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Ref.No.MAIT/PY/2575

November 04, 2022

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

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. MAIT would like to congratulate the Ministry of Environment Forest and Climate Change for the new rules. We also thank you for the wider consultation before notifying the rules and in fact thoughtfully implementing the suggestions of revising the targets every two years.

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.

However, for the current year 2022-23, as per the previous EWM Rules, the target is 60% and that is where Industry requests your intervention to keep the target at 50%. In the meeting with your goodself on 19th October 2022, you were 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, we would like to draw your attention that for FY 2022-23 targets are not reduced to the tune of 50% and we would request 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 in 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.

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

Warm regards,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Col. AA Jafri, Retd.
Acting Director General, MAIT

CC: Dr Prashant Gargava, Member Secretary, CPCB
CC: Shri Satyendra Kumar, IPS, Director, MoEF&CC
CC: Shri Ved Prakash Mishra, IRS, Director, MoEF&CC
CC: Shri N. Subrahmanyam, Scientist D, MoEF&CC