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Ref.No.MAIT/PY/2722 April 26, 2023

Dr. Prashant Gargava Member Secretary Central Pollution Control Board

Subject: MAIT inputs on EPR portal for Plastic Waste

Respected Sir,

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

As you may be aware, MAIT is a member of the **stakeholder group constituted to review the development of the online EPR portal** via Office Memorandum No.B-17011/7/UPC-II/PWM/2022 dated July 18, 2022.

MAIT being a member of the stakeholder group would like to humbly reiterate a few observations and suggestions with respect to the recent changes on the EPR portal with a view to not only ease compliance for the industry but also aid in the ease of doing business. Screenshots of the issues on the EPR portal from one of the Industry members are attached for your lucid understanding in **Annexure 1**.

1. Observation-Importer: Discrepancy in Registration vs Portal targets

Targets are showing against Importer for FY 2022-23. However, as per the Importer registration certificate, targets were ZERO for FY 2022-23 as complete Importer liability was transferred to BO at the time of registration. (Kindly Refer to Annexure 1)

Impact: EC will be levied if the achievement is not shown against these targets through EPR certificates.

2. Observation- Brand Owner: Credit transfer to Annual report for FY 2022-23:

Denominations are faded even when trying to add credits to the annual report for Cat 3. (Kindly Refer to **Annexure 1**). However, this issue is not observed while transferring the credits to the Annual report for Category 2.

Impact: Cannot transfer the EPR certificates, which are available in Wallet, to the Annual report for FY 2022-23 due to this glitch for Category 3.

3. Observation- Brand Owner: Credit transfer to Annual report for FY 2022-23:

Kindly let us know what are Target credits (6724.375) showing in the portal for Cat 2? (Kindly Refer to **Annexure 1**)

Kindly let us know what are Target credits (19.065) showing in the portal for Cat 3? (Kindly Refer to Annexure 1)

The above-stated observations require your immediate kind attention and rectifications.

Warm regards,

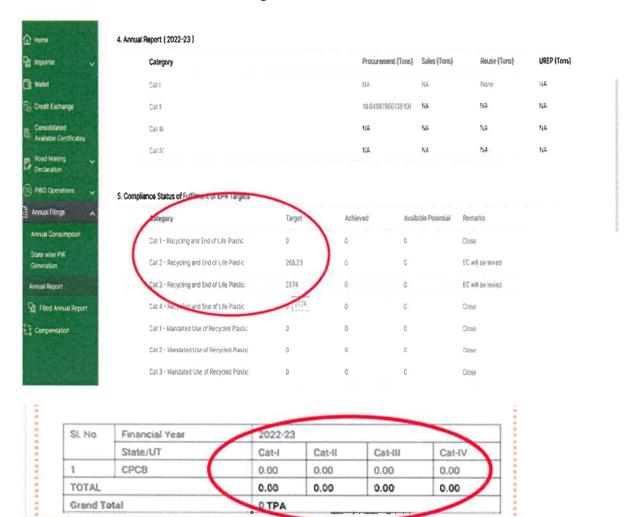
Col. AA Jafri, Retd. Director General

CC: Ms. Divya Sinha, Addl. Director & I/c, UPC-II, CPCB

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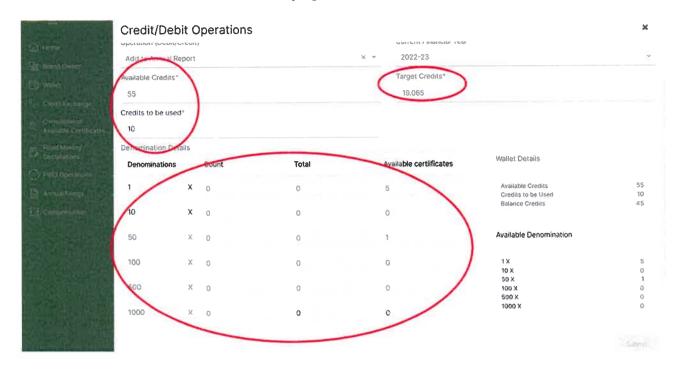
Annexure 1

1. Targets are showing against Importer for FY 22-23. However, as per the Importer registration certificate, targets were ZERO for FY 22-23 as complete Importer liability was transferred to BO at the time of registration:



2. For BO, what are the Target credits (19.065) showing in the portal for Cat 3?

Denominations are faded even when trying to add credits to the annual report for Cat 3:



3. For BO, what are the Target credits (6724.375) showing in the portal for Cat 2?

