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April 30, 2019

Shri Ritesh Kumar Singh
Jt. Secretary
Ministry of Environment, Forests & Climate Change

Respected Sir,

Sub: Request for intervention regarding implementation procedures followed by Central Pollution Control Board (CPCB) on E-waste rules

Greetings from MAIT!

We thank you for the courtesy extended to the MAIT Delegation on their visit to your office.

Sir, we take this opportunity to reiterate industries commitment to fulfill its responsibilities under the EPR framework. As you are aware that the 2016 E-waste rules got effective Oct'16 onwards, and during this short period, all stakeholders are in the process of putting in place the best practices towards the implementation of the same. And it is a learning process requiring a collaborative approach and a lot of support from the Government towards its implementation.

We wish to share with the Government the challenges the industry is facing in this journey and in particular the implementation procedures. Industry wishes to express its anguish on recent suspensions of imports despite the Industry having filed their responses to the queries raised, and attending the hearings called for wherein they requested a reasonable time for addressing the gaps identified.

Our humble request in the event of any deviation is that the industry should be given a fair opportunity to address any concerns. As advised, we have sought an appointment with Shri. S. P. Singh Parihar, Chairman, CPCB vide our letter dated 22 April 2019 and are awaiting a response to discuss these challenges and other concerns.

We have been informed by our Members that in last one week, Industry has been reached out directly by the states of J&K, Jharkhand, Karnataka asking the details like data of Electrical and Electronic Equipment (EEE) sold in last 10 years in the state under the state level e-waste inventory. States further delegate requirement to their Regional Offices and with each tier, where the level of understanding reduces that leads to discrepancies. In the context of the ongoing audits, there is a new checklist that has been issued to the Producer companies for providing the responses.

The industry is apprehensive that in the absence of clarity to this checklist, there arises a possibility of varied interpretation of the same. The industry requests that this checklist should be articulated with better interpretation through a process of dialogue with the concerned stakeholders and should be centralized and available on the website. The industry is more than willing to get into a dialogue with CPCB with the singular objective of having clarity on the checklist and requests for a regular interaction with CPCB.

In this context of Regional audits, we would request to provide the industry with reasonable time to rectify on shortfalls, if any, and not take steps that go towards suspending imports or trade that lead to huge business losses.

Further Sir, for effective implementation, the Industry requests for a Process-based approach, a classification of deviations into minor and major violations, Penalties commensurate with the perceived non-compliance among other steps.

Also in an ecosystem with multiple stakeholders including from the semi-organized sector, the Industry requests for flexibility in e.g. Changing of PROs, Closing of a collection center or opening of a new center and some others can be through a process of intimation rather than prior approvals.

There is also an urgent need to bring under the framework, individual responsibility on each stakeholder. Today under the EPR framework, the statutory responsibility lies with the Producer, who has very limited authority to ensure that these stakeholders are executing their individual responsibilities.

We look forward to your support and guidance in this matter.

With warm regards,



George Paul
Chief Executive Officer