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April 16, 2022

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

Subject: Renewal of EPR Certificate.

Respected Madam,

Greetings from MAIT!

I am writing to you on behalf of MAIT, India's apex ICT Industry body. Founded in 1982, MAIT represents India's Telecom manufacturers, IT Hardware manufacturers, Recyclers, PROs, Testing Laboratories and affiliate associations. We are constantly engaged with MoEF&CC & CPCB on Environmental Policy matters. The Association members are committed towards meeting our environmental obligation in letter and spirit.

The Industry is presently saddled with severe issues with respect to renewal of Extended Producer Responsibility (EPR) authorization. Despite filing applications well in advance, the EPR registration renewals are still awaited. The EPR registration delay is not an isolated issue being faced by a few members but by almost all of them. In some instances, renewal applications had been submitted almost four months in advance.

It is humbly submitted that completing EPR registration related documentation at the Companies end is becoming challenging since some requirements imposed are beyond their control. Queries on the registration applications are being raised after a long hiatus and these are expected to be resolved at extremely short notice, in some cases within hours. There are instances where companies are required to re-submit more than 10-12 documents mentioned in the checklist (which the industry has several reservations on) at the request of the regulator and not backed by the regulation or the SOP or any logic at all.

The deadline for registration is looming large and we expect that the registrations which are proceeding at a snail pace will not be completed by end-April. If this happens then there will be severe compliance issues and legal complications specially at Ports which will impact business adversely. As a responsible association representing the voice of the ICT Industry, we would humbly request you for the immediate renewal of EPR registration through a general notification or a provisional extension of the validity of existing registrations by 6 months. This will ensure that businesses are not disrupted till all pending applications are processed at CPCB.

Our members are companies of repute and represent leading brands. A delay in timely renewal will disrupt the business and supply chain process.

And we would also like to **request for a meeting with our members** be called so that uniform clarifications in the form FAQs may also be issued from a long-term perspective.

We sincerely request for an urgent resolution of the matter at your end.

With regards,

George Paul
Chief Executive Officer

CC: Shri Tanmay Kumar, IAS, Chairman, CPCB