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Ref.No.MAIT/PY/2633

January 20, 2023

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

Subject: Seeking clarity under Plastic Waste Management Rules 2022 and its EPR obligations.

Respected Sir,

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

This bears reference to the **Office Memorandum (OM) dated 6th January 2023 on Guidelines on EPR for Plastic Packaging reg. by MoEF&CC** and Circular to all PIBOs/ PWP's dated 21st December 2022 with a subject- **Directions under section 5 of the EPA, 1986 regarding the provision of GST invoice of transactions related to plastic packaging by PIBOs and PWP's by CPCB.**

MAIT would like to emphasise that the above-stated notifications are not in harmony. As per industry understanding, the OM dated 6th January 2023, supersedes the Directions released by the CPCB dated 21st December 2022. Where the OM states *"EPR target calculation may be done through self-declaration of enterprise based upon the audited statement of accounts and detailed invoices of the last two years may be verified, whenever required, on a need basis, as a part of the auditing exercise"* whereas the directions released by CPCB dated 21st Dec 2022 mandates the use of GST invoices for target calculations.

Also, MAIT would like to seek clarity on how the audited statements of accounts will help in calculating the EPR targets, the revenue generated by any entity is not relevant to the plastic packing used by them.

MAIT respectfully requests your good offices to kindly clarify the doubts stated above as the disharmony in the OM and the Circular is causing a lot of misunderstanding in the Industry.

We would also **request a suitable time for a meeting** to discuss our submission in detail.

Warm regards,

Col. AA Jafri, Retd.
Director General

CC: Shri Tanmay Kumar, IAS, Chairman, CPCB
CC: Shri Satyendra Kumar, IPS, Director, MoEF&CC
CC: Ms. Divya Sinha, Addl. Director, CPCB