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Ref.No.MAIT/PY/2671

March 29, 2023

Ms. Manmeet Nanda, IAS
Joint Secretary
DPIIT

Subject: Requesting urgent intervention in the implication of Battery Waste Management Rules 2022 affecting EoDB

Respected Madam,

Greetings from MAIT!

This bears reference to the **Battery Waste Management Rules 2022 (BWMR 22) dated 22nd August 2022**. MAIT would like to emphasise that ICT Industry is fully committed to compliance with the regulations formulated by the Government for responsible management of E-Waste in the country.

MAIT would like to highlight the alarming situation reg. the implication of BWMR '22. As we are already sitting in the last week of the FY 2022-2023, and the EPR Portal (Extended Producer Responsibility Portal) for Battery waste was made functional just a week ago with no recyclers onboard and the Industry is facing a lot of difficulties while registration, imposing a higher risk of non-compliance which will adversely affect the downstream supply-chain ultimately affecting the ecosystem. The non-compliance status will halt the electronics import into the country.

A few of the potential impacts are listed below:

Economic impact: India heavily relies on imported electronics, and halting their import could lead to a shortage of electronic products, leading to a rise in prices. This shortage could affect several industries, including telecommunications, manufacturing and IT, leading to a decline in economic growth.

Consumer behaviour: If electronics were more expensive due to the halt of imports, it could affect consumer behaviour, leading to a decline in demand for electronics. This could further impact the economy and the country's technological development.

Job loss: Halting imports could also lead to job loss in the electronics industry, which employs a significant number of people in India. This could have a ripple effect on other industries and further hurt the country's economy.

In summary, the halt of the import of electronics in India due to the EPR regime would have significant economic and societal impacts, including a shortage of electronics, job loss, a decline in economic growth and potential repercussions.

Considering the present state of preparation and readiness of portal, registration etc., MAIT, on behalf of the industry, suggests that the BWMR 2022 should only be made applicable from 01st April 2023 onwards due to the following concerns:

According to schedule II – Clause (vi) and Clause (ix) require minimum of 50% recycling of the batteries in FY22-23. However, the industry is struggling to comply with the Rules for the following reasons:

- The online registration of the PIBOs has not yet started. CPCB has not issued any target to the PIBOs.
- The Battery waste recycling infrastructure and technology are almost non-existent in the country as per the requirements of this regulation. It is going to take time to put this infrastructure in place.
- SPCBs are still in the process of authorizing recyclers under BWMR 2022. There have not been enough battery waste recyclers authorized under BWMR as of now and the infrastructure for the collection of batteries is at a very nascent stage.
- No time left in FY22-23 to identify, evaluate, select, make agreements and start/complete collection/disposal which is practically not possible for the industry to manage.
- Even if some recyclers get registered in FY22-23 (in Feb/Mar'23), it is very challenging for the limited number of authorized recyclers to recycle a full year's quantity in 1 week due to capacity constraints.

We are sanguine that our request will merit your positive consideration.

We would also **request a suitable time for a meeting** to discuss our submission in detail.

Warm regards,



Col. AA Jafri, Retd.
Director General