



PHD House, 4th Floor, Ramakrishna Dalmia Wing
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,
Tel# 9355144223 E-mail: dg@mait.com □ Website: <http://www.mait.com>

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October 19, 2023

Shri Naresh Pal Gangwar, IAS
Additional Secretary
MoEF&CC

BWMR- MAIT delegation meeting on 16 Oct' 23 with Addl Secretary, MoEF&CC, Shri N P Gangwar

Respected Sir,

Greetings from MAIT!

At the outset, MAIT would like to thank you for giving us time and holding a meeting on the pressing industry challenges with the MAIT delegation on 16 Oct 23.

Following up on the meeting, the summary of the discussions held, and requests are as under:

1. **Self-Declaration of Invoices-** Sales invoices of finished products do not carry battery weight data hence submission of daily sales data places an unnecessary compliance without serving the purpose of providing information required to calculate EPR Targets.

Request- The self-declaration of invoicing should be allowed by CPCB.

2. **Self-declaration of invoices for Imported Batteries-** In the case of imported batteries, the invoices do not contain the required information on the composition of the battery, and hence uploading invoices will create an additional burden on the producers without solving any purpose. This was accepted by MoEF&CC in the meeting.

Request- The self-declaration of invoicing for imported batteries should be allowed by CPCB.

3. **The recycling target** should be based only on the type and the weight of the battery placed in the market and not on the average percentage of constituents in a battery. The chemical composition of batteries from individual producers is not a practical approach. The Additional Secretary, MoEF&CC accepted this and assured that CPCB would standardize the chemical composition of batteries in consultation with the industry.

Request- The notification to be issued from CPCB regarding the recycling target to be based on the weight of the battery.

4. **Recycling infrastructure** is still under development:

- Until the end of the second quarter, there were no recyclers registered with the portal and presently there are only 5 recyclers registered with CPCB, it is practically not possible to meet the recycling targets of FY 22-23.
- The recyclers registered on the portal would have to go through the audit procedures and in case the registered recycler fails to clear the CPCB audit then who shall be held liable, the producer or the recycler?

Request-

- *The targets for FY 22-23 should be waived off for all products (irrespective of whether the battery was included in E-Waste or not).*
- ***CPCB should clarify whether the liability shall be levied on the producer or the recycler.***

5. **No logo or digital signature in payments receipt-** Financial receipts serve as an accounting compliance for the industry and it was assured that CPCB would acknowledge the financial transactions (fee submission) by providing a receipt with either a CPCB logo or a stamp.

Request- CPCB should incorporate the logo or digital signature on the receipt.

6. **Labelling requirements** should be in sync with EU directives, which mandate labelling only when the threshold limit is exceeded. This was acknowledged by the Additional Secretary, MoEF&CC.

Request- CPCB should take up the case in steering committee.

In the light of above issues, as MAIT, we would like to gather your support and turn your focus to the issues faced by the ICT industry. MAIT would like to reiterate that the ICT Industry is fully committed to compliance with the regulations.

We are sanguine that our request on the subject matter will be addressed positively by your good office.

Warm regards,


Col Suhail Zaidi (Retd.)
Director General

CC: Shri Tanmay Kumar, Chairman, CPCB
CC: Shri Bharat Kumar Sharma, Member Secretary, CPCB
CC: Shri Satyendra Kumar, IPS, Director, MoEF&CC
CC: Shri V P Yadav, Director, CPCB
CC: Ms. Youthika, Sr. Environmental Engineer, CPCB