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Ref.No.MAIT/PY/2296

August 23, 2023

Ms. Leena Nandan, IAS
Secretary
Ministry of Environment, Forests & Climate Change

Subject: Request for immediate and urgent issuance of appropriate Instructions to Customs & Port Authorities to ensure seamless flow of consignments of EEE covered under EWMR rules 2022.

Reference:

- 1. CPCB's memorandum dated June 30, 2023 regarding the release of imported consignments of 85 EEE items covered under EWMR rules.**

Respected Madam,

Greetings from MAIT!

We wish to urgently draw your attention to a serious business and compliance risk that faces Producers of Electronics and Electronic Equipment. Our members from the electronics industry have been sharing their challenges with respect to completing the online registration covering additional categories introduced by EWMR 2022 & amendment procedure as introduced by CPCB in April 2023.

In line with CPCB's guidance, Producers filed E-Waste Amendment Authorisation Applications at least a month ago, as per the requirement of the online EPR portal, and since then have not received the approval of the amendment application. Despite repeated follow-ups with Officials at CPCB, the amendment applications have not been processed and in many cases, no acknowledgement has been issued by CPCB.

We would like to urgently highlight that the interim arrangement provided according to the CPCB Notice No.CP-22/40/2023/-WM-III-HO-CPCB-HO dated 30-06-2023 is approaching its end date and most of the industry members have not received their authorization migrated from offline to online EPRA yet, even after filing the amendment applications more than a month ago.

This is creating an unnecessary inconvenience and business risk for the industry as the Customs might halt the consignments post 31st August 2023.

It is our urgent and sincere request to kindly issue the necessary instructions to Customs and Port authorities about the above before August 31, 2023 so that the industry doesn't face the challenge of shipments and consignments being blocked due to an absence of such communication.

We urge MoEF&CC and CPCB to issue a copy of the letter to Customs to the Industry as well for our records.

We hope that immediate action will be taken on this matter and Industry is supported to remain compliant and not face unnecessary disruption in business.

Warm regards,



Col Suhail Zaidi (Retd)
Director General

CC: Shri Naresh Pal Gangwar, IAS, Additional Secretary, MoEF&CC

CC: Smt. Manmeet K Nanda, IAS, Jt. Secretary, DPIIT

CC: Shri Ved Prakash Mishra, IRS, Director, MoEF&CC

CC: Shri Bharat Kumar Sharma, Member Secretary, CPCB

CC: Shri Anand Kumar, Director, CPCB