



PHD House, 4th Floor, Ramakrishna Dalmia Wing
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016, India
Tel#: (+91-11) 2685 5487 • Fax#: (+91-11) 2685 1321
E-mail: ceo@mait.com • Website: <http://www.mait.com>

Ref.No.MAIT/PY/2176

July 14, 2020

Shri Rameshwar Prasad Gupta
Secretary
Ministry of Environment, Forests & Climate Change

Sub: Request for a VIRTUAL CALL to understand the detailed Uniform Framework for Extended Producers Responsibility (Under Plastic Waste Rules) Guideline Document and provide detailed feedback thereof

Respected Sir,

Greetings from MAIT!

This letter bears reference to the recently published **Guideline Document of Uniform Framework for Extended Producers Responsibility (Under Plastic Waste Management Rules, 2016)** dated June 23, 2020.

We acknowledge and appreciate the efforts put in by MoEF&CC in preparing this base document and MAIT on behalf of its members thanks you for bringing out the same. However, there are several clauses/statements in the document where industry seeks your support in understanding to come up with the detailed feedback with there being certain questions that the industry is facing and therefore the challenge to provide its feedback as it may lead to a difference in the interpretation.

MAIT, along with the industry has drafted an initial set of questions on the framework interpretation, EPR Models, and Plastic Credit model that industry has compiled based on internal discussions within MAIT and its industry members (kindly refer Annexure 1). We understand that the industry can get complete clarity once the industry and MoEF&CC team come together for a discussion through a VC. This meeting will ensure that the industry is well aligned with the MoEF&CC's objectives and thus enable MAIT to submit the detailed comments within the timeline of July 31, 2020.

Hence, we would like to seek a virtual meeting with MoEF&CC with the industry to seek clarity on the draft guidelines at the earliest preferably in the next one week.

Looking forward to hearing from you at the earliest.

With regards,

George Paul
Chief Executive Officer

CC: Ms. Geeta Menon, Jt. Secretary, Ministry of Environment, Forests & Climate Change
CC: Dr Dharmendra Kumar Gupta, Scientist "F", Ministry of Environment, Forests & Climate Change
CC: Shri Amardeep Raju, Jt. Director–HSMD, Ministry of Environment, Forests & Climate Change



ANNEXURE 1

UNIFORM FRAMEWORK FOR PRODUCERS RESPONSIBILITY ORGANISATION UNDER PLASTICS WASTE MANAGEMENT RULES, 2016.

FIRST QUESTIONS FROM INDUSTRY SEEKING CLARIFICATION ON THE DRAFT DOCUMENT RELEASED BY THE MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE

On the Framework Implementation

1. What would be indicative timeline for implementing the guidelines? Especially, considering the timelines will be influenced by development of essential technology solutions such as online registration, record keeping, plastic credits etc.
2. What would be the mechanism for existing producers with registered EPR Plan to transition to the new EPR models under the uniform guidelines? What would be the guidance for producers who are in the process of registration of their EPR plan under the prevailing mechanism?
3. Is an amendment to the Plastic Waste Management Rules under consideration to accommodate uniform framework guidelines?

On the EPR Models

EPR Model 1

4. What would be the indicative quantitative and qualitative metrics/data points to define the threshold for producer's eligibility to participate in EPR Model 1?
5. What would be the reason for not allowing producers to access and select the appropriate framework model prior to registration of their EPR?
6. How can producers demonstrate their compliance in fee-based model? What would be the liability of producers arising from execution of the fee-model?
7. Is there a one-time basic membership fee/corpus fund OR per kilogram cost depending upon the plastics entered into the market by the producers?
8. What would be the criteria for arriving at the normative cost? Would initial estimates of cost be provided to help producers decide on opting for this model of EPR? How frequently may these be expected to be revised?

9. What would be constitution of the Central Committee? Clarity on function of the Central Committee in more detail? Would this be an independent body? How would the committee collaborate with the SLAB?

EPR Model 2

10. Producers participation in EPR Model 2 is indicated to be possible without linking with a PRO. Would this mean producers' execution of EPR compliance by way of Individual Producer Responsibility (IPR)? More clarity on the means and manner for producers to execute the IPR plan?
11. What is recycling target? Is it same as collection target or is it recycling target (recycling efficiency)? What is waste diversion target?
12. Regarding reference to industry wide recycling rate target. How would the industry recycling rate be determined? Does this mean producers will be required to meet industry wide recycling targets in addition to individual targets?

On Plastic Credit Model

13. Seek more clarity on the operation of the model? Is this a stand-alone model independent of EPR Model 1 and EPR Model 2 OR a further elucidation of EPR mechanisms indicated at 1&2?
14. Seek more clarity on how EPR compliance targets would be based on the models selected by producers?