



PHD House, 4th Floor, Ramakrishna Dalmia Wing  
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,  
Tel# 9355144223 E-mail: dg@mait.com □ Website: <http://www.mait.com>

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October 19, 2023

Shri Naresh Pal Gangwar, IAS  
Additional Secretary  
MoEF&CC

**EWMR- MAIT delegation meeting on 16 Oct' 23 with Addl Secretary, MoEF&CC, Shri N P Gangwar**

Respected Sir,

***Greetings from MAIT!***

At the outset, MAIT would like to thank you for giving us time and holding a meeting on the pressing industry challenges with the MAIT delegation on 16 Oct 23.

Following up on the meeting, the summary of the discussions held, and requests are as under:

1. With less than six months in hand of the FY 2023-24, it is to be noted that 6 months of recycling capacity has been lost and the industry shall not be able to meet the targets as most of the stakeholders are struggling with the EPR portal. To date, only 101 recyclers are registered with CPCB against 450 recyclers registered earlier, which certainly draws that the targets set for the industry, and the available recycling capacity do not match up.

***Request- The targets should be reduced. To be made on a pro-rata basis.***

2. **The portal is still under development and has glitches:**

- The recyclers are unable to transfer the certificates.
- Even, if they do so, the credits are not being reflected on the portal of producers.

***Request- The operational issues related to the portal should be resolved at the earliest.***

3. **EPR certificates once uploaded on Producer's dashboard, should not be revoked:** If any recycler gets disqualified during the CPCB audit, the EPR certificates which were already issued to the Producer through the CPCB portal will remain valid.

The cancellation of recycler authorization due to failure in audit will block the recycler from issuing any further EPR credits through the CPCB portal till the time the registration of that recycler is reinstated by CPCB.

***Request- EPR certificates once uploaded on Producer's dashboard, should not be revoked.***


4. **Standardization of regulatory fees:** We would like to highlight that the registration fees under BWMR and PWMR are comparatively more practical in nature. On the contrary, the fees under the EWMR are extremely high.

***Request- An alignment in the fees with other regulatory fees should be maintained.***

In the light of above issues, as MAIT, we request your support and turn your focus to the issues faced by the ICT industry. MAIT would like to reiterate that the ICT Industry is fully committed to compliance with the regulations.

We are hopeful that our request on the subject matter will be addressed positively by your good office.

Warm regards,

  
Col Suhail Zaidi (Retd)  
Director General

CC: Shri Tanmay Kumar, Chairman, CPCB  
CC: Shri Bharat Kumar Sharma, Member Secretary, CPCB  
CC: Shri Ved Prakash Mishra, IRS Director, MoEF&CC  
CC: Shri Anand Kumar, Director, CPCB  
CC: Shri Tarun Darbari, Scientist, 'E', CPCB