



Japan Machinery Center
for Trade and Investment

6th December 2023

Naresh Pal Gangawar
Additional. Secretary
Ministry of Environment, Forest and Climate Change
Indira Paryavaran Bhawan, Jor Bagh Road, Aliganj
New Delhi – 110003

Via email: asnpg.mefcc@gov.in; satyendra.kumar07@nic.in; amit.love@nic.in

Our comments on Plastic Waste Management (Second Amendment) Rules, 2023 dated 30th October, 2023: Notification No. G.S.R. 807(E)

Dear Additional Secretary Mr. Naresh Pal Gangawar:,

The Japan Machinery Center for Trade and Investment (“**JMC**”) is a non-profit organization. It was established in December 1952 in accordance with the Japanese Export and Import Trade Law under the authorization of the Minister of Economy, Trade and Industry of Japan. The objective of the JMC is to engage in activities that enhance the common benefit of member companies and promote the sound development of international trade and investment by the machinery industry. JMC comprises member companies engaged in machinery and systems-related exports and foreign investments such as machinery manufacturers, trading houses and engineering companies. At present, the total number of JMC member companies is about 240.

Our committee handles environmental and product safety issues regarding products for trade and is strongly concerned with overseas environment- and product safety-related regulations on products. From this standpoint, we would like to comment on Our comments on Plastic Waste Management (Second Amendment) Rules, 2023 dated 30th October, 2023: Notification No. G.S.R. 807(E)

Rm. 401, Kikai Shinko Bldg., 3-5-8 Shiba-koen Minato-ku, Tokyo 105-0011, Japan

Tel : 81-3-3431-9230 , Fax : 81-3-3436-6455

E-mail : morikawa@jmcti.or.jp

URL : <https://www.jmcti.or.jp>



Japan Machinery Center
for Trade and Investment

If you have any questions, please feel free to contact our secretariat (Mr. Chiaki Morikawa, E-mail: morikawa@jmcti.or.jp)).

Sincerely yours,

A handwritten signature in black ink that reads 'Kanno Yasuhiko' in a cursive script.

KANNO Yasuhiko

Chairman

Environment Law Committee

Our comments on Plastic Waste Management (Second Amendment) Rules, 2023 dated 30th October, 2023: Notification No. G.S.R. 807(E)

We, the Japan Machinery Center for Trade and Investment, would like to send the following comments to the Ministry of Environment, Forest & Climate Change regarding Plastic Waste Management (Second Amendment) Rules, 2023 dated 30th October 2023: Notification No. G.S.R. 807(E).

We welcome the Government of India's efforts to strengthen the effective implementation of the Rules. Having given the rules careful consideration, we are concerned about a number of provisions that will be difficult for producers to comply with in practice and submit the following comments.

As for Rule 11 (1):

The requirement to mark on plastic packaging the brand owner's name, its registration number, and thickness in the case of packaging made by a plastic sheet or the like was once introduced in August 2021; however, it was abolished for imported products according to Plastic Waste Management (Second Amendment) Rules, 2022 published in July 2022. This requirement is re-introduced for imported products according to Plastic Waste Management (Second Amendment) Rules, 2023 published on the 30th October 2023.

We propose that the marking requirement be exempted for packaging for imported electronic products and their accessories.

Reason:

Electronic products and their packaging are generally designed for worldwide use. Marking unique to India will require further design changes of packaging for different products for the Indian market, requiring additional resources, administrative costs, and the recovery of unwanted packaging, resulting in an increased environmental impact.

Many overseas manufacturers were forced to spend considerable resources to meet the marking requirement in 2021, and the marking was removed when the requirement was abolished the following year. We are not ready to spend additional resources to once again meet this unique requirement in India.

End