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Ref.No.MAIT/PY/2279

July 21, 2023

Shri Naresh Pal Gangwar, IAS  
Additional Secretary  
Ministry of Environment, Forests & Climate Change

**Subject: Urgent attention to the ambiguities in the Conversion factors formulated by CPCB under EWMR 2022**

**Reference:** MAIT Representation No MAIT/PY/2277 dated July 19<sup>th</sup> 2023, requesting an extension to provide feedback on the conversion factors under EWMR 2022.

Respected Sir,

***Greetings from MAIT!***

MAIT would like to seek your kind attention to concerns related to the determination of critical elements/ metals in the EEE product categories and conversion factors associated with them under EWMR 2022. CPCB provided just a day for the industry's feedback on the draft paper mentioning the conversion factors of 106 EEE products.

At the outset, we would like to request that, any implementation of the conversion factor should be only done by the **Steering Committee** formulated under EWMR 2022. Secondly, we would request that any change should not be implemented in the middle of the year. Please appreciate that the module for producing the certificate in the CPCB's EWMR EPR portal is not even ready, and we are already in the second quarter of the financial year. It is absolutely unfair to push the industry to comply with this kind of unreasonable ask.

MAIT would like to highlight the following concerns on the draft Conversion factors formulated by CPCB under EWMR 2022.

1. **Short Timeline:** The timeline allotted to share inputs is challenging to meet for the industry and recyclers. Hence, on behalf of the stakeholders, we request CPCB to kindly call the steering committee meeting to discuss this and not seek inputs in just one or two days. The rush on finalising the conversion factors will have a huge and long-term impact on the industry. The exercise should be given enough time in order for it to succeed.
2. **Ambiguities in the Conversion factors:** There are ambiguities as per the data shared by the Recyclers Association (a copy is attached). There is a huge variation in the values that can be recovered by the recyclers from commercially sourced E-Waste. Material recovery from commercially sourced E-Waste is very less as compared to the data shared by CPCB.
  - a. Also, we request CPCB to transparently publish the methodology and the basis used by CPCB in arriving at these numbers, that CPCB has circulated to the industry.
3. **Commercially sourced E-Waste:** 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.

- a. 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.
  - b. 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.
4. **Sourcing of Products/Components by Producers:** The sourcing of the components for the products by producers is done by the technological specifications and not by the material composition of the components. Only recyclers have full control of the material recovery process from these products/ components.
5. **Role of the steering committee:** The EWMR 2022 states- *“The steering committee shall be responsible for the overall implementation, monitoring, and supervision of these rules and it shall also decide upon the disputes arisen from time to time and on representations received in this regard and shall refer to the MoEF&CC for any substantial issue arisen or pertaining to these rules.”* Here, the ambiguities need to be taken up by the said steering committee and a formal consultation is highly required to set realistic recoverable material targets and conversion factors based on the commercially sourced E-Waste.
6. **Consultation on the data shared by CPCB:** Industry requests that CPCB publish the data sets and methodology used to determine material recovery targets/ conversion factors. This will enable the consensus to be built on the data sets from all the stakeholders.
7. **CMET’s methodology:** Industry reiterates the challenges with the commercially sourced e-waste and the poor quality of the same. Hence, **it is requested by the industry to conduct a Pilot project with the commercially sourced e-waste and finalize the recovery targets, which will be more realistic and achievable by the stakeholders.**

**Asks:**

1. **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.**
2. **We also request an urgent and formal consultation with the producers and recyclers.**
3. **MAIT also requests CPCB & MoEF&CC to call for a steering committee meeting to decide the conversion factors under the E-Waste (Management) Rules, 2022, and not e-mail discussion on these critical issues, which will make every producer non-compliant, if the draft conversion factors formulated by CPCB are implemented.**

Warm regards,

Col Suhail Zaidi (Retd)  
Director General

CC: Shri Tanmay Kumar, IAS, Chairman, CPCB  
CC: Shri Prashant Gargava, MS CPCB  
CC: Shri Ved Prakash Mishra, IPS, Director, MoEF&CC  
CC: Dr Sandeep Chatterjee, MeitY  
CC: Shri Anand Kumar, Director, CPCB  
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