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October 18, 2023

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

Subject: Request to allow sufficient Consultation Period to provide Inputs on Draft Ecomark Certification Rules, 2023

Respected Madam,

Greetings from MAIT!

This communication pertains to the recent request for inputs sought by the Ministry of Environment, Forests and Climate Change on the recently launched Draft Ecomark Certification Rules, 2023.

On October 11, 2023, the MoEF&CC issued a notification announcing the introduction of the Ecomark Certification Rules 2023. The purpose of this scheme is to provide accreditation and labels, to household and consumer products that meet specific criteria while adhering to the quality standards set by Indian regulations. The Central Pollution Control Board (CPCB) will oversee the administration of this initiative in conjunction with the Bureau of Indian Standards (BIS).

The industry was taken by surprise with this notification as it occurred without prior consultation and pre-communication. We collectively believe that there is a vital need for a sufficient duration to comprehend the rationale behind this initiative and the motives driving its implementation. This will allow the industry to provide well-informed feedback before its execution, thereby fostering a more seamless implementation process.

Furthermore, it is worth noting that the specified consultation period is only 30 days, which deviates from the usual 60-day timeframe for similar initiatives. **The industry strongly insists on the necessity of additional time to convene and thoroughly deliberate on this scheme to ascertain its implementation process accurately.** Failing to do so could potentially burden the industry with significant compliance challenges. We appreciate your attention to this matter and await a positive response from your office.

MAIT wishes to underscore the ICT industry's unwavering commitment to adhering to Government regulations pertaining to responsible environmental waste management. MAIT members have diligently complied with environmental regulations from the outset and have played an active role in collaborating with the Ministry over the past decade to help shape sustainable and effective policies.

We are hopeful that your office will consider our request positively.

Warm regards,

Col Suhail Zaidi (Retd.)
Director General

CC: Shri Naresh Pal Gangwar, IAS, Additional Secretary, MoEF&CC
CC: Ms. Nameeta Prasad, IA&AS, Joint Secretary, MoEF&CC
CC: Shri Ved Prakash Mishra, IRS, Director, MoEF&CC
CC: Dr. Unmana Sarangi, Joint Director, MoEF&CC