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Ref.No.MAIT/PY/2251

June 02, 2023

Shri Ved Prakash Mishra, IRS
Director
Ministry of Environment, Forests & Climate Change

Subject: Requesting MoEF&CC for accepting hard copies of recycling certificates

Respected Sir,

Greetings from MAIT!

MAIT would like to highlight that producers are responsible for the recycling of e-waste with the help of recyclers. The industry has started the collection and recycling of e-waste through authorized recyclers to ensure that huge targets for EPR FY 23-24 are completed within FY 23-24.

In the absence of the EPR portal's functionality for EPR certificate generation, it is not possible for recyclers to generate online EPR certificates. Till last FY, as per E-waste Management Rules 2016, Industry was collecting physical recycling certificates from recyclers, and payment was made to recyclers on the basis of physical recycling certificates and other related documents.

Request:

1. Please let us know when the portal is expected to be operational for online EPR certificate generation. This will help us in making decisions in regard to continuing our collection through recyclers and payment-related decisions to recyclers as this will increase the risk for the organization if some recyclers fail to generate EPR certificates through the portal for the organization/industry.
2. Kindly confirm if hard copy recycling certificates will suffice as proof of compliance till the time the EPR portal becomes functional for the generation of EPR certificates. Industry requests that the hard copy should be accepted till the concerned module of the portal is not operational, tested and validated.

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.

With regards,

Col. AA Jafri, Retd.
Director General

CC: Dr Prashant Gargava, Member Secretary, CPCB
CC: Shri Anand Kumar, Director, CPCB
CC: Dr. Vinod K. Singh, Scientist 'E', MoEF&CC