



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/2735

May 11, 2023

Shri Naresh Pal Gangwar, IAS  
Additional Secretary  
Ministry of Environment, Forests & Climate Change

**Subject: Confirmation of Industry Understanding of the latest amendments under Plastic Waste Management (Amendment) Rules, 2023**

Respected Sir,

***Greetings from MAIT, the apex body representing the IT, Electronics & Telecom Hardware Manufacturing Sector!***

This bears reference to the amendments made under the Plastic Waste Management (Amendment) Rules, 2023 dated April 27<sup>th</sup> 2023.

In the above-mentioned latest amendment, the provision for 'Renewal of Registration' has been omitted under clause 4(i), however under Rule 13, sub-Rule 9(b), the clause is still there which says that '*The registration granted under this rule shall be valid for a period of one year, unless revoked, suspended or cancelled and shall subsequently be granted for 3 years*'.

The statement leads to ambiguity w.r.t. the 'Renewal of Registration' under the PWMR (Amendment) 2023.

As per the latest amendment dated 27<sup>th</sup> May 2023, the industry understands that the registration will now become perpetual in nature unless revoked, suspended or cancelled from the date of release of the above-stated amendment. Also, it has been observed that the EPR portal for Plastic waste is already changed by CPCB which is in line with the above amendment by removing the provision for 'Renewal of Authorization', however amendment in rule 13(9)(b) still needs to be amended.

Also, we request CPCB to kindly make the necessary amendment in the existing registration certificates issued under the "Importers" category which is still showing a validity of 1 year & will be expiring in the month of July'23 for most companies. Industry foresees that imports will get stopped at Customs, if the validity is not changed on the CPCB portal post the above amendment.

Considering the above facts, as per the Gazette notification published by MoEF&CC dated April 27<sup>th</sup> 2023, **MAIT believes that the provision of renewing the registration is no more required under the rule and it has become perpetual.**

A line in confirmation of this industry's understanding shall greatly help.

Look forward to your early response.

Warm regards,

  
Col. AA Jafri, Retd.  
Director General

CC: Dr. Prashant Gargava, Member Secretary, CPCB  
CC: Shri Satyendra Kumar, IPS, Director, MoEF&CC  
CC: Ms. Divya Sinha, Scientist E & DH - UPC-II, CPCB