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Ref. No.MAIT/PY/2533

September 16, 2022

Dr. Prashant Gargava
Member Secretary
Central Pollution Control Board

Subject: Carrying forward the surplus EPR target for Plastic Waste collected in FY 21-22 to FY 22-23

Respected Sir,

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

At the outset, MAIT would like to thank you for your kind consideration for considering MAIT as a member of the **Stakeholder group constituted to review development of EPR portal** via Office Memorandum No.B-17011/7/UPC-II/PWM/2022 dated July 18, 2022. It's an absolute honour for MAIT to contribute to the development of the portal.

The subject bears reference to the meeting organised by **CPCB** on **30th August 2022** on Centralised EPR portal. During the meeting, the industry was informed by the CPCB official that the surplus of the EPR target collected in **FY 21-22 (surplus to 25% target)** cannot be carried forward and offset against the current **FY 22-23 EPR target**.

As per our understanding, **Clause 8** of the **PWM Amendment Rules 2022**, sets the target for **FY 2021-22 as 25%** and the Amendment Rules have laid down a provision for carrying forward the excess target collected in any FY. And since the Amendment Rules came into effect in February 2022, they are effective from FY 21-22 and allow the excess collection target to be carried forward to the FY 22-23.

Further, MAIT would like to highlight that the industry submitted the requisite supporting documents to CPCB on May '22 to confirm the collection of the obligated EPR targets for FY 21-22. However, the same has not been processed yet and adjusted to date. Industry requests early processing of the submitted intervening period compliance data by CPCB so that the industry can plan their EPR targets accordingly for FY 22-23 considering the carry forward option against the surplus quantity collected in FY 21-22.

The ambiguity that occurred due to the difference in the notification referred above and the clarification given by the CPCB representative could significantly make compliances cumbersome and hamper the spirit of Ease of Doing Business in India.

Hence, MAIT requests your good office to kindly clarify the above-stated issue. We are sanguine that our request for seeking clarification will be addressed.

Look forward to your continuous support.

With regards,

Col. AA Jafri, Retd.
Dy. COO
(Acting Director General - MAIT)

CC: Shri Satyendra Kumar, IPS, Director, MoEF&CC
CC: Ms. Divya Sinha, Addl. Director, CPCB