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January 19, 2023

Ms. Leena Nandan, IAS
Secretary,
Ministry of Environment, Forests & Climate Change

Subject: Requesting for 50% target for FY 2022-23 under e-Waste Management Rules

Respected Madam,

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

The representation bears reference to our earlier request for rationalising the targets for the financial year 2022-23. At the outset, MAIT would like to request your kind intervention in recommending rationalisation of targets for the FY 2022-23. The industry is not seeking any reduction in the targets for next financial year when the new EPR regime will be prevailing.

In the 2nd consultative committee meeting held on the 13th Jan 2023, under the chairmanship of MeitY and in presence of MoEF&CC and the Industry members, it was stated that the targets for FY 2022-23 would remain at 60% as per the rules. This would be very difficult for the industry to achieve this target for the year as approx. two months are left in the current financial year.

Currently, the targets based on e-waste generation is not matching-up with the recycling capacity available in the country. The industry requests your attention to the following numbers:

- As per CPCB's data, the **growth of E-Waste generation is more than 30%**
- Even if we consider a conservative growth rate of 20%, then based on the actual numbers of 2018-19 and 2019-20 (7.7 lakh tonne and 10.14 lakh tonne respectively), the **e-waste generated (@20% growth per year) in 2022-23 would be close to 18-19 lakh tonnes**
- Considering that 60% of the e-waste is to be recycled, the total e-waste to be recycled would be 11.4 lakh tonnes
- **The present capacity available in the country (as informed by CPCB in the Consultative Committee Meeting) is just about 10 lakh tonne**
- We are not considering other deductions (such as area-based capacity formula and removal of dismantlers).
- If we consider the deductions then the stated capacity would reduce to only 7-8 lakh tonnes.
- From the above, it is evident that the recycling capacity is not sufficient to cater to the 60% target for e-waste recycling.

- **It is our apprehension that due to this lack of real recycling capacity, the ICT Industry would either be non-compliant or it will just lead to some wrongful practices.**

Congruence with E-waste Management Rules 2022: The industry request also would be in line with the trend that has been proposed in the new E-Waste Management Rules which are to be implemented from 1st April 2023. These rules have mandated EPR targets to be stable for a block of two years (instead of they being changed annually). The EPR target for the block of two years commencing from 2023-24 to 2024-25 is 60% and therefore having a 50% EPR target for FY 2022-23 would be congruent with pattern envisaged in E-waste Management Rules 2022.

We request your good office to kindly recommend a reduction of e-waste EPR target for FY 2022-23 to 50% (with option of carrying forward upto 10% extra collection to next FY).

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.

Warm regards,



Col. AA Jafri, Retd.
Director General

CC: Shri Naresh Pal Gangwar, IAS, Additional Secretary, MoEF&CC
CC: Shri Ved Prakash Mishra, IRS, Director, MoEF&CC