

14/3/2020-SBM-III
Government of India
Ministry of Housing and Urban Affairs
(SBM III Division)

Nirman Bhawan, New Delhi,
the 18th November, 2020.

To,

All State Mission Directors,
Swachh Bharat Mission (Urban)

Sub: Independent Assessment and Certification for SBM ODF Protocols and Star rating Protocol under Swachh Bharat Mission – Urban.

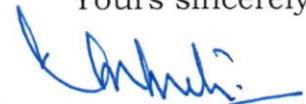
Sir/Madam,

As you are aware, Star Rating certification is not only an acknowledgement of the clean status of Urban Local Bodies (SWM) and strengthened SWM systems but also a mark of trust and reliability akin to universally known standards. In its continuous endeavor to institutionalize a mechanism for cities to achieve Garbage Free status, and to motivate cities to achieve higher degrees of cleanliness, Ministry of Housing & Urban Affairs (MoHUA) introduced 'Star Rating of Garbage Free Cities 2021' on 19th May, 2020.

2. The new protocol was developed based on the feedback received from the States/cities and review of the assessments of the cities during the assessment period 2019-2020.
3. In order to provide further clarity with reference to the queries received from States/Cities, enclosed are component wise responses in Annexure – 1.
4. We look forward to your enthusiastic participation and wish you all the best in pursuit to get your ULBs star rated.

Encl: As above.

Yours sincerely,



(Jagdish Chandra Upreti)

Under Secretary to the Govt. of India

Ph. No: 23061530

Annexure - 1

S. NO.	PARTICULARS	QUERY/ SUGGESTION	RESPONSE
1.	Prequalification Condition	<ul style="list-style-type: none"> • % of unaccounted waste after considering waste processed by BWGs or processed by Informal Workers/ On-site waste processing by non-bulk waste generators: • 1-star: 15% •3-star: 10% •5-star: 5% • 7-star: Nil • Unaccounted waste: We request further guidance on this. • We have observed the per capita waste generation formula is not suitable for wide variety of ULBs, we have observed the gap between theoretical waste generation as per CPHEEO norm and actual waste collection is very high. • As well in covid scenario we have observed that there is significant reduction of waste being generated/collected from commercial/public areas leading to overall reduction in waste collection which is contributing more gap in unaccounted waste % • Hence, we request you to kindly relax the slabs of % unaccounted qualify various star levels. We request you to revise the slabs 1-star: 40% •3-star: 30% •5-star: 20% • 7-star: 10%. 	<p>As per protocol, the unaccounted waste is “actual waste generated by the ULB that is not being collected after considering waste processed by BWGs, Informal Workers, On-site waste processing by non-bulk waste generators.”</p> <p>The pre-qualifying condition for unaccounted waste was introduced as it was observed that any unaccounted waste hampers city’s efforts to become garbage free. This is even more important considering the covid scenario where any waste generated but not collected could lead to potential infection and health hazard, hence efforts shall me made to ensure 100% waste collection, processing and disposal. Hence, the pre-qualifying condition for unaccounted waste as specified in the protocol remains the same:</p> <ul style="list-style-type: none"> • 1-star: 15%; 3-star: 10%; 5-star: 5%; 7-star: Nil

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2.	Third Party Certification: Citizen Validations	<ul style="list-style-type: none"> • Success criteria of 90% will be used to validate claims made by the city. For example, 9 of 10 validations shall match with city claims. • We would like to bring in your notice that, the 90% success Criteria is very critical for few indicators such as Spot fines, Sweeping, User Charges, C & D waste etc. • There may be cases such that the respondent may not be representing the particular ward or City for which assessor is performing the citizen validation. Or respondent may not be familiar with Jargons such as User charges, C & D waste so on, etc. • We have observed that most of the ULBs failed in above indicators for Citizen Validation despite the ULB is having 100% on field compliances for that indicator. We request you kindly relax the success criteria. 	<p>Citizen validation plays a critical role in third party assessment and is a testimony of service level progress achieved by the city. There's already a discount of 10% considered and since assessment is on sampling basis further discounting will affect the assessment. Hence, the success criteria of 90% will remain the same as per the protocol. Cities are requested to not only achieve service level progress but also educate citizens to ensure a sustainable solid waste mechanism and achieve Star Rating.</p>
3.	Component M10: Grievance Redressal	<ul style="list-style-type: none"> • Solid Waste Complaint's SLA <ul style="list-style-type: none"> • We request you to make available the provision of displaying real time % of Complaints related to "solid waste" which are resolved within SLA. • The dashboard shows overall complaints. There should be provision so that ULB could easily track the Solid waste related complaint's SLA also. 	<p>ULBs are requested to ensure that all Swachhata App complaints (Sanitation, Solid waste and Covid related) are resolved within the respective SLAs.</p>

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4.	Component D3: C&D Waste-Collection Facilities	<ul style="list-style-type: none"> Facility of collection of C&D waste from premises of Non-bulk generators to be available in 25% of wards(L1). If ULB has a dedicated single vehicle catering all wards for C & T of C & D waste, as well a single earmarked site for storage, segregation of C & D waste collected from all wards together, we request you to clarify whether it will be considered as 100% coverage of wards. (L3 & L4). 	As per the protocol for mobile collection, ULBs to ensure suitable vehicles of different capacities (such as Rickshaws at ward level, Tempo at Zonal Level and Tractors/ Trucks at ULB Level) are made available at fixed rate, and staff is assigned at each level to ensure C&D waste collection is completed within the SLA period for Debris Removal/Construction Material as defined in Swachhata App i.e. 12 hours.
5.	Citizen Declaration	<ul style="list-style-type: none"> < 1 lakh population needs 3 citizen categories though the box below says 4 categories are mandatory. We request you to share clarification of which one can be avoided for this case. 	For ULBs with < 1 lakh population, school children (age more than 14 years) was kept as additional category since some of the smaller ULBs may not have the senior secondary schools. Hence, the declarations from citizens other than School Children are mandatory for ULBs with < 1 Lakh population.
6.	E9(B) Screening of Nallah	<ul style="list-style-type: none"> If screening of nallah at the points of discharge in to other nallahs is done. But no intermediate screens for tertiary nallahs are installed. Please clarify whether above scenario will be considered. 	As per the protocol, all 'tertiary nallahs/drains' (irrespective of the width) are to be considered for screening.
7.	Cooling off period in case of failure, Re-Application for higher rating:	<ul style="list-style-type: none"> In previous year ULBs were allowed minimum two chances for GFC fresh application and 1 chance for applying for higher star. In revised framework, cooling off period is mentioned as 6 months for Field Assessment & for reapplication of higher star rating ULBs have to wait for 3 	<ul style="list-style-type: none"> As per the protocol, if a ULB fails in desktop assessment, it can undergo re-assessment immediately (no cooling-off period), while if a ULB fails in field assessment, it can undergo re-assessment after 6 months (the cooling-off period). However, if the ULB

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		<p>months.</p> <ul style="list-style-type: none"> • With reference to current Covid scenario, estimating the time frame ULBs will not get any second chance for both reapplication & reply for failure in Field assessment. • We request you to relax the cooling off period and reapplication time condition so that ULBs should get at least 2 attempts/chances in both cases. 	<p>fails in the re-assessment (DA/FA) as well, it will only be able to re-apply after 6 months. If a ULB has been certified a star rating, it can re-apply for higher star rating after 3 months (maximum twice in a year and as per the timelines issued by Ministry).</p> <ul style="list-style-type: none"> • The protocol also has the provision of validating and certifying ULB for lower star in case ULB fails for the applied star. • Since the assessment includes ward-level field assessment and in order to meet the Swachh Survekshan timelines, it will not be possible to conduct field assessment twice . • Considering the above provisions, the cooling-off and re-application periods remain as per the protocol. • ULBs are requested to prepare well and in advance for assessment and for consideration.
8	Wet waste processing facility with HDPE Organic Compost Beds	<ul style="list-style-type: none"> • In many ULBs especially, ULBs with space constraints are using HDPE Organic Vermi Compost Beds for wet waste processing activity for decentralized processing. All such practices were considered in previous year. • In revised GFC toolkit its mentioned that the wet waste processing activities with cemented flooring will only be considered. • In most of the ULBS, due to 	<p>Facilities having HDPE compost beds shall be considered with the following guidelines as specified in the protocol:</p> <ul style="list-style-type: none"> • The processing capacity shall be 15-20 times the daily wet waste input of the processing facility. For example, for a 1 TPD composting facility, the facility shall have compost beds (2 or more) equivalent to accommodate 15-20 Tons of wet waste.

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		<p>Covid situation there is delay in construction of Wet waste processing plant as per DPR and sites are yet under construction phase.</p> <ul style="list-style-type: none"> We request you to kindly consider, wet waste processing activities with HDPE Organic Compost Beds. 	<ul style="list-style-type: none"> Efforts shall be made to not have haphazard HDPE compost beds considering the following guidelines: <ul style="list-style-type: none"> The bottom of compost beds shall be cemented or on a suitable water-proof barrier to prevent infiltration of leachate. The bottom of compost beds shall be at least 2 meter above the highest yearly ground water table (GWT) depth. Leachate shall be properly collected, treated and recirculated. The lowest ground level in the compost beds shall be above ground and at least 1 meter above HFL (highest flood level) recorded.
9	M2 - Source Segregation at ward Level and E3: Source Segregation at City Level	<p>Collection of Sanitary/Domestic Hazardous waste on daily basis would not be feasible with current demand, vehicle designs, and third bin added during the previous Survekshan. Considering the addition of new items in DHW (CFL, Paint drums, etc.) the vehicle would be clogged beyond its capacity. We would suggest to consider alternate collection mechanism, with collection of sanitary waste (sanitary pads and diapers) on daily basis and collection of the remaining DHW categories on alternate or weekly basis by a separate dedicated covered vehicle with proper route map and logbooks to cover all wards of the city. Kindly revisit the above</p>	<ul style="list-style-type: none"> As per the Protocol, Sanitary Waste collection to be done on daily basis, domestic hazardous waste may be collected on weekly basis. All kinds of sanitary waste to be wrapped securely in the pouches provided by the manufacturers or brand owners of these products or in a suitable wrapping material as instructed by the local authorities. Domestic hazardous waste need not to be wrapped.

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		clause and advise, so that we can implement the above suggestion across all our ULBs.	
10	D3 - C&D Waste - Storage, Segregation, Processing and Recycling	Small ULBS have less quantity of C&D waste generation, as there is limited scope for new construction activity. Usually, these ULBs use their C&D waste for filling of low-lying area and for other menial renovation work undertaken by the municipality. There is no requirement for setting up C&D waste plants with machinery for such ULBs. We would request you to kindly review this clause for smaller ULBs with population less than 3 Lakhs.	The component has been revised and as per the protocol the segregation machineries/plants are mandatory for cities with population > 50,000.
11	D6 - Implementation of Swachh Nagar/Similar App	In case of Swachh Nagar App, our ULBs are facing technical issues. Considering the current Covid 19 pandemic situation, it will be difficult for small ULBs to implement and use the Swachh Nagar App. We would request your intervention to resolve these technical issues and provide relaxation in the implementation of Swachh Nagar App	The component 'Implementation of Swachh Nagar' has been removed from the protocol.
12	E7, E8 - Scientific Landfill: Availability, Use and Waste Disposal	GFC 2021 toolkit has a provision to consider Simple Landfill for cities with population <50,000. ULBs claiming Simple Landfill in GFC2021 will not qualify to gain marks in Q2.8 of SS2021, as the SS2021 toolkit does not have any provision related to Simple landfill. We would request you to kindly review the Q2.8 of SS2021 for creating provision for Simple Landfill for ULBs with population <50,000.	The concept of Simple Landfill has been removed from both Swachh Survekshan and Star Rating Protocol. With this clarification, all the previous communication related to this matter are superseded. Cities/States are encouraged to set-up scientific landfills on cluster basis. Pls. refer Table 1 for E7 and E8 components.

Table 1: Component E7 and E8

Component E7: Scientific Landfill- Availability & Use

Level	Level 1	Level 2	Level 3	Level 4
Condition	Land identified either in own city or in other city	Remaining unprocessed waste/Process Rejects are sent to Scientific Landfill either within the city or in another city	Only Process rejects are sent to Scientific Landfill either within the city or in another city	Only Process rejects are transported to Scientific Landfill either within the city or in another city
Marks	30	50	100	100

Component E8: Scientific Landfill- Waste disposed

Level	Level 1	Level 2	Level 3	Level 4
Condition	Not more than 45% including process rejects if any*	Not more than 25% including process rejects if any*	Not more than 15% including process rejects if any	Not more than 10% (Process rejects only, no unprocessed waste is sent to scientific landfill)
Marks	30	50	75	100

*The landfill may not necessarily be scientific landfill for Level 1 and Level 2 only for cities with population < 100,000. For Level 3 & Level 4, only scientific landfills to be considered.