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Ref.No.MAIT/PY/2389

September 14, 2021

Shri Rameshwar Prasad Gupta
Secretary
Ministry of Environment, Forests & Climate Change

Subject: Request for immediate relief by suspending Rule 11 on the imported products and extending the timeline for implementation of the Rule 11

Respected Sir,

Greetings from MAIT!

MAIT is the industry apex body, representing the Electronic Hardware sector in the country. MAIT also represents major Information Technology, Data Communication, Networking products, and Technology companies. We would like to acknowledge the fact that the collaboration of MAIT with MoEF&CC has been steadily increasing.

The members of MAIT had made extensive representations both written and verbal before your offices during the consultation process of the draft Plastics Waste Management Rules 2021 expressing significant concerns with the proposed amendment, specifically to that of marking and labelling requirements specified under Rule 11.

The amendment to Rule 11 (1) has with immediate effect expanded the scope of the plastics packaging to require marking and labelling of name and registration number of manufacturers, producers or brand owners on plastic packaging.

We have 2 major concerns to be kept in front of you:

S.No.	Concern related to Rule 11	Proposed Request	Rationale
1.	Companies with global supply chain using the same packaging for all countries, including for India. As these companies have expressed deep concerns due to the country unique marking/ labelling requirements mandated for products coming	A transition period of at least 12-18 months be provided to accommodate country unique changes to labelling requirements.	This amendment of rule 11 with immediate effects is near to impossible as changes in marking or labelling requirements require extensive testing of solutions, sourcing of appropriate raw material sources, addition of necessary capital equipment for etching/printing/labelling and updates to production lines processes these are time and resource consuming processes and are certainly not feasible to be implemented with immediate

	from a global supply chain.		effect and it is technically difficult to adhere to the labelling requirements on packaging used for packing small components and parts due to the size constraints.
2.	Global brands that don't manufacture in India but import certain products.	We request a suspension on the imported electronic products.	Making any India unique changes in the packaging will be very difficult & need to get aligned with the global packaging norms for uniformity. There are uniform manufacturing lines, from the product assembly to its final packaging which uses the same plastic packaging for all countries including India. Enforcing an India-specific labelling requirement is not possible.

Moreover, collection responsibility of plastic waste under the PWM rules is brand agnostic, marking the importer/brand owner/manufacturer/producer name, registration no. and thickness on the packaging will not help in improving the collection of plastic waste or enhancing the recycling rate in the country.

We humbly request your kind offices to provide immediate relief by suspending this Rule 11 on the imported products and extending the timeline for implementation of the Rule 11 for at least 12-18 months for the companies manufacturing in India.

We request you for an **appointment on a day & time convenient to you** to discuss the concerns mentioned above.

With regards,



George Paul
Chief Executive Officer

CC: Shri Naresh Pal Gangwar, Jt. Secretary, MoEF&CC

CC: Shri Ved Prakash Mishra, Director, MoEF&CC

CC: Shri Amit Love, Addl. Director, MoEF&CC