground realities and national policy frameworks. Themes of decentralisation, community engagement, informal sector inclusion, and the use of technology emerged prominently.

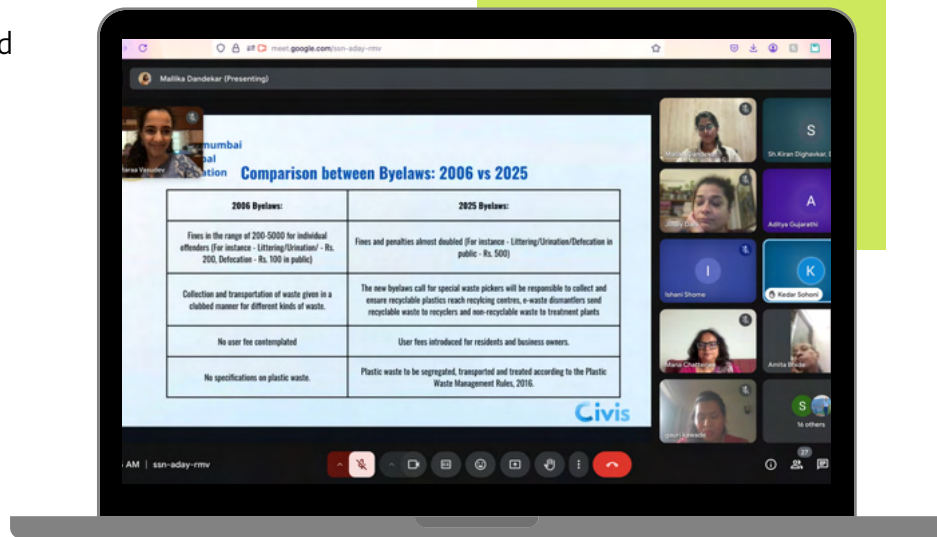


Image: Expert townhall on May 7, 2025

The session maintained a collaborative tone, with participants often building on each other's insights. It concluded with a summary of key suggestions, and Civis encouraged continued engagement through written submissions, reaffirming its commitment to sharing a consolidated feedback report with the BMC.

The key recommendations and concerns that emerged from this expert-led discussion are as follows:

1. Policy Coherence and Legal Backing

Most participants cogently urged alignment of the draft with the Plastic Waste Management Rules, 2016, and EPR guidelines, state-level Solid Waste Management policies as well as the Mumbai Municipal Corporation Act, 1888.

They also recommended defining roles and liabilities for private players and contractors under law.

The participants suggested these points in view of the fact that national, state and local laws on the issue of solid waste management must be aligned and uniform – to not only ensure clarity and avoid confusion for citizens and businesses, but also have common processing methods and segregation for mass adoption and ease.

- Participants, including Jinaly Dani from Vidhi Centre for Legal Policy, highlighted inconsistencies in the language and definitions within the bylaws, particularly overlaps between domestic hazardous waste and biomedical waste. Jinali suggested a need for more specificity to avoid implementation challenges and noted that broad penalty provisions could be misused.
- Amita Bhide from Tata Institute of Social Sciences pointed out a misalignment with the larger legislative framework of the Bombay Municipal Corporation Act, 1888, especially regarding waste ownership, which the Act considers municipal property while the bylaws shift responsibility to the larger city.
- Kedar Sohoni from Green Communities Foundation added that the bylaws are not fully aligned with national Solid Waste Management Rules (2024), citing different definitions for waste types and bulk waste generators. He also found the language regarding mandatory composting for bulk waste generators "loose" and not truly enforceable.
- Dr. Lata Ghanshamnani of Rnisarg Foundation noted a confusion stemming from two governing bodies (Ministry of Environment, Forests and Climate Change and Ministry of Housing and Urban Affairs) having different rules, and advised against clubbing biomedical and plastic waste with municipal solid waste due to their distinct management requirements.

2. Monitoring and Grievance Redressal

- Participants suggested strengthening systems for public grievance reporting (via mobile apps and ward offices).
- They also recommended introducing third-party audits and social audits of collection, transportation, and processing performance.

3. Decentralised Waste Processing

All experts urged BMC to prioritise decentralised waste solutions, such as:

- Community-level composting units and bimethanation plants.
- Making it mandatory for bulk generators to process wet waste on-site.
- Suggested ward-level micro-planning for SWM, with tailored infrastructure needs and targets for each area.

Particularly, Mr. Sumedh from Shakti Plastics emphasised the need for decentralised models, suggesting that every ward should have at least five to six decentralised units to redistribute the heavy load on single Material Recovery Facilities (MRFs). This would lead to more meaningful segregation and benefit recyclers by reducing the need for additional manpower for segregation. Kedar Sohoni also suggested involving brands and producers in setting up infrastructure and incentivising waste pickers and scrap dealers to collect non-commercial waste (like textile waste or multi-layer plastic) that often ends up in dumping grounds.

4. Inclusion of Informal Waste Workers

Most experts highlighted the critical role of waste pickers, scrap dealers, and itinerant buyers. They proposed issuing:

- Formal registration, ID issuance, and inclusion in SWM systems.
- Training programs to help them comply with occupational safety norms.
- Access to decentralised collection centres and material recovery facilities (MRFs).

Konark from Project Mumbai highlighted the need to involve informal waste workers in the segregation and collection process. Gauri from Saahas stressed the importance of developing larger infrastructure through aggregators and providing incentives to formalise the informal sector, thereby integrating them into the social space and ensuring they are incentivized for their work.

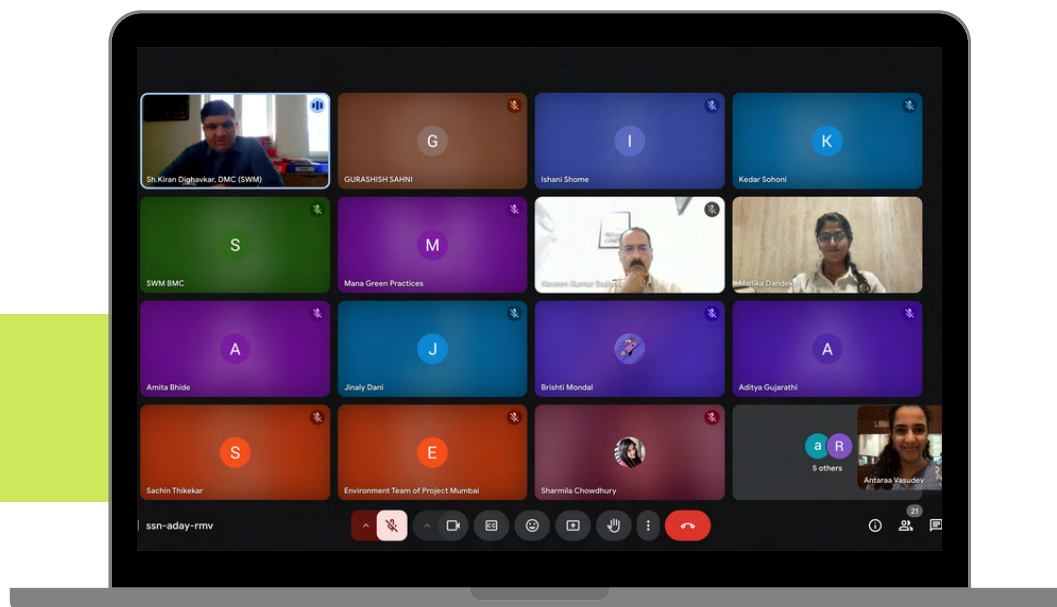


Image: Expert townhall on May 7, 2025

5. Segregation and Compliance Incentives

The discussion highlighted the importance of enforcement coupled with incentives and penalties for effective awareness and compliance. A strong enforcement call was echoed, that the 3-way segregation (wet, dry, hazardous) should be non-negotiable. Most of them recommended the following:

- Public display of segregation compliance by bulk generators.
- Monetary incentives for compliant housing societies.
- Use of spot fines and penalties for non-segregators.

Dr. Lata also suggested integrating compulsory segregation into society bylaws, enabling housing society secretaries to enforce it

6. Citizen Participation and Behaviour Change

Maximum participants laid emphasis on local community engagement. They recommend:

- Setting up ward-level SWM committees with RWAs, NGOs, and local champions.
- Campaigns through schools, SHGs, and mohalla sabhas.
- They also highlight the need for multilingual IEC materials (Marathi, Hindi) and regular awareness drives.

Dr. Lata emphasized that awareness building models, or Information, Education, and Communication (IEC) initiatives, need to be coupled with enforcement and fines to be sustainable.

7. Technology and Transparency.

Proposals were made to integrate technology-driven solutions, with discussions around real-time tracking of garbage trucks, QR code-based disposal logs, and public dashboards:

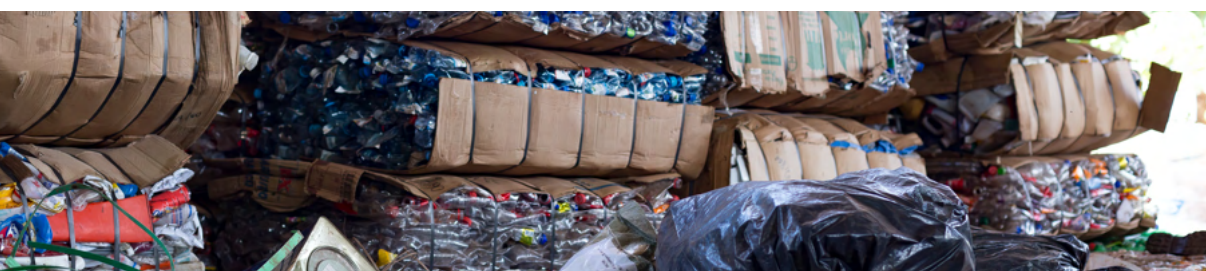
- Real-time GPS tracking of garbage trucks and bin monitoring.
- QR code-based waste disposal logs for bulk generators.
- Public dashboard showing ward-wise waste generation and disposal metrics.

8. Capacity Building and Support for BMC Staff

Some participants called for regular training programs for:

- Ward officers and junior engineers on interpreting and implementing byelaws.
- Sanitation workers on segregation, safety, and handling different waste types.
- Participants also suggested institutionalising a capacity-building wing within the SWM department.

Sumedh from Shakti Plastics highlighted that existing MRFs are overburdened and lack proper sanitation for waste workers, emphasizing the need to channelize and facilitate decentralised models. Dr. Brijesh Tripathi from NMIMS School of Liberal Arts also commented on the user fee model, suggesting that while municipal corporations can mediate, a community-driven approach mediated by NGOs or housing societies at a local level might be more sustainable



ON-GROUND INTERVIEWS

To delve deeper into pockets of Mumbai that may not be digitally enabled, but might require interventions with respect to waste management – we collaborated with EkSaath, an organisation working on waste collection and segregation in urban slum communities in Mumbai. We spoke to residents of the Kokari Agar slum in Wadala in this exercise and heard their concerns regarding the improvements required to better manage the waste in their locality.



Image: Interviews with slum residents in collaboration with EkSaath

We spoke with women in the community, who had resided in the slum for 6-25 years, and lived in families with 3-6 members. We conducted one round of interviews with all the women together to encourage discussion and deliberation. Across our conversation, several key issues in waste management in the area were highlighted:

Key Recommendations:

- 1. Door-to-door waste collection:** Residents prefer BMC to collect segregated waste directly from their homes rather than them having to take it to a collection point. This is because their homes are not large enough (they are about 120 square feet each) to store and hold waste, let alone separate bins for segregated waste as per the draft bye-laws.
- 2. Dedicated collection for wet waste from businesses:** A number of residents in the slum run small businesses like idli carts that generate a lot of wet waste. Residents suggest BMC should collect this waste directly from their location in the evening. Currently, they are dumped together with dry waste as there are no separate bins provided by the BMC.
- 3. Education on waste segregation:** Residents believe that teaching children about waste segregation in schools, particularly BMC-run municipal schools, would be an effective way to improve waste management practices in the long run. They also suggest educating adults through community efforts, which is already being undertaken by independent NGOs. However, large-scale government effort can strengthen this process deeply.
- 4. Fines for littering:** Residents strongly support imposing fines on individuals who throw garbage outside, believing it will deter littering and promote cleanliness.

Image: Garbage dumped in the gutter running through the Kokari slum



5. Gutter maintenance: Currently, the community bins are not accessibly placed for all citizens, particularly those living deep inside the slum or basti. These citizens resort to throwing waste into the open gutter running close to their homes. Citizens shared that this gutter is cleaned only once a year before the monsoons. Despite it being cleaned just a few weeks before our visit, the solid waste dumped into the gutter was excessive. Even drinking water pipes intersect with this gutter and risk cross contamination. Residents health is risked on a large scale too, as waste sits in the gutter, emitting toxic fumes, and mixing with rain and gutter water, flowing into homes as well when overflowing.

Citizens suggest that regularly cleaning and covering gutters would prevent garbage accumulation, mosquito breeding, and the mixing of waste with drinking water. Several residents pointed out that they even clean gutters themselves due to inaction and have to pay extra for this basic service.

Concerns Raised:

- **Lack of proper waste segregation:** While BMC vehicles collect garbage daily, segregation of dry and wet waste is not consistently happening at the collection points or by the BMC. The residents currently have dry waste picked up from their homes directly by NGOs in the area, and wet waste is thrown in a the community trash bin. However, only one community bin is provided, and they do not have separate bins. In the absence of local NGOs segregation would be a challenge. Residents are willing to segregate at home if BMC collects it separately daily as well, as they cannot have garbage pileup in their small homes.
- **Inconvenient garbage disposal:** Residents have to take their household garbage to a collection point themselves, which is not always convenient.
- **Health issues due to poor waste management:** Dirty water, mosquitoes, and general filth from unmanaged waste are leading to health issues and diseases. Another key concern is the sale of cheap spurious alcohol in plastic packets. Not only is the rampant spurious alcohol consumption a health hazard, but the plastic packets are strewn about the entire slum, especially the entry points – causing waste accumulation.
- **BMC's inadequate services:** Residents feel that BMC is not taking enough interest in addressing their waste management concerns, including regular cleaning of their streets and gutters.
- **Toilet facilities:** Toilets are available, but they are not free, costing Rs. 150 per household for a monthly pass. There are also issues with cleanliness in the toilets, particularly regarding the disposal of sanitary pads, despite attempts to provide separate bins. There is a concern about access during emergencies at night due to timing restrictions on toilets.
- **Lack of awareness about new rules:** Many residents are unaware of the BMC's new rules and regulations regarding waste management, including the importance of segregating dry and wet waste at home. Citizens believe close to 50% of people are unaware of segregation.
- **Poor conditions in municipal schools:** Residents expressed concern about the lack of cleanliness and proper education in municipal schools, particularly regarding topics like waste segregation.

CONCLUSION

The consultation on the Draft Brihanmumbai Municipal Corporation Solid Waste Management By-laws 2025 received diverse feedback from a wide range of stakeholders, reflecting both support and significant concerns.

Key aspects discussed included waste segregation, collection logistics, infrastructure, user fees, composting systems, and enforcement. Major concerns highlighted the impracticality of daily source segregation, issues with waste recombination during collection, and inadequate infrastructure like bins and toilets. Citizen sentiment on user fees was polarized, with many citing fairness issues and a lack of transparency. Distrust in the fine collection system was also a prominent concern.

In response, stakeholders suggested improving waste segregation and collection infrastructure, implementing comprehensive civic awareness drives, and better supporting the informal waste sector. Suggestions also focused on enhancing circular economy initiatives, strengthening monitoring and compliance through technology, and refining composting systems. Calls were made for policy coherence, legal backing, and integrating civic education.

Civis' report, built on multi-channel feedback collection, aims to meaningfully contribute to the consultation process. The BMC's commitment to shaping a stronger solid waste management framework, informed by public input, demonstrates a dedication to improving urban cleanliness.

Civis hopes to add value by amplifying relevant recommendations for an effective and inclusive solid waste management regime in Mumbai.

ANNEXURE A: WHATSAPP CHATBOT AND PLATFORM RESPONSES

ANNEXURE B: MINUTES OF THE TOWNHALL MEETINGS



CONTACT US

This report is produced and presented by Civic Innovation Foundation (registered as a Section 8, non-profit company under the Indian Companies Act), through its platform 'Civis', provides targeted stakeholder engagement services to governments and other organisations.

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