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Ref.No.MAIT/PY/2270

June 30, 2023

Ms. Leena Nandan, IAS
Secretary
Ministry of Environment, Forest & Climate Change

Subject: Request for immediate and urgent issuance of appropriate Instructions to Customs & Port Authorities to ensure seamless flow of consignments of EEE covered under EWMR rules 2022.

Reference:

- 1. Meeting held with Director E-Waste, MoEF&CC & CPCB officials with Industry Representatives on the matter of seeking extension in registration and amendment under EWMR 2022 dated June 28, 2023**
- 2. MAIT's letter dated June 23rd 2023 explaining challenges being faced by Industry in completing registration and amendment procedure on the EWMR online portal.**
- 3. CPCB's memorandum dated May 09, 2023, regarding release of imported consignments of 85 EEE items covered under EWMR rules.**
- 4. MAIT's representation dated June 12th 2023 on seeking clarity on ITEW categorisation and EOL of EEE items.**

Respected Madam,

Greetings from MAIT!

We wish to urgently draw your attention to a serious business and compliance risk that faces Producers of Electronics and Electronic Equipment.

As explained in our representations referred above and enclosed as Annexures to this appeal, we have been sharing our challenges faced in completing the online registration covering additional categories introduced by EWMR 2022 & amendment procedure as introduced by CPCB in April 2023.

While MAIT appreciates and acknowledges CPCB's efforts in rectifying and addressing some of the technical challenges on the portal and updating the changes at the End of Life of product categories on the EPR portal; however, changes made in the EPR portal, were reflected in only a few working days from the deadline of June 30th. **This posed a significant challenge for the Industry to complete all the registration and amendment procedures within such a short timeline. The industry has thus been seeking an extension in the timeline to duly complete the process.**

In the meeting with Director E-Waste, MoEF&CC and Director E-Waste CPCB on June 28th, the MAIT delegation appealed for seeking an extension for the registration of Producers with the above explanation.

The request for extending the last date of filing online application for EPR registration & amendment beyond June 30th was denied. **However, as a measure of interim relief, the officials suggested the below actions to the Industry & in turn assured the Industry that MoEF&CC and CPCB will issue a letter to Customs before June 30th, to not block imported EEE consignments of Producers who have filed applications and that the acknowledgment email received from CPCB on submission of the application shall suffice for shipment clearance.**

Interim solution pathway offered by MoEF&CC & CPCB to Industry -

1. Industry needs to follow the deadline of 30th June to register on the portal.
2. Industry can fill zero value data for the newly introduced products in the portal as of now and will be allowed to amend the data later on.
3. Industry needs to provide a self-declaration letter stating that as of now, whatever data is being provided on the portal will be amended with all the necessary requirements to register on the portal.
4. Industry needs to add an Annexure to every mandatory document to be uploaded on the portal. Where in the annexure, the industry will declare that they will amend the data and furnish all the true information like the CA certificate and affidavit while amending the data on the portal.
5. Also in the cover letter, the industry needs to add the list of annexures.
6. CPCB will try to hyperlink the application status on the EPR Portal for Customs and based on the application status, Customs authorities will be issued instructions before June 30th to not withhold the consignments under EWMR 22.

Industry has placed trust in the above path advised by the officials and is working to meet the above requirement within a short window of 24-48 hours. **It is our urgent appeal to kindly issue the necessary instructions to Customs and Port authorities about the above by June 30th, so that the Industry doesn't face the challenge of shipments and consignments being blocked due to an absence of such communication. We urge MoEF&CC and CPCB to issue a copy of the directive sent to Customs to the Industry as well for our records.**

We hope that immediate action will be taken on this matter and Industry is supported to remain compliant and not face unnecessary disruption in the business.

Warm regards,



Col Suhail Zaidi (Retd)
Director General

CC: Shri Naresh Pal Gangwar, IAS, Additional Secretary, MoEF&CC
CC: Ms. Manmeet Nanda, IAS, Jt. Secretary, DPIIT
CC: Dr Prashant Gargava, Member Secretary, CPCB
CC: Shri Ved Prakash Mishra, IPS, Director, MoEF&CC
CC: Shri Anand Kumar, Director, CPCB
CC: Shri Vinod Singh, Addl Director, MoEF&CC

Encl:

1. MAIT's letter dated June 23rd 2023 explaining challenges being faced by Industry in completing registration and amendment procedure on the EWMR online portal.
2. MAIT's representation dated June 12th 2023 on seeking clarity on ITEW categorisation and EOL of EEE items.