Policy Brief

City Cleaning and Work with Waste—The Labour Question

Mouleshri Vyas

Calcutta Research Group
2025

Published by:

Mahanirban Calcutta Research Group
IA-48, Sector-III, Ground Floor
Salt Lake City
Kolkata-700097
India
Web: http://www.mcrg.ac.in

Printed by:

Graphic Image
New Market, New Complex, West Block,
2nd floor, Room no.115, Kolkata-87

This publication is brought out with the support of FGHR. It is part of the research programme of the Calcutta Research Group on "Justice, Security, and Vulnerable Populations of South Asia."

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Managing solid waste across Indian cities is a major task. It is the responsibility of Urban Local Bodies (ULBs). So far it has largely been viewed and dealt with as an urban issue. However, urbanisation and consumption patterns and lifestyles across the country are undergoing a change, and solid waste is generated in peri-urban and rural areas as well. This means that the scale of waste collection, and how the work is organised and carried out are both important in the management and governance of cities and their regions; in both these respects, solid waste management in India has undergone many changes in the past two decades. It is obvious that the changes would have important fallouts for labour engaged in the range of tasks for city cleaning. This paper examines issues of labour engaged in waste management work in a policy context with Municipal Solid Waste Management Rules[2] (providing the framework for ULBs to carry out this work), and the four Labour Codes (recently re-formulated labour laws) that determine the rights and entitlements of labour. There is a clear need to strengthen access of informal labour to better work and working conditions and Decent Work conditions as spelt out by the International Labour Organisation in 1999. The paper outlines the way forward based on analysis of research, policy and practice.

Solid Waste is defined to include all types of solid and semi-solid waste that is generated across residential, commercial, industrial, institutional areas, and streets, drains, etc. generated in areas under local authorities[3]. A report (CPCB, 2021-22) states that the total quantity of solid waste generated in the country is 1,70,339 tonnes per day (TPD) and the total waste collected is 1,56,449 TPD, making for 92% of overall efficiency in waste collection in the country[4]. To give an idea of the scale and quantum of waste generated, the city of Mumbai with a population of more than 12 million, generates about 9000 tonnes of solid waste per day (Municipal Corporation of Greater Mumbai), while Ranchi with a population of 10,73,427 (Census, 2011) generates 600-700 tons. There are 7935 towns/cities in India, the number having increased significantly between 2001 and 2011 (Census, 2011). With urbanisation, and increased consumption, cities are likely to generate increasing quantities of solid waste that needs to be segregated, collected, transported, processed, recycled, and therefore, managed.

City cleaning requires large numbers of workers, depending on the scale of cleaning work which is determined by the area and population. Hundreds and thousands of workers are engaged with a range of tasks, and are part of the formal as well as informal economy in the city. Since solid waste management is a key responsibility of the ULBs, all tasks come within their purview and are undertaken directly through their employees, or through private organisations—such as contractors or non-governmental

[1] Mouleshri Vyas, Ph.D., is Professor, School of Social Work, in the Centre for Community Organisation and Development Practice at Tata Institute of Social Sciences, Mumbai. She is a member of Mahanirban Calcutta Research Group.
[2] Brought in under the Environment (Protection) Act, 1986.
[3]According to the MSW Rules 2016, "solid waste" means and includes solid or semi-solid domestic waste, sanitary waste, commercial waste, institutional waste, catering and market waste and other non-residential wastes, street sweepings, silt removed or collected from the surface drains, horticulture waste, agriculture and dairy waste, treated bio-medical waste excluding industrial waste, bio-medical waste and e-waste, battery waste, radio-active waste generated in the area under the local authorities and other entities mentioned in rule 2 (https://cpcb.nic.in/uploads/MSW/SWM_2016.pdf)
[4] https://cpcb.nic.in/uploads/MSW/MSW_AnnualReport_2021-22.pdf

organisations (NGOs). Mumbai city, for instance has a workforce of more than 30,000 workers, in solid waste management tasks, and includes workers on contract (Darokar, 2018). In addition, self-employed waste pickers who move around the cities to collect and segregate waste materials, contribute significantly to the waste value chain and recycling industry. Contractual labour hired by contractors/NGOs, and waste pickers are part of the informal economy and confront varying extents of insecurity and lack of social protection. Under the umbrella term of City Cleaning, this paper includes both these segments of labour, which may not be counted in formal data bases of ULBs.

This brief comprises three sections. The first outlines the landscape of labour in city cleaning; the second provides an overview of the MSW Rules, discusses the provisions for these sections of workers in the labour codes, and key concerns for labour. The third section outlines the way forward for government and civil society organisations working for rights and welfare of the labour.

1. City Cleaning—work and workers

City cleaning entails several jobs in all cities. The scale of the work, and number of workers would vary depending on the size of the city and its population, but irrespective of these factors, the following are the types of tasks undertaken on a daily/regular basis:

- Door-to-door collection of waste
- Collection and transportation to refuse stations/landfills or dumping grounds
- Driving of refuse vehicles
- Street sweeping
- Waste picking and segregation
- Cleaning of public toilets
- Cleaning of community toilets
- Cleaning of open drains and gutters
- Cleaning of sewers/ manholes

Workers who perform these tasks could be in various **types of employment**: *permanent* (employed by the ULB), *contractual* (employed by private contractors/firms/NGOs who have the contracts from the ULB), *casual* (employed on daily wages by the ULB/contractor when a regular worker is absent, or by individual workers who are unable to perform the task), or *part of a government scheme* and responsible for cleaning work at the neighbourhood level (such as with the Slum Adoption Scheme in Maharashtra).

There is a hierarchy in wages and working conditions in this sector, with caste and gender determining the **profile of workers**. Given the nature of these jobs, and the structural reality of caste and occupation in India, and stigma attached to such work, more than 90 percent of the labour belongs to marginalised castes. Women are found in contractual employment in street sweeping, and self-employment in waste

picking[5], and neighbourhood cleaning jobs. These jobs and work are marked by insecurity, unless the workers are collectivised. In cities where waste pickers are organised, their collectives manage to negotiate and obtain contracts for waste collection and transportation[6]. The standard wage employment of solid waste door-to door collection and transportation, and driving of refuse vehicles is male dominated. For women workers the precarity increases as they may not be paid equal wages for the same work, and the absence of basic amenities such as water and sanitation makes their working conditions very tenuous.

City cleaning work typically takes place in public places and is in the public gaze. All workers—whether collecting and transporting waste (on the municipal vehicles or contractor-owned vehicles), or sweeping the streets, or collecting solid waste from residential/commercial/industrial areas, are seen handling waste. They are often shunned and not allowed entry into public transport and eating places when they have to work in their everyday clothes due to not being given uniforms and protective gear. Provisioning of uniforms by the employer/contractor and of protective gear such as boots, raincoats, and implements for cleaning and handling waste, is essential to protect the workers from injury and health hazards. These are caused by handling waste, long and arduous hours of difficult work, and inadequate access to timely and affordable healthcare. Contractual and other informal workers do not necessarily receive stipulated minimum wages or other social security benefits such as paid leave, insurance, Provident Fund, gratuity, and so on unless they are aware about entitlements, and able to negotiate for them, which they have attempted to do in some cities with a measure of success[7]. However, casual, and self-employed workers are among the most precarious in these respects, as they do not have an employer, and cannot begin to negotiate till they are organised.

Research on city cleaning workers details the work, working conditions, and precarious nature of their everyday lives. The social exclusion experienced by families engaged in these jobs has inter-generational and communal impacts and makes it a challenge for them to come out of the milieu (Vyas and Jha, 2021; Darokar, 2018; Vyas, 2014; Choudhary, 2003; Vivek, 2000). In this scenario, broader questions of social justice, rights, and dignity of labour remain central in the discourse on work with waste. The extent to which they are addressed in policy and practice, and what more needs to be done to better the nature of work, and conditions of labour, are important aspects to examine.

2. Policies, laws, and key implications for labour

SWM has been governed by several laws, policies, and schemes, as well as institutions such as the National Commission for Safai Karamcharis. Civil society organisations play a key role in working to address issues that labour faces, and in advocacy with authorities at various levels, towards ensuring social justice, rights and dignity for workers in the sector, for which the context is set by certain policies and laws.

[5] A person or groups of persons informally engaged in collection and recovery of reusable and recyclable solid waste from the streets and bins as well as from material recovery facilities, processing and waste-disposal facilities – for sale to recyclers directly or through intermediaries to earn their livelihood (Solid Waste Management Rules, 2016)

[6] Such as in Pune, where SWaCH takes on contracts for collection and transportation through collectives of women waste pickers.

[7] Kachra Vahatuk Shramik Sangh in Mumbai, a trade union of contractual workers has succeeded in advocacy for social security measures to be implemented for contractual workers, and in gaining permanency for sections of its members in the municipal corporation.

MSW Rules

Following the Supreme Court judgement in the case of Almitra Patel v Union of India, Solid Waste Management came into focus, and a committee was set up to study SWM in Class I cities in India (1998-1999). The Municipal Solid Waste (Management and Handling) Rules, 2000 that were then formulated articulated a perspective of the state, and provided the guidelines for ULBs to manage waste in the cities, while streamlining their functioning.

These Municipal Solid Waste Rules have been brought in at three points of time, in the years 2000, 2016, and then in 2026 (to be followed from 1 April, 2026), with each one superseding the previous. The overview of their provisions in Table 1 highlights the policy thrust and direction of SWM and of city cleaning.

Table 1: Municipal Solid Waste Rules - Highlights

Rules	Number of terms defined	New provisions	Implications for labour
Municipal Solid Wastes (Management and Handling) Rules, 2000	**26**	• Provision for: drinking water (preferably bathing facilities for workers) and lighting arrangements at landfills • Safety provisions including health inspections of workers at landfill site • ULBs could bring in private organisations into city cleaning work - [Schedule IV (2)] • Door-to-door collection of waste - [Form II. 2. iii]	• Removal of roadside bins from where the municipal vehicles collected it for transportation to the landfill • Source of waste and livelihoods for waste pickers (largely women workers) cut off.

Rules	Number of terms defined	New provisions	Implications for labour
Solid Waste Management Rules, 2016	**58**	• Key terms added in Definitions: - contractor - door to door collection - handling - informal waste collector - materials recovery facility - operator of a facility - primary collection - redevelopment - street vendor - transfer station - transportation - user fee - waste hierarchy - waste picker • Proposed starting a scheme on registration of waste pickers and waste dealers • Laid out duties and responsibilities of local authorities and village Panchayats of census towns and urban agglomerations - including facilitating formation of Self-Help Groups, prescribing appropriate user fee, and planning collection • Local authorities - training on solid waste management to waste-pickers and waste collectors; involve communities in waste management; educate workers including contract workers and supervisors for door to door collection of segregated waste etc., ensure that the operator of a facility provides personal protection equipment including uniform, fluorescent jacket, hand gloves, raincoats, appropriate foot wear and masks to all workers handling solid waste and the same are used by the workforce	• Contract system is accepted and established in SWM • Expansion of systems and facilities for waste handling • Collection of user fees would place the private entity in direct interface with citizens • Provision for inclusion and integration of waste pickers in SWM policy and strategy at state levels • Formalising entry of Self Help Groups and communities in SWM • Ensuring provisioning of protective gear to workers

Rules	Number of terms defined	New provisions	Implications for labour
Solid Waste Management Rules, 2026	**70**	• Broadened the application of the Rules to all ULBs as well as rural local body, including all entities within their jurisdictions whether being controlled and managed by the government; private sector or in Public Private Partnership and so on • Integration of waste pickers involved in solid waste management • Encourage Public-Private Partnership mode models for solid waste management • Duties of ULBs include: creating public awareness through information, education and communication campaign and educate the waste generators on payment of user fees • Mentioned [Form IV. 36.] Human resource including waste pickers in informal sector a. Collection b. Street sweeping c. Transportation d. Segregation e. Processing f. disposal	• Bringing waste pickers into the fold of SWM • PPP models for SWM could increase insecure jobs in the sector • Collection of user fees -not a simple task for informal workers and their organisations • Informality prevalent in all work in city cleaning - waste collection, transportation, street sweeping, segregation, processing and disposal of waste

(Source: Author compilation)

As pointed out in the above table, the increase in number of terms defined in the Rules over the years, points to addition of newer aspects in SWM, and clarifies the approach and guidelines for local authorities to deal with newer stakeholders such as contractors, waste pickers, self-help groups etc. In effect, the planning of work and systems have become more detailed, with recognition to earlier unacknowledged work and contributions of particular sections of workers. As stakeholders in this sector have increased, so have the complexity and channels of communication and accountability (for instance, between ULBs and other agencies; between workers, their contractors, and the ULB). Although labour unions have vociferously contested this shift, it is evident that private entities are here to stay, and this work of ULBs that is perennial in nature is now organised with private contractors and Public-Private Partnerships[8]. In fact, over the past two decades, informality has increased in SWM, with more self-employed and contractual workers engaged in various tasks. In the meantime, the restructuring of labour laws appears to have bypassed substantive concerns of contract labour and other informal workers in city cleaning.

Labour Codes

The recent consolidation of the multiple labour laws and rules into four codes, the Codes on Wages (2019), Social Security (2020), Industrial Relations (2020), and Occupational Safety and Health (2020),

[8] As per the Contract Labour (Abolition and Regulation) Act, 1970, work that was perennial in nature could not be given out on contract.

was meant to bring order and a unified framework, to rationalise definitions, and set the stage for technology-driven governance. However, the biggest problem is that the labour law regime is still confined to protecting workers in the organised sector, and labour unions, researchers and civil society organisations have voiced their dissatisfaction with these changes (Sharma and Mehrotra, 2025). It is not within the scope of this paper to undertake a detailed analysis of the labour codes. But, given the concerns of casual and contractual workers in waste collection and transportation, and self-employed women waste pickers, who are among the precarious segments, it would be important to examine whether the mechanisms to address them are provided in the new regime, and what it would take for these to work in the interest of labour.

Table 2: Labour codes: Impact of major changes on workers and employers

Labour Code	Major Changes	Impact on Workers	Impact on Employers
Code on Wages, 2019	National Floor Wage introduced	Sets absolute minimum wage but may be lower than state-set wages	Simplifies wage compliance but increases base salary obligations
	Reduction in multiple wage definitions	Easier for workers to understand wages	Reduces complexity in wage calculation
	Inspector-cum-Facilitator introduced	May not lead to better compliance without more labour inspectors	Allows employers to rectify violations before prosecution
Code on Social Security, 2020	Fixed-term employment introduced	Fewer permanent jobs, leading to job insecurity but parity with permanent workers	Flexibility to hire and fire but requires ESI & PF contributions
	Gig & platform workers included	Expands worker coverage	Additional compliance burden
	Unorganized workers Board	All unorganised workers to be registered; follow-up action unclear	Lead to formalization and contractualization
	Gratuity for fixed-term workers	Benefits short-term workers	Increases financial liability for employers
OSHWC Code, 2020	Factory coverage limit raised (10 to 20 workers)	Excludes small factory workers from safety laws; unorg sector was already excluded	Reduces regulatory burden on small units
	No surprise inspections	Weakens enforcement of safety norms	Employers receive prior notice, reducing compliance stress
	Primary responsibility for welfare shifted from contractor to employer	Stronger protection for contract workers	Increased responsibility for principal employers
Industrial Relations Code, 2020	60-day notice for strikes	Makes striking legally difficult, weakening worker rights	Provides time to prepare for strikes
	Retrenchment limit raised from 100 to 300 workers	Easier layoffs, reduces bargaining power of workers	More flexibility in workforce management
	Sole negotiating union (51% rule)	Limits smaller unions' influence	Employers have clearer negotiation process

(Source: Sharma and Mehrotra, 2025)

In Table 2, the boxes coloured green are visible impacts that the codes have on contractual workers[9].

[9] One of the key clauses is as earlier under the Contract Labour (Regulation and Abolition) Act: It states that if a question arises about whether any activity is a core activity of an establishment and therefore cannot be given on contract, it can be taken up through an application made to designated officials; a grievance redressal mechanism for contract labour is also detailed.

For salaried employees such as the waste collection and transportation workers, the Principal Employer and/or contractor need to ensure Decent Work conditions, and they would need to be held accountable for this; as contractualisation in this sector is increasing, there is need for overseeing and ensuring compliance in regard to entitlements. In alignment with what was the legally mandated as equal pay for equal work, the code stipulates wages and working conditions should be the same when the same or similar kind of work is performed, and the details of mode of payment, time of the month etc., are specified; non-payment of wages is to be looked into by Labour Officers; social security for contract workers (EPFO, ESIC) is to be provided, and the contractor is supposed to keep the authorities informed electronically about any change in the number of workers or their working conditions. Further, of great importance are the provisions for employment of women under the OSHWC Code[10] that in effect would apply to organised workplaces, and fail to consider the need for safe, secure and healthy working conditions for women engaged in work such as street sweeping, and waste collection (Niyazi, 2022). Streets as workplaces, and as urban commons, are fraught with uncertainty, and lack water, sanitation, and resting places that women workers need. But women workers have to fend for themselves, and count on vendors, shopkeepers, and small-shop owners for drinking water and washrooms that they can use. Self-employed women lack protection from sexual harassment at the workplace, which women employed by the ULBs - whether permanent or contractual - would have[11].

Ground realities demonstrate that laws and policies for marginalised sections effectively reach their target constituencies only with active intervention of intermediaries i.e. individuals and organisations that work in their interest. Labour collectives therefore have a key role to play in this respect.

3. The way forward

As implementation of labour codes kicks in, and the discourse on the efficacy of the present policy and legal framework for those working with waste continues, certain concerns for contractual labour and the self-employed in this sector would remain. Salaried workers may still *need to demand* that their wages be paid in full, and on time, and through cheques/bank accounts; social security measures and entitlements such as protective gear, paid leave, insurance, and so on, need to be provided, and very importantly, that the ULBs play their role of Principal Employer rather than passing on the entire responsibility to the contractors. Waste pickers across the country would still need to deal with extortion, police harassment, fight injustice, and challenge stereotypes while struggling for adequate earnings by contributing to the waste value chain on a daily basis (Chikarmane and Narayan, n.d.).
In cities and city areas where workers do not have scope to communicate with each other, the struggles for rights and building a common cause could begin with acknowledging that what they do is 'work' and that it contributes to the city, having information about entitlements, and the fact that there are others working in similar conditions. These cannot be ad hoc interventions, but need sustained communication and organising of labour.

In addition to the specific issues of precarious labour in this sector, is the absence of an overarching coherent strategy for waste management and cleaning work across the country. This multi-stakeholder

[10] See 73. Employment of Women in establishment under Section 43
[11] OSHWC Code, 2020: 73. h. the provisions of the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 (14 of 2013), as applicable to the establishments, shall be complied with.

context appears compartmentalised with fragmented interests and conflicting priorities of the ULBs, labour and their organisations, climate and environmental activists, citizen groups, and others. What is needed is the political will to ensure rights of workers and their wellbeing over the profiteering that prevails in some of these contexts.

The following are suggestions for government departments and agencies that could lay the ground for overall strengthening of SWM, across the country:

- **Enumeration** of number of workers in various jobs/tasks of waste management and cleaning, and review of the implications of different definitions, terminology.
- **Support to Civil Society Organisations** to create awareness about the Labour Codes; this could be done together with officials of Labour Departments in the states, so that Labour Officers, who are very small in number, are supported in this task.
- **Undertake Social Audit** of schemes for labour in the waste value chain and cleaning work, and of implementation of labour codes to assess whether these are reaching the workers. Social Audits could be undertaken through the Social Audit Unit (SAU) in each state. These SAUs have the knowledge, experience, and trained personnel to carry out these audits.
- **Labour departments in the states could have MoUs with academic institutions** for research to assess the implementation of laws and schemes, and recommend measures to strengthen the same.
- **A national level multi-stakeholder consultation/series of regional consultations** at this juncture with a transforming solid waste management landscape, could enable policy makers to take stock of the range of issues in the sector, explore replication of successful models and ensure better implementation of the laws. Institutions like the National Commission for Safai Karamcharis could initiate such a process.

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