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Ref.No.MAIT/PY/2626 January 16, 2023

Shri Alkesh Kumar Sharma, IAS Secretary Ministry of Electronics & iT

Subject: Requesting for 50% target for FY 2022-23 under e-Waste Management Rules

Respected Sir,

Greetings from MAIT, India's apex Industry body empowering IT, Telecom & Electronics Hardware sectors!

The representation bears reference to the **E-Waste Management Rules 2022 (EWMR)** dated 2nd November 2022. The rules have set the collection and recycling target of **60% starting from 2023-24** is still higher than the current capacity available in the country. Nonetheless, the members are now gearing up to achieve the targets despite the capacity constraints and not asking for any revision.

In the meeting with MoEF&CC on 19th October 2022, MoEF&CC was kind enough to assure the MAIT delegation that the targets would be revised every two years and indeed that reflects in the new rules. However, for FY 2022-23 targets are not reduced to the tune of 50% and we have requested MoEF&CC for a target reduction for FY 2022-23 from 60% to 50% considering below:

- 1) **Continuity of 2 years' block increase:** The industry recommends that keeping the targets at 50% for FY 22-23 will maintain the continuity of block increase as targets for FY 21-22 were 50% (under the earlier/current EWM Rules).
- 2) Inadequate Recycling capacity: As per the publicly available data, the existing recycling capacity of India is approximately 1/3rd of its required capacity. The disparity in recycling capabilities will act as a huge deterrent to the effective implementation of the e-waste rules. MAIT, therefore, strongly recommends MoEF&CC to extend the Block Methodology for FY 22-23 targets also and reduce it to 50% from the existing 60%.

MAIT would like to reiterate that ICT Industry is fully committed to compliance with the regulations. MAIT members have been diligently complying with the E-Waste rules since its genesis and have been deeply involved with the Ministry over the past decade to help shape sustainable and functional regulation. We are hopeful that our request on the subject matter would be addressed in a positive manner by your good office.

In view of the facts presented above, <u>we hereby request MeitY to recommend an e-waste</u> target setting of 50% for the year 2022-23 to MoEF&CC.

We are sanguine that our request shall merit your consideration.

Warm regards.

Col. Ali Akhtar Jafri, Retd. Director General