

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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8<sup>th</sup> January 2023

**Mr. Satyendra Kumar**  
**Director**  
**Ministry of Environment, Forest and Climate Change**  
**Government of India**  
**Indira Paryavaran Bhawan, Jor Bagh Road**  
**New Delhi - 110003**

**Subject:** Input on Draft Notification for Second Amendment in Plastic Waste Management Rules, 2016

Dear Sir,

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

I am writing to extend our sincere appreciation for your commitment to advancing the cause of sustainability, as reflected in the recent draft notification regarding the second amendment in Plastic Waste Management Rules, 2016, released on 16th October 2023.

At the outset, allow me to express our wholehearted support for the bold initiative to encompass manufacturers and sellers within the Extended Producer Responsibility (EPR) framework. This reflects a commendable step towards shared responsibility for the environmental impact of plastic waste. We particularly commend the provision exempting Micro and Small Producers from the EPR obligation, a move that resonates with our shared commitment to fostering a sustainable future.

In essence, the EPR depends upon the successful mass balance of material entering environment as packaging and leaving the environment through EPR. It is feasible to use technology by providing special suffix or prefix to raw material consumed for packaging and leveraging Udyog Aadhar registration of micro and small producers, the need for registration on EPR portal become redundant and should be done away with.

Building on this, we propose an even more robust approach by advocating for the exemption of Micro and Small Producers from the registration process altogether. The rationale behind this proposition lies in the intricate web of raw material movements among Manufacturers, Importers, and Traders. Leveraging cutting-edge technologies like blockchain or bar code traceability, the traceability of raw material movements across stakeholders becomes seamless. This not only facilitates precise calculation and implementation of reverse obligations, as evidenced by successful European models but also underscores the feasibility of excluding Micro and Small Producers from mandatory registration.

In the current Indian scenario, micro and small brand owners are already exempted from both EPR obligations and registration. The obligation for these entities is calculated based on the total packaging material produced minus what is sold to Large and Medium Brand Owners. This precedent establishes that EPR

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obligations can be effectively managed without mandatory registration for certain categories of producers. On similar lines, we can establish a clear and fair metric. This corollary serves as a blueprint for determining the precise mass balance of materials consumed by small and micro-producers.

Furthermore, the advent of blockchain technology provides an unprecedented opportunity for complete traceability of raw materials, extending from production to post-consumer waste and beyond if necessary. Manufacturers, as primary contributors to the production cycle, can leverage these technologies to ensure the traceability of materials, allowing for the precise calculation of EPR obligations. This traceability is independent of the registration status of Micro and Small Producers.

Removal of such requirements would reduce the compliance burden on micro and small units and enhance ease of business for them and thus support the web of micro and small producers providing large number of employment.

In closing, I want to reiterate our gratitude for your thoughtful actions thus far. We stand ready and willing for further consultation, should the need arise to develop a comprehensive module that addresses all variables and ensures the resounding success of this enhanced EPR model.

We appreciate your attention to this matter and look forward to the exclusion of Micro and small producers from the ambit of EPR regulations.

**Yours sincerely**  
**The All India Plastics Manufacturers' Association**

*MMD*

**Manish Dedhia**  
**President, AIPMA**