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May 10, 2023

Dr Prashant Gargava  
Member Secretary  
Central Pollution Control Board

**Subject: Seeking EPR exemptions for Electrical and Electronics Manufacturers (EMS sector) and consumers or Bulk consumers importing for self or captive use**

Respected Sir,

***Greetings from MAIT!***

Under the Hon'ble Prime Minister's Atmanirbhar programme, our country has taken a goal of making **2030 the decade for Electronic H/w Manufacturing for India**. The country has set a target of **\$300 billion in electronics manufacturing by 2025**. To realise this promise of **\$300 bn**, there is a need to enable specific provisions to promote electronic manufacturing in India.

MAIT would like to highlight that the **Central Pollution Control board** released a notification reg. the subject- **Clarification regarding non-applicability of EPR authorisation under E-Waste Management Rules 2016 (EWMR 2016)** dated 06<sup>th</sup> June 2019, where it has been notified under sec B clause 4 & 5 that the **EPR authorisation is not applicable to manufacturers of Electrical and Electronic equipment (including spare components, consumables) listed in the schedule-I of the EWMR 2016 if they are manufacturing and/or importing for the purpose of selling exclusively to EPR authorised producers and exempted for consumers or bulk consumers if they import EEE equipment for self or captive use.**

MAIT requests the MoEF&CC to kindly extend the exemption for the Electrical and Electronics Manufacturers (EMS sector) and Bulk consumers importing for captive use under the ambit of EPR obligations in **E-Waste Management Rules (EWMR), Plastic Waste Management Rules (PWMR), and Battery Waste Management Rules (BWMR)** to EMS Companies as the EMS companies are not the brand owners nor the producers but mere contract manufacturers for the OEMs and hence their responsibility is to provide electronic manufacturing services only. Due to very limited scope and ownership, it becomes really challenging for the EMS companies to comply with the EPR obligations under the above-mentioned rules.

The scope of consumers or bulk consumers who imports for their own consumption or limited B2B research & development activities offered on a loan basis only should be limited to environmentally friendly disposal actions such as engaging an authorized e-waste/battery/plastic waste recycler, refurbisher and maintaining necessary documentation with timely submission to the authorities.

Hence, **MAIT requests MoEF&CC for extending the exemption of non-applicability of EPR obligations for contract manufacturers (EMS Companies) and manufacturing Electrical and Electronic equipment (including spare components, consumables) and Bulk consumers importing for captive use under the EWMR, BWMR and PWMR.**

We are sanguine that our request will be answered in a positive manner.

Warm regards,

Col. AA Jafri, Retd.  
Director General

CC: Shri Naresh Pal Gangwar, IAS, Addl. Secretary, MoEF&CC  
CC: Shri Ved Prakash Mishra, IRS, Director, MoEF&CC  
CC: Shri Anand Kumar, Director, CPCB