

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ref. No. AIPMA/2023-2024/GOI/042

Date: 30th December 2023

Mrs. Leena Nandan
Secretary,
Ministry of Environment, Forest and Climate Change
Government of India,
Indira Paryavaran Bhawan, New Delhi

Subject: Urgent request to resolve the challenges faced by Plastics Producers concerning EPR compliances

Dear Madam,

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

The purpose of this communication is to bring to your attention a critical issue currently faced by the plastic industry – the challenges encountered in submitting Extended Producer Responsibility (EPR) annual returns.

With reference to the constructive meeting of AIPMA with officials from the Ministry of Environment, Forest and Climate Change (MoEF&CC) and Central Pollution Control Board (CPCB) on 24th and 25th July 2023, it was discussed that the EPR registration form is currently cumbersome to fill and needs simplification in the EPR registration process. A summary of the discussions and the agreed-upon roadmap which was sent on 1st August 2023 and the same is attached for your perusal. At that time EPR portal was not working properly and the simplification process of the form got delayed due to the change of the IT vendor in CPCB. Till date minimal progress has been observed in simplifying the EPR registration forms as per the agreed points and therefore difficulties has been faced by producers in meeting the obligations.

Subsequently, there is significant confusion surrounding the draft notification for the amendment in the Plastic Waste Management (PWM) Act, 2016, published on 16th October 2023. The proposed changes, if implemented as is, will exempt micro and small producers from EPR obligations, transferring them to manufacturers. We are actively collaborating with MOEF&CC officials to develop an effective roadmap for the implementation of this progressive step, which aims to boost the growth of micro and small producers.

The last date for the submission of EPR annual returns was 30th November 2023 but given these pressing circumstances, we earnestly request an extension of the EPR annual return filing date until the implementation of the draft notification or at least 31st March 2024. We believe that your support in addressing the technical challenges surrounding EPR registration and annual return filings will provide much-needed relief to the industry.

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Thank you for your attention to this matter, and we look forward to your positive response.

Yours sincerely
The All India Plastics Manufacturers' Association

MMD.

Manish Dedhia
President, AIPMA