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Ref.No.MAIT/PY/2321

October 19, 2023

Shri Naresh Pal Gangwar, IAS
Additional Secretary
MoEF&CC

PWMR- 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 MoEF&CC for holding a meeting with the MAIT delegation on October 16, 2023. MAIT members have been diligently complying with the Plastic Waste rules since its genesis and have been deeply involved with the Ministry over the past decade to help shape sustainable and functional regulation.

Following up on the meeting held yesterday, MAIT would like to present a summary of discussions held and raise its asks on the Plastic Waste Management Rules 2016 (as amended) urging for your support in addressing critical concerns.

Underwritten are the concerns raised by the MAIT Members that were discussed in the meeting:

1. Bulk upload of quarterly consolidated Data for plastic packaging-

- a. The provision for submitting a self-declaration has not been provided by CPCB as per OM dated 6th Jan 2023 issued by MOEFCC. Multiple communications on the bulk uploading of purchase/ sales invoices create huge confusion in the industry. The requirement for submitting invoices of finished goods will not fulfill the purpose of CPCB since there is no reference to plastic packaging in the invoices of the finished goods.
- b. Products that are imported in India are prepacked and import invoices do not have any information on plastic packaging. Importers and brand Owners are also not buying plastic packaging locally in India.

Request-

- a. The self-declaration of GST invoicing should be clarified urgently by CPCB as it does not contain any plastic-related information and adds up as an unnecessary compliance burden for the industry. It was assured in the meeting that CPCB would work on resolving the same.
- b. PIBOs selling prepacked products imported or locally manufactured in India should be exempted from uploading invoice details of finished products on the CPCB portal since there is no reference to plastic packing in the invoices of finished goods. Self-declaration in such cases should be accepted. This request was already accepted by MOEFCC during a meeting with MAIT on 16th Oct'2023.

2. Only 20 percent variation between Total Plastic Packaging quantity procurement and total Plastic Waste Generation-

It was assured that CPCB would look into this and remove the limiting percentage under the variation criteria to enable the filing of the annual return. Any excess plastic packaging left during any fiscal year will be carried forward to the next year & and shall be used in the subsequent years by the producers,

Request- MAIT requests CPCB to issue a notice clarifying the same and updating the portal accordingly.

3. Annual Returns:

- a) The portal is still in the development stage and many of the producers are unable to file their annual returns. The deadline to file the same is October 31, 2023, however, with the portal currently having functional issues, it is not possible for the industry to file annual returns within the stipulated timelines.
- b) For those who were able to file annual returns, there has been no acknowledgment provided by CPCB and in fact, their annual returns are presently being shown as "pending".
- c) The targets and obligations reflected on the portal do not match up with the actual returns and the previous year's filing.

It was assured in the meeting that CPCB would consider the operational challenges faced by the industry and would resolve them at the earliest.

Request- MAIT requests CPCB to resolve the Operational challenges faced by the industry members and in case CPCB needs more time to make corrections in their portal, the deadline will be suitably extended to file annual returns.

- 4. 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.

In the light of above issues, as MAIT, we would like to gather your support and turn your focus to these 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 Amit Love, Addl Director, MoEF&CC
CC: Ms. Divya Sinha, Sc. E & DH - U