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Ref. No.MAIT/PY/2277

July 19, 2023

Shri Prashant Gargava
Member Secretary
Central Pollution Control Board

Subject: Requesting an extension to provide feedback on the conversion factors under EWMR 2022

Respected Sir,

Greetings from MAIT!

While the industry understands that the determination of critical elements / metals in EEE product categories and conversion factors associated with them under EWMR 2022 is in the draft stage and **CPCB has sought industry inputs on the same within a day's time for all the 106 EEE products, the timeline allotted to share inputs is too short.**

Hence, on behalf of the stakeholders, we request CPCB to kindly allow a minimum of 2 weeks' time for analyzing the given data with the global counterparts, which is a time-consuming process for the companies. Also, there are ambiguities and huge challenges with the finalized draft conversion factors as per the data shared by the E-Waste recyclers.

The Recyclers take cognizance of the Draft Material Recovery factors (or Conversion factors) for critical elements under the E-Waste Management Rules 2022. However, we must understand that:

1. PCBs & other critical elements get scavenged by the unorganized sector much before they reach the Recycling facilities, meaning that possible recoveries of Au, Cu, Mg, etc. may not be feasible always as per the minimum recovery parameters shared.
2. Material recoveries depend upon the quality of feedstock (e-waste) supplied. Recyclers seeking high-quality E-waste only may lead to lesser demand for poor-quality E-waste and the same not being collected in order to meet recommended minimum recovery parameters.
3. Recyclers seeking high-quality e-waste may incur significantly high sourcing costs, owing to increased demand and less supply. This may lead to a multi-fold jump in the EPR costs for Producers.

Apropos challenges, and material recovery targets, if any, will deliver the best results only when imposed on recyclers as they have full control of the chemical/refining processes. Material recovery targets imposed on producers in any form, directly or indirectly, are an undue burden for a matter which is not in producers' control. This is purely related to the recycling capacity, capabilities, and infrastructure of the country. MoEF&CC and CPCB must allow the CE Infrastructure to develop, and Industry will support all efforts in this direction but embarking on new requirements will cause a serious impediment in the process of generation & issuance of recycling certificates.

Industry requests that the CPCB should publish the data sets and methodology used to determine material recovery targets/conversion factors. This will enable the industry to provide additional comments. We also request for a formal consultation with the producers and recyclers. MAIT also requests CPCB to allow 2 weeks' time for stakeholders to respond and share inputs on the applicability of the conversion factors under the E-Waste (Management) Rules, 2022.

Warm regards,


Col Suhail Zaidi (Retd)
Director General

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

CC: Dr Sandip Chatterjee, Scientist G & Group Coordinator, MeitY

CC: Shri Anand Kumar, Director, CPCB

CC: Shri Vinod Singh, Addl. Director, MoEF&CC