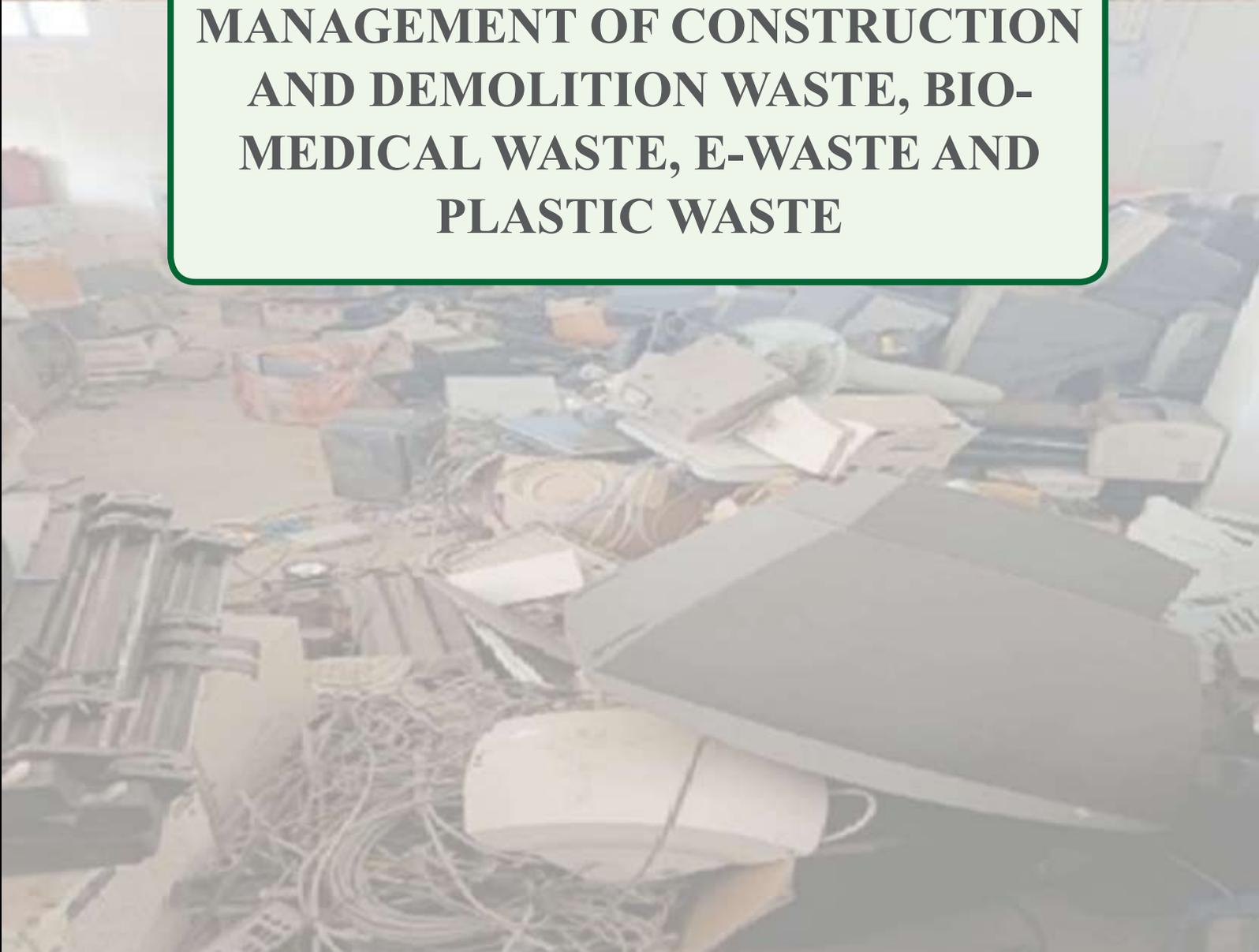


CHAPTER-VII

MANAGEMENT OF CONSTRUCTION AND DEMOLITION WASTE, BIO- MEDICAL WASTE, E-WASTE AND PLASTIC WASTE



Chapter- VII

Management of Construction & Demolition Waste, Bio-Medical Waste, E-waste and Plastic Waste

The scope of this Performance Audit (PA) was to cover the solid waste management framework in Meghalaya with solid waste being defined as municipal solid waste (MSW), bio-medical waste (BMW), construction and demolition (C&D) waste, e-waste, and plastic waste. This chapter deals with the management of Construction & Demolition Waste, Bio-Medical Waste, E-waste and Plastic Waste.

7.1 Construction & Demolition Waste

MSWM Manual, 2000 stipulates that C&D waste, being predominantly inert in nature does not create chemical or biochemical pollution. Hence maximum effort should be made to reuse and recycle them. It was only in 2016 that separate rules for C&D waste was notified by Government of India. According to the Building Material Promotion Council, the total C&D waste generation estimated in India from buildings activities in the year 2020 was 4.11 lakh TPD⁶⁶ while the recycling capacity was 6,500 TPD. The information on quantum of C&D waste generated in the State was not available with MSPCB. Similarly, test-checked ULBs also do not have the data on C&D waste generation in their jurisdiction.

7.1.1 Meghalaya State Policy on Construction and Demolition Waste

Delay in finalising and approving the Meghalaya State Policy on Construction & Demolition (C&D) Waste, along with the lack of direction from relevant authorities, has hindered the implementation of C&D Waste Management Rules 2016 in the State.

Rule 9 (1) of the C&D Waste Management Rules 2016 stipulates that the Secretary in-charge of Development in the State Government shall prepare their policy document with respect to management of C&D waste in accordance with the provisions of these rules within one year from date of final notification (29 March 2016) of these rules. From records, it was seen that the draft Meghalaya State Policy on C&D Waste was forwarded by the Directorate to the Department of Urban Affairs on 7 January 2022, after a delay of almost five years. The State Government was also yet to approve the Meghalaya State Policy on C&D Waste. As a result of delay in approval of the State Policy, audit noticed the following:

- It was seen that neither the concerned Department of the State Government nor the ULBs/Town Committee had framed any directions or carried out any activities regarding C&D waste.
- As per Rule 8 of the C&D Waste Management Rules, the State Pollution Control Board shall monitor the implementation of these rules by the concerned local bodies and

⁶⁶ 150 million tons per year/365 day= 4.11 lakh TPD.

the competent authorities and the annual report shall be sent to the Central Pollution Control Board and the State Government for generating State level comprehensive data. Moreover, as per Rule 9 (2) of the C&D Waste Management Rules 2016, the concerned department in the State Government dealing with land shall be responsible for providing suitable sites for setting up of the storage, processing and recycling facilities for construction and demolition waste.

In the latest report submitted (29 July 2022) by MSPCB to CPCB, it was pointed out that the State Government was yet to finalise the Meghalaya State Policy on C&D Waste. It was also submitted that the site for collection and processing facility was also yet to be identified by the State Government. Thus, it could be seen that no concrete steps had been taken by the State Government to ensure implementation of the C&D Waste Management Rules 2016.

- Rule 6 of the C&D Waste Management Rules states that the ULBs/Town Committee were to issue directions with regard to proper management of C&D waste, chalk out stages, methodology and equipment, material involved in the overall activity and final clean up after completion of the construction and demolition, make arrangements and place appropriate containers for collection of waste and shall remove at regular intervals *etc.* In the absence of the State Policy on C&D waste, none of the selected ULBs/Town Committees had issued any directions or made any plans with regard to management of C&D Waste in their jurisdiction.

During the Exit Conference (May 2023), the Director, Urban Affairs Department stated that the Policy has been forwarded to the Cabinet for approval.

7.1.2 Comparison between Meghalaya SWM Bye Law and C&D Waste Management Rules 2016.

The Meghalaya Solid Waste Management Bye Law of 2020 requires Local Authorities to collect and dump Construction & Demolition (C&D) waste separately without mixing, but the practice of dumping C&D waste within landfill sites goes against national policy; thus, there is a need for the State Government and Local Authorities to establish appropriate storage, processing, and recycling facilities for C&D waste.

Section 5 (i) of the Meghalaya Solid Waste Management Bye Law, 2020 stipulates that the C&D waste should be collected by the respective Local Authority (Municipal boards, Town Committees or Dorbar Shnongs) without mixing with other solid waste and the Local Authority should develop and maintain an area specifically for dumping of C&D waste in a landfill site. The dumping of C&D within the landfill site is, however against the National policy⁶⁷ which stipulates that the department in the State Government dealing with land shall be responsible for providing suitable sites for setting up of the storage, provide processing and recycling facilities for C&D waste.

During JPV of Marten (SLF of Shillong), it was confirmed that C&D waste was dumped separately within the premises of Marten. Further, no processing or recycling of C&D waste were noticed. In reply to audit, the test checked ULBs/Town Committee

⁶⁷ Rule 9(2) of the C&D Waste Management Rules 2016.

admitted that they were yet to provide any processing facility of C&D waste. The State Government along with the ULBs should take up concrete steps to provide storage, processing and recycling facilities for C&D waste.



Exhibit 7.1 : Dumped C&D Waste and covered with loose soil in Marten, Shillong

7.2 Bio Medical Waste

GoI notified (July 1998) the Bio-medical Waste (Management and Handling) Rules, 1998, which provided a regulatory framework for management of BMW generated in the country. This was replaced by the Bio-medical Waste Management Rules, 2016 (BMW Rules, 2016) notified (March 2016) by GoI.

MSPCB is the authority designated for implementation of the provisions of these rules. Every occupier or operator handling BMW, irrespective of the quantity should obtain authorisation from MSPCB and shall hand over segregated waste to a common bio-medical waste treatment facility (CBMWTF) for treatment, processing and final disposal.

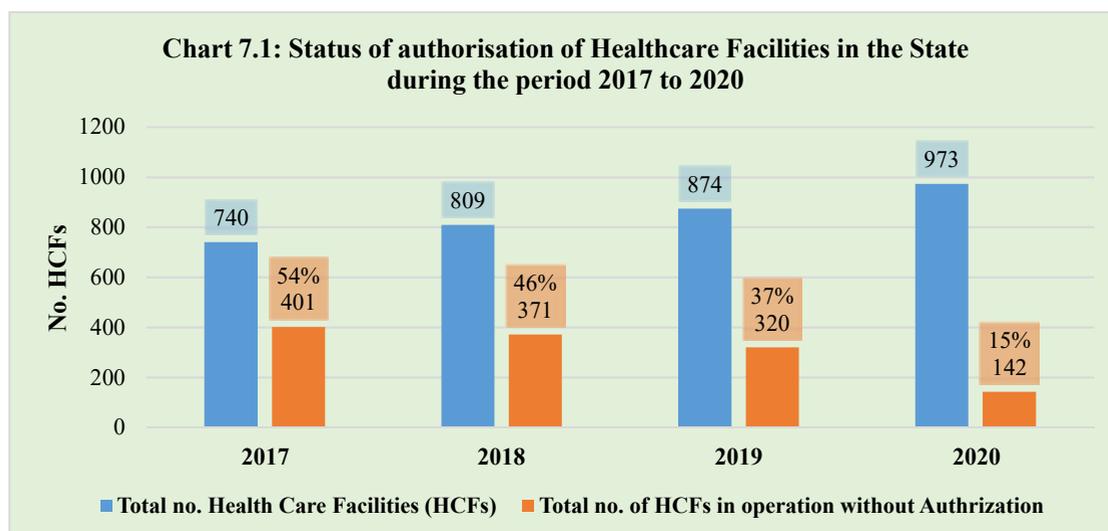
7.2.1 Authorisation status of Health Care Establishments

Healthcare facilities in Meghalaya showed a gradual decrease in unauthorised status from 2017 to 2020 under the Bio Medical Waste Management Rules 2016, but MSPCB should ensure compliance of BMW Rules, 2016 by all the HCFs in the State

Rule 10 of the Bio Medical Waste Management Rules 2016 states that every occupier or operator handling bio-medical waste, irrespective of the quantity shall make an application in Form II to the prescribed authority *i.e.* State Pollution Control Board for grant of authorisation.

The status of authorisation of Healthcare Facilities in the State during the period 2017 to 2020⁶⁸ is given in **Chart 7.1**.

⁶⁸ Position up to 2020 since Annual Reports of MSPCB are available only up to 2019-20.



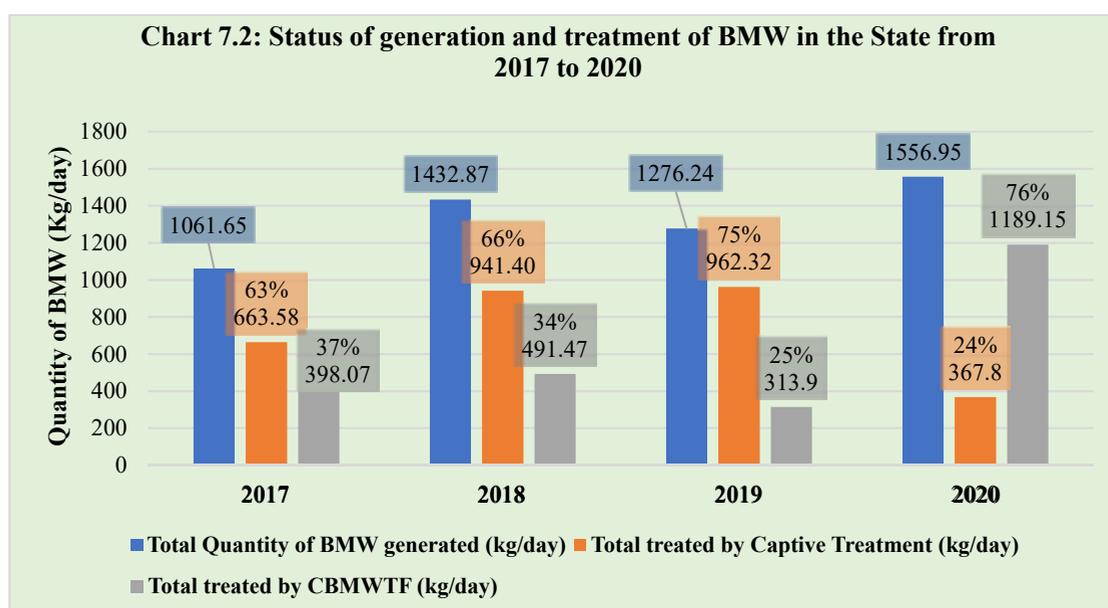
Source: CPCB Annual Reports of Bio Medical Waste.

Hence, it is evident from the **Chart 7.1** that the percentage of unauthorised HCFs were decreasing gradually from the year 2017 to 2020. However, MSPCB should ensure compliance of BMW Rules, 2016 by all the HCFs in the state.

7.2.2 Generation and treatment of Bio Medical Waste

Despite an increase in bio-medical waste (BMW) generation from 2017 to 2020, treatment by Common Biomedical Waste Treatment Facility (CBMWTF) surged from 37 per cent to 76 per cent, while captive treatment declined. However, scrutiny revealed operational issues with the sole CBMWTF in Shillong, casting doubt on the accuracy of reported data provided by MSPCB to CPCB.

The status of generation and treatment of BMW in the State during the period 2017 to 2020 as per the annual reports of CPCB is given in **Chart 7.2**.



Source: CPCB Annual Reports of Bio Medical Waste.

It can be seen from the chart above that there was an increase in the generation of BMW from 2017 to 2020. Also, the treatment of BMW by CBMWTF increased from 37 per cent to 76 per cent while the captive treatment was shown to have decreased by 63 per cent to 24 per cent. Further, during the year 2019 and 2020, an amount of 313.9 kg/day (25 per cent) and 367.8 kg/day (24 per cent) was shown to be treated by CBMWTF. Scrutiny of records, however revealed that from August 2018 to March 2021, the only CBMWTF in Shillong was not operational as pointed out in **Para 7.2.4**. Hence, MSPCB provided the unverified information to CPCB resulting in compilation of incorrect reports which raised questions about the reliability of data maintained by MSPCB.

7.2.3 Disposal of Bio Medical Waste

Except for Shillong Municipal Board, the test-checked ULBs and Town Committees in Meghalaya lacked Common Bio-Medical Waste Treatment and Disposal Facilities (CBMWTF) as required by BMW Rules, 2016 resulting in improper disposal practices that pose risks to public health and environmental contamination.

As per Schedule III (7) to BMW Rules, 2016, ULBs shall (a) provide or allocate suitable land for development of CBMWTF in their respective jurisdictions as per the guidelines of CPCB. During 2017-22, it was seen that none of the test checked ULBs/Town Committee except Shillong Municipal Board had a CBMWTF. In Tura, it was stated (October 2022) that the BMW was either disposed in the deep burials available in Rongkhon Songittal, the dumpsite of Tura or in the deep burials of the respective hospitals. In Jowai and Nongpoh, BMW was disposed by the hospitals concerned and were not collected by the JMB and Nongpoh Town Committee. During JPV of Rongkhon Songittal, the dumping site of Tura Municipal Board, it was noticed that BMW such as syringes, ampoules, etc. were openly dumped as shown in **exhibit 7.1**.



Exhibit 7.1: Openly dumped BMW in Tura

Improper disposal of BMW would not only affect public health but also lead to contamination of the surrounding environment.

7.2.4 Status of CBMWF in Shillong

Non-functioning incinerator of CBMWTF Shillong attracted imposition of Environmental Compensation of ₹ 0.82 crore on Shillong Municipal Board by the CPCB.

During audit, it was seen that the CPCB had conducted an inspection of the CBMWTF at Marten, Shillong on 4 December 2018 and found the following observation:

- a. Unit did not have a valid authorisation under BMW Rules, 2016;
- b. Separate space for treated and untreated BMW was not provided;
- c. Incinerator was not in operation since August 2018 and BMW was being openly burned and dumped;
- d. No treatment equipment like autoclave/shredder was provided for treatment and disposal of red, blue and white category of waste, etc.

As a result of non-compliance of SMB to the Bio Medical Waste Rules 2016, the CPCB imposed a fine of ₹ 8.60 lakh as Environmental Compensation for period from 4 December 2018 to 27 February 2019⁶⁹. It further ordered that an amount of ₹ 10,000 per day of Environmental Compensation from 28 February 2019 till compliance to the provisions of the BMW Rules was payable by SMB.

Further scrutiny of records revealed that an agreement for setting up of the CBMWTDF at Shillong and Tura was signed (4 June 2020) by the Director, Urban Affairs Department and the supplier (M/S S.M Enterprise). The CBMWTDF at Shillong was made operational in March 2021 while the CBMWTDF at Tura was yet to be made operational till date of audit (October 2022).

Hence, because of non-compliance to the BMW Rules 2016, SMB was liable to pay the CPCB an amount of ₹ 81.70 lakh (₹ 8.60 lakh + 731 days X ₹ 10,000) as Environmental Compensation.

During the Exit Conference (May 2023), the Department stated that the Environmental Compensation was not paid by the Shillong Municipal Board, and it has also not been insisted by MSPCB. It was stated that the new CBMWTDF was functioning in Marten since March 2021.

7.3 E-Waste

Ministry of Environment Forest and Climate Change (MoEFCC), Government of India notified (March 2016) the E-Waste (Management) Rules, 2016 (EWM Rules, 2016) which came into effect from 1 October 2016. These rules are applicable to every producer, consumer or bulk consumer, collection centre, dismantler and recycler of e-waste involved in the manufacture, sale, purchase and processing of electrical and electronic equipment or components specified in Schedule-I of these Rules.

7.3.1 Producer Responsibility Organisation registered with MSPCB

In Meghalaya, there are three registered Producer Responsibility Organisations (PROs) based in Shillong responsible for collecting e-waste, but there was a lack of dedicated collection vehicles, insufficient storage facilities for categorisation, and lack of awareness, hindering effective implementation of e-waste management as per E-Waste Rules, 2016.

⁶⁹ at the rate of ₹10,000 per day since day of inspection.

‘Producer Responsibility Organisation’ (PRO) means a professional organisation authorised or financed collectively or individually by producers, which can take the responsibility for collection and channelisation of e-waste generated from the ‘end-of-life’ of their products to ensure environmentally sound management of such e-waste. There are only three registered PROs in Meghalaya and all of them are based in Shillong. Thus, other urban areas of the State were yet to be covered by the PROs for collection of e-waste. The names of the registered PRO/ collection centre on behalf of a registered PRO are (i) M/s Karo Sambhav (ii) M/s RLG Reverse Logistics India Pvt. Ltd. and (iii) M/s J.S Enterprise (authorised collector on behalf of PRO Hulladek Recycling). A JPV of the PROs was conducted (January 2023) and the following observations were noticed:

- None of the PROs had their own collection and transportation vehicle and they were hiring vehicles at the time of collection. It was thus difficult to collect and transport various categories of e-waste as envisaged in Schedule-I of the E-Waste Rules, 2016.
- The storage space of all the PROs did not have any partition or separate space to store separate various categories of e-waste as envisaged in Schedule-I of the E-waste Rules, 2016.
- M/s RLG Reverse Logistics India and M/s J.S Enterprise informed that unwillingness by general public as well as organisations to deposit e-waste through authorised collection centres and general lack of awareness was one of the biggest challenges faced by the collection centre.



Exhibit 7.2: Unorganised Storage of e-waste at M/s Karo Sambhav

Exhibit 7.3: Storage section of e-waste at M/s RLG Reverse Logistics India

Exhibit 7.4: Storage section of e-waste at M/s J.S Enterprise

7.3.2 Inventory of e-waste in the state of Meghalaya

The Meghalaya State Pollution Control Board (MSPCB) has failed to maintain an inventory of e-waste generation as required by E-Waste (Management) Rules 2016, leading to a lack of comprehensive data for comparison with e-waste collection by Producer Responsibility Organisations.

As per the annual report submitted by the MSPCB to CPCB from 2017-18 to 2020-21, the status of e-waste collection is detailed in **Table 7.1**.

Table 7.1: Status of e-waste collection in the State of Meghalaya

FY	Collection centres	Name	Qty of e-waste collected (Kg)
2017-18	1 collection centre	M/s Karo Sambhav	1,500
2018-19	2 collection centres	M/s Karo Sambhav & M/s RLG	840
2019-20	3 collection centres	M/s Karo Sambhav, M/s RLG & M/s Kenny D Kharkongor (scrap dealer)	4,714.34
2020-21	3 collection centres	M/s Karo Sambhav, M/s RLG & M/s Fabshop Technology	6,175.09

Source: Information furnished by MSPCB.

As per Schedule-IV of E-Waste (Management) Rules 2016, it is the duty of State Pollution Control Boards to prepare and maintain an inventory of e-waste. Though MSPCB was maintaining a list of bulk generators in the State, it did not make any inventory of e-waste generation by these bulk consumers. As a result, audit could not compare the e-waste generation and collection done by the PROs. Secondly, it was noticed that various central and State Government department offices and financial institutions like office of the Principal Accountant General (Audit) and (Accounts & Entitlement), Fisheries Department and Reserve Bank of India; educational institutions like Shillong Law College, Institute of Hotel Management; and defence establishments like the Director General, Assam Rifles were not included in the list of bulk generators of e-waste prepared by MSPCB (the names provided here are illustrative and not exhaustive). Further, the list was not updated periodically to incorporate all kinds of bulk generators. As such, a comprehensive inventory of e-waste generation was yet to be prepared by MSPCB.

The Member Secretary, MSPCB stated that the task of preparation of inventory of e-waste generation had been outsourced to the Indian Institute of Waste Management, Bengaluru but the report was yet to be finalised. The reply is not tenable as the MSPCB has failed to comply with the provisions of the E-Waste (Management) Rules, 2016 even after a lapse of seven years from the date of notification of the rules.

7.3.3 Disposal of E-Waste mixed with Municipal Solid Waste

E-Waste found to be mixed with Municipal Solid Waste in Tura solid waste disposal site in contradiction to the E-Waste (Management) Rules, 2016.

As per Schedule-IV of the E-Waste (Management) Rules 2016, it was the duty of ULBs to ensure that e-waste if found to be mixed with Municipal Solid Waste is properly segregated, collected and is channelised to authorised dismantler or recycler.

However, during JPV conducted in Tura Municipal Board (TMB), e-waste *i.e.*, printer cartridges, *etc.* were seen lying without required care within the premises of the dumpsite.



Exhibit 7.5: e-waste disposed openly in TMB dumpsite

7.4 Plastic Waste

MoEFCC notified (February 2011) the Plastic Waste (Management and Handling) Rules, 2011 (PW Rules, 2011). It was replaced by the Plastic Waste Management Rules, 2016 (PWM Rules, 2016) notified (18 March 2016) by Government of India. These rules shall apply to every waste generator, local body, manufacturer, importers and producer.

As per Section 7.4.3 of MSWM Manual 2016, reuse and recycling of plastic waste are the preferred methods for managing plastic wastes after reduction. However, as mentioned, plastics cannot be recycled indefinitely; each recycling cycle reduces the strength and utility of the plastic.

7.4.1 Status of submission of Annual Return of Plastic Waste

The plastic waste management reporting by ULBs has been inconsistent as evidenced by incomplete and delayed annual reports, discrepancies between submitted data and CPCB estimates, and the lack of MSPCB's effective oversight and guidance to ensure accurate reporting.

As per Rule 17 (2) of Plastic Waste Management Rules 2016, every local body shall prepare and submit an annual report in Form-V to the concerned Secretary-in-charge of the Urban Development Department under intimation to the concerned State Pollution Control Board or Pollution Control Committee by the 30th of June, every year. However, the status of Plastic Waste Management in Meghalaya as per records submitted by MSPCB is detailed in **Table 7.2**.

Table 7.2: Compilation of Annual Report submitted to the MSPCB from 2017-22

Sl. No.	Name of the Local Body	PW generated in (in TPA ⁷⁰)				
		2017-18	2018-19	2019-20	2020-21	2021-22
1	Shillong Municipal Board	6.276	Not submitted	Not submitted	Not submitted	Not submitted
2	Jowai Municipal Board	2.8	1260	5040	Not submitted	Not submitted
3	Tura Municipal Board	2.78	Not submitted	Not submitted	Not submitted	488.4
4	Shillong Cantonment Board	2.12	Not submitted	Not submitted	Not submitted	Not submitted
5	Baghmara Municipal Board	0.4	Not submitted	Not submitted	Not submitted	Not submitted
6	Resubelpara Municipal Board	0.32	Not submitted	Not submitted	0.516	Not submitted
7	Williamnagar Municipal Board	0.4	3	3	3	Not submitted

From the Table above it could be seen that, during five years (2017-22) none of the Local bodies had submitted Annual Report for all the years. Shillong Municipal Board, Shillong Cantonment Board and Baghmara Municipal Board has submitted only one

⁷⁰ Tons per Annum.

Annual Report in respect of 2017-18, thereafter no Report was furnished. Other local bodies had submitted ranged from two (Jowai Municipal Board) to four (Williamnagar Municipal Board).

During the Exit Conference (May 2023), the Member Secretary, MSPCB stated that directions are being issued regularly to submit their replies in time.

As per the CPCB Annual Report 2019-20 on implementation of PWM Rules 2016, the per capita plastic waste generation was approx. 2500 grams/year. On that basis, the plastic waste generation in the seven ULBs of Meghalaya are given in **Table 7.3**.

Table 7.3: Quantum of plastic waste generation per annum

Sl. No.	Name of the Local Body	Population as per 2011 census	Quantum of plastic waste generated per annum ⁷¹ (Tons)
1	Shillong Municipal Board	143,229	358
2	Jowai Municipal Board	28,430	71
3	Tura Municipal Board	74,858	187
4	Shillong Cantonment Board	11,930	30
5	Baghmara Municipal Board	13,131	33
6	Resubelpara Municipal Board	19,595	49
7	Williamnagar Municipal Board	24,597	61

Thus, it could be seen from the above that the reports submitted by the ULBs were not consistent with the data generated by CPCB and most of the ULBs did not even submit their reports on time. There was nothing on record to indicate that the MSPCB had taken any action to ensure submission of reports by ULBs nor did they provide necessary guidance to the ULBs to rectify/submit accurate information. In fact, MSPCB had merely forwarded the reports to CPCB without any scrutiny.

7.4.2 Setting up of infrastructure for plastic waste management

The selected ULBs and Town Committees in Meghalaya have not taken effective action to establish infrastructure for plastic waste management or provide accurate information on plastic waste, revealing a lack of commitment from both the local authorities and higher administrative bodies, while on-site observations demonstrate mixed disposal with MSW, limited segregation efforts, and challenges related to recycling capacity.

As per Rule 6 (1) of the PWM Rules 2016, every local body shall be responsible for development and setting up of infrastructure for the management of plastic waste. Moreover, as per Form-V of PWM Rules 2016, the ULBs should submit the quantum of plastic waste generated, collected, reused, recycled or disposed in their respective jurisdictions. None of the selected ULBs/Town Committee were able to furnish information on the quantum of plastic waste collected, processed and disposed during 2017-22.

⁷¹ 0.0025 tonne X population.

During January 2017, the MSPCB directed the Deputy Commissioners of all the districts of Meghalaya “to ensure for development and setting up of infrastructure for segregation, collection, storage, transportation, processing and disposal of the plastic waste either on its own or by engaging agencies or producers”. No infrastructure was however created in Shillong or Jowai by the respective Deputy Commissioners.

In reply (December 2022), the Deputy Commissioner, Ri-Bhoi District stated that the matter was dealt with by the Nongpoh Town Committee. The reply is not tenable as the Nongpoh Town Committee had not undertaken any activity/programme with regard to setting up of infrastructure for plastic waste management. Reply from Deputy Commissioner, West Garo Hills District is yet to be received in this regard. This indicates the lackadaisical attitude of the ULBs, MSPCB as well as the Deputy Commissioners to tackle the growing problem of plastic waste.

During JPV the following were noticed:

- In Shillong region, plastic waste was mixed with MSW and efforts were seen to segregate them either manually or by using Compost Plant Machineries which was then sent to cement factories for use as RDF. Other recyclable portion of plastic waste was being sorted and transported by the recyclers that are operating inside Marten. As per SMB, they processed about 36 TPD of recyclables. Though SMB was unable to quantify the amount of plastic waste sent to the cement companies, scrutiny of records of MSPCB revealed that only 1.04 tonnes of plastic waste was processed during 2021-22 by cement company.
- In Jowai, no segregation was carried out and all the plastic waste was being disposed in dumpsites.
- In Tura, one group of workers was segregating and sorting plastic waste from MSW and they were processing one TPD of recyclables. The rest were being dumped in Ronkhon Songital dumpsite, Tura. The proprietor of the informal group informed that his capacity could be augmented if one plastic baling machine was made available to him.
- In Nongpoh, no segregation was carried out and all the plastic waste was dumped in the Umshangling dumpsite.



Exhibit 7.6: Plastic baling machine at Marten, Shillong



Exhibit 7.7: Informal Sector workers working on segregation at Tura

7.5 Conclusion

Health care institutions were functioning without authorisation and unauthorised disposal of biomedical waste and e-waste was observed in TMB. SMB was imposed a fine amounting to ₹ 0.82 crore as Environmental Compensation by the CPCB due to non-compliance to BMW Rules, 2016. The accuracy and reliability of data in the annual reports submitted with regards to BMW was not verified by MSPCB. Similarly, annual reports submitted by ULBs regarding plastic waste generation were found to be inconsistent with the data generated by CPCB. In addition, the list of bulk generators of e-waste maintained by MSPCB did not include various central and state offices and other institutions and an inventory of e-waste generation was not maintained. There are only three registered Producer Responsibility Organisation (PROs) for collection of e-waste in Meghalaya. Infrastructure for the efficient management of Plastic waste and C&D waste was non-existent in all the test checked urban areas.

Recommendations:

- 12. The State Government should expedite preparation of State policy on C&D waste without any further delay.***
- 13. The MSPCB needs to ensure that all health care facilities obtain necessary authorisation for their functioning and adhere to the BMW Rules.***
- 14. The State Government must promote awareness and adherence to e-waste management regulations to ensure that e-wastes are exclusively channelled through authorised Producer Responsibility Organisations (PROs). Additionally, the MSPCB should maintain a database of bulk generators and an inventory of e-waste.***
- 15. Greater emphasis needs to be placed on proper disposal of e-waste to minimise the risk of toxic pollutants contaminating the soil, air, water bodies, etc. and sensitise the public at large about benefits of disassembling, repairing and recycling of e-waste.***
- 16. The MSPCB should analyse the data/information in the reports submitted by ULBs/other bodies before compiling and forwarding to CPCB since unreliable data is likely to result in incorrect/skewed action taken by the management. They should also ensure timely submission of reports vis-à-vis various waste management rules by repeated follow up.***