Comments on the BMC's Draft Municipal Solid Waste (Management and Handling), Cleanliness and Sanitation Bye-laws, 2025

Submissions to the Solid Waste Management Department, Municipal Corporation of Greater Mumbai

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The Municipal Corporation of Greater Mumbai ("**BMC**") published a draft of the Municipal Solid Waste (Management and Handling), Cleanliness and Sanitation, Bye-laws (**"Draft Bye-laws"**) in February 2025 and invited comments from the public. Separately, the BMC also organised a consultation on the Draft Bye-laws on 7th May 2025, which was attended by several civil society organisations, experts in solid waste management (**"SWM"**), private sector agencies engaged in SWM and academics. The Vidhi Centre for Legal Policy ("**Vidhi**") had also attended this consultation. Through this note, Vidhi is submitting written comments to the BMC on the Draft Bye-laws.

Please note that Vidhi's comments primarily address substantive legal issues and certain significant drafting concerns in the Draft Bye-laws. They are not intended to be an exhaustive review of the Draft Bye-laws. The comments provided by Vidhi are of two types: (A) General Legal and Drafting Comments on the Draft Bye-laws, and (B) Additional aspects that the Draft Bye-laws should provide for. For ease of reference, recommendations are in red text.

(A) General Legal and Drafting Comments

1. *The Draft Bye-laws are based on the Solid Waste Management Rules, 2016 ("**SWM Rules, 2016**"), but the Central Government has notified the Draft Solid Waste Management Rules, 2024 ("**Draft SWM Rules, 2024**"), which will come into force from 1st October 2025*

   The Draft Bye-laws are based on the SWM Rules, 2016.[1] For example, draft bye-law 11, Chapter VI on solid waste in the Draft Bye-laws, has been adopted from Rule 4 of the SWM Rules, 2016. The Draft SWM Rules 2024[2] have been notified by the Central Government in the Official Gazette for public comments in December 2024. They are to come into force on 1st October 2025.[3] There are substantial differences between the SWM Rules 2016 and the Draft SWM Rules 2024. Moreover, the Draft SWM Rules 2024 have not yet been finalised, and extensive comments from various stakeholders on these rules can be found in the public domain as well.

   Presuming that the Central Government will notify the final Draft SWM Rules, 2024, after taking into consideration and incorporating the stakeholder comments, the BMC would have to amend its bye-laws again so as to ensure that they are in line with the Central rules. Therefore, we recommend that, to the extent possible, the BMC may consider aligning the Draft Bye-laws with the Draft SWM Rules, 2024.

2. *The Draft Bye-laws contain provisions related to biomedical waste, construction & demolition waste, plastic waste and e-waste.*

   The Draft Bye-laws are titled '*Municipal Solid Waste (Management & Handling) Cleanliness and Sanitation Bye-laws*', but they contain chapters on various other categories of waste such as biomedical waste, construction and demolition waste, e-waste, plastic waste, etc. The

[1] Solid Waste Management Rules, 2016 <https://cpcb.nic.in/uploads/MSW/SWM_2016.pdf>
[2] Draft Solid Waste Management Rules, 2024 <https://cdn.cseindia.org/attachments/0.43997600_1737200894_draft-solid-waste-management-rules,-2024.pdf>
[3] Rule 1(2), Draft Solid Waste Management Rules, 2024

BMC's intention to create more comprehensive bye-laws covering all aspects of waste management is commendable. However, from a policy perspective, the BMC should ideally notify separate bye-laws or guidelines for the different categories of waste, which, even under the Central legal framework, is regulated by way of separate rules. The definition of 'solid waste' in the draft SWM 2024 Rules excludes liquid waste, bio-medical waste, e-waste, battery waste, and radioactive waste. A similar definition is also present under the SWM Rules, 2016. Our suggestions with respect to the different categories of waste are as follows:

a. Provisions regarding E-Waste Management

The E-Waste Management Rules, 2016[4] have been superseded by the E-Waste (Management) Rules, 2022 ("**2022 E-Waste Rules**").[5] Chapter VI(III) in the Draft Bye-laws lays down definitions, duties and responsibilities according to the superseded central rules and not the 2022 E-Waste Rules.

Moreover, it is unclear why the definitions and duties of manufacturers, producers, recyclers and dismantlers are replicated under the Draft Bye-laws when they can simply be referred to from the central rules. The responsibilities of urban local bodies are specifically provided in the Schedule to the 2022 E-Waste Rules.[6] Should the BMC decide to regulate e-waste management through the Draft Bye-laws, provisions should be drafted with these responsibilities in mind, as delineated under the central legal framework.

b. Provisions regarding Construction and Demolition Waste Management

Chapter VI(IV) on construction and demolition waste is based largely on the Construction and Demolition Waste Management Rules, 2016 ("**2016 C&D Rules**").[7] In April 2025, the Central Government notified the Environment (Construction and Demolition) Waste Management Rules, 2025 ("**2025 C&D Rules**"), which will come into force from 1st April 2026.[8] The 2025 C&D Rules are significantly different from the 2016 C&D Rules and obligate the urban local bodies with a wide variety of duties and obligations. To the extent possible, the BMC may consider aligning the Draft Bye-laws with the 2025 C&D Rules.

Moreover, it is unclear why the Draft Bye-laws are merely replicating the duties from the central rules. In order to ensure that the Draft Bye-laws are more meaningful and

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[4] The E-Waste Management Rules, 2016 <https://jaipurmc.org/PDF/Auction_MM_RTI_Act_Etc_PDF/E-WASTE%20MANAGMENT%20RULES%202016.pdf>

[5] E-Waste (Management) Rules, 2022 <https://www.mppcb.mp.gov.in/proc/E-Waste-Management-Rules-2022-English.pdf>

[6] Entry 3, Schedule V, E-Waste (Management) Rules, 2022

[7] Construction and Demolition Waste Management Rules, 2016 <https://cpcb.nic.in/displaypdf.php?id=d2FzdGUvQyZEX3J1bGVzXzIwMTYucGRm>

[8] Environment (Construction and Demolition) Waste Management Rules, 2025<http://www.indiaenvironmentportal.org.in/files/file/Environment%20(Construction%20and%20Demolition)%20Waste%20Management%20Rules,%202025.pdf>

implementable, their provisions should elaborate upon and provide for matters that are not operationally covered under the central rules. Provisions of the Draft Bye-laws should be drafted keeping in mind the specific duties allocated to the urban local bodies under the central rules.

c. Provisions regarding Plastic Waste Management

Chapter XI of the Draft Bye-laws replicate a large number of provisions under the Plastic Waste Management Rules, 2016[9] (**"PWM Rules"**). This may not be needed. The Draft Bye-laws should contain provisions that would enable the enforcement of the central rules. The PWM Rules empower the local bodies to come up with their own bye-laws to implement the Rules.[10] The Ahmedabad Municipal Corporation has notified separate bye-laws to implement the Plastic Waste Management Rules which are extensive,[11] whereas the Bruhat Bengaluru Mahanagara Palike (**"BBMP"**) have included enforcement provisions in their SWM Bye-laws.[12] It is suggested that the BMC include enforcement provisions related to Plastic Waste Management within the Draft Bye-laws in line with the BBMP's SWM Bye-laws.

3. *The "Applicability and Scope" of the Draft Bye-laws can be made more comprehensive.*

The applicability and scope provision[13] states that the Draft Bye-laws *"shall apply to all persons within the geographical area vested in the BMC, including all generators of waste."* As such, it is clear that generators of waste will come under the ambit of the current Draft Bye-laws. However, confusion may arise if the waste is generated outside the BMC's jurisdiction but is transported and deposited in the BMC's jurisdiction. Therefore, the drafting of the applicability and scope provision can be made more comprehensive as follows:

Extent of application: - (1) These Bye-laws shall be applicable within the territorial jurisdiction of Municipal Corporation of Greater Mumbai established under the provisions of the Mumbai Municipal Corporations Act, 1888.

(2) These Bye-laws shall be applicable to any Solid Waste that is collected, transported, processed and disposed outside the jurisdiction of the Municipal Corporation of Greater Mumbai as long as such Solid Waste originated within the jurisdictional limits. Similarly, the Bye-laws shall be applicable to any waste originating from outside the Corporation's jurisdiction but being disposed within.

(3) These Bye-laws shall be read along with the bye-laws/ guidelines/ directions issued by the Corporation for management of Plastic Waste, Construction and Demolition Waste, Biomedical

[9] The Plastic Waste Management Rules, 2016 <https://drive.google.com/file/d/1EANa2aAUe1zKI-nuDAh6mfb6A03ERRkH/view?usp=sharing>
[10] Rule 6(4) of the Plastic Waste Management Rules, 2016
[11] Ahmedabad Plastic Waste Management Bye-laws, 2018 <https://ahmedabadcity.gov.in/Images/Plastic_Waste%20Mgmt_bye_laws_AMC.pdf>
[12] Bye-law 30(18), the BBMP SWM Bye-laws, 2019
[13] Draft Bye-law 2, Draft BMC SWM Byelaws, 2025

Waste and E-Waste, from time to time under respective Rules.

The above provision has been borrowed from the BBMP SWM Bye-laws, 2019[14] as it is more comprehensive.

4. *The various definitions under the Draft Bye Laws can be made more clear, precise and consistent.*

a. Each new chapter under the Draft Bye Laws deals with a different category of waste and replicates definitions from the central rules dealing with the respective category of waste. Additionally, draft bye-law 4 also contains some definitions. As a result, some terms have been defined twice and in a contradictory manner under the Draft Bye-laws. See, for example, the definition of "authorisation" under bye-law 4.6 and bye-law 13.1.1. Another example is the definition of "occupier", which is quite descriptive in draft bye-law 4.63, but is different in draft bye-law 13.1.7.

Typically, the provisions on definitions are always at the start of any legislation, rule, regulation or bye-law. This approach avoids any confusion in interpreting the legal instrument. The BMC should consider amending the Draft Bye-laws and adopting this approach.

b. Some definitions in draft bye-law 4 are unclear and could be drafted in a more precise manner to avoid confusion. As an example, we have referred to two definitions from the bye-laws below:

Illustration1: Draft bye-law 4.6 defines authorisation as *"authorisation" means the permission given by Competent Authority, as the case may be, to the operator of a facility or urban local authority, or any other agency responsible for processing and disposal of solid waste wherever applicable or the permission given by the urban local authority or agency responsible for solid waste. In accordance with Sub-rule 15 (y) of the Solid Waste Management Rules, 2016, every Local Authority need to obtain authorisation for processing / recycling / treatment and disposal of solid waste. Every Urban Local Authority should apply to BMC to obtain authorization.*

The term 'urban local authority' is undefined under the Draft Bye-laws but will typically include the BMC. Moreover, it is unclear which other urban local authority is operating in the jurisdiction of the BMC and would need authorisation from the BMC. Rule 15(y) of the SWM Rules, 2016, states that the authorisation is to be sought from the State Pollution Control Board or Pollution Control Board by the local authority. The above-mentioned definition is not in line with the provision under the SWM Rules, 2016, or the Draft SWM Rules, 2024.

Illustration 2: Draft bye-law 4.15 defines Bye-laws as "Bye-laws" means regulatory framework notified by State/urban local body, census town and notified area townships for facilitating the implementation of these bye-laws in their jurisdiction.

[14] Bye-law 2, BBMP SWM Bye-laws, 2019

Again, it is unclear how other urban local bodies will issue separate bye-laws for implementing the BMC's Draft Bye-laws. This definition appears to be borrowed from the SWM Rules, 2016, which states that a local body can issue bye-laws to implement the SWM Rules, 2016. In the current context, the Bye-laws do not need to be defined as it is clear that the bye-laws mean the Draft Bye laws of 2025. The definition is therefore both imprecise in the context of the bye-laws, as well as superfluous.

c. Some of the definitions in draft bye-law 4 are redundant and can be omitted since they could potentially cause confusion and increase the length of the document. For example, draft bye-laws 4.18 and 4.33 are similar concepts and two separate definitions are not required to explain the concept of door-to-door collection. Draft bye-law 4.34, which defines "door-to-door collection system is superfluous and not well defined, either. "Door-to-Door collection system" is a self-explanatory term when door-to-door collection has already been defined. Furthermore, "collection at source" is not used anywhere in the document beyond the definition.

Similarly, definitions in draft bye-law 4.47 and 4.105 of "informal waste collector" and "Waste-picker" respectively have been used interchangeably, or together in some of these bye-laws, but they convey the same meaning and the same persons. Generally, it is recommended that the definitions of Draft Bye-laws be re-examined entirely and redundant definitions in the Draft Bye-laws be removed. The definitions should also be clear and consistent throughout the document to avoid any confusion in interpretation.

5. *Contradictory provisions under the Draft Bye-laws should be resolved.*

The Draft Bye-laws contain some provisions that are repeated. These provisions, in addition to being repetitive, are also inconsistent with each other. For example, draft bye-law 9.11 provides that: *While organizing an event or* ***gathering of more than 50 persons at any unlicensed place or public place,*** *the organizers shall intimate the BMC at least three working days in advance. Further, they shall* ***undertake the segregation and collection of waste no later than 24 hours after the completion of the event and hand over such wastes to the BMC*** *by paying prescribed user charges to the BMC.*

However, draft bye-law 11.5 states that: *No person shall organize an event or* ***gathering of more than one hundred persons at any unlicensed place*** *without intimating the BMC, at least three working days in advance and such person or the organizer of such event s****hall ensure segregation of waste at source and handing over of segregated waste to waste collector or agency as specified by BMC.***

Such inconsistencies under the Draft Bye-laws will need to be addressed. A large number of provisions under draft bye-law 9 (Responsibilities and Duties of Generators) overlap with provisions of draft bye-law 11 (Management of Solid Wastes). It is recommended that the provisions of both these bye-laws be mapped and combined.

6. *Provisions related to grievance redressal must be revamped*

a. Create a separate grievance redressal mechanism and adjudication procedure:

Various types of complaints and appeals may arise under the Draft Bye-laws. These may include
I. General grievances regarding waste collection, insufficient garbage cans, etc.
II. Complaints regarding the violations of the Draft Bye-laws, which are punishable offences; and
III. Complaints against actions taken or penalties levied by relevant ward staff under the Draft Bye-laws.

Currently, all of the above are dealt with under draft bye-law 23 on grievance redressal. It is recommended that the first two types of complaints (I and II) be addressed through a general grievance redressal system. An appellate structure should be created for appeals from actions taken by relevant authorities or penalties levied, and a nodal officer should be designated to hear such cases.

A clear demarcation of the two will lead to lesser ambiguity amongst citizens and BMC staff, more effective resolution mechanisms and, in turn, better implementation of the Draft Bye-laws.

b. Design a more practical and accessible grievance redressal mechanism:

Draft bye-law 23.1 states that any person aggrieved or affected by any provision of the said Draft Bye-laws can make a complaint to the Deputy Municipal Commissioner of the Solid Waste Management Department of BMC ("**DMC-SWM**").

While this procedure is legally sound and ensures accountability when it comes to general adjudication processes under the law, it might not be feasible for the DMC-SWM to hear all "grievances". This is because grievances would include all issues ranging from penalisation of offences under the Draft Bye-laws to complaints about day-to-day civic issues. Thus, such a provision will add significantly to the workload of such officers, cause inadvertent delay in resolution and become difficult to implement on ground.

Instead, the grievance redressal mechanism can be designed to be more like the mechanism outlined under draft bye-law 6.6, which states that a complaint centre must be set up in each administrative ward, apart from a common digital platform to register complaints or suggestions. This is similar to the procedure under the BBMP SWM Bye-laws, 2019, which states that the BBMP shall strengthen its public grievance redressal system(s), including the app, with an option for grievances to be submitted through telephone, email, post, on the app and/or in person.

It is recommended that, as the BMC already has an online complaints portal, a 24x7

helpline number and in-person Citizen Facilitation Centres,[15] they can attempt to strengthen and make all these platforms more accessible. Another portal can be created for appeals in cases of unsatisfactory resolution of grievances. The procedure for filing grievances as well as appeals must be laid out clearly and publicised widely, including the details of nodal officers who will be appointed to ensure speedy resolution and accountability.

c. Lay down a strong and clear appeals mechanism:

According to draft bye-law 23.3, any person aggrieved or affected by any action of the BMC's ward staff (by invocation of the said Draft Byelaws) can file a complaint before the Assistant Commissioner of the concerned ward. Similarly, draft bye-law 28 provides that an appeal against any order passed by the Assistant Commissioner shall lie with the Zonal Deputy Municipal Commissioner of the respective Zone, whose order shall be final and binding on the parties. The aforementioned Draft Bye-laws fall under separate chapters and appear to be disjointed in the present draft. It is recommended that a comprehensive procedure must be distinctly laid down under the Draft Bye-laws for complaints against actions taken by the ward staff. The details must include the provision of a hearing, timelines for passing order for such complaints, etc.

7. *Provisions on enforcement and initiation of proceedings can be strengthened and improved*

a. Enforcement of bye-laws

The Draft Bye-laws provide for various penalties in the Schedule, but no enforcement mechanisms. Bye-law 30(5) of the SWM bye-laws issued by the BBMP states that the official or authority concerned with the enforcement of SWM Rules, which would be the SWM Cell of the BBMP, shall designate officers or nodal officers to levy fines and penalties.

It is recommended that a provision for the appointment of separate nodal officers who would enforce the provisions of the bye-laws at each ward level be inserted in the bye-laws. They would be in charge of implementing the responsibilities specified under the Bye-laws, and levying fines and penalties as well.

b. Initiation of proceedings under other laws

The BMC has jurisdiction to take direct action under its bye-laws and the BMC Act. When it comes to the Central Acts and Rules, it has limited jurisdiction to impose a particular penalty or initiate direct action, as these powers are largely vested with the Pollution Control Boards and the Adjudicating Officers appointed under the

[15] Lodging civic complaints, MCGM website, <https://portal.mcgm.gov.in/irj/portal/anonymous?NavigationTarget=navurl://292767acb759a47eeb3b07911ad27c98&guest_user=english#:~:text=By%20visiting%20the%20nearest%20Citizen,calling%20the%20telephone%20number%201916> last accessed on 30 May, 2025.

respective Acts.

Draft bye-law 24.1 states that,
BMC *is at liberty to initiate appropriate proceedings under any other law in addition to proceedings under these Bye-laws and Mumbai Municipal Corporation Act, 1888 such as the Environmental Protection Act, 1986, Mumbai Municipal Corporation Act, 1888, the Solid Waste Management Rules, 2016, Plastic Waste Management Rules, 2016, E-Waste Management Rules, 2016 Construction and Demolition Waste Management Rules 2016, and Bio-Medical Waste Management Rules, 2016; the Water (Prevention and Control of Pollution) Act, 1974 and the Air (Prevention and Control of Pollution) Act, 1981 etc. for violation of any provisions thereunder.*

The provision provides blanket power to the BMC *without differentiating between initiating proceedings and taking penal action*. It is recommended that the provision be drafted in the following manner.

"The BMC is at liberty to initiate appropriate proceedings for violation of provisions under laws such as the, Bharatiya Nyaya Sanhita, 2023, the Water (Prevention and Control of Pollution) Act 1974, the Air (Prevention and Control of Pollution) Act 1981, the Environment (Protection) Act, 1986 and the Rules prescribed thereunder, in addition to taking any action under these Bye-laws and the Mumbai Municipal Corporations Act, 1888 as the case may be."

8. *Penal provisions under the Draft Bye-laws should be made more comprehensive*

The penal provisions in Schedule I are not comprehensive. For example, Draft bye-law 26.1 states that, "*If a person is found spreading pollution or filth in public parks etc. by throwing dead animal/cattle or its parts, it will be a punishable offence and penalty shall also be levied.*" But there is no provision for such a penalty in the Schedule. Similarly, there are no fines or penalties listed for the enforcement of plastic bans as the BBMP SWM Bye-laws stipulate. Furthermore, there is no separate listing of offences for the enforcement of non-compliance of provisions related to gatherings and public events. The column in Schedule I, where penalties for offences have been listed, contains incorrect bye-law numbers. These should be rectified.

We suggest that a comprehensive review should be undertaken of the offences under the Draft Bye-laws to assess whether penalties for all of them have been included in the Schedule.

(B) Additional Aspects that the Draft Bye-laws should Provide For

1. *A separate chapter on duties and responsibilities of the BMC related to SWM and the recourse that the citizens would have in case of failure to perform duties should be added*

The current Draft Bye-laws do not contain provisions on the responsibilities and duties of the BMC in detail. Some other bye-laws like the BBMP SWM Bye-laws, New Delhi Municipal

Corporation Solid Waste Management Bye-laws, 2017 (**"NDMC bye-laws")**,[16] Corporation of Chennai Solid Waste Management Bye-laws, 2019 **("Chennai bye-laws"**)[17] provide for separate and detailed provisions on the responsibilities of the Corporation. These duties and responsibilities can act as a guide for the BMC's SWM Department as well as create a charter of rights for the people living within the jurisdiction of the BMC to hold them accountable. While Chapter V in the Draft Bye-laws does talk about responsibilities of the BMC, it fails to detail them and mostly only obligates agents of the BMC rather than the corporation itself.

It is recommended that the BMC add detailed provisions on its duties and responsibilities, in line with the BBMP, NDMC and Chennai bye-laws.

2. *A separate chapter on the rights of waste-pickers is required*

Informal waste-pickers form a critical and irreplaceable chain in Mumbai's solid waste management system. There are about 3,00,000 informal waste pickers[18] in the city. The examples of collaboration with waste-pickers unions in neighbouring corporations of Pune and Pimpri-Chinchwad are an example of how unionised and organised waste-pickers can be worked with for an efficient SWM.[19]

The BBMP has rights-based provisions in their bye-laws related to welfare, occupational safety, protective equipments and training and capacity building of informal waste pickers.[20] One critical provision they have also included is the integration of informal waste collectors through appointed agency, or independent surveys and drives. Bye-law 17(1) mandates the BBMP to maintain records of the waste pickers operating under its jurisdiction.[21]

Due to the Pune Municipal Corporation and Pimpri Chinchwad Municipal Corporations' collaboration with Swach cooperative, it is estimated that today, 60 MT of waste is diverted away from landfills per day, with 80-85% of the waste generated in the city being recycled/processed, resulting in annual GHG emission savings of approximately 50,000 tonnes of CO2.[22] Therefore, there is enough data to suggest that directly engaging with informal waste pickers is beneficial for overall SWM in the city. Hence, it is recommended that a separate chapter with provisions for rights of informal waste pickers be inserted in line with the BBMP Bye-laws.

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[16] New Delhi Municipal Council Solid Waste Management Bye-Laws, 2017<https://www.ndmc.gov.in/ndmc/ByLaws/Delhi%20Gazette%20Notificatino%20SWM%20Rules%202016-15-1-2018.pdf>

[17] Corporation of Chennai Solid Waste Management Bye-Laws, 2019 <Corporation of Chennai SOLID WASTE MANAGEMENT BYE-LAWS, 2019 In exercise of the powers conferred under sections 3, 6 and 25 of>

[18]Recycling in Mumbai: The Megacity's Busy Bees, Natalie Mayroth <https://www.goethe.de/ins/in/en/cul/nhk/22273144.html#:~:text=The%20Megacity's%20Busy%20Bees,-Meenal%20has%20been&text=They%20pick%20up%2C%20sort%20through,drown%20in%20its%20own%20rubbish>

[19] https://swachcoop.com/

[20] Bye-law 16, BBMP SWM Bye-laws, 2019

[21] *Integration of informal waste collectors,* Bye-law 17, BBMP SWM Bye-laws, 2019

[22] Waste Management Cooperative: Pune, India, Centre for Public Impact, 2021 <https://centreforpublicimpact.org/public-impact-fundamentals/waste-management-cooperative-pune-india/>

3. *Establish "safai mitras" and obligate Ward Committees to perform their duties*

Considering the challenges related to SWM in the city, a more decentralised and citizen-participation approach can be utilised to implement the SWM Rules. The BBMP SWM bye-laws provide for Ward committees to play an active role, including reviewing action plans, taking into account ward requirements, budgetary allocations and infrastructure requirements among other things. There are a total of 16 Ward Committees within the BMC established under the BMC Act. Under Section 50TT(7)(a), grievances of citizens connected with local and essential municipal services like water supply, drainage, sanitation and stormwater disposal come under the ambit of the ward committees directly. Furthermore, the ward committees have been delegated with functions related to providing suggestions and proposals related to the maintenance of cleanliness.[23] It is imperative that these delegated functions are brought under the ambit of the Ward Committees and such a provision is included in the bye-laws.

Another crucial aspect to bring forth more citizen participation in the management of waste is having 'safai-mitras' that work closely with the ward committees for the implementation of the bye-laws. These groups of safai-mitras will have to be voluntary to make sure that only active citizens who care about the community and waste management take up the mantle for change, working closely with ward committees.

[23] https://portal.mcgm.gov.in/irj/portal/anonymous/qlwardcom?guest_user=english

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