



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>

Ref.No.MAIT/PY/2285

August 07, 2023

Dr. Prashant Gargava
Member Secretary
CPCB

Subject: Request for clarification on EPR Fees

Respected Sir,

Greetings from MAIT!

MAIT would like to highlight the industry's concern regarding the challenges faced with respect to the registration fees paid by producers under the E-Waste Management Rules, 2022, Battery Waste Management Rules, 2022, and the Plastic Waste Management Rules, 2022.

We would like to bring the following points to your kind attention and seek immediate action to resolve them at the earliest:

- 1. Notification for the payment of fees:** As of date no notification has been issued by CPCB for the fees that are applicable under the regulations. The amount of fees to be paid only appears on the last screen of the portal during the online submission. Without a valid notification, it becomes extremely challenging for producers to seek a budget for the fees to be paid. Therefore, we request that a suitable notification, clearly spelling out all applicable fees to be paid, be issued immediately.
- 2. Invoice and receipt for the registration fees:** As a matter of proper accounting procedure and compliance, it's critical that an invoice be issued for the fees to be paid under the respective regulations. Along with this, a receipt must also be issued once the fees are paid. Currently, producers get a screenshot of the payment gateway when the transaction is complete which is not acceptable under accounting principles. Not having a legitimate invoice and receipt from CPCB amounts to financial and accounting non-compliance. We request CPCB to issue an invoice mentioning the fees and applicable taxes if any at the earliest.
- 3. Justification for the fees:** No rationale has been provided for fees charged for the various submissions. This includes obtaining EPR registration, filing annual returns, etc. It would be helpful if CPCB could provide a detailed explanation of the factors that contribute to the registration fees and any others. This would help producers better understand the rationale behind the fees and ensure transparency in the process.
- 4. Standardization of regulatory fees:** We would like to highlight that the registration fees under BWMR and PWMR are comparatively more practical in nature. On the contrary, the fees under the EWMR are extremely high and, therefore, we request an alignment in the fees with other regulatory fees.

MAIT believes that open communication and transparency are crucial in maintaining a fair and efficient regulatory environment.

We are sanguine that our request will be heard in a positive manner by your good office.

Warm regards,

Col Suhail Zaidi (Retd)
Director General