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October 04, 2022

Ms. Leena Nandan, IAS
Secretary
Ministry of Environment, Forests & Climate Change

Subject: Customs Clearance issues reg. Battery Waste Management Rules 2022

Respected Madam,

Greetings from MAIT!

The representation bears reference to the recently released **Battery Waste Management Rules 2022 (BWMR 2022)** dated 22nd August 2022.

First and foremost, MAIT would like to emphasise that ICT Industry is fully committed to compliance with the regulations formulated by the Government for responsible management of E-Waste in the country. 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. Most of our members have been implementing successful E-Waste take-back and compliance programs across the world for several decades.

Coming back to the industry concerns for Customs Clearances issues reg. BWMR 2022, we would like to bring to your kind notice that the Industry is facing challenges with the proposed implementation of the **Centralised Online Portal** by CPCB. According to **Clause 14 (1)**, CPCB shall establish the online portal within six months from the date of release of the BWMR 2022.

The industry would like to highlight here that they are facing challenges in the clearance of their shipments from various ports. The industry is requested to share Extended Producers Responsibility Authorisation (**EPRA**) from CPCB of the battery waste management rules 2022 by the Customs department at the entry ports. The **Centralised Online Portal** by CPCB for the BWMR 2022 doesn't exist as of now. So, it is impossible for the industry to produce EPRA for BWMR 2022.

Hence, the unreasonable ask from the Customs department is hampering the business for the Industry members, which is against the motto of Ease of Doing Business.

MAIT on behalf of the Industry recommends the following:

1. The current status and the implementation timeline of the Centralised Online Portal for BWMR 2022 shall be intimated to all the concerned Govt. entities officially.
2. Till the online portal is not available, the ask for the Industry registration by the Customs and other concerned departments shall be relaxed.

We are sanguine that our request on the subject matter would be addressed in a positive manner by your good office.

With regards,

Col. Ali Akhtar Jafri, Retd.
Dy. COO
(Acting Director General - MAIT)

CC: Smt. Manmeet K Nanda, IAS, Joint Secretary, DPIIT
CC: Shri Amitesh Kumar Sinha, IRAS, Joint Secretary, MeitY
CC: Dr. Prashant Gargava, Member Secretary, CPCB
CC: Shri Gaurav Masaldan, IRS, Joint Secretary, CBIC
CC: Shri R Ananth, IRS, D.S. (Customs), CBIC