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September 03, 2021

Shri Srinivasulu (IFS)
Member Secretary
Karnataka State Pollution Control Board

Subject: Direction by Karnataka SPCB to producers to provide historical sales data (FY2010- 2020) for various categories of EEE.

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 that with our continuous endeavor, industry's collaboration with MoEF&CC/CPCB has been steadily increasing, resulting in greater engagement between the Government & the industry.

Sir, we would like to bring to your notice the recent direction from Karnataka State Pollution Control Board (KSPCB) seeking information pertaining to the product-wise historical sales related data for various categories of electronic and electrical equipment (EEE) placed in the respective State. In this regard, it is to be noted that Producers have already submitted national level sales data to the Central Pollution Control Board (CPCB) at the time of application for EPR Authorization as mandated under the E-waste Management Rules 2016 (EWM Rules 2016). Consequently, the SPCBs requiring this state level sales data is not supported by the current regulatory framework under EWM Rules 2016.

There exists a genuine issue of obtaining this information due to the fact that the subsequent percolation of the products from such national level distributors down to various channels/resellers and their ultimate sale to consumer in any state is not tracked by the producers. This is further constrained by the participation of large body of retailers not directly linked to the producers. Therefore, the data pertaining to sales of EEE on a state basis, will not be available with producers. Given these perplexities faced by the industry, MAIT requests you to not insist on the requirement of state-level sales data from the producers.

In addition to the request for geographical area-based sales data, the recent directions of the KSPCB to provide a state level action plan goes against the pan-India compliance plan put in place by the EWM Rules 2016.

One of the main purposes of CPCB regulating EPR Authorization under the EWM Rules 2016 was to ensure that there is seamless (national) compliance and there is ease of doing business. While such efforts of SPCB may be well-intended, these attempt to break-away from pan-India compliance regime set up by MoEF&CC under the direction of CPCB. Since the goal is to inventorise the e-waste in their state, the SPCBs should consider working with their respective GST authorities to track the electronic devices sold in their state.

We request your immediate intervention into the matter and look forward to your positive consideration.

With regards,

George Paul
Chief Executive Officer