



PHD House, 4th Floor, Ramakrishna Dalmia Wing
4/2, Siri Institutional Area, August Kranti Marg, New Delhi – 110016,
Tel# 9599665859 E-mail: ajafri@mait.com □ Website: http://www.mait.com

Ref.No.MAIT/PY/2722

April 26, 2023

Dr. Prashant Gargava
Member Secretary
Central Pollution Control Board

Subject: MAIT inputs on EPR portal for Plastic Waste

Respected Sir,

Greetings from **MAIT**, India's apex Industry body empowering IT, Telecom & Electronics Hardware!

As you may be aware, MAIT is a member of the **stakeholder group constituted to review the development of the online EPR portal** via Office Memorandum No.B-17011/7/UPC-II/PWM/2022 dated July 18, 2022.

MAIT being a member of the stakeholder group would like to humbly reiterate a few observations and suggestions with respect to the recent changes on the EPR portal with a view to not only ease compliance for the industry but also aid in the ease of doing business. Screenshots of the issues on the EPR portal from one of the Industry members are attached for your lucid understanding in **Annexure 1**.

1. Observation- Importer: Discrepancy in Registration vs Portal targets

Targets are showing against Importer for FY 2022-23. However, as per the Importer registration certificate, targets were ZERO for FY 2022-23 as complete Importer liability was transferred to BO at the time of registration. (*Kindly Refer to Annexure 1*)

Impact: EC will be levied if the achievement is not shown against these targets through EPR certificates.

2. Observation- Brand Owner: Credit transfer to Annual report for FY 2022-23:

Denominations are faded even when trying to add credits to the annual report for Cat 3. (*Kindly Refer to Annexure 1*). However, this issue is not observed while transferring the credits to the Annual report for Category 2.

Impact: Cannot transfer the EPR certificates, which are available in Wallet, to the Annual report for FY 2022-23 due to this glitch for Category 3.

3. Observation- Brand Owner: Credit transfer to Annual report for FY 2022-23:

Kindly let us know what are Target credits (6724.375) showing in the portal for Cat 2? (*Kindly Refer to Annexure 1*)

Kindly let us know what are Target credits (19.065) showing in the portal for Cat 3? (*Kindly Refer to Annexure 1*)

The above-stated observations require your immediate kind attention and rectifications.

Warm regards,

Col. AA Jafri, Retd.
Director General

CC: Ms. Divya Sinha, Addl. Director & I/c, UPC-II, CPCB

Annexure 1

1. Targets are showing against Importer for FY 22-23. However, as per the Importer registration certificate, targets were ZERO for FY 22-23 as complete Importer liability was transferred to BO at the time of registration:

4. Annual Report (2022-23)				
Category	Procurement (Tons)	Sales (Tons)	Reuse (Tons)	UREP (Tons)
Cat I	NA	NA	None	NA
Cat II	18.64387866138106	NA	NA	NA
Cat III	NA	NA	NA	NA
Cat IV	NA	NA	NA	NA

5. Compliance Status of Fulfillment of EPR Targets				
Category	Target	Achieved	Available Potential	Remarks
Cat 1 - Recycling and End of Life Plastic	0	0	0	Close
Cat 2 - Recycling and End of Life Plastic	268.23	0	0	EC will be levied
Cat 3 - Recycling and End of Life Plastic	2274	0	0	EC will be levied
Cat 4 - Recycling and End of Life Plastic	0.00	0	0	Close
Cat 1 - Mandated Use of Recycled Plastic	0	0	0	Close
Cat 2 - Mandated Use of Recycled Plastic	0	0	0	Close
Cat 3 - Mandated Use of Recycled Plastic	0	0	0	Close

Sl. No	Financial Year		2022-23			
	State/UT		Cat-I	Cat-II	Cat-III	Cat-IV
1	CPCB		0.00	0.00	0.00	0.00
TOTAL			0.00	0.00	0.00	0.00
Grand Total			0 TPA			

2. For BO, what are the Target credits (19.065) showing in the portal for Cat 3? Denominations are faded even when trying to add credits to the annual report for Cat 3:

Credit/Debit Operations

Operation (Debit/Credit)*: Add to Annual Report x 2022-23

Available Credits*: 55

Target Credits*: 19.065

Credits to be used*: 10

Denomination Details

Denominations	Count	Total	Available certificates
1	X 0	0	5
10	X 0	0	0
50	X 0	0	1
100	X 0	0	0
500	X 0	0	0
1000	X 0	0	0

Wallet Details

Available Credits: 55
Credits to be Used: 10
Balance Credits: 45

Available Denomination

1 X: 5
10 X: 0
50 X: 1
100 X: 0
500 X: 0
1000 X: 0

Submit

3. For BO, what are the Target credits (6724.375) showing in the portal for Cat 2?

Credit/Debit Operations

Type of Certificate*: Plastic Recycling x

Category of Plastic Packaging*: CAT 2 x

Operation (Debit/Credit)*: Add to Annual Report x

Current Financial Year: 2022-23

Available Credits*: 8181

Target Credits*: 6724.375

Credits to be used*: 1

Denomination Details

Denominations	Count	Total	Available certificates
1	X 1	1	1
10	X 0	0	3
50	X 0	0	1
100	X 0	0	11

Wallet Details

Available Credits: 8181
Credits to be Used: 1
Balance Credits: 8180

Available Denomination

1 X: 1
10 X: 3
50 X: 1
100 X: 11

Submit