Ref.No.MAIT/PY/2255   June 12, 2023

Shri Prashant Gargava
Member Secretary
Central Pollution Control Board

Subject: Requesting Extension for Producer Registration under EWMR 2022

Respected Sir,

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

MAIT would like to highlight that producers are responsible for the recycling of e-waste with the help of recyclers. In order to fulfil the responsibility and PER obligation, the ICT industry requests for an extension for Producer registration on the EPR portal for E-Waste due to the following reasons:

1. **Technical Glitches in EPR Portal:** While registering on the EPR portal, most of the industry members are facing a mismatch of Item category codes. The data populated under certain category code is not matching in the table.

   Example: data entered for the ITEW-21 category is being reflected under CEEW-13 category. Data entered for scanners is getting populated under the camera category. Due to these technical glitches, the industry is not able to register on the portal.

2. **Ambiguity in EOL for ITEW-17 category:** We understand that CPCB has created 6 sub-product categories under the ITEW-17 category:

   1) Bluetooth-enabled devices; Average end of life: 3
   2) Telecommunication Antenna; Average end of life: 7
   3) Transmitters; Average end of life: 5
   4) Wi-Fi/wireless enabled Devices; Average end of life: 3
   5) Walkie talkie; Average end of life: 5
   6) Radio/Satellite Telephone; Average end of life: 7

   We would like to bring to your kind attention that Certain product categories defined by CPCB are components in themselves and are not finished products. For example, transmitters (average end of life 5 yrs) and telecommunication Antennas (average end of life 7 yrs). These components are used in multiple products like Radios, Access Points, Mobile phones, etc.

   Similarly, telecom products normally have multiple functionalities. Most of the products are wireless devices and would be Bluetooth enabled and would have telecommunication antennas, for instance, Access Points. In such cases, it is not clear under which product category would it qualify and what would be its average end of life.

   It would be helpful if CPCB can be more specific in defining the product categories under ITEW-17 and we recommend that instead of categorizing the products as per the functionality or operability, CPCB should define the end products like it has defined BTS or Router.

MAIT would like to reiterate that due to the challenges listed above producers' registrations will take a significant amount of time, and since the last date is approaching, Customs will start halting the consignments and it will adversely impact the business, which will have larger repercussions.

Hence, we request CPCB to kindly extend the date for registration to at least 3 months. 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: Shri V P Mishra, IRS, Director, MoEF&CC
CC: Shri Anand Kumar, Director, CPCB