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August 25, 2023

Shri Bharat Kumar Sharma  
Member Secretary  
CPCB

**Subject: Industry concerns regarding short timelines given by CPCB to seek inputs**

Respected Sir,

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

The representation bears reference to the recent inputs sought by the Battery waste department on key metals present in the batteries under BWMR 2022 for the generation of EPR certificates on 24<sup>th</sup> Aug 2023 and the inputs sought by noon 25<sup>th</sup> Aug 2023.

The inputs sought by the CPCB have been given a working time of even less than a day. We are sure that being the industry experts, you are very well aware, that to provide correct and accurate information, the industry needs an appropriate considerable time for the same as in many cases the data has to be sought from their global counterparts.

It is humbly submitted to curb the practice of seeking inputs on such short notices and always provide adequate time to the industry for submitting accurate information especially when such important documents which will have a long-lasting impact on the overall EPR framework and sound working of the BWM rules are involved.

We further bring to your kind notice that producers should only be given an EPR obligation for the weight of the battery placed in the market and the Recycler's target should be for material extraction.

MAIT would like to emphasize that ICT Industry is fully committed to compliance with the regulations formulated by the Government for responsible management of Environmental Waste in the country. MAIT members have been diligently complying with the Env Waste rules since its genesis and have been deeply involved with the Ministry over the past decade to help shape sustainable and functional regulation.

Through the above-stated issues in compliance requirements for the Electronics sector in such a short period of time, MAIT would like to highlight that we might need a change in approach to highlight the systemic gaps that are translating as tactical issues on a daily basis and industry suffers from the same. This overall approach leads to compliance risk and business disruption which is against the motto of Ease of Doing Business.

We are sanguine that our request on the subject matter will be addressed in a positive manner by your good office.

Warm regards,

Col Suhail Zaidi (Retd)  
Director General

CC: Shri Naresh Pal Gangwar, IAS, Addl. Secretary, MoEF&CC  
CC: Shri V P Yadav, Director, CPCB  
CC: Ms. Youthika, Sr. Environmental Engineer, CPCB