





# THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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16 January 2024

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# North Zone :

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West Zone : Block - A, 13<sup>th</sup> Floor, Office No.1306/1307, Mondeal Heights, Near Wide Angle Cinema, S.G. Highway, Ahmedabad - 380 015. Tel No.: 079 2970 5124 aipma.west@aipma.net Subject: EPR related – transfer of liability.

Indira Paryavaran Bhawan, Jor Bagh Road,

Dear Sir,

Greetings from The All India Plastics Manufacturers' Association (AIPMA).

Hon'ble Minister- Ministry of Environment, Forests and Climate Change

Thank you for sparing your valuable time with delegation of Laghu Udyog Bharati.

This is regarding transfer of EPR liability of plastic producers who have sold the material to medium and large brand owners.

This is to further inform you for FY 21-22, the producers who have sold the material to medium and large brand owners for the year 19-20 and 20-21, the liability of EPR compliances should have been shifted to the medium and large brand owners. However in cases where the medium and large brand owners have not registered on EPR, the liability is still showing with the producers since it has not been transferred to large and medium brand owners. This is putting the producers at a very highly disadvantageous position as the cost of EPR compliances are very high.

We kindly request you to consider the transfer of the liability of the producer in FY 19-20 and FY 20-21 to medium and large brand owners

Thanks & Regards For The All India Plastics Manufacturers' Association

MMI

Manish Dedhia President, AIPMA