

# LIST OF CLARIFICATIONS ISSUED BY CPCB SINCE 16 FEB 2022 POST EPR NOTIFICATION

DATE	CIRCULAR / OM REF	SUBJECT
13.05.2022	CPCB No. B-17011/7/PWM(MLP)/2022	SUBMIT COMPLIANCE DOCUMENTS OF 25 % OF EPR TARGET FOR THE INTERVENING PERIOD (FROM DATE OF ISSUE OF REGISTRATION CERTIFICATE TO TILL DATE) AS PER FORMAT .
26.07.2022	CPCB No. B-11011/UPC-II/PWM/2022-23	REGISTRATION OF PWP's ON CENTRAL CPCB PORTAL BY 05th AUG 2022. FAILING WHICH CONSENTS ISSUED BY PCBs/PCCs WILL BE REVOKED.
13.12.2022	CPCB No. B.17011/7/UPC-II-PWM(SUP)/2022	COMPREHENSIVE DIRECTIONS UNDER SEC 5 OF EP ACT TO PLASTIC RAW MATERIALS MANUFACTURERS ON IN DIRECTIONS ISSUED UNDER PARA 3 TO ENSURE EPR REG NO. ISSUED BY CPCB TO PRODUCER TO BE INCORPORATED IN
21.12.2022	CPCB No. CP-20/33/2021-UPC-II-HO-CPCB-HO	DIRECTIONS UNDER SEC 5 OF EP ACT REG PROVISION OF GST INVOICE OF TRANSTIONS RELATED TO PLASTIC PKG BY 9 DIRECTIONS WITH ENV PENALTY OF 5000 PMT ON NON COMPLIANCE
06.01.2023	MoEEF & CC OM FILE NO.17/6/2021-HSMD	GUIDELINES ON EPR FORPLASTIC PACKAGING PWP's ARE NOT COVERED UNDER OTHER TYPES OF PLASTIC WASTE IN VALUE CHAIN DETAILED INVOICES OF LAST TWO YEARS MAY BE VARIFIED ON NEED BASIS AS A PART OF AUDITING
25.01.2023	CPCB No. CP-20/117/2021-UPC-II-HO-CPCB-HO-Part(1) FOR E COMMERCE UNITS WITH LIST	CLOSURE DIRECTIONS UNDER SEC 5 OF EP ACT FOR NON-COMPLIANCE OF PWM RULES 2016(AS AMENDED) 15 DAYS DEADLINE GIVEN
03.02.2023	MoEEF & CC OM No. HSM-17/1/2023-HSM	APPLICABILITY OF THICKNESS RESTICTION ON SHRINK FILM, CLING FILM , STRETCH FILM UNDER PWM RULES 2016 AS AMENDED UNTIL EXEMPTION GIVEN BY CENTRAL GOVT ON RECOMMENDATION BY CPCB THICKNESS WILL BE ABOVE 50 MICRONS MLPs ARE EXEMPTED FROM THICKNESS SPECIFICATION
07.02.2023	CPCB No. CP-99/143/2021-UPC-II-HO-CPCB-HO	REGULAR INSPECTION ON BANNED SUP PRODUCTS INCLUDING CLAIMED AS BIODEGRADABLE OR OXO BIODEGRADABLE ARE NOT MANUFACTURED ,IMPORTED, STOCKED, DISTRIBUTED , SOLD OR USED ISSUING OF PUBLIC NOTICES THAT SALE OF BIODEGRADABLE (WITHOUT CPCB CERTIFICATE) AND OXO DEGRADABLE PLASTICS IS IN VOILATION OF PWM RULES 2016 AS AMENDED
08.02.2023	CUSTOMS STANDING ORDER 03/2023	CLARIFICATION ABOUT APPLICABILITY OF PWM RULES ON IMPORTED GOODS CUSTOM OFFRS WILL UPLOAD SUCH IMPORTS WHO DO NOT HAVE CERTIFICATE



IF CPCB REJECTS IMPORTER EPR APPLICATION , IMPORTER  
WILL FACE ACTION UNDER SEC 111 & 112 OF CUSTOMS ACT  
1962

14.02.2023	MoEEF & CC OM No. 12/14/2023-HSM	CLARIFICATION ON APP ON APPLICABILITY OF EPR GUIDELINES ON PLASTIC PKG ON MANUFACTURERS OF RIGID INDL CONTAINERS AS THERE IS A PROVISION FOR REUSE OF RIGID PKG BY BOs , ITs UNDER EPR OBLIGATION PLASTIC CRATES DOES NOT FALL UNDER EPR OBLIGATIONS
17.02.2023	CPCB No. CP-20/117/2021-UPC-II-HO-CPCB-HO-Part1	DIRECTIONS TO AIRLINE OPERATORS ON EPR & SUP BANNED PRODUCTS
21.02.2023	CPCB No. CP-20/6/2023-UPC-II-HO-CPCB-HO	APPLICABILITY OF EPR NOTIFICATION ON TARPAULIN MANUFACTURERS HSN CODE 6306 SHALL NOT BE CONSIDERED FOR EPR SUBJECT TO IT IS USED FOR NON PACKAGING ACTIVITIES MAINTAIN PROPER RECORD FOR VARIFICATION
21.02.2023	CPCB No. CP-20/33/2021-UPC-II-HO-CPCB-HO	PROVISION OF TRANSCION(SALES & PROCUREMENT) NOTICE IS ISSUED TO INFORM PIBOs TO UPDATE ACTION UNDER EP ACT 1986 FOR DEFAULTERS
24.02.2023	MIN OF C & I OM No.7/1/2017-EP(CAP) Part	REQUEST FOR A STAKEHOLDER MEETING -MAJOR ISSUES NOT TO SUPPLY RM FOR NON EPR REGD ENTITIES BY RM UNRESOLVED GAIL REQUEST REQUEST FROM ASSOCIATIONS REP PROCESSORS
28.02.2023	AIPMA/222-23/GOI/108	HUMBLE APPEAL FROM 25000 MICRO & SMALL INDS IN
01.03.2023	CPCB No. CP-20/117/2021-UPC-II-HO-CPCB-HO-PART1	IMPLEMENTATION ON SUP BAN
01.03.2023	CPCB No. CP-20/117/2021-UPC-II-HO-CPCB-HO-PART1	IMPLEMENTATION ON SUP BAN
13.03.2023	MoEEF & CC OM No. 12/51/2023-HSM	UPLOADING OF SALES/PROCUREMENT INVOICES ON CPCB LAST DATE EXTENDED TO 31st MAY 2023
22.03.2023	MOCF DCPC DO No.PC-1-13014/7/2023-Chem-CPC	RECOMMENDATIONS ON REQUEST FROM STAKE HOLDERS
23.03.2023	MIN OF C & I OM No.7/1/2017-EP(CAP)PART	REQUEST FOR EXEMPTION OF MICRO & SMALL INDS FROM PRODUCERS EXEMPTION FROM EPR REGISTRATION TILL RIGID CONTAINERS FOR INDUSTRIAL UTILITY MAY BE KEPT
25.03.2023	LUB REQUEST FOR MEETING ON EPR	NOTE FOR EPR MEETING



समर्पण हित

**लघु उद्योग भारती**

(जोधपुर संभाग, राज. उत्तर-पश्चिम)

जोधपुर कार्यालय :

रिफो गेस्ट हाऊस के पास

न्यू पॉवर हाऊस के पीछे

डीजल शेड के सामने

जोधपुर - 342 003 (राज.)



लघु उद्योग भारती

पंजीकृत सं. 11/78609 दिनांक 26.05.1994

राष्ट्र हित

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**लघु उद्योग की सेवा में समर्पित अखिल भारतीय संगठन**

## **NOTE FOR EPR MEETING ON 25<sup>TH</sup> MARCH 2023**

### **1) Shifting of Applicability of EPR liability Target from 01.04.2023 onwards**

#### **1.1) The current targets of EPR Liability are as :**

2021-22 : 25%    2022-23 : 75%    2023 onwards : 100%

#### **1.2) Plastic Waste Management Rules were notified in 2016. However, the EPR Guidelines were issued in Feb 2022.**

#### **1.3) Various amendments of Rules have been issued (latest was in 2023)**

#### **1.4) There should be time (Cooling time) between notifying the rules and implementation of the rules. The EPR portal was launched in 2022 and has been undergoing constant changes. Some of the modules on EPR portal has been launched by CPCB in Feb 2023. Its difficult for Micro and small producers to understand the constantly changing portal and related compliances. Till now, there have been major changes in the process and portal itself. It's not possible for the industry to understand and comprehend complex details in such short span of time.**

### **2) Urban Local Bodies have been completely absolved of Waste Management responsibilities.**

Why ?

### **3) MSME Producers be kept at par with MSME Brand Owners**

3.1) For some reasons, MSME Brand owners have been exempted from the EPR while all Producers including Micro and Small have been kept under the EPR. However, products are being mainly introduced in the market by Brand Owners and as per the objective of EPR i.e. polluter pays principle, Brand Owners should be covered as they are one who are placing the products in the market. With removal of MSME Brand Owners, their liabilities have been unfairly passed on to producers. Moreover, taking advantage of the situation, large number of Brand Owners are deliberately delaying registration there by shifting their past obligation to producers.

- 3.2) As per the provision of EPR, if the Brand Owner has not registered under EPR, their liabilities automatically come on Producers. Producers are thus penalized for wrongdoing by Brand Owners.
- 3.3) If the Producer sells its product to Trader or MSME Brand owners (not required to register under EPR), their entire liabilities are transferred to Producers. This is discrimination against Producers.
- 4) **The intent of PWM Rules (EPR) is environmentally sound management of plastic products until the end of its life . Primary responsibility is of Brand Owners & not Producers.**
- 4.1) PWM Rules 2016 defines stakeholders in the value chain i.e. Raw material Manufacturers, Producers, Importers and Brand Owners (PIBO)
- 4.2) Surprisingly, Raw material manufacturers have been kept out of the ambit of post-consumer waste management while all other stakeholders have been made responsible for Waste Management.
- 4.3) Producers are farthest from the Waste Generator. Material flow is from Raw material manufacturers to producers to Brand owners to Distributors to Retailers to Consumers. Role of producers in waste generation is negligible.
- 4.4) Producers work under closed loop environment with almost no slippage of material beyond control boundaries. Minimal value addition by producers (conversion only). Maximum value addition is at the level of Brand owners.
- 5) **Even the Brand owners are resisting the registration due to obvious procedural hassles. They seem to have approached the court also.**
- 6) **Implementation of some sort of Environmental cess on the manufacturing of Raw Material is the easiest & best solution for EPR.**
- 6.1) Manufacturers of Plastic Raw material are not covered under the EPR. As per the very objective of the EPR, they should be covered as they are the largest stakeholders (in terms of size and volume) in the entire value chain. It would be far easier to manage EPR if some fee/ cess is introduced at the level of Raw material manufacturers which could be recovered by them from producers. As there are only 18 Raw material manufacturers vis-à-vis around 1,30,000 producers of plastic packaging, any responsibilities at the level of Raw material manufacturers could be discharged smoothly and monitored by authorities easily.

6.2) The very objective of the EPR is to provide the required gap funding in order to manage non-recyclable waste.

6.3) A cess of @ Rs. 2 per kgs on 1,00,00,000 MTPA (1 Crores MTPA) of Polymers consumed shall fetch an annual fund of 2000 crore per annum basis. Sufficient to fund the PWP to collect, segregate & transport the plastic waste.

7) PWM Rules 2016 mandated Multilayer Plastic (MLP) to be phased out in 2 Years, as they can never be recycled, but somehow in 2018 amended this condition was surreptitiously deleted. Why ? On what basis ?

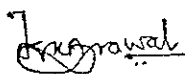
8) In 2023 Plastic tarpaulins were exempted from EPR by a CPCB letter. Why ? on what basis ? Will they not be littered on road after their end life ? we can sense lot of lobbying & not logic in this approach of CPCB.

9) CPCB has asked raw material manufacturers to stop supply of raw material to Producers after 31<sup>st</sup> March 2023 who have not registered under EPR. To request the ministry that this date may be kindly extended, till pending issues are resolved.

10) We propose a open house meeting with the Hon'ble Minister along with their officials to present the matter in proper prepxpective in mutual interest of the Government & the Stake Holders.

Regards

For Laghu Udyog Bharti, (Jodhpur Prant) (EPR Committee)

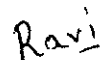


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## The case of the PRODUCERS in EPR under PWM 2022

1. **Algebra of Material Balance in EPR is flawed:** Case of inequality in quantity of Plastic Packaging Waste projected to be generated and EPR liability to be carried over by the Producers. Two examples will explain that the material balance can never happen and there will be too many entities behind a packaging waste quantity which theoretically is meant for only one. This has a potential to increase the gray area of EPR certificates being traded while no real recycling of waste has been done.

1a) Case of Producer selling packaging to a Trader and who in turn sells the same to a Brand Owner. In that case both Producer and BO are obliged to do the EPR. But the waste projected to be generated can be only equal to either BO's or Producers EPR liability. This will create undue stress in the EPR market and the PWP's will be compelled to issue certificates either from other than plastic packaging waste processed (which is against the provisions of PWM rules) or issue just EPR certificates by clever data management without actually processing any waste.

1b) Case of Producer selling to a Laminator (who is also a Producer) and both or any one these two selling to a pouch maker (who is also a Producer). The quantity of plastic is common between all the three but the EPR responsibility is distinct and each of the 3 have to separately undertake the same. Where does the quantity for the rest of the 2 come from..? This will again increase the trade of EPR certificates and do no good to the environment.

2. **Producers are too much loaded:** Producers are projected to become the most loaded enterprise to carry out the EPR Liability whereas Brand Owner who is in reality responsible for placing the products packed Plastic Packaging out for sale in the market and vis a vis littering of plastic packaging is least loaded to carry out the EPR liability. Brand Owners are majority by act Medium and Large, but if their Brand is unregistered their EPR liability comes to the micro / small shoulders of a Producers. EPR for all quantities sold to Micro and Small Brand Owners also falls on the shoulders of a Producer. Moreover if a producer sells to a trader then that quantity also falls on his shoulders. Majority of the producers are Micro and Small, they in this way are projected to be crushed under the extra load of EPR. (सारी दुनिया का बोझ हम उठाते हैं.)
3. **Unhealthy discrimination between Manufacturer & Producers :** The Producers make plastic sheets & films, whose product is a Raw Material for Packaging (Pouch, Bags etc) manufacturer and the Producers also make Plastic Pouch, Bags etc, whose product is a Raw Material for those Brand Owners who pack their commodity in any type of a plastic packaging. Thus the producers are basically Raw Material providers to Registered or

Unregistered Brand Owners. Their task or business is equivalent to Plastic Raw Material Manufacturer. The Manufacturer of Packaging Raw Material vis a vis big industries producing Raw Plastic Pallets or Powder are required to just provide the information on how much plastic RM has been sold to Producers. Then why are the producers of plastic films or sheets (which have diversified uses other than packaging use) bound to obey EPR and the manufacturer of Plastic Raw Materials (which also have diversified uses other than packaging films mfr.) are free from EPR..? As the plastic granules made by Manufacturer only have a certain potential to be converted into a litterable plastic packaging so is the potential of a plastic film or sheet made by a Producer to be converted into a litterable plastic packaging. If the potential is the same why then the Manufacturer is just required to keep record of sale done to producers, why not also allow the producers of plastic sheet or films or pouches to just keep record of sale done by them to real packers i.e. registered or unregistered Brand Owners.

Suggestions:

1. Immediately hold the implementation of EPR till all the 3 above anomalies are addressed.
2. Treat Producers equivalent to manufacturers and ask them just the same amount of task as asked by the manufacturers.
3. All large and medium Brand Owners (Commodity packers) may come under EPR irrespective of the fact that their Brand being Registered or Unregistered or applied for TM etc.

This is necessary to mitigate a hell lot of confusion prevailing on the floor level of business entities projected to be covered under PIBO and PWP's. If this is not done only a new GST free economy of EPR Certificate buy and sell will flourish. This new trade of EPR certificates is not covered under any GST or TDS tax etc. so it will also not contribute to India becoming a 5 Trillion USD economy. It has full potential of giving flying powers to the Pollution Board officers to harass the industry and business.

**VARUN MITTAL**  
**MUKESH AGGARWAL**

## Case of PWP Recyclers under EPR of PWP 2022

Sub : Identification & Establishment of Plastic Packaging Waste is still unaddressed in current format of EPR Rules 2022. A registered PWP processing non plastic packaging waste should not be allowed to issue EPR certificates.

In present scenario the plastic waste comes to a PWP recyclers classified as type of plastic (i.e. PP, LDPE, PET etc) and not as type of waste origin (i.e. Packaging , furniture, white goods etc).

As per the core of the PWM EPR Rules 2022, **EPR Certificates can be issued by PWPs who are Recycling Plastic Packaging Waste only**. Thus other than Plastic Packaging Waste, recyclers should not be able to issue the EPR Certificates, but in the current scenario there is no provision to establish that what the PWP recycler is processing is Plastic Packaging Waste only. So irrespective of what type of plastic waste is being recycled any registered PWP can issue EPR Certificates of Plastic Packaging Waste, which is against the aim of the EPR.

### Request & Suggestions :

(i). Devise an unambiguous methodology for PWPs to arrive at the conclusion that what they are recycling is Plastic Packaging Waste only. This will mitigate any chance of harassment or confusion while following the Rules of EPR under PWM 2022. **The Plastic Packaging Waste needs to be uniquely identified at the point of collection and segregation. One way of doing this is by having a unique HSN code under GST for each of the 4 categories of Plastic Packaging Waste. (Note: This ambiguity is more prevalent for Category 1 defined in EPR Rules under PWM)**

(ii) Having done that, the GST Purchase Invoice with that HSN code forms the basis of total annual plastic packaging waste procured by a PWP. The EPR certificates generated by the PWP can not be more than that quantity and quality of plastic waste.

(iii). Hence it is required to withhold the process of issuing any EPR Certificates by the PWPs till the provision of opting for OTHER than plastic packaging waste is live and functional on the CPCB Portal and the guidelines of establishing the type of waste being processed is well laid out in the rules.

We have tried to update the concerned administration on the ground reality teething problems faced by the industry in general and correlating it with the PWM rules.

Mukesh Aggarwal  
Varun Mittal



F.No.7/1/2017-EP(CAP)part  
Government of India  
Ministry of Commerce & Industry  
Department of Commerce  
EP(CAP) Division  
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Vanija Bhavan, New Delhi  
Dated 23 March, 2023

**OFFICE MEMORANDUM**

**Subject: Appeal from 25,000 micro and small industries in plastic sector - complexities of EPR - Regarding.**

The undersigned is directed to refer to this Department's OM of even No. dated 24.02.2023 forwarding therein representation received from All India Plastics Manufacturer Association (AIPMA) and major plastic association regarding the issue concerning EPR Registration and availability of raw-material to Plastic Industries after 31<sup>st</sup> March, 2023 for resolution so as to ensuring ease of doing business for the Indian Industry & trade fraternity.

2. Now this Department has received another representation from AIPMA on the subject matter wherein the plastic industry has requested for the following:

- Micro and small producers may be kept out of the purview of EPR. Any fee in lieu of EPR related costs agreed upon may be applied from the date of application and not from retrospective date. Alternatively, a slab wise model on the lines of GST can be introduced with a fraction of normal EPR obligations in accordance with production volume of the enterprise, longer timelines for compliance and bare minimum procedure so that it is feasible for micro and small units to embrace EPR regime.
- Producers other than micro and small enterprises may be exempted from EPR registration for a period of at least 1 year (ending 31st March 2024), in which time the effort should be to streamline the portal for all its deficiencies and then onboard Brand Owners first onto the EPR portal.
- Rigid containers of industrial utility may be kept out of the ambit of EPR

A copy of the representation received in this regard from All India Plastics Manufacturer Association (AIPMA) is **enclosed**.

3. It is requested to kindly consider the issue faced by the Plastic Industry for the benefit of Indian Industry & our exporters. An expedited action is requested for, under intimation to this Department.

Encl: as above

  
(R. Manohar Kamath)

Under Secretary

Ph: 011-23039713

Email: rm.kamath63@nic.in

To,

**Kind attention:**

Shri Naresh Pal Gangwar

Additional Secretary

Central Pollution Control Board

Ministry of Environment, Forests and Climate Change

Paryavaran Bhavan, New Delhi



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Date: 28.02.2023

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SUNIL SHAH  
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Ref: AIPMA/2022-23/GOI/108

Shri Narendra Modi,  
Hon'ble Prime Minister  
Government of India  
PMO office,  
New Delhi- 110011

वाणिज्य एवं उद्योग मंत्री कार्यालय वाणिज्य भवन  
C&I M's Office Vanijya Bhawan  
756366  
डायरी नं० / Dy. No. 09-03-2023  
दिनांक / Date

**Subject: Humble Appeal from 25,000 Micro and Small Industries in Plastic sector to save from complexities of EPR**

Respected Sir,

Greetings from the All India Associations representing more than 50,000 plastic processors.

We, the associations representing the plastic processing sector, appreciate the responsibility and role of industry towards sustainability, circularity and the holistic objective of ending plastic waste in the emerging new order towards carbon neutral economic activities.

The plastic processing industry is aligned towards your environmental goals and vision and would like to bring to your kind attention the following for an effective regulatory framework that embraces the principle of "Sabka Saath Sab Ka Vikas" based on inputs from the MSME segment engaged in this sector. **Annexure 1 (enclosed) includes the industry background, facts and figures w.r.t EPR guidelines notified by Ministry of Environment, Forest & Climate Change.**

With the above mentioned points as context and feedback from the industry during our pan India seminars/conferences, dialogue with the industry & associations, we humbly request you to take a fresh perspective and facilitate following demands in order to save more than 25,000 plastic processing units in MSME Sector: -

**A. CURRENT STATUS: Micro and small producers are required to register under EPR on the portal.**

**CHALLENGES FACED:** Undue burden of compliance on small and micro producers compromising viability to carry on business for over 25000 units engaged in the segment, such units are managed by entrepreneurs who do not have competence, time and financial resources to cope with complex requirements. This would put question mark on employment of few lacs of human resources and threat to few thousand crores of investment to become non-performing assets. Liability on such units from retrospective effect including that of material supplied to brand owners who have not registered would spell financial collapse. There is already a concern due to rising harassment by implementing authorities.

USIRME/EPCLSub on  
10/03/23

Dir(SK)/BP-CAD  
16/03/2023

761448/2023-24  
21/03/2023





## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ahmedabad - 380 015.  
Tel No.: 079 2970 5124  
aipma.west@aipma.net

**PROPOSED SOLUTION:** Micro and small producers are aligned towards the objective and would be willing to contribute to the cost through lump sum fee. However, they should be kept out of the purview of complicated compliance like micro and small brands. Any fee in lieu of EPR related costs agreed upon to be applied from the date of application and not from retrospective date. Alternatively, a slab wise model on lines of GST can be introduced with a fraction of normal EPR obligations in accordance with production volume of the enterprise, longer timelines for compliance and bare minimum procedure so that it is feasible for micro and small units to embrace EPR regime."

### B. CURRENT STATUS: EPR portal registration and procedural compliances far too complex for MSMEs.

**CHALLENGES FACED:** The new CPCB EPR Portal itself has been evolving and is not stable in terms of the requirements for uploading documents, not to say the intricate details etc. that is also required to be uploaded on the portal. This is evident from the guideline document of 73 pages to be comprehended by the entity prior to registration. By the time a company understands the requirements, changes are made on the same (so far more than six amendments and modules have been notified since 16<sup>th</sup> Feb 2022), making it impossible for the small entrepreneur to register on the portal. This is also evidenced by the poor number of registrations till date since the inception of the new portal.

In the meanwhile, as MSMEs struggle with the registration requirement, CPCB has instructed large Plastic resin manufacturers not to supply plastic granules (raw material) if the Producer is not EPR registered. This will have a drastic impact on the packaging producers forcing many small and micro units to closure and leading to bankruptcy, loss of jobs etc. In fact, the effort from CPCB should be directed towards getting Brand Owners to be registered first on the portal, followed by Producers and others.

There is an urgent need for SPCB officials to also fully understand the provisions of PWM 2022 and its provisions, as we are also getting regular representations from our members and associations regarding unnecessary harassment on the ground, due to the inadequate understanding of the law and its enforcement.

Further CPCB has also instructed Customs not to release goods if EPR registration is not done by importers for imports of all goods that use plastic packaging, whether as the primary or secondary packaging material. This is already leading to huge losses for importers on account of demurrage charges as the time period from applying for registration to getting registration is approximately 4-6 weeks. This has already started to strain the supply chain of many industries and will add to the chaos of clearing materials at port.



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Phone : +91 22 6777 8899 (30 Lines) • Fax : +91 22 2821 6390

E-mail : office@aipma.net • Website : www.aipma.net

### OFFICE BEARERS :

MAYUR D. SHAH  
President

MANISH DEDHIA  
Senior Vice President

MANOJ R. SHAH  
Vice President - Finance

SUNIL SHAH  
Vice President (West Zone)

LALIT KUMAR SINGH  
Vice President (North Zone)

ANIL REDDY VENNAM  
Vice President (South Zone)

ASHOK AGARWAL  
Vice President (East Zone)

North Zone :  
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West Zone :  
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Mondeal Heights,  
Near Wide Angle Cinema,  
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**PROPOSED SOLUTION:** Producers other than micro and small enterprises should be exempted from EPR registration for a period of at least 1 year (ending 31st March 2024), in which time the effort should be to streamline the portal for all its deficiencies and then onboard Brand Owners first onto the EPR portal.

Plastic Associations should be roped in by CPCB for conducting awareness workshops for the SPCBs for ease of implementation.

**C. CURRENT STATUS:** EPR guidelines mandate EPR on rigid containers.

**CHALLENGES FACED:** EPR scope should be limited to post consumer plastic packaging which is irretrievable easily from the environment and is difficult to recycle. Rigid containers of industrial utility which are not found in the environment as pollution.

**PROPOSED SOLUTION:** Rigid containers of industrial utility should be kept out of the ambit of EPR.

**Summary of our request for your urgent intervention and consideration: -**

1. Micro and small producers should be kept out of the purview of EPR. Any fee in lieu of EPR related costs agreed upon should be applied from the date of application and not from retrospective date. Alternatively, a slab wise model on lines of GST can be introduced with a fraction of normal EPR obligations in accordance with production volume of the enterprise, longer timelines for compliance and bare minimum procedure so that it is feasible for micro and small units to embrace EPR regime.
2. Producers other than micro and small enterprises should be exempted from EPR registration for a period of at least 1 year (ending 31st March 2024), in which time the effort should be to streamline the portal for all its deficiencies and then onboard Brand Owners first onto the EPR portal.
3. Rigid containers of industrial utility should be kept out of the ambit of EPR.

We believe that a fair review in the matter to ensure survival of MSME producers who contribute to the packaging needs of remaining industrial activity, provide gainful employment to millions and are facilitating India's journey towards a five trillion economy is an earnest need of the sector. Timely intervention would ensure that Government's objective and your vision sees light of the day.



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We hope for a favorable action on the matter.

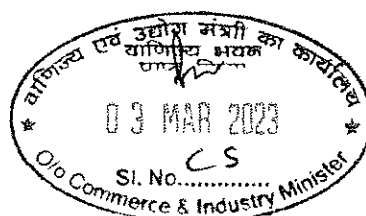
Thanks and Best Regards.

Yours Sincerely,

Sr.no.	Associations Name	Name	Designation
1	The All India Plastics Manufacturers' Association (AIPMA)	Mr. Mayur D Shah	President
2	Organization of Plastics Processors of India (OPPI)	Mr. Dilip Parekh	President
3	The Plastics Export Promotion council (Plexconcil)	Mr. Hemant Minocha	Chairman
4	Gujarat State Plastic Manufacturers Association (GSPMA)	Mr. Bhagwanbhai Patel	President
5	Indian Plastics Federation (IPF)	Mr. Sisir Jalan	President
6	Telangana and Andhra Plastics Manufacturers Association (TAAPMA)	Mr. Vimlesh Gupta	President
7	The Tamil Nadu Plastics Manufacturers Association	Mr. L. Meiyappan	President
8	Karnataka State Polymers Association (KSPA)	Mr. Vijay Kumar	President
9	Maharashtra Plastics Manufacturers Association (MPMA)	Mr. Bharat Rajput	President
10	Kerala Plastics Manufacturers Association (KPMA)	Mr. M.S. George	President
11	Canara Plastic Manufacturers & Traders Association (CPMTA)	Mr. B. A. Nazeer	President

Copy to:

1. Shri Bhupendra Yadav, Hon'ble Minister for Environment, Forest and Climate Change, Government of India
2. Shri Piyush Goyal, Hon'ble Minister for Commerce & Industry, Government of India
3. Shri Narayan Rane, Hon'ble Minister for Micro, Small and Medium Enterprises, Government of India
4. Shri Mansukh Mandaviya, Hon'ble Minister for Chemicals and Fertilizers, Government of India





### Annexure I

1. The plastic packaging value chain includes Raw material manufacturers, producers or converters, brand owners or packers, small business packers and consumers. The producers are a link between raw material manufacturers and the users like brands who introduce the packaging through their products and derive maximum economic benefits. Needless to say the producers largely in MSME segment are merely a conduit serving industry for least monetary benefits and are not a major contributor to the plastic waste stream as they operate under closed environment contrary to the popular belief and are the farthest entity based on the doctrine of "Polluter Pays Principle" of our environmental policy.
2. The sector comprises over a lakh of MSMEs, majority of them are small and micro units engaged in mostly mono layer plastic packaging requiring small capital investment. This category of plastic packaging is easily recyclable and reflects the existence of over seventy clusters across India involving thousands of units and engaging millions of workers to recycle almost sixty percent of plastic waste for many years now. As against this, the modern plastic packaging MLP (multi-layer plastic) contributes a major portion of plastic waste which is extremely difficult to recycle and mostly finds its way to burning for energy recovery. The latter is Capex intensive and mostly dominated by large units catering to Brands who introduce these packaging through their products. A scientific study would validate the extent of content in the waste stream of each category of packaging and the value chain beneficiaries which in our opinion should be the basis of regulatory regime. EPR should focus on Brands selling through modern retail or normal distribution channels as they contribute maximum to plastic waste.
3. The PWM 2016 and subsequent amendments are adopting the concept of EPR based on the European model to address uncollected, unrecyclable plastic packaging waste by incentivizing management of post-consumer packaging waste. The EPR as practiced in Europe and North America is applied on packaging and mandates packers rather than producers to discharge EPR liabilities for packaging introduced by them. The current proposals have missed following vital differences in Indian context. The mono layer packaging produced by small producers is highly recyclable and is being recycled to a greater extent, a de facto EPR. Well lubricated system already exists for recovery of such recyclable waste which includes mono layer films, most rigid containers and other recyclable products. Any efforts to strengthen this value chain without burdening it with undue compliance would go a long way in achieving intended objectives and realizing "Swacch Bharat".

Unlike large units, the small and micro segment is entrepreneur driven and needs to be nurtured through less compliance burden for its survival let alone growth. The evolving regulatory regime is biased against our structure of MSMEs and in favor of large Brands/ Packers effectively compromising the very existence of the former.





F.No.7/1/2017-EP(CAP)part  
Government of India  
Ministry of Commerce & Industry  
Department of Commerce  
EP(CAP) Division

Udyog Bhavan, New Delhi  
Dated: 24 February, 2023

OFFICE MEMORANDUM

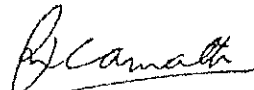
**Subject: Request for a Stakeholder meeting – Major issues faced by the Plastic Industry including exporters – Regarding.**

The undersigned is directed to refer to this Department's OM of even No. dated 03.01.2023 regarding Comprehensive Directions dated 13th December 2022, issued by Central Pollution Control Board viz.. "Not to supply plastic raw materials directly to producers engaged in manufacture of plastic packaging not having valid registration certificate from concerned SPCB/PCC/CPCB through centralized EPR portal" and to say that the concern highlighted by Gail (India) Ltd. remains unresolved which shall adversely impact Indian Plastic Industry and our exports.

2. In this regard; it is mentioned that the Plastic Industry Associations have requested this Department to call a stakeholder meeting with CPCB, Plastic raw-material manufacturers and Plastics processing industries to discuss issue concerning EPR Registration and availability of raw-material to Plastic Industries after 31st March, 2023 for resolution so as to ensuring ease of doing business for the Indian Industry & trade fraternity. A copy of the representation received in this regard from All India Plastics Manufacturer Association (AIPMA) is enclosed

3. It is requested to kindly consider the issue faced by the Plastic Industry and consider the request made by GAIL India Ltd. concerning the subject for the benefit of Indian Industry & our exporters. An expedited action is requested for, under intimation to this Department.

Encl.: As above

  
(R. Manohar Kamath)  
Under Secretary  
Ph:011-23039713  
Email: rm.kamath63@nic.in

To,

Kind attention:  
Shri Tanmay Kumar  
Chairman  
Central Pollution Control Board  
Ministry of Environment and Forests, Paryavaran Bhavan  
New Delhi





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# AIPMA



PLASTICS  
INDIA

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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OFFICE BEARERS : AIPMA/GOI/22-23/201

Date: 15-02-2023

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Vice President - Finance

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Mr. Manish Chadha  
Joint Secretary, Department of Commerce  
Ministry of Commerce and Industry  
Govt. of India  
Udyog Bhavan  
New Delhi - 110011

**Subject: Request for a Stakeholder meeting – Major issues faced by the Plastic industry including exporters**

Dear Sir,

Greetings from AIPMA.

Kindly refer to your meeting with Mr. Deepak Ballani, Director General, AIPMA on 14<sup>th</sup> Feb 2023.

The Govt. of India had notified PWM Rules, 2016 and made several amendments from time to time and also notified Schedule II on Extended Producers Responsibility (EPR) in Feb., 2022 imposing EPR targets on producers, Importers and Brand owners (PIBO). We fully support the efforts of the Govt. of India to control and regulate the use, collection of waste, processing of plastic waste and use of reprocessed granules under the principle of sustainable development, precautionary principle, and polluter pays principle as have been recognized in the law.

However, the plastics industry is facing major issues due to complex EPR registration process and compliance procedures. Till date, merely 7-8% industries have been able to complete their EPR registration process. As per the circular from CPCB, Raw material manufacturers have been asked to stop supplying Raw Material Polymers to Plastics packaging producers without EPR registration number after 31<sup>st</sup> March 2023.

Moreover, Commissioner of Custom on 08.02.2023 has issued a circular stating that all the importers of goods which are not plastic packaging, but are wrapped or packed in plastic packaging, such as machinery, textile, etc. are required to upload the EPR registration at the time of filling the bill of entry. This circular will not only put EPR obligations on plastic industry but also on non-plastic packaging producers who are using plastics just for wrapping their primary products. This will invite not only a lot of compliances on the industry but will also create a problematic situation for importers.

Overall, the industry is facing major issues and challenges that is likely to adversely impact both domestic production and exports of plastics goods from the country.

Taking above in to consideration, we would kindly request you to call a stakeholder meeting including relevant Ministries, CPCB, Raw material manufacturers and





FORWARDING PROGRESS THROUGH PLASTICS  
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# AIPMA



PLASTICS INDIA

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Plastics Processing industries. Following are the issues that may be discussed during the Stakeholder meeting: -

1. Simplification of the EPR registration process and portal.
2. Exemption to Micro and Small Producers and manufacturers from EPR obligation (similar to the exemption extended to Brands)
3. Removing Rigid plastics from the ambit of EPR
4. Availability of Raw material to Plastic packaging producers and manufacturers after 31<sup>st</sup> March 2023.
5. Ease of doing business for the industry by simplified compliance procedures and process.

We would request you to kindly consider the above.

Thanking you,

Yours Sincerely,

For The All India Plastics Manufacturers' Association

*Mayur D. Shah*

Mayur D. Shah  
President, AIPMA



अरुण बरोका, भा.प्र.से.  
ARUN BAROKA, IAS

DO No. PC-I-13014/7/2023-Chem-CPC



सचिव  
भारत सरकार  
रसायन और उर्वरक मंत्रालय  
रसायन और पेट्रोसायन विभाग  
Secretary

Government of India  
Ministry of Chemicals & Fertilizers  
Department of Chemicals & Petrochemicals

22<sup>nd</sup> March 2023

*Respected Ma'am*

Representations were received by this Department from various Plastics processors /manufacturers in connection with issues faced by them in relation to Extended Producers Responsibility (EPR) implementation as per Amendment to PWM Rules, Feb 16, 2022.

2. Subsequently, a Meeting was convened by this Department to discuss the industry related issues on Extended Producers Responsibility (EPR) implementation on 13th March, 2023 with the industry stakeholders like The All India Plastics Manufacturers Association (AIPMA), Organization of Plastics Processors of India (OPPI), Chemicals and Petrochemicals Manufacturers Association (CPMA), Gujarat State Plastic Manufacturers Association (GSPMA), Karnataka State Polymers Association (KSPA), The All India Flat Tape Manufacturers Association (AIFTMA) and the Indian Plastics Federation (IPF).

3. The major issues discussed with the industry stakeholders and the recommendations are enclosed for kind perusal.

4. Considering the importance of these issues which can cause a large scale disruption in the industry, it is requested to kindly consider them favourably at the earliest.

*With warm regards,*

Yours sincerely,

(Arun Baroka)

Encl.: As above

**Ms. Leena Nandan**  
Secretary,  
Ministry of Environment, Forest and Climate Change,  
Indira Paryavaran Bhawan,  
Jorbagh Road,  
New Delhi – 110 003.





**Extended Producer's Responsibility (EPR)**  
**Issues arising out**

SR. NO.	ISSUES	DETAILS	RECOMMENDATIONS
1.	<p><b>Country doesn't have sufficient plastic waste processing facility.</b></p> <p>EPR framework is based on the premise that credits generated by plastic waste processors in the form of EPR certificates will be available for PIBO – Producers, Importers, Brand owners.</p> <p>If plastic waste processing capacity is not available in the country then sufficient EPR Credits will not be available and such a business model will not work and EPR framework cannot be successfully implemented.</p>	<p>Recyclers/Plastic Waste Processors also part of EPR (Category 2). Fulfilment of liability by producers depends on the Recycler wherein the recycler is supposed to upload the certificate mentioning the material and quantity recycled. Therefore, if the recycler is not able to do its part and if sufficient recycling credits are not available on the portal, producers would have to pay the environment compensation for the shortfall, if any.</p>	<p>CPCB may look into the matter.</p> <p>Environmental compensation for current year may be waived off if possible.</p>
2.	<p><b>Manufacturers of Plastic Raw material will not supply raw materials to the unregistered Producers after 31.03.2023</b></p>	<p>CPCB has issued notices to Manufacturers of Plastic Raw material to stop supply of raw materials to the unregistered Producers after 31.03.2023.</p>	<p>Considering that very few Producers are currently registered in the EPR portal, therefore based on the industry request, an extension of 6-months' time beyond 31.03.2023 may be given to prevent large scale disruption in Industry.</p>
3.	<p><b>Closure notices issued to the non-registered Producers after 31.03.2023.</b></p>	<p>Some SPCBs have issued closure notices to producers who have not done EPR registration as on 31.03.2023.</p>	<p>Considering that very few Producers are currently registered in the EPR portal, therefore based on the industry request an extension of 6-months' time beyond 31.03.2023 may be given to prevent disruption in supply value chain.</p>



SR. NO.	ISSUES	DETAILS	RECOMMENDATIONS
4.	Producers need to submit the Consent to Operate (CTO) from SPCBs, without which units are not able to proceed further with EPR Application.	CPCB/SPCBs are demanding hefty penalty retrospectively from those units who do not have CTO.	<p>The industry suggested that :</p> <p>(i) Delink requirement of Consent to Operate (CTO) and Consent to Establish (CTE) from EPR registration. Or alternatively,</p> <p>(ii) Provisional EPR registration may be given to producers who don't have CTE/CTO.</p> <p>They may also be allowed 6 months' time to upload the CTO and SPCBs may be asked to issue CTO within 30 days of the application by producers. Those who are applying for CTO may get moratorium from past fees / environmental compensation / penalties.</p>
5.	<p>At present <b>majority of the Brand Owners (BO) have not registered themselves on the EPR portal.</b></p> <p><i>(Small and micro owners – upto 50 and 25 crs respectively already exempted from EPR)</i></p>	The EPR liability of such unregistered BOs is being transferred to Producers.	All the eligible BOs (irrespective of their size) must be got registered – as they are most close to the pollutant- in next three months. The liability for plastic used as packaging materials for earlier periods, when they were not registered, should remain with BOs as defined in Clause 4(iii) of amended PWM Rules, 2016, notified as on Feb. 2022.
6.	Recording Procurement and Sales operation requires that <b>every invoice to be uploaded on the EPR portal.</b>	<p>The process requires to fill each and every invoices generated by the entity for both sales and purchase data (Importers and Producers) and only Purchase data for (Brand Owners).</p> <p>The details are to be uploaded on monthly basis.</p>	The industry suggested that the Producers should be allowed to <b>Bulk upload quarterly data in Excel file on EPR portal</b> (Issued by MOEFCC on 13th March 2023)



SR. NO.	ISSUES	DETAILS	RECOMMENDATIONS
7.	<b>Producers need to submit various other details</b> such as production capacity, geo tagged location, pictures of raw material storage area and production area, Disaster Management Plan (DMP).	This process is quite complex for producers.	The industry suggested that the requirement of such data should be eliminated from EPR portal.
8.	Rigid Plastic of Industrial nature is not the part of plastics waste problem. Rigid plastic is already getting recycled and is never seen in the landfill.	It is creating undue compliance on Rigid plastics manufacturers.	The industry suggested that Rigid Plastic items of industrial nature such as plastic drums should be exempted from EPR.
9.	EPR is <b>too complex</b> for Micro and Small producers.		<p>The industry suggested that Micro and Small producers should be asked to give self-declaration for calculating their EPR liability.</p> <p>Micro and small producers should be asked to pay a lump sum fee based on their production so that they can be relieved from EPR registration and compliance.</p>
10.	EPR is too complex for Producers. The main objective of the rule is based on Polluter Pays principle.		<p>The industry suggested that Producers are farthest from the waste generator. Therefore, they should be exempted from EPR.</p> <p>Alternately, focus should be on Brands. As per the data, more than 80% of the waste is generated by 100 top brands. If the focus is on these 100 brands, more than 80% waste problem would be resolved.</p>
11.	Capacity Building of Law enforcers.	Currently there is urgent need for better understanding and smooth implementation at the ground level by all stakeholders.	All stakeholders need to be made aware about the provisions of amended PWM Rules, 2016, notified as on Feb. 2022. CIPET, industry associations and CPCB must join hands so that fears and



SR. NO.	ISSUES	DETAILS	RECOMMENDATIONS
			apprehensions can be removed.
12.	In Part C / Section 8 of EPR portal, there are four subsections (A,B,C,D) requiring procurement and sales data of last two financial years. However, this section does not provide opportunity to edit the data once it has been entered into the system.	Units need to upload a huge data during the registration processes requiring additional resources.	The industry suggested that if the data is auto fetched from the GST servers it will reduce the burden on the units and also decrease the chances of human error.
13.	Applications are being rejected on the basis of discrepancy between the pre-consumption data and sales data.	If the producer is manufacturing both packaging and non-packaging items, it creates mismatch between sales and production data in the EPR portal, thus rejecting the application. The Auto tune setting of the portal is not capable enough to differentiate and calculate such data as there may be various other scenario which would require human interaction. Under such circumstances the units need to bear environmental compensation.	The industry suggested that necessary rectification should done on the EPR portal in this regard.
14.	CPCB has introduced the concept of <b>late fee mechanism</b> where units need to submit certain % of fee (late fee reply submission) after 7 days of the Show Cause Notice issued by the CPCB/SPCB.	This is creating extra financial liability on producers.	The industry suggested that it should be levied only after 4 weeks instead of after 7 days of the Show Cause Notice issued by the CPCB/SPCB.
15.	Producers (in case of multiple locations) need to submit unit wise registration even if they are located within a State.	This is increasing compliances and complexities.	The industry suggested that there should be one registration for one entity within a state.





**F. No.-12/51/2023-HSMD**  
**Government of India**  
**Ministry of Environment, Forest and Climate Change**  
**(Hazardous Substances Management Division)**

\*\*\*

6<sup>th</sup> Floor, Jal Block  
Indira Paryavaran Bhawan  
Aliganj, Jorbagh Road,  
New Delhi-110003

**Date: 13<sup>th</sup> March, 2023**

**OFFICE MEMORANDUM**

**Subject: Uploading of sales/procurement invoices on Centralized online EPR portal - Reg.**

This relates to uploading of procurement and sales transactions details (as applicable) & uploading of GST E-invoice as per the prescribed pro forma on EPR portal.

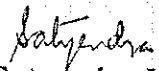
2. In this regard, the following is clarified, in line with the Guidelines on Extended Producer Responsibility on plastic packaging, to allow ease of compliance by Producers, Importers and Brand Owners (PIBOs) of covered under EPR regime:

(i) The Producers (P), Importers (I) and Brand Owners (BO) registered on the Centralized online EPR portal on plastic packaging, may be asked to bulk upload quarterly consolidated data of transactions in prescribed format developed by CPCB, by the last day of the next month of every reporting quarter. CPCB/SPCBs/PCCs may, wherever required, verify the transaction details of PIBOs with detailed invoices, as part of auditing exercise.

(ii) Further, the last date for uploading of all data i.e. for four quarters of the current financial year may as fixed at 31<sup>st</sup> May 2023.

3. CPCB is accordingly requested to issue appropriate instructions to make provision for bulk uploading of transactions by PIBOs in the centralized online EPR portal, as mentioned above, on an immediate priority basis.

4. This issues with the approval of the Competent Authority.

  
(Dr. Satyendra Kumar)

Director

Email: [satyendra.kumar07@nic.in](mailto:satyendra.kumar07@nic.in)

To,

The Chairman,  
Central Pollution Control Board,  
Parivesh Bhawan, East Arjun Nagar,  
Delhi-110032, Email- [ccb.cpcb@nic.in](mailto:ccb.cpcb@nic.in)

Copy for kind information:

1. PPS to Secretary (EF&CC)
2. PPS to AS (NPG)



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F.No.CP-20/117/2021-UPC-II-HO-CPCB-HO-Part(10)

Date: 01-03-2023

To,

The Principal Secretary  
All State UDDs

Sub: Directions Under Section 5 of the Environment (Protection) Act, 1986 for Implementation of ban on Single Use Plastic (SUP)-Reg.

Whereas, the Ministry of Environment, Forest & Climate Change (MoEF&CC) notified the PWM Rules, 2016, in exercise of the powers conferred under section 3,6, & 25 of the Environmental (Protection) Act, 1986 Vide Notification No. G.S.R. 320 (E) dated March 27, 2016; and

Whereas, Hon'ble Prime Minister of India announced India's pledge to phase out SUP by 2022 on World Environment Day, June 05, 2022 and also pitched for freedom for Single Use Plastic while delivering the Independence Day speech on August 15, 2019; and.

Whereas, MoEF&CC vide Notification dated August 12, 2021, banned identified SUP items and prescribed minimum thickness of carry bag with effect from July 01, 2022; and

Whereas, as per Rule 4(2) of PWM Rules, 2016 (as amended), *"The manufacture, import, stocking, distribution, sale and use of following single use plastic (SUP), including polystyrene and expanded polystyrene, commodities shall be prohibited with effect from the 1<sup>st</sup> July, 2022:*

(a) Ear buds with plastic sticks, plastic sticks for balloons, plastic flags, candy sticks, ice-cream sticks, polystyrene [Thermocol] for decoration.

(b) Plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping or packing films around sweet boxes, invitation cards, and cigarette packets, plastic or PVC banners less than 100 micron, stirrers; and

Whereas, as per Rules 4(1)(c) of PWM Rules, 2016 (as amended) *"Carry bag made of virgin or recycled plastic, shall not be less seventy five microns in thickness with effect from the 30th September, 2021 and one hundred and twenty (120) microns in thickness with effect from 31st December, 2022"; and*

Whereas, as per Rule 4 (d) of the PWM Rules, *"plastic sheet or like, which is not an integral part of multilayered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be less than fifty microns in thickness except where the thickness of such plastic sheets impair the functionality of the product"; and*

Whereas, as per Rule 12 (1) of PWM Rules, *"the State Pollution Control Board and Pollution Control Committee in respect of a Union territory is the authority for enforcement of the provisions of these rules relating to registration, manufacture of*

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in

plastic products and multilayered packaging, processing and disposal of plastic wastes"; and.

**Whereas**, as per Rule 12 (2) of PWM Rules "the concerned Secretary-in-charge of Urban Development of the State or a Union Territory is the authority for enforcement of the provisions of these rules relating to waste management by waste generator, use of plastic carry bags, plastic sheets or like, covers made of plastic sheets and multilayered packaging"; and

**Whereas**, CPCB prepared a Comprehensive Action Plan for implementation of SUP ban as per which SPCBs/PCCs have a key role to play for elimination of SUP; and

**Whereas**, CPCB issued Direction dated 01-2-2022 to all SPCBs/PCCs to ensure compliance of notification published by MoEF&CC dated 12-08-2021 in line with comprehensive action plan; and

**Whereas**, for effective monitoring of ban on identified single use plastic items and plastic waste management in the country, CPCB developed SUP Compliance Monitoring portal and SUP field inspection app to facilitate the structured inspection and monitoring by state boards and local bodies, and SUP Public Grievance App to ensure citizen participation for effective enforcement of ban; and

**Whereas**, CPCB issued Directions dated 30-06-2022 to all State UDDs to monitor compliance through SUP Compliance Monitoring App ; and

**Whereas**, CPCB issued Direction dated 18-07-2022 to all State UDDs which included following Directions related to the State Authorities:

- a. Field inspections of all major local markets, tourist locations, bus stations, airports, malls, shopping complexes, hotels, restaurants, vegetable/ meat / fish market, warehouse etc to verify compliance of SUP ban is conducted by the concerned local body by July 18, 2022.
- b. The inspections are conducted using the Field inspection App to ensure that the inspection report is uploaded on the SUP Compliance Monitoring Portal.
- c. The action against the commercial establishment for violation of SUP ban is taken within three day of reporting of violation and the Action Taken Report is uploaded on the portal.
- d. Usage of SUP Public Grievance App by the citizens is promoted in your jurisdiction.
- e. All grievance lodged on the portal are resolved within seven days.

**Whereas**, pan India enforcement drive for implementation of ban on identified single use plastic items was carried out from July to September 2022 by CPCB/SPCB/PCCs; and

**Whereas**, special inspection drive was conducted from October to December 2022 with focus on enforcement on street vendors, local shops, wholesale markets etc. by CPCB/SPCB/PCC with State UDD; and

**Whereas**, it has been observed that it is essential to break the Supply chain of SUP items for enforcement of SUP ban; and

**Whereas**, it was observed that supply chain can be broken through identification & initiating necessary action against wholesale suppliers/ retailers/ stockist/ producers of banned SUP items as well as plastic raw material suppliers to banned SUP producers for enforcement of SUP ban; and

**Whereas**, to further strengthen enforcement through inspection drive and to ensure consistent reporting of SUP inspection at pan India level, CPCB has prepared Standard Operating Procedure (SOP) (**Annexure I**) with the prime objective to break the supply chain of SUP items. Key features of SOP include the following:

- a. Inspections shall be conducted jointly by SPCB/PCC and UDD officials. SPCBs/PCCs shall inspect the industrial units and UDD officials shall inspect commercial entities. Violations & details of action taken w.r.t Commercial establishment shall be reported by State UDD and violation & details of action taken w.r.t industries shall be reported by the SPCB/PCC
- b. All the inspection reports shall be filed on SUP compliance monitoring portal through field inspection app
- c. The inspection report has provision for providing information w.r.t supplier of SUP items (for commercial users), plastic raw material suppliers (for banned SUP producers) and SUP producers (for plastic waste recyclers making granules)
- d. The action taken report has provision to include details of action taken against the defaulters ( Seizure/ challan/ fine levied/ cancellation of permission granted for Commercial entities & Seizure/ Show Cause Notice/ Closure/ environmental compensation levied in case of banned SUP producers)
- e. The SUP Compliance Monitoring Portal shall autogenerate the Daily report
- f. SPCB/PCC official can validate the auto generated report and submit the report by the last working day of every month

**Now therefore**, in view of above and in exercise of powers vested under section 5 of environmental (Protection) Act, 1986 to the chairman, CPCB following directions are issued for compliance:

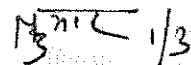
1. To conduct SUP ban enforcement drive jointly with State UDD as per the SOP prepared by CPCB for four days a month during the period March-August, 2023 The schedule of inspection is to be finalized by the concerned SPCB/PCC in consultation with State UDD and is to be completed by 25<sup>th</sup> of every month. The Police force may be deployed during the inspection drive as per requirement.
2. To conduct the inspections with focus on street vendors, local shops, wholesale markets, interstate borders, industries, bus depots, railway stations, airports etc.
3. To register all the concerned field officers (SPCB/PCC/State UDD) on SUP Compliance monitoring portal
4. To conduct the inspections through Field inspection app and file the inspection report on the SUP compliance monitoring portal. Violations

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5. To include information w.r.t supplier of SUP items (for commercial users), plastic raw material suppliers (for banned SUP producers) and SUP producers (for plastic waste recyclers making granules) in the inspection report
6. To provide details w.r.t action taken against the defaulters ( Seizure/ challan/ fine levied/ cancellation of permission granted for Commercial entities & Seizure/ Show Cause Notice/ Closure/ environmental compensation levied in case of banned SUP producers)
7. To validate the auto generated reports and submit the report by last working day of every month.

You are requested to take necessary action to ensure compliance of above Directions and submit action taken report before the 30<sup>th</sup> of every month till August, 2023 to this office.

Yours faithfully,

  
(Tanmay Kumar)  
Chairman

R.P. 1/3

o/c



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F.No.CP-20/117/2021-UPC-II-HO-CPCB-HO-Part(10)

Date: 01-03-2023

To,

The Chairman  
All SPCBs/PCCs

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1. To conduct SUP ban enforcement drive jointly with State UDD as per the SOP prepared by CPCB for four days a month during the period March-August, 2023. The schedule of inspection is to be finalized by the concerned SPCB/PCC in consultation with State UDD and is to be completed by 25<sup>th</sup> of every month. The Police force may be deployed during the inspection drive as per requirement.
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7. To validate the auto generated reports and submit the report by last working day of every month.

You are requested to take necessary action to ensure compliance of above Directions and submit action taken report before the 30<sup>th</sup> of every month till August, 2023 to this office.

Yours faithfully,

  
(Tanmay Kumar)  
Chairman 

Copy to:

1. Addl. Secretary, HSMD, MoEF&CC
2. Regional Director, All CPCB Regional Directorates
3. DH (IT)

  
(Prashant Gargava)  
Member Secretary

o/c

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.  
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Date: 28.02.2023

### OFFICE BEARERS :

MAYUR D. SHAH  
President

MANISH DEDHIA  
Senior Vice President

MANOJ R. SHAH  
Vice President - Finance

SUNIL SHAH  
Vice President (West Zone)

LALIT KUMAR SINGH  
Vice President (North Zone)

ANIL REDDY VENNAM  
Vice President (South Zone)

ASHOK AGARWAL  
Vice President (East Zone)

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Ref: AIPMA/2022-23/GOI/108

Shri Narendra Modi,  
Hon'ble Prime Minister  
Government of India  
PMO office,  
New Delhi- 110011

**Subject: Humble Appeal from 25,000 Micro and Small Industries in Plastic sector to save from complexities of EPR**

Respected Sir,

Greetings from the All India Associations representing more than 50,000 plastic processors.

We, the associations representing the plastic processing sector, appreciate the responsibility and role of industry towards sustainability, circularity and the holistic objective of ending plastic waste in the emerging new order towards carbon neutral economic activities.

The plastic processing industry is aligned towards your environmental goals and vision and would like to bring to your kind attention the following for an effective regulatory framework that embraces the principle of "Sabka Saath Sab Ka Vikas" based on inputs from the MSME segment engaged in this sector. **Annexure I (enclosed) includes the industry background, facts and figures w.r.t EPR guidelines notified by Ministry of Environment, Forest & Climate Change.**

**With the above mentioned points as context and feedback from the industry during our pan India seminars/conferences, dialogue with the industry & associations, we humbly request you to take a fresh perspective and facilitate following demands in order to save more than 25,000 plastic processing units in MSME Sector: -**

**A. CURRENT STATUS: Micro and small producers are required to register under EPR on the portal.**

**CHALLENGES FACED:** Undue burden of compliance on small and micro producers compromising viability to carry on business for over 25000 units engaged in the segment, such units are managed by entrepreneurs who do not have competence, time and financial resources to cope with complex requirements. This would put question mark on employment of few lacs of human resources and threat to few thousand crores of investment to become non-performing assets. Liability on such units from retrospective effect including that of material supplied to brand owners who have not registered

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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ANIL REDDY VENNAM  
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ASHOK AGARWAL  
Vice President (East Zone)

#### North Zone :

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Tel No.: 079 2970 5124  
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would spell financial collapse. There is already a concern due to rising harassment by implementing authorities.

**PROPOSED SOLUTION:** Micro and small producers are aligned towards the objective and would be willing to contribute to the cost through lump sum fee. However, they should be kept out of the purview of complicated compliance like micro and small brands. Any fee in lieu of EPR related costs agreed upon to be applied from the date of application and not from retrospective date. Alternatively, a slab wise model on lines of GST can be introduced with a fraction of normal EPR obligations in accordance with production volume of the enterprise, longer timelines for compliance and bare minimum procedure so that it is feasible for micro and small units to embrace EPR regime."

### **B. CURRENT STATUS: EPR portal registration and procedural compliances far too complex for MSMEs.**

**CHALLENGES FACED:** The new CPCB EPR Portal itself has been evolving and is not stable in terms of the requirements for uploading documents, not to say the intricate details etc. that is also required to be uploaded on the portal. This is evident from the guideline document of 73 pages to be comprehended by the entity prior to registration. By the time a company understands the requirements, changes are made on the same (so far more than six amendments and modules have been notified since 16<sup>th</sup> Feb 2022), making it impossible for the small entrepreneur to register on the portal. This is also evidenced by the poor number of registrations till date since the inception of the new portal.

In the meanwhile, as MSMEs struggle with the registration requirement, CPCB has instructed large Plastic resin manufacturers not to supply plastic granules (raw material) if the Producer is not EPR registered. This will have a drastic impact on the packaging producers forcing many small and micro units to closure and leading to bankruptcy, loss of jobs etc. In fact, the effort from CPCB should be directed towards getting Brand Owners to be registered first on the portal, followed by Producers and others.

There is an urgent need for SPCB officials to also fully understand the provisions of PWM 2022 and its provisions, as we are also getting regular representations from our members and associations regarding unnecessary harassment on the ground, due to the inadequate understanding of the law and its enforcement.

Further CPCB has also instructed Customs not to release goods if EPR registration is not done by importers for imports of all goods that use plastic packaging, whether as the primary or secondary packaging material. This is already leading to huge losses for importers on account of demurrage charges as the time period from applying for registration to getting registration is approximately 4-6 weeks. This has already started to strain the supply chain of

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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many industries and will add to the chaos of clearing materials at port.

**PROPOSED SOLUTION:** Producers other than micro and small enterprises should be exempted from EPR registration for a period of at least 1 year (ending 31st March 2024), in which time the effort should be to streamline the portal for all its deficiencies and then onboard Brand Owners first onto the EPR portal.

Plastic Associations should be roped in by CPCB for conducting awareness workshops for the SPCBs for ease of implementation.

**C. CURRENT STATUS:** EPR guidelines mandate EPR on rigid containers.

**CHALLENGES FACED:** EPR scope should be limited to post consumer plastic packaging which is irretrievable easily from the environment and is difficult to recycle. Rigid containers of industrial utility which are not found in the environment as pollution.

**PROPOSED SOLUTION:** Rigid containers of industrial utility should be kept out of the ambit of EPR.

### Summary of our request for your urgent intervention and consideration: -

1. Micro and small producers should be kept out of the purview of EPR. Any fee in lieu of EPR related costs agreed upon should be applied from the date of application and not from retrospective date. Alternatively, a slab wise model on lines of GST can be introduced with a fraction of normal EPR obligations in accordance with production volume of the enterprise, longer timelines for compliance and bare minimum procedure so that it is feasible for micro and small units to embrace EPR regime."
2. Producers other than micro and small enterprises should be exempted from EPR registration for a period of at least 1 year (ending 31st March 2024), in which time the effort should be to streamline the portal for all its deficiencies and then onboard Brand Owners first onto the EPR portal.
3. Rigid containers of industrial utility should be kept out of the ambit of EPR.

We believe that a fair review in the matter to ensure survival of MSME producers who contribute to the packaging needs of remaining industrial activity, provide gainful employment to millions and are facilitating India's journey towards a five trillion economy is an earnest need of the sector. Timely intervention would ensure that Government's objective and your vision sees light of the day.

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.

Phone : +91 22 6777 8899 (30 Lines) • Fax : +91 22 2821 6390

E-mail : office@aipma.net • Website : www.aipma.net

### OFFICE BEARERS :

MAYUR D. SHAH  
President

MANISH DEDHIA  
Senior Vice President

MANOJ R. SHAH  
Vice President - Finance

SUNIL SHAH  
Vice President (West Zone)

LALIT KUMAR SINGH  
Vice President (North Zone)

ANIL REDDY VENNAM  
Vice President (South Zone)

ASHOK AGARWAL  
Vice President (East Zone)

#### North Zone :

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1, Blackers Road, Chindadripet,  
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Tel No.: 044 4203 0236  
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#### East Zone :

Gajraj Signature,  
Suite # 5E, 5th Floor,  
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Kolkata - 700 026.  
Tel No.: 033 4005 0367  
aipma.east@aipma.net

#### 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

We hope for a favorable action on the matter.

Thanks and Best Regards.

Yours Sincerely,

Sr.no.	Associations Name	Name	Designation
1	The All India Plastics Manufacturers' Association (AIPMA)	Mr. Mayur D Shah	President
2	Organization of Plastics Processors of India (OPPI)	Mr. Dilip Parekh	President
3	The Plastics Export Promotion council (Plexconcil)	Mr. Hemant Minocha	Chairman
4	Gujarat State Plastic Manufacturers Association (GSPMA)	Mr. Bhagwanbhai Patel	President
5	Indian Plastics Federation (IPF)	Mr. Sisir Jalan	President
6	Telangana and Andhra Plastics Manufacturers Association (TAAPMA)	Mr. Vimlesh Gupta	President
7	The Tamil Nadu Plastics Manufacturers Association	Mr. L. Meiyappan	President
8	Karnataka State Polymers Association (KSPA)	Mr. Vijay Kumar	President
9	Maharashtra Plastics Manufacturers Association (MPMA)	Mr. Bharat Rajput	President
10	Kerala Plastics Manufacturers Association (KPMA)	Mr. M.S. George	President
11	Canara Plastic Manufacturers & Traders Association (CPMTA)	Mr. B. A. Nazeer	President

Copy to:

1. Shri Bhupendra Yadav, Hon'ble Minister for Environment, Forest and Climate Change, Government of India
2. Shri Piyush Goyal, Hon'ble Minister for Commerce & Industry, Government of India
3. Shri Narayan Rane, Hon'ble Minister for Micro, Small and Medium Enterprises, Government of India
4. Shri Mansukh Mandaviya, Hon'ble Minister for Chemicals and Fertilizers, Government of India

### Annexure I

1. The plastic packaging value chain includes Raw material manufacturers, producers or converters, brand owners or packers, small business packers and consumers. The producers are a link between raw material manufacturers and the users like brands who introduce the packaging through their products and derive maximum economic benefits. Needless to say the producers largely in MSME segment are merely a conduit serving industry for least monetary benefits and are not a major contributor to the plastic waste stream as they operate under closed environment contrary to the popular belief and are the farthest entity based on the doctrine of "Polluter Pays Principle" of our environmental policy.
2. The sector comprises over a lakh of MSMEs, majority of them are small and micro units engaged in mostly mono layer plastic packaging requiring small capital investment. This category of plastic packaging is easily recyclable and reflects the existence of over seventy clusters across India involving thousands of units and engaging millions of workers to recycle almost sixty percent of plastic waste for many years now. As against this, the modern plastic packaging MLP (multi-layer plastic) contributes a major portion of plastic waste which is extremely difficult to recycle and mostly finds its way to burning for energy recovery. The latter is Capex intensive and mostly dominated by large units catering to Brands who introduce these packaging through their products. A scientific study would validate the extent of content in the waste stream of each category of packaging and the value chain beneficiaries which in our opinion should be the basis of regulatory regime. EPR should focus on Brands selling through modern retail or normal distribution channels as they contribute maximum to plastic waste.
3. The PWM 2016 and subsequent amendments are adopting the concept of EPR based on the European model to address uncollected, unrecyclable plastic packaging waste by incentivizing management of post-consumer packaging waste. The EPR as practiced in Europe and North America is applied on packaging and mandates packers rather than producers to discharge EPR liabilities for packaging introduced by them. The current proposals have missed following vital differences in Indian context. The mono layer packaging produced by small producers is highly recyclable and is being recycled to a greater extent, a de facto EPR. Well lubricated system already exists for recovery of such recyclable waste which includes mono layer films, most rigid containers and other recyclable products. Any efforts to strengthen this value chain without burdening it with undue compliance would go a long way in achieving intended objectives and realizing "Swachh Bharat".

Unlike large units, the small and micro segment is entrepreneur driven and needs to be nurtured through less compliance burden for its survival let alone growth. The evolving regulatory regime is biased against our structure of MSMEs and in favor of large Brands/ Packers effectively compromising the very existence of the former.





F.No.7/1/2017-EP(CAP)part  
Government of India  
Ministry of Commerce & Industry  
Department of Commerce  
EP(CAP) Division

Udyog Bhavan, New Delhi  
Dated: 24 February, 2023

OFFICE MEMORANDUM

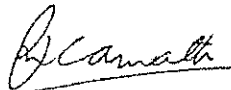
**Subject: Request for a Stakeholder meeting – Major issues faced by the Plastic Industry including exporters – Regarding.**

The undersigned is directed to refer to this Department's OM of even No. dated 03.01.2023 regarding Comprehensive Directions dated 13th December 2022, issued by Central Pollution Control Board viz.. "Not to supply plastic raw materials directly to producers engaged in manufacture of plastic packaging not having valid registration certificate from concerned SPCB/PCC/CPCB through centralized EPR portal" and to say that the concern highlighted by Gail (India) Ltd. remains unresolved which shall adversely impact Indian Plastic Industry and our exports.

2. In this regard; it is mentioned that the Plastic Industry Associations have requested this Department to call a stakeholder meeting with CPCB, Plastic raw-material manufacturers and Plastics processing industries to discuss issue concerning EPR Registration and availability of raw-material to Plastic Industries after 31st March, 2023 for resolution so as to ensuring ease of doing business for the Indian Industry & trade fraternity. A copy of the representation received in this regard from All India Plastics Manufacturer Association (AIPMA) is enclosed.

3. It is requested to kindly consider the issue faced by the Plastic Industry and consider the request made by GAIL India Ltd. concerning the subject for the benefit of Indian Industry & our exporters. An expedited action is requested for, under intimation to this Department.

Encl.: As above

  
(R. Manohar Kamath)  
Under Secretary  
Ph:011-23039713  
Email: rm.kamath63@nic.in

To,

**Kind attention:**  
Shri Tanmay Kumar  
Chairman  
Central Pollution Control Board  
Ministry of Environment and Forests, Paryavaran Bhavan  
New Delhi



POWERING PROGRESS THROUGH PLASTICS  
www.aipma.net

# AIPMA



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C. Marol, Andheri (East), Mumbai - 400 093, India

Phone : +91 22 6777 8500 (30 Lines) • Fax : +91 22 2521 6390

E-mail : office@aipma.net • Website : www.aipma.net

OFFICE BEARERS : AIPMA/GOI/22-23/201

Date: 15-02-2023

MAYUR D. SHAH  
President

Mr. Manish Chadha  
Joint Secretary, Department of Commerce  
Ministry of Commerce and Industry  
Govt. of India  
Udyog Bhavan  
New Delhi - 110011

MANISH DEDHIA  
Senior Vice President

MANOJ R. SHAH  
Vice President - Finance

SUNIL SHAH  
Vice President (West Zone)

LALIT KUMAR SINGH  
Vice President (North Zone)

ANIL REDDY VENNAM  
Vice President (South Zone)

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Mondeval Heights  
Near Wide Angle Cinema  
S G Highway,  
Ahmedabad - 380 015  
Tel No. 079 2970 5124  
aipma.west@aipma.net

**Subject: Request for a Stakeholder meeting – Major issues faced by the Plastic industry including exporters**

Dear Sir,

Greetings from AIPMA.

Kindly refer to your meeting with Mr. Deepak Ballani, Director General, AIPMA on 14<sup>th</sup> Feb 2023.

The Govt. of India had notified PWM Rules, 2016 and made several amendments from time to time and also notified Schedule II on Extended Producers Responsibility (EPR) in Feb., 2022 imposing EPR targets on producers, Importers and Brand owners (PIBO). We fully support the efforts of the Govt. of India to control and regulate the use, collection of waste, processing of plastic waste and use of reprocessed granules under the principle of sustainable development, precautionary principle, and polluter pays principle as have been recognized in the law.

However, the plastics industry is facing major issues due to complex EPR registration process and compliance procedures. Till date, merely 7-8% industries have been able to complete their EPR registration process. As per the circular from CPCB, Raw material manufacturers have been asked to stop supplying Raw Material Polymers to Plastics packaging producers without EPR registration number after 31<sup>st</sup> March 2023.

Moreover, Commissioner of Custom on 08.02.2023 has issued a circular stating that all the importers of goods which are not plastic packaging, but are wrapped or packed in plastic packaging, such as machinery, textile, etc. are required to upload the EPR registration at the time of filling the bill of entry. This circular will not only put EPR obligations on plastic industry but also on non-plastic packaging producers who are using plastics just for wrapping their primary products. This will invite not only a lot of compliances on the industry but will also create a problematic situation for importers.

Overall, the industry is facing major issues and challenges that is likely to adversely impact both domestic production and exports of plastics goods from the country.

Taking above in to consideration, we would kindly request you to call a stakeholder meeting including relevant Ministries, CPCB, Raw material manufacturers and



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# AIPMA



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ahmedabad - 380 015  
Tel No. 079 2970 5124  
aipma.west@aipma.net

Plastics Processing industries. Following are the issues that may be discussed during the Stakeholder meeting:-

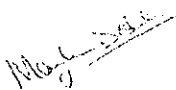
1. Simplification of the EPR registration process and portal.
2. Exemption to Micro and Small Producers and manufacturers from EPR obligation (similar to the exemption extended to Brands)
3. Removing Rigid plastics from the ambit of EPR
4. Availability of Raw material to Plastic packaging producers and manufacturers after 31<sup>st</sup> March 2023.
5. Ease of doing business for the industry by simplified compliance procedures and process.

We would request you to kindly consider the above.

Thanking you,

Yours Sincerely,

For The All India Plastics Manufacturers' Association

  
Mayur D. Shah  
President, AIPMA





केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. CP-20/33/2021-UPC-II-HO-CPCB-HO

February 21, 2023

**NOTICE**

**Sub: Provision of transaction (sales/procurement) details related to plastic packaging by Producers, Importers & Brand-Owners (PIBOs) on Centralized Extended Producer Responsibility (EPR) Portal for Plastic Packaging**

MoEF&CC notified EPR Guidelines on Plastic Packaging on February 16, 2022 vide fourth Amendment to PWM Rules, 2016. CPCB has developed the Centralized EPR Portal in accordance with provisions of notified EPR Guidelines.

The registered PIBOs are required to provide transaction (sale /procurement) details related to plastic packaging as per the proforma provided on the EPR portal. The Module to facilitate provision of transaction details on the EPR Portal was launched on November 19, 2022. Subsequently training was imparted to the registered PIBOs on the subject by CPCB. Further, CPCB, vide Directions dated December 21, 2022, directed PIBOs to upload GST e-invoice of all transactions (sale /purchase) related to plastic packaging and plastic waste on the EPR Portal

However, it is observed that several registered PIBOs have not updated the transaction details (procurement & sales) & GST E-invoice on the EPR portal which is in violation of provisions of PWM Rules 2016 (as amended).

This notice is being issued to inform all the registered PIBOs to update Procurement & Sales transactions details (as applicable) & upload GST E-invoice as per the prescribed proforma on EPR portal within fifteen days of issue of this Notice. Standard Operating Procedure & Guidance manual uploaded on EPR Portal may be referred for the purpose. Action, as deemed fit under the Environment (Protection) Act, 1986, including levying of Environmental Compensation and closure of operations, shall be taken against defaulters.

  
(Prashant Gargava)  
Member Secretary





केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. CP-20/6/2023-UPC-II-HO-CPCB-HO

Dated: 21.02.2023

To,

The President,  
Tarpaulin Manufacturers' Members Association  
31, Omkar House, Swastik Cross Road  
Ahmedabad-380009

Sub: Applicability of Notification No. GSR133(E) dated 16.02.2022, namely, Plastic Waste Management (Amendment) Rules, 2022- Reg.

Sir/Madam,

This has reference to Representation dated January 27, 2023 received from Tarpaulin Manufacturers' Members Association on the above said subject matter.

The representation has been examined and this is to inform that tarpaulin (HSN Code 6306) shall not be considered as plastic packaging subject to the condition that its usage is restricted to non-packaging activities including the following:

1. Agriculture and Shelter purpose for poor families
2. Agriculture field for conservation of water
3. Protect farm crops from water
4. Protect partially built or damaged structures
5. Erecting temporary structures
6. Covering Soil & Crop

The tarpaulin manufacturers shall keep a proper record of their sales details to ensure the above which may be checked by the concerned Authorities as per the requirement.

This issues with approval of Competent Authority

Yours faithfully,

  
(Divya Sinha)  
DH & Director-UPC-II







केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. CP-20/117/2021-UPC-II-HO-CPCB-HO-Part(10)

Date: 17-02-2023

To,

Airline Operators  
(As per list)

**Sub: - Direction under Section 5 of the Environment (Protection) Act, 1986 to Airlines operators for phasing out of Single Use Plastic (SUP) & obtaining Registration as per EPR Guidelines -Reg.**

**Whereas**, the Ministry of Environment, Forest & Climate Change (MoEF&CC) notified the Plastic Waste Management (PWM) Rules, 2016, in exercise of the powers conferred under section 3, 6 & 25 of the Environmental (Protection) Act, 1986 vide Notification No. G.S.R. 320 (E) dated March 27, 2016; and

**Whereas**, MoEF&CC issued Notification, dated August 12, 2021 which mandated banning of identified Single Use Plastic (SUP) items with effect from July 01, 2022; and

**Whereas**, as per Rule 4(2) of PWM Rules, 2016 (as amended), *"The manufacture, import, stocking, distribution, sale and use of following single use plastic (SUP), including polystyrene and expanded polystyrene, commodities shall be prohibited with effect from the 1<sup>st</sup> July, 2022:*

- (a) ear buds with plastic sticks, plastic sticks for balloons, plastic flags, candy sticks, ice-cream sticks, polystyrene [Thermocol] for decoration.
- (b) Plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping or packing films around sweet boxes, invitation cards, and cigarette packets, plastic or PVC banners less than 100 micron, stirrers; and

**Whereas**, as per Rules 4(1)(c) of PWM Rules, 2016 (as amended) *"Carry bag made of virgin or recycled plastic shall not be less than seventy five microns in thickness with effect from the 30th September, 2021 and one hundred and twenty (120) microns in thickness with effect from 31st December, 2022"; and*

**Whereas**, as per Rules 4(d) of PWM Rules, 2016 (as amended), *"plastic sheet or like, which is not an integral part of multilayered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be less than fifty microns in thickness except as specified by Central Government where the thickness of such plastic sheets impair the functionality of the product";*

**Whereas**, as per Rules 4(1)(j) of PWM Rules, 2016 (as amended) *"Non-woven plastic carry bag shall not be less than 60 Gram Per Square Meter (GSM) with effect from the 30th September, 2021";*

**Whereas**, MoEF&CC notified Extended Producer Responsibility (EPR) Guidelines for Plastic Packaging in Schedule II of Fourth Amendment to PWM Rules on February 16, 2022; and

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030 22305792 वेबसाइट/Website : www.cpcb.nic.in

**Whereas**, as per Section 4 of the notified EPR Guidelines, brandowners , producers and importers (PIBOs) of plastic packaging are covered under the Extended Producer Responsibility obligations and provisions of the EPR guidelines; and

**Whereas**, as per Section 10.1 of the EPR guidelines, brandowners, producers and importers of plastic packaging have to register on the Centralized EPR Portal developed by CPCB; and

**Whereas**, CPCB has developed online portal <https://eprplastic.cpcb.gov.in> for registration of PIBOs which was launched by Hon'ble MEF on April 05, 2022; and

**Whereas**, it has been observed that banned SUP items (as per MoEF&CC notification dated August 12, 2021), thin plastic sheets (less than 50 microns thickness), thin plastic bags (less than 120 microns thickness) are continued to be used by various operators in the Airlines sector which is in violation of PWM Rules 2016 (as amended); and

**Whereas**, it has been observed that plastic packaging (more than 50 micron), without obtaining Registration as per notified EPR Guidelines, is used by various operators in the Airlines sector which is in violation of PWM Rules 2016 (as amended);

**Now, therefore**, in compliance of above and in exercise of powers vested under Section 5 of Environment (Protection) Act, 1986 to the Chairman, CPCB, following Directions are being issued for compliance:

- i. To ensure that banned SUP items (as per MoEF&CC notification dated August 12, 2021), thin plastic sheets (less than 50 microns thickness), thin plastic bags (less than 120 microns thickness) are not sold/ stocked/ used in any form by your Airline.
- ii. To obtain Registration as a Brand-owner/Producer/Importer (as applicable) under PWM Rules, 2016 (as amended) on Centralized EPR portal, if using plastic packaging more than 50 micron thickness in any form.

Necessary action for compliance of aforesaid directions shall be taken and Action Taken Report to be submitted to this office within 15 days of issue of these directions, failing which appropriate action including levying of Environmental Compensation will be taken under the provision of Environmental (Protection) Act, 1986.

Yours faithfully,

  
(Tanmay Kumar)  
Chairman

### LIST OF AIRLINES

S.No.	Name	Address
1.	Air India	M/s. Air India Limited Airlines House, 113 Gurudwara Rakabganj Road, New Delhi, Delhi, 110001
2.	Air India Express	M/s. Air India Express Ltd. Door No. 54/4042 A&B, 5th Floor, Aryabhangy Pinnacle, Sahodaran Ayyappan Road, Elamkulam, Kochi, Kerala 682020
3.	AIX Connect	M/s. AIX Connect Private Limited Ground Floor, Alpha 3 Building Kempegowda International Airport, Devenahalli, Bangalore, Bangalore, Karnataka
4.	Akasa Air	M/s. Akasa Air Urmi Estate, Tower A, 12th Floor 95, Ganpatrao Kadam Marg, Lower Parel (W), Mumbai 400013
5.	Go First	M/s. Go Airlines (India) Ltd Terminal 2, Indira Gandhi International Airport New Delhi -110037
6.	IndiGo	M/s. IndiGo Level 1, Tower C, Global Business Park, Mehrauli-Gurgaon Road, Gurgaon – 122 002, Haryana
7.	SpiceJet	M/s. SpiceJet Ltd. 319, Udyog Vihar, Phase IV, Gurgaon – 122016 Haryana
8.	Vistara	M/s. Tata SIA Airlines Limited Intellion Edge, Tower A, 9th and 10th Floor, South Peripheral Road, Sector – 72, Gurugram, Haryana - 122101
9.	Alliance Air	M/s. Alliance Air Aviation Limited Alliance Bhawan, Domestic Terminal-1, I.G.I. Airport, New Delhi 110037
10.	FlyBig	M/s. FlyBig Killa No. 13, 3rd Floor, Begumpur, Khatola, Gurugram - 122001, Haryana
11.	Star Air	M/s. StarAir 2nd Floor, Block 3 Sindhu Logistic Park, No. 34, Nellakunte, Bettahalasuru, Hunsemaranahalli (P), Bangalore - 562 157,



**RAMESHBHAI DHADUK**  
**रमेशभाई धडुक**



सत्यमेव जयते

Member of Parliament (Lok Sabha)  
Porbandar (Gujarat)

संसद सदस्य (लोक सभा) पोर्बंदर (गुजरात)

Member:

• Standing Committee on Commerce

• Consultative Committee, Ministry of Jal Shakti

Date: 17-02-2023

GJ/MP/434/2023

To,

**ShriBhupenderYadavji,**

Hon. Minister of Environment, Forest and Climate Change,

Indira ParyavaranBhawan,

Government of India, New Delhi

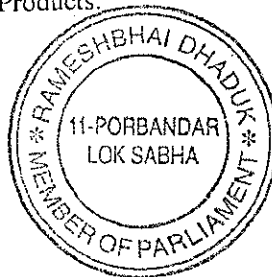
**Subject:-Regardinggiving permission for Provisional License and removal of Hurdles by  
CPCB for PWM Registration for Manufacturing of Bio-degradable SUP Products.**

Respected Sir,

As per above mentioned subject, I would like to inform you that I have received a request from **Gujarat State Plastic Disposable Manufacturing Association, Shapar-Veraval, Dist Rajkot, Gujarat** requesting as manufacturers of Non-foamed rigid biodegradable disposable products (Cups, Glasses, Containers, Trays etc.) to review the current guidelines for obtaining provisional License from CPCB for Manufacturing of Bio-degradable SUP Products. I have attached the request letter for your reference.

I will be extremely grateful if the Ministry of Environment, Forest and Climate Change can understand the situation of these MSME Companies and positively approve & permit immediate Provisional License and removal of Hurdles by CPCB for PWM Registration for Manufacturing of Bio-degradable SUP Products.

Thanking You,



Sincerely,

(Rameshbhai L.Dhaduk)

Enclosed: Request Letter from GSPDMA (Gujarat).

Copy with Urgent Reference to:

- (1) **Chairman, CPCB**  
Central Pollution Control Board,  
Ministry of Environment, Forest and Climate Change,  
'PariveshBhawan', Delhi
- (2) **Chairman, GPCB**  
Gujarat Pollution Control Board  
Paryavaran Bhavan, Sector-10A,  
Gandhinagar.



# Gujarat State Plastic Disposable Manufacturers Association

Survey No. 62/1-2, Opp. Shree Rakholiya Hanumanji Mandir, Shapar(Veraval), Rajkot (Gujarat) India.  
Email.: gspdma@gmail.com

To,  
Shri Ramesh Bhai Dhaduk,  
Member of Parliament,  
Porbandar (Gujarat)  
K2/13-14, udhyognagar,  
Gondal-360311,  
Gujarat.

Date:15.02.2023

Sub.: Regarding grant of provision license and removal of hurdles by CPCB for PWM registration for mfg of bio degradable SUP product.

Dear sir,

We are manufacturers of non foamed rigid biodegradable products like cups, glasses, trays etc. We have few challenges as per current guidelines and we urge you to kindly consider our request on few points for provisional license from CPCB for Mfg. of biodegradable sup products.

We have taken every steps as per sop for sup mfg of CPCB biodegradable, like CTE & CTO to (permission from SPCB), then we have given sample testing as per IS / ISO 17899:t2022 in approved lab and its interim report has also arrived.

Now S.O.P. (rule 4(h) of pwm rule,2016) as per point no. 1.D issue no. (4) and page no. 9 issue no. As per 2.6 Provisional license as per point no.2(a) of S.O.P. It is mandatory to register pwm as per rule 13(1) but it is not decided by CPCB where to give registration of pwm to bio degradable sup as per rule we from spcb. It is said and till today none of our members have registered pwm. According to the S.O.P., it is said in the guide line (sop) of CPCB to give provisional license only after the manufacturese interim report and pwm registration.

Hence we request CPCB and MOEF to issue permission to start production of bio degradable products at the earliest by clearing the hurdle of PWM from interim lab report under IS / ISO 17899:T2022 with all necessary proofs and as per S.O.P. If the testing of our product is filed in an approved lab, we also assure them to fill EPR or stop the production.

We hope that you understand our situation and positively approve & permit immediate production of biodegradable products.

Thanking you.

Yours faithfully,

*Chavali*

Members of,

Gujarat state plastic disposable mfg. Association

**F. No. 12/14/2023- HSM**  
**Government of India**  
**Ministry of Environment, Forest and Climate Change**  
**Hazardous Substances Management Division**

6th floor, Jal wing  
Indira Paryavaran Bhawan  
Jor Bagh Road,  
New Delhi – 110 003  
Date: 14<sup>th</sup> February 2023

**OFFICE MEMORANDUM**


**Subject: Clarification on applicability of Guidelines for Extended Producer Responsibility (EPR) on plastic packaging on manufacturers of rigid industrial containers – Reg.**

The Ministry has received a representation for clarification with respect to non-applicability of EPR on manufacturers of rigid industrial containers.

2. The EPR guidelines notified by the Ministry on 16th February 2022, mandate brand owners to ensure minimum reuse of rigid plastic packaging from 2025-26 onwards. As per EPR Guidelines, the quantity of rigid packaging reused by brand owner shall be reduced from the EPR on total rigid plastic packaging. Thus, in effect reducing the EPR target of the brand owner to the extent of rigid plastic packaging reused by the brand owner, subject to provision of requisite documents.

3. Industrial drums fall under the category of rigid plastic packaging. As there is provision for reuse of rigid plastic packaging by brand owners (BOs), this would enable the EPR obligations of the BOs for industrial drums be reduced to the extent, requisite documents regarding reuse of industrial drums, as mandated by CPCB, are submitted.

4. Further this is to clarify that plastic crates, these are plastic products and, hence do not fall under the ambit of plastic packaging.

  
(Dr. Satyendra Kumar)

Director

011-20819291

Email: [satyendra.kumar07@nic.in](mailto:satyendra.kumar07@nic.in)

To:  
The Chairman,  
Central Pollution Control Board,  
Parivesh Bhawan, East Arjun Nagar,  
Delhi-110032,  
[Email-mscb.cpcb@nic.in](mailto:Email-mscb.cpcb@nic.in)

Copy to:

1. PPS to Secretary, EFCC
2. PPS to AS (NPG)
3. Director General, AIPMA







सीमा शुल्क प्रधान आयुक्त का कार्यालय, एन.एस.- I  
**OFFICE OF THE PR. COMMISSIONER OF CUSTOMS (NS - I),**  
मूल्य निरूपण मुख्य (आयात) **APPRAISING MAIN (IMPORT),**  
जवाहरलाल नेहरू सीमा शुल्क भवन, न्हावा शेवा, ता. उरण,  
**JAWAHAR LAL NEHRU CUSTOM HOUSE, NHAVASHEVA, TAL-URAN,**  
**जिला रायगड/ RAIGAD-400707, महाराष्ट्र MAHARASHTRA**  
(e-mail: [appraisingmain.jnch@gov.in](mailto:appraisingmain.jnch@gov.in); Telephone No.022-27244979)

Date: 08.02.2023

**STANDING ORDER 03 /2023**

**Subject: Clarification about applicability of Plastic Waste Management Rules, 2016, as amended from time to time, on imported goods-reg.**

\*\*\*\*\*

Plastic Waste Management Rules, 2016 have been amended to introduce Schedule II to said Rules, vide Plastic Waste Management (Amendment) Rules, 2022. Accordingly, Extended Producer Responsibilities on producer, importer and brand owner have been made applicable to both pre-consumer and post-consumer plastic packaging waste. As per definition of "Importer", as provided at Rule 3(f) and obligations mentioned at Rule 6 of the Schedule II of Plastic Waste Management (Amendment) Rules, 2022, person who imports plastic packaging product or products with plastic packaging or carry bags or multilayered packaging or plastic sheets or like, is under an obligation to get registered on the Centralized portal developed by Central Pollution Control Board and without which the importers are barred from carrying out any business. Relevant paras of the Rules are mentioned below for ready reference.

*Rule 3(f)-"Importer" means a person who imports plastic packaging product or products with plastic packaging or carry bags or multilayered packaging or plastic sheets or like;*

*Rule 4(ii) - Importer (I) of all imported plastic packaging and / or plastic packaging of imported products;*

*Rule (6.1) (a) The following entities shall register on the centralized portal developed by Central Pollution Control Board namely: -*

*Producer (P); (ii) Importer (I); (iii) Brand owner (BO); (iv) Plastic Waste Processor engaged in (a) recycling, (b) waste to energy, (c) waste to oil, and (iv) industrial composting,*

*Rule (6.2) The entities covered under clause 6.1 shall not carry any business without registration obtained through online centralized portal developed by Central Pollution Control Board.*

**2.** It thus, emerges that besides the importers of plastic packaging, the importers of various items such as primary products, chemicals, machinery, textiles, articles etc. which are not plastic packaging but are coming packed in plastic packaging are also required to take said EPR registration. However, it is gathered that since this is a new requirement, the said registration is taking time up to 3-4 months and till then clearance of imported consignments cannot be held up resulting in disruption of supply chains and inflated dwell

I/1001819/2023

time in Customs clearance. Thus, in order to facilitate trade and in order to keep a check on the dwell time, following procedure is adopted for faster clearance of the Bills of Entry :-

(i) Importers of goods which are not plastic packaging, but are coming wrapped or packed in plastic packaging, such as machinery, textile, etc., are required to upload the EPR registration in e-sanchit at the time of filing of the Bills of Entry to avoid any query on this issue.

(ii) Where EPR registration is not available at the time of filing of Bill of Entry, though the importer had applied for the same on CPCB portal, the Importer is required to upload the Application status in e-Sanchit. Goods shall not be kept on hold by the Customs Authorities and the consignment shall be released and the officer giving Out of Charge shall maintain the record of such consignments in the format attached to this Standing Order, to enable monitoring of the Importer having eventually obtained the EPR registration or otherwise.

(iii) All officers giving Out of Charge shall forward the list of such consignments (which were given Out of Charge even though EPR registration was not submitted by the importer and only application to CPCB portal was submitted by the importer), on monthly basis to the Deputy Commissioner (Appraising Main) Section by 5<sup>th</sup> of the following month. Based on the same, Deputy Commissioner (Appraising Main) shall forward to the CPCB, the complete list of consignments cleared by JNCH in the previous month where EPR registration was not available with the Importer at the time of clearance of goods, but application had been filed on the portal of CPCB. This shall be completed by the Deputy Commissioner (Appraising Main) by 20<sup>th</sup> of every month.

3. If CPCB rejects any such application of an Importer, action against such consignment and the Importer shall be taken by the concerned Appraising Groups under Sections 111 & 112 of the Customs Act, 1962.

4. This Standing Order shall come into force with immediate effect and any difficulty in implementation of above said directions may be communicated to the Commissioner of Customs, NS-I, JNCH.

5. This issues with the approval of the Chief Commissioner of Customs, JNCH.

**(Dipak Kumar Gupta)**

आयुक्त, सीमाशुल्क / Commissioner of Customs,  
मूल्यनिरूपण मुख्य(आयात)/Appraising Main (I),  
जेएनसीएच, न्हावा शेवा / JNCH, Nhava Sheva

**Copy to:**

1. The Chief Commissioner of Customs, Mumbai Zone-II, JNCH for information.
2. The Commissioner of Customs, NS-G/NS-I/NS-II/NS-III/NS-Audit/NS-V, JNCH.
3. All Additional/Joint/Dy./Astt. Commissioners of Customs, JNCH.
4. All Sections/Group of NS-G/NS-I/NS-II/NS-III/NS-Audit/NS-V, JNCH.
5. Representative of BCBA/WISA/Members of PTFC for information and circulation

I/1001819/2023

among their members and other importers for information.

6. DC, EDI for uploading on the JNCH website.

7. Office Copy.

### **ANNEXURE**

Section wise details of Consignments Out of Charged on the basis of Application made on CPCB portal but prior to actual issuance of certificate Plastic Waste Management Rules, 2016						
Name of OOC Section:-						
For the Month of :-						
Sr. No.	IEC	Importer Name	B/E No.	B/E Date	CPCB registration no. shown in Application status web page	Receipt date of CPCB Application shown in Application status web page

Signed by Dipak Kumar  
Gupta  
Date: 08-02-2023 13:26:36  
Reason: Approved





F.NO. CP-99/143/2021-UPC-II-HO-CPCB-HO

07 February, 2023

To,

The Chairperson  
All SPCBs/ PCCs

**Subject: - Direction under Section 5 of the Environment (Protection) Act, 1986 to SPCBs/ PCCs for Implementation of the Plastic Waste Management Rules, 2022 (as amended)**

Whereas, the Ministry of Environment, Forest & Climate Change (MoEF&CC) notified the Plastic Waste Management Rules, 2016 in exercise of the powers conferred under Sections 3, 6 and 25 of the Environmental (Protection) Act, 1986 vide Notification No. G.S.R. 320(E) dated March 27, 2016, and;

Whereas, per Rule 4(h) of PWM Rules, manufacturers and sellers of biodegradable & compostable plastic commodities are to be certified by CPCB;

Whereas, it is observed that banned SUP products claiming to be biodegradable/oxo-biodegradable products are being sold in the market;

Whereas, CPCB has not issued any certificate for biodegradable products as per Rule 4(h) of the Plastic Waste Management Rules, 2022 (as amended) till date;

Whereas, no exemption has been given to oxo-biodegradable plastics under Plastic Waste Management Rules, 2022 (as amended);

Whereas, industries are found to be manufacturing compostable plastic using false identities impersonating those who have been certified as compostable plastic manufacturers by CPCB;

Whereas, MoEF&CC issued Notification dated August 12, 2021 which mandates the thickness of carry bag as 120 microns with effect from December 31, 2022;

Now, therefore, in view of above and exercise of powers vested under Section 5 of the Environment (Protection) Act, 1986 to the Chairman, CPCB, the following directions are issued for compliance:

#### 1. Conduction of Inspections

- Regular inspections of entities (industries, commercial establishments, distributors, stockists, sellers, users, etc.) be conducted to ensure that banned SUP products claiming to be biodegradable (without CPCB certificate)/oxo-biodegradable are not manufactured, imported, stocked, distributed, sold or used.
- Regular inspection of industries to ensure that only manufacturers having authorized certificate from CPCB are involved in the manufacturing process of compostable plastics.

'परिवेश भवन' पृथ्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Telex: 43102030, 22305792 वेबसाइट/Website: www.cpcb.nic.in



- c. Regular inspection of entities to ensure that only entities having authorized certificate from CPCB are involved in the selling of compostable plastics.
- d. Regular inspections of entities (industries, commercial establishments, distributors, stockists, sellers, users, etc.) be conducted to ensure that carry bags with thickness of less than 120 microns are not manufactured, imported, stocked, distributed, sold, or used.


**2. Public Notices**


- a. Public notices/advertisements to be issued in English and regional language in leading newspapers and website of SPCB/ PCC informing the general public that sale of banned SUP biodegradable (without CPCB certificate) and oxo-biodegradable plastics is in violation of PWM Rules.
- b. Public notices/ads to be issued in English and regional language in leading newspapers and website of SPCB/ PCC informing the general public regarding minimum permitted thickness of 120 microns for carry bags with effect from December 31, 2022.

You are requested to take necessary action to ensure compliance of above Directions and submit an action taken report within 15 days of issue of this letter in this regard to Central Pollution Control Board.

**Copy to:**

1. Sh. Naresh Pal Gangwar  
Additional Secretary  
Ministry of Environment, Forest and Climate Change  
Indira Paryavaran Bhawan  
Jor Bagh Road, New Delhi - 110003
2. Division Head, IT Division, CPCB

  
(Tanmay Kumar)  
Chairman

  
(Prashant Gargava)  
Member Secretary

o/c

**F. No. HSM-17/1/2023-HSM**

**Government of India**

**Ministry of Environment, Forest and Climate Change  
Hazardous Substances Management Division**

6<sup>th</sup> floor, Jal wing  
Indira Paryavaran Bhawan  
Jor Bagh Road, New Delhi – 110 003

Date: 3<sup>rd</sup> February 2023

**OFFICE MEMORANDUM**

**Subject: Applicability of thickness restriction on shrink film, cling film, stretch film- under Plastic Waste Management Rules, 2016, as amended- Reg.**

This has reference to applicability of thickness restriction on shrink film, cling film and stretch film under Plastic Waste Management Rules, 2016, as amended. Rule 4 (d) of the Plastic Waste Management Rules, 2016, as amended, stipulate restriction on thickness of plastic sheet or like or cover made of plastic sheet.

2. The following is clarified:

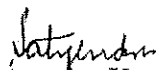
(i) The use of plastic sheet or like, which is not part of multi-layered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be less than 50 microns in thickness, in an independent manner, inter-alia including shrink film, cling film and stretch film, which shall not have thickness less than 50 microns, until an exemption is specified, by the Central Government, based upon recommendation on CPCB, that the thickness of such plastic sheets impair the functionality of the product,

(ii) Further, as per rules, only in cases where, plastic sheet or like, is integral part of multi layer packaging (made from different materials or made from different type of plastics) the thickness restriction shall not apply. However, in such cases, the use of plastic sheet has to be accounted for in production of plastic packaging, through EPR registration of producers of plastic packaging/converters, as EPR Guidelines.

(iii) As EPR target is on weight basis, while registering for EPR of multilayered plastic packaging, in which plastic sheet or like, is a part, the complete weight of multilayered plastic packaging will covered under EPR.

3. It is requested that the above information is shared with all SPCBs/PCCs.
4. This issues with the approval of Competent Authority.

Yours faithfully,

  
**Dr. Satyendra Kumar**  
Director, HSMD  
Ph: 20819291

Email: [satyendra.kumar07@nic.in](mailto:satyendra.kumar07@nic.in)

To,  
The Chairman, Central Pollution Control Board,  
Parivesh Bhawan, CBD-cum-Office,  
East Arjun Nagar, New Delhi- 110 032

Copy for kind information:

1. PPS to Secretary, EFCC
2. PPS to AS (NPG)





केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. CP-20/117/2021-UPC-II-HO-CPCB-HO-Part(10)

Dated: 25-01-2023

To,

M/s. E-commerce Company  
(As per list)

**Sub: - Closure Directions under Section 5 of the Environment (Protection) Act, 1986 for Non-compliance of PWM Rules, 2016 (as amended) - Reg.**

Whereas, the Ministry of Environment, Forest & Climate Change (MoEF&CC) notified the Plastic Waste Management (PWM) Rules, 2016, in exercise of the powers conferred under section 3, 6 & 25 of the Environmental (Protection) Act, 1986 vide Notification No. G.S.R. 320 (E) dated March 27, 2016; and

Whereas, MoEF&CC issued Notification, dated August 12, 2021 which mandated banning of identified Single Use Plastic (SUP) items and prescribed minimum thickness of carry bag with effect from July 01, 2022; and

Whereas, as per Rule 4(2) of PWM Rules, 2016 (as amended), "The manufacture, import, stocking, distribution, sale and use of following single use plastic (SUP), including polystyrene and expanded polystyrene, commodities shall be prohibited with effect from the 1<sup>st</sup> July, 2022:

(a) ear buds with plastic sticks, plastic sticks for balloons, plastic flags, candy sticks, ice-cream sticks, polystyrene [Thermocol] for decoration.

(b) Plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping or packing films around sweet boxes, invitation cards, and cigarette packets, plastic or PVC banners less than 100 micron, stirrers; and

Whereas, as per Rules 4(1)(c) of PWM Rules, 2016 (as amended) "Carry bag made of virgin or recycled plastic shall not be less than seventy five microns in thickness with effect from the 30th September, 2021 and one hundred and twenty (120) microns in thickness with effect from 31st December, 2022"; and

Whereas, as per Rule 4(1)(d) of PWM Rules (as amended) "Plastic sheet or like, which is not an integral part of multilayered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be less than fifty microns in thickness except as specified by the Central Government where the thickness of such plastic sheets impair the functionality of the product"; and

Whereas, as per Rule 4(1)(j) "non-woven plastic carry bag shall not be less than 60 Gram Per Square Meter (GSM) with effect from the 30th September, 2021."; and

Whereas, M/s. Unit Name Limited is engaged in selling / using banned SUP items as per the said Notification; and

Whereas, vide letter No. B.17011/7/UPC-II-PWM(SUP)/2022 dated 01/02/2022, CPCB issued following Directions to your unit to stop selling / usage of banned SUP items through the online platform provided by your organization with effect from July 01, 2022.

Whereas, vide letter dated 03-6-2022, a reminder letter was sent for compliance of the above said direction issued to your unit; and

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel: 43102030 22305792 वेबसाइट/Website: www.cpcb.nic.in

**Whereas**, report on compliance of aforementioned Directions has not been received from your organization, although six months have lapsed since the ban on SUP items has been in force, as per MoEF&CC Notification dated 12.08.22.; and

**Whereas**, CPCB issued Show Cause Notice dated December 13, 2022 under Sec 5 of the Environment (Protection) Act, 1986 (notice thereof) to your unit for i) Closure of operations of the unit ii) Levying of Environment Compensation for non-compliance of provisions of PWM Rules, 2018 and given an opportunity to submit its reply within 10 days from issuance of these directions; and

**Whereas**, M/s. Unit name has not submitted any response to CPCB so far;

**Whereas**, as per the EC Regime prepared by CPCB, Environmental Compensation is to be levied @Rs.5000/- per ton of SUP items sold in marketplace through your platform.

**NOW THEREFORE**, in view of above and in exercise of the powers vested to Chairman, Central Pollution Control Board (CPCB) under Section 5 of the Environment (Protection) Act, 1986, the following directions are issued to your unit:

1. The industry shall close down its operations with immediate effect and not resume its operations till it complies with provision of the PWM Rules, 2016 (as amended) related to SUP ban.
2. The unit shall pay **Rs. 25,00,000/-** (Twenty Five lakhs only) as interim Environmental Compensation charge for violation of Plastic Waste Management Rules, 2016 (as amended) to CPCB (A/c No. 532702050000164, Bank Name: Union Bank Of India, IP Extension Branch, Vikash marg Ext, Delhi, IFSC: UBIN0553271). In case of delay, simple interest @12% shall be levied for the delay period (delay period shall be calculated after 15 days of issue of this direction till the date of EC deposited by the unit).

You are required to take necessary action to comply with the above Directions and submit the Compliance report within 15 days of issue of these Directions, failing which CPCB shall be constrained to take action as deemed fit under Section 5 of EPA.

Yours faithfully,

13/01/23  
(Tanmay Kumar)  
Chairman

Copy to:

1. The Secretary,  
Ministry of Electronics and Information  
Technology  
(Government of India)  
Electronics Niketan, 6, CGO Complex,  
Lodhi Road, New Delhi – 110003

: For information & necessary  
action please

2. Sh. Naresh Pal Gangwar,  
Additional Secretary,  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhawan, Jorbagh Road,  
New Delhi – 110003

**E commerce companies (Non-complying)**

Sl. No.	Name	Address
1.	MS Movers and Packers	M/s. MS Movers and Packers 8A/ 174/2740 Sai Co-operative Housing Society, Hariyali Village, Tagore Nagar, Vikroli East Mumbai, Maharashtra 400083
2.	Limeroad	M/s. A. M. Marketplaces Pvt Ltd (Lime Road) 4 <sup>th</sup> & 5th Floor, Plot No. 48, Sector 44, Near HUDA City Center Metro Station, Gurgaon, Haryana – 122001
3.	Yepme	M/s. Yepme Limited 312 F, 3rd Floor, Centrum Plaza, Golf Course Road, Sector 53, Gurgaon 122001
4.	Netmeds	M/s. Netmeds 5th Floor, EA Chambers (Express Avenue) No 49 & 50 L, Whites Road, Royapettah, Chennai – 600014
5.	Zivame	M/s. Reliance Retail Limited (Zivame) 3rd Floor, Court House, Lokmanya Tilak Marg, Dhobi Talao, Mumbai, Maharashtra - 400 002
6.	Clovia	M/s. Purple Panda Fashions Private Limited (Clovia) 109 B -plot No. 18, Rajendra Jaina Tower, Wazirpur Commercial Complex, Wpia, New Delhi -110052
7.	Quikr	M/s. Quikr India Pvt. Ltd. 1st Floor, Raghuvanshi Mansion, Senapati Bapat Marg, Lower Parel, Mumbai, Maharashtra – 400013
8.	Sulekha	M/s. Sulekha.com New Media Pvt. Ltd. RMZ Millenia Business Park, 2nd Floor of, Campus 1A, No 143, Dr. MGR Road, Kandanchavadi, Perungudi, Chennai - 600 096
9.	Hopscotch	M/s. Hopscotch 1st Floor DGP House, Behind Bengal Chemical, Old Prabhadevi Road, Mumbai, Maharashtra 400025
10.	FreshMenu	M/s. FreshMenu No 1229, 4th Main Cross, Sector 7, HSR Layout, Bengaluru, Karnataka 560034

3. DH (IT)

  
(Prashant Gargava)  
Member Secretary

o/c

**File No. 17/6/2021-HSMD**  
**Government of India**  
**Ministry of Environment, Forest and Climate Change**  
**(HSM Division)**

Level-VI, Jal Block,  
Indira Paryavaran Bhawan  
Jor Bagh Road, Ali Ganj,  
New Delhi-110003

Dated: 6<sup>th</sup> January, 2023

**OFFICE MEMORANDUM**

**Subject: Guidelines on Extend Producer Responsibility for Plastic Packaging-Regarding.**

1. The Guidelines on Extended Producer Responsibility (EPR) for Plastic Packaging (hereinafter referred as "EPR Guidelines") were notified in the Gazette of India vide Plastic Waste Management (Amendment) Rules, 2022, on 16<sup>th</sup> February, 2022. The Producers, Importers and Brand Owners are mandated to fulfill Extended Producer Responsibility for plastic packaging, under Rule 9 (1), of the Plastic Waste Management Rules, 2016, as amended, as per EPR Guidelines, given in Schedule II of the rules.

2. Accordingly, EPR Guidelines need to be followed for implementation of EPR obligations. Requests for clarifications have been received on the EPR Guidelines specifically with respect to clause 4 and clause 6 of the guidelines. The following clarifications are provided with respect EPR Guidelines:

Producer (P), Importer (I) and Brand Owners (BO) – PIBO

(i) The obligated entities covered under Extended Producer Responsibility obligations and provisions of EPR Guidelines given in clause 4 of the guidelines. The same is quoted below:

*"4. Obligated Entities:*

*The following entities shall be covered under the Extended Producer Responsibility obligations and provisions of these guidelines namely: -*

- (i) Producer (P) of plastic packaging;*
- (ii) Importer (I) of all imported plastic packaging and / or plastic packaging of imported products;*
- (iii) Brand Owners (BO) including online platforms/marketplaces and supermarkets/retail chains other than those, which are micro and small enterprises as per the criteria of Ministry of Micro, Small and Medium Enterprises, Government of India.;*
- (iv) Plastic Waste Processors."*

It is to be noted from clause 4 of EPR Guidelines quoted above, Producer (P) is of plastic packaging. This is distinct from Brand Owners which are defined under the Rules 3 (b) as quoted below:

*“(b) “brand owner” means a person or company who sells any commodity under a registered brand label or trademark.”*

For reference, the terms “commodity” and “plastic packaging” are also defined under Rule 3, as quoted below:

*“(d) “commodity” means tangible item that may be bought or sold and includes all marketable goods or wares;*

*(oa) Plastic Packaging<sup>1</sup> means packaging material made by using plastics for protecting, preserving, storing, and transporting of products in a variety of ways;”*

(ii) The obligated entities mandated for registration on the centralized EPR portal developed by CPCB, as per clause 6 of EPR Guidelines, are defined in clause 4 of the EPR Guidelines quoted above. As such, any interpretation related to registration on centralized EPR portal need to be read in alignment with clause 4 of EPR guidelines only. For clarity, Micro and Small Brand Owners (BO) exempted under clause 4 of EPR Guidelines, and do not manufacture plastic packaging as defined under the rules, are not required to be registered on the Centralized EPR portal, as Producer (P) of plastic packaging, as per EPR Guidelines.

(iii) Clause 4(iii) of the EPR Guidelines exempts micro and small Brand Owners (quoted above), from EPR obligations and provisions of EPR guidelines. Therefore, clause 6.3 of EPR Guidelines is not applicable on micro and small brand owners.

#### Plastic Waste Processors (PWPs)

(iv) The restriction under clause 6.3 of EPR Guidelines relates to dealing with obligated entities under the Guidelines only and does not cover the value chain of other types of plastic waste. The general condition mentioned in their registration certificate, restricting PWPs to undertake business with only entities registered on centralized EPR portal, needs to be suitably amended to reflect the correct factual position. CPCB is requested to instruct all SPCBs/PCCs, accordingly.

(v) CPCB is requested to further disseminate the above clarifications given in paragraphs 2 (i) to 2 (iv) with all State Pollution Control Boards/Pollution Control Committees for immediate compliance.

3. The CPCB is also requested to incorporate the following changes on the Centralized EPR portal on most immediate priority

#### PIBOs

(i) In order to allow for maximum enterprises to register and come under ambit of EPR, self-declaration of enterprise based upon audited statement of accounts may be used as for determination of EPR target while registering on centralized EPR portal. Detailed invoices for last two years may be verified, wherever required, on need basis, as part of auditing exercise.

### **List of Association**

- All India President, Laghu Udyog Bharati

#### *Association from Uttarakhand*

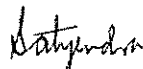
- Sidcul Manufacturers Association Uttarakhand,
- Industries Association of Uttarakhand
- Kumaun Garhwal Chamber Of Commerce & Industry
- Bhagwanpur Industries Association
- Association of Pharmaceutical Manufacturers.
- Food Industries Association of Uttarakhand.
- Roorkee Small Scale Industries Association.
- Drugs Manufacturer Association of Uttarakhand.
- Indian Industries Association.

PWPs

(ii) An option is to be provided for filling information on the quantum of plastic packaging waste recycled and recycling of other plastics by PWPs on the centralized EPR portal.

(iii) An option of "Others" is to be provided to such PWPs who do not deal with plastic packaging waste. CPCB may also provide the option, to already registered PWPs / recyclers to edit their existing option in order to reflect correctly the kind of plastic waste or plastic packaging waste being recycled or processed by them.

This issues with the approval of Secretary, EFCC.

  
(Dr. Satyendra Kumar)  
Director  
011-20819291

Email: [satyendra.kumar07@nic.in](mailto:satyendra.kumar07@nic.in)

To,

The Chairman,  
Central Pollution Control Board,  
Parivesh Bhawan, East Arjun Nagar,  
Delhi- 110032  
Email - [ccb.cpcb@nic.in](mailto:ccb.cpcb@nic.in)

Copy to

Industry associations as per list

Copy for kind information:

1. PPS to Secretary (EF&CC)
2. PPS to AS(NPG)





File No: CP-20/33/2021-UPC-II-HO-CPCB-HO

Dated: 21-12-2022

To,

All PIBOs/PWPs

**Sub: Directions under Section 5 of the EPA, 1986 regarding provision of GST invoice of transactions related to plastic packaging by Producers / Importers/ Brand owners (PIBOs) and Plastic Waste Processors (PWPs)**

1. Whereas, Guidelines on Extended Producer Responsibility (hereinafter "EPR Guidelines") for Plastic Packaging were notified by MoEF&CC on February 16, 2022 in Schedule — II of 4th amendment of Plastic Waste Management Rules, 2016.
  - 1.1. Section 4 of the EPR Guidelines provides that, "The following entities shall be covered under the Extended Producer Responsibility obligations and provisions of these guidelines namely: - (i) Producer (P) of plastic packaging; (ii) Importer (I) of all imported plastic packaging and/ or plastic packaging of imported products; (iii) Brand Owners (BO) including online platforms/marketplaces and supermarkets/retail chains other than those, which are micro and small enterprises as per the criteria of Ministry of Micro, Small and Medium Enterprises, Government of India.; and (iv) Plastic Waste Processors".
  - 1.2. Section 6.1(a) of the EPR Guidelines provides that, "The following entities shall register on the centralized portal developed by Central Pollution Control Board namely: - (i) Producer (P); (ii) Importer (I); (iii) Brand owner (BO); (iv) Plastic Waste Processor (PWP) engaged in (a) recycling, (b) waste to energy, (c) waste to oil, and (iv) industrial composting".
  - 1.3. As per Section 6.6 of the EPR Guidelines while registering, the entities shall have to provide PAN Number, GST Number, CIN Number of the company and Aadhar Number and PAN Number of authorized person or representative and any other necessary information as required.
  - 1.4. Section 7 of the EPR Guidelines provides further details for calculations of Extended Producer Responsibility (EPR) Targets to be fulfilled by the Registered PIBOs.
  - 1.5. Section 10.3 of the EPR Guidelines, Brand Owner covered under clause 4 (iii) shall provide details of plastic packaging purchased from Producers and/or Importers covered under clause 4 (i) and 4 (ii) separately. The quantities attributed to each Producer and Importer covered under clause 4 (i) and 4 (ii) obligated upon Brand Owner shall be deducted from the obligation of Producers and Importers. The record of such purchase

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including category—wise quantity purchased, shall be maintained separately by Brand Owner; and

- 1.6. Section 10.4 of the EPR Guidelines **provides that** "The Producers and Importers covered under clauses 4 (i) and 4 (ii) will maintain the record of the quantity of plastic packaging material made available to Brand Owner covered under clause 4(iii). The record of such sale including category-wise quantity sold, will be maintained separately by Producers and Importers. In case such records are not maintained, they will have to fulfil the complete Extended Producer Responsibility obligation. The online platform shall cross—check the declaration of transactions among Producers, Importers & Brand—Owners.
- 1.7. As per section 11.1 of the EPR Guidelines, "All plastic waste processors shall have to register with concerned State Pollution Control Board or Pollution Control Committee in accordance with provision 13(3) of Plastic Waste Management Rules, 2016 on the centralized portal developed by **Central Pollution Control Board. Central Pollution Control Board shall lay down uniform procedure for registration within three months of the publication of these guidelines.**
- 1.8. Section 11.5 of the EPR Guidelines, "Registered plastic waste processors registered under Plastic Waste Management Rules, 2016, as amended, shall provide certificates for plastic waste processing. The certificate provided by only registered plastic waste processors shall be considered for fulfilment of Extended Producer Responsibility obligations".
- 1.9. Section 11.6 of the EPR Guidelines provides that, the pro forma for the certificate shall be developed by Central Pollution Control Board. In no case, the amount of plastic packaging waste recycled by the enterprise shall be more than installed capacity of the enterprise. **The certificates will be for plastic packaging category-wise and shall include GST data of the enterprise.**
- 1.10. **Section 11.7 of the EPR Guidelines provides that,** The certificate for plastic packaging waste provided by registered plastic waste processors shall be in the name of registered Producers, Importers & Brand—Owners or Local authorities, as applicable, based upon agreed modalities. **Central Pollution Control Board will develop mechanism for issuance of such certificate on the centralized portal.**
- 1.11. Section 12.1 of the EPR Guidelines, **Central Pollution Control Plastic Board shall prescribe the standard operating procedure for registration of Producers, Importers & Brand-Owners under Waste Management Rules, 2016; and**
2. In view of the above mentioned provisions of EPR Guidelines, it is observed that verified details of all plastic waste/ packaging transactions between PIBOs & PWPs are required for fool proof method of calculation of EPR Target of PIBOs, cross checking of transactions between PIBOs as well as generation of EPR

Certificates by PWPs (Recycling& EOL) and PIBOs (Use of Recycled Plastic & Reuse (Cat I packaging)).

3. As per Section 9 of the EPR Guidelines, Environment Compensation (EC), as applicable shall be levied by CPCB/SPCB/PCC on PIBOs for the non-fulfilment of their EPR targets, responsibilities and obligations in these guidelines in accordance with EC Guidelines framed by CPCB. EC, @ Rs.5000/— per ton is to be levied for shortfall in EPR target on defaulting PIBOs, as per EC Guidelines framed by CPCB.
4. It is observed that non-fulfilment of EPR Targets by PIBOs not only have huge financial implications but also have severe adverse environmental impact.
5. GST invoice provides verified details of all transactions (sales/purchase) including that related to plastic waste /packaging transactions by PIBOs/PWPs and Section 10.3 & 10.4 of the EPR Guidelines mandate PIBOs to provide details of sales & procurement of plastic packaging. Further, GST details are to be incorporated in the Certificates generated by PWPs and accordance with Section 11.7 of the Guidelines.
6. As per the EPR Guidelines, CPCB has developed the Centralized portal for registration of Producers, Importer and Brand—owners (PIBOs) & Plastic Waste Processors (PWPs). The portal is available at <https://cpcbepplastic.in/>
7. The EPR portal has provision for cross validation of transactions between PIBOs/PWPs as well as auto—generation of EPR target of successive years based on real time capture of procurement / sales of plastic packaging of preceding years.
8. The EPR Portal has provision for generation of EPR Certificates based on the actual sales figures of PWPs /PIBOs (as applicable). The portal also has provision of transfer of certificates between PWPs/PIBOs (as applicable).
9. The Ministry of Environment, Forest & Climate Change (MoEF&CC) has notified Plastic Waste Management Rules, 2016 (hereinafter "PWM Rules"), in exercise of the powers conferred under sections 3, 6 & 25 of the Environment (Protection) Act, 1986 vide Notification No. G.S.R 320 (E) dated March 18, 2016.
10. In the light of the provisions mentioned in above paragraphs and in continuation of the provisions made under PWIVI Rules, 2016 and in exercise of powers vested under Section 5 of the Environment (Protection) Act, 1986 to the Chairman CPCB, all PIBOs and PWPs are hereby directed to upload GST E-invoice details of all transactions (sales /purchase) related to plastic packaging and plastic waste, as per requirement, on the centralized EPR Portal for ensuring compliance of the provisions as contained in the Guidelines on Extended Producer Responsibility for Plastic Packaging which have been notified by MoEF&CC on February 16, 2022 in Schedule — II of 4th amendment of Plastic Waste Management Rules, 2016.

11. All concerned are hereby directed to take immediate necessary action for the compliance of aforesaid directions, failing which action shall be initiated against the PIBOs/PWPs, which are found in non-compliance of the provisions of aforesaid Directions.

12. This circular shall come into force with immediate effect.

  
(Tanmay Kumar)  
Chairman  
CPCB

Copy to:

1. Sh. Naresh Pal Gangwar, : for kind information please  
Additional Secretary,  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhawan  
Jor bagh Road,  
New Delhi – 110003
2. DH (IT) : for uploading on CPCB website please

  
(Prashant Gargava)  
Member Secretary  
CPCB



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. B.17011/7/UPC-II-PWM(SUP)/2022

Dated: 13-12-2022

To,

The Manufacturers,  
(As per list)

**Sub: Comprehensive Directions under Section 5 of the Environment (Protection) Act, 1986 to Plastic Raw Material Manufacturers for effective implementation of ban on identified Single-use plastic (SUP) items and implementation of Guidelines for Extended Producer Responsibility (EPR) on plastic packaging-Reg.**

**Whereas**, the Ministry of Environment, Forest & Climate Change (MoEF&CC) notified the Plastic Waste Management (PWM) Rules, 2016, in exercise of the powers conferred under sections 3, 6, & 25 of the Environmental (Protection) Act, 1986 vide Notification No. G.S.R. 320 (E) dated March 27, 2016; and

**Whereas**, MoEF&CC issued Notification, dated August 12, 2021 which mandated banning of following Single Use Plastic (SUP) items with effect from July 01, 2022; and

- ear buds with plastic sticks, plastic sticks for balloons, plastic flags, candy sticks, ice-cream sticks, polystyrene [Thermocol] for decoration;
- plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping or packing films around sweet boxes, invitation cards, and cigarette packets, plastic or PVC banners less than 100 micron, stirrers.

**Whereas**, as per provision 4(1)(c) of PWM Rules 2018, (as amended), "carry bags made of virgin or recycled plastic shall not be less than seventy five microns in thickness with effect from the 30th September, 2021 and one hundred and twenty (120) microns in thickness with effect from the 31st December, 2022"

**Whereas**, as per provision 4(d) of PWM Rules 2018, (as amended), "Plastic sheet or like, which is not an integral part of multilayered packaging and cover made of plastic sheet used for packaging, wrapping the commodity shall not be <50 microns in thickness except as specified by Central Government where the thickness of such plastic sheets impair the functionality of the product";

**Whereas**, as per Rules 4(1)(j) of PWM Rules, 2016 (as amended) "Non-woven plastic carry bag shall not be less than 60 Gram Per Square Meter (GSM) with effect from the 30th September, 2021"; and

**Whereas**, As per provision 4(1-e) of the PWM Rules, as amended, "The manufacturer shall not sell or provide or arrange plastic to be used as raw material to a producer, not having valid registration from the concerned State Pollution

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Control Boards or Pollution Control Committee or the Central Pollution Control Board; and

**Whereas**, MoEF&CC notified Guidelines for Extended Producer Responsibility for Plastic Packaging in Schedule II of Fourth Amendment to PWM Rules on February 16, 2022; and

**Whereas**, as per Section 10.1 of the EPR guidelines: *"The Producers, Importers & Brand-Owners (PIBOs) shall have to register through the online centralized portal developed by CPCB. The certificate of registration shall be issued using the portal"*; and.

**Whereas**, CPCB has developed online portal <https://eprplastic.cpcb.gov.in/plastic/> for registration of PIBOs & PWPs which was launched on April 05, 2022; and

**Whereas**, M/s. Name of Industry is engaged in manufacturing plastic raw material which can be used for production of plastic items including plastic packaging as enumerated above; and

**Whereas**, vide letters dated 10-06-2022, CPCB issued following modified Directions to your unit for phasing out Single Use plastic; and

1. The manufacturers shall not directly supply plastic raw materials to producers (in formal/informal sector) engaged in production of banned SUP items.
2. Manufacturers shall inform its plastic raw material buyers that they shall not be supplying plastic raw material for production of banned SUP items w.e.f. July 01, 2022:
3. The manufacturers shall print the following advisory on their invoices raised for sale of plastic raw material w.e.f. July 01, 2022:  
*"Not to be used in the manufacture of SUP items prohibited under PWM Rules"*
4. The manufacturers shall print the following on all Packaging Bags of plastic raw material w.e.f. July 01, 2022:  
*"Not to be used in the manufacture of SUP items prohibited under PWM Rules, 2016."*
5. The following shall be incorporated in all MoU/ Sale Contracts/Price Lists pertaining to sales of plastic raw materials w.e.f. July 01, 2022:  
*"Buyer hereby undertakes and warrants to comply, at all times, with the applicable laws including but not limited to the Plastic Waste Management Rules 2016 as amended from time to time and notifications and directives issued thereunder ("PWM Rules"), in relation to the use of the Goods. Buyer expressly undertakes and warrants that the plastic raw material purchased shall not be used, directly or indirectly, in production of banned Single Use Plastic (SUP) items, listed in PWM Rules."*

6. The plastic raw material manufacturers shall provide sales details of plastic raw materials on quarterly basis to CPCB w.e.f. July 01, 2022 in the prescribed format.

**Whereas,** vide letters dated 17-08-2022 & 18-09-2022, CPCB issued following Directions to your unit:

1. Not to supply plastic raw materials directly to producers engaged in manufacture of plastic packaging not having valid registration certificate from the concerned State Pollution Control Boards or Pollution Control Committee or CPCB through the centralized EPR Portal.
2. Manufacturers shall send a communication to its plastic raw material customers that they, henceforth, shall not be supplying plastic raw material for production of banned SUP items to producers of plastic packaging not registered on CPCB portal.
3. The plastic raw material manufacturers shall submit quarterly sales details of plastic raw materials to CPCB.
4. To ensure that Registration No., as issued on the centralized EPR Portal to the plastic packaging producer, is henceforth incorporated in all invoices issued for sale of plastic raw material to such producers.

**Whereas,** production, sale and usage of banned SUP items and improper management of plastic packaging waste still continues in various sections of the Indian economy; and

**Now, therefore,** in exercise of powers vested under Section 5 of Environment (Protection) Act, 1986 to the Chairman CPCB, following comprehensive directions are issued to your industry:

1. Not to supply plastic raw materials directly to producers engaged in manufacture of plastic packaging not having valid registration certificate from the concerned State Pollution Control Boards or Pollution Control Committee or CPCB through the centralized EPR Portal.
2. Not to supply plastic raw materials directly to banned SUP producers. The list of banned items to include items listed in MoEF&CC Notification dated August 12, 2021, plastic sheets less than 50 micron thickness, plastic carry bags less than 75 micron thickness w.e.f 30.9.21 and & 120 micron w.e.f 31.12.22 and non-woven bags less than 60 GSM
3. To ensure that Registration No., as issued on the centralized EPR Portal to the plastic packaging producer, is henceforth incorporated in all invoices issued for sale of plastic raw material to such producers
4. To ensure that first buyer and every subsequent buyer of plastic raw materials shall maintain record of transactions of plastic raw material in electronic form, till such time the raw material is sold for making products.

5. To print the following advisory on their invoices raised for sale of plastic raw material w.e.f. July 01, 2022: "Not to be used in the manufacture of SUP items prohibited under PWM Rules including plastic sheets < 50 micron thickness, non-woven carry bags < 60 GSM, Carry bags < 75 micron thickness w.e.f 30.9.21 and 120 micron thickness w.e.f 31.12.22"
6. To print the following on all Packaging Bags of plastic raw material w.e.f July 01, 2022: "Not to be used in the manufacture of SUP items prohibited under PWM Rules, 2016. including plastic sheets < 50 micron thickness, non-woven carry bags < 60 GSM, Carry bags < 75 micron thickness w.e.f 30.9.21 and 120 micron thickness w.e.f 31.12.22"
7. To incorporate the following in all MoU/ Sale Contracts/Price Lists pertaining to sales of plastic raw materials w.e.f July 01, 2022:  
"Buyer hereby undertakes and warrants to comply, at all times, with the applicable laws including but not limited to the Plastic Waste Management Rules 2016 as amended from time to time and notifications and directives issued thereunder ("PWM Rules"), in relation to the use of the Goods. Buyer expressly undertakes and warrants that the plastic raw material purchased shall not be used, directly or indirectly, in production of banned Single Use Plastic (SUP) items, listed in PWM Rules."
8. To provide sales details of plastic raw materials on quarterly basis to CPCB w.e.f. July 01, 2022 in the prescribed format (annexed).

Necessary action shall be taken to ensure compliance of aforesaid directions and Action Taken Report submitted to this office on quarterly basis, failing which appropriate action including levying of Environmental Compensation will be taken against your industry in accordance with the provisions under Environmental (Protection) Act, 1986.

Yours faithfully,

  
(Tanmay Kumar)  
Chairman 

Copy to:

1. Sh. Naresh Pal Gangwar,  
Additional Secretary,  
Ministry of Environment, Forests & Climate Change  
Indira Paryavaran Bhawan  
Jorbagh Road,  
New Delhi – 110003
2. DH (IT)

  
(Prashant Gargava)

o/c



[illegible][illegible]

**LIST OF LEADING MANUFACTURERS OF PLASTIC RAW MATERIAL**

S.No.	Company	Registered Address
1	Reliance Industries Limited	Reliance Industries Limited 3rd Floor, Maker Chambers IV,,222, Nariman Point, Mumbai Maharashtra - 400021
2	Indian Oil Corporation Limited	Indian Oil Corporation Limited Indian Oil Bhavan G-9, Ali Yavar Jung Marg, Bandra (East), Mumbai -400051
3	Haldia Petrochemicals Ltd.	Haldia Petrochemicals Ltd. Tower 1, Bengal Eco Intelligent Park (Techna) Block EM, Plot No 3, Sector V, Salt Lake PO: Bidhan Nagar, District: North 24 Paraganas Kolkata 700091
4	GAIL (INDIA) Limited	GAIL (INDIA) Limited GAIL Bhawan, 16 Bhikaji Cama Place, R K Puram, New Delhi - 110066
5	HPCL-Mittal Energy Limited	HPCL-Mittal Energy Limited Phullokari Village, Talwandi Saboo Taluka, District Bathinda - 151301, Punjab
6	IVL Dhunseri Petrochem Industries Limited	IVL Dhunseri Petrochem Industries Limited 'Dhunseri House', 4A, Woodburn Park, Kolkata 700020
7	Supreme Petrochem Ltd.	Supreme Petrochem Ltd. Solitaire Corporate Park, Building No. 11, 5th Floor, 167, Guru Hargovindji Marg, Chakala, Andheri (East), Mumbai - 400093,
8	Finolex Industries Limited	Finolex Industries Limited Gat No. 399, Village Urse,, Taluka Maval, Pune District Maharashtra-410506
9	Chemplast Sanmar Limited	Chemplast Sanmar Limited 9 Cathedral Rd Madras Tamil Nadu 600086

10	LG Polymers India Pvt., Ltd.	LG Polymers India Pvt., Ltd. Quality Innovation & Solutions RR Venkatapuram, Visakhapatnam-530029. Andhra Pradesh, India.
11	INEOS Styrolution India Limited	INEOS Styrolution India Limited 5th Floor, OHM House-2, OHM Business Park, Near Balaji Hospital Subhanpura, Vadodara - 390007, Gujarat India
12	ONGC Petro additions Limited	ONGC Petro additions Limited 35, Nutan Bharat Co-operative Housing Society Limited, R.C. Dutt Road, Alkapuri, Vadodara-390007, Gujarat,
13	Mangalore Refinery and Petrochemicals Limited	Mangalore Refinery and Petrochemicals Limited Kuthethoor P.O., Via Katipalla, Mangalore, 575 030
14	Brahmaputra Cracker & Polymer Ltd.	Brahmaputra Cracker and Polymer Limited 1st Floor, House No 6 Bhuban Road, Uzanbazar Guwahati, Assam Pin - 781001
15	DCW Limited	DCW Limited Nirmal 3rd Floor, Nariman Point Mumbai-400021, India.
16	DCM Shriram Ltd.	DCM Shriram Ltd. 2nd Floor (West Wing) World Mark 1, Aerocity Delhi - 110037
17	Gujarat State Fertilizers & Chemicals Limited	Gujarat State Fertilizers & Chemicals Limited P. O. Fertilizernagar-391750, Dist. Vadodara, Gujarat
18	Bhansali Engineering Polymers Ltd.	Bhansali Engineering Polymers Ltd Unit No. 401, 4th Floor, Peninsula Heights, C.D. Barfiwala Road, Andheri (West), Mumbai 400058



## **FREQUENTLY ASKED QUESTIONS**

### **Part A: General**



### **Registration of PIBO /PWP as per EPR Guidelines Notified by MoEF&CC**

#### **FREQUENTLY ASKED QUESTIONS**

**1. What is Extended Producer Responsibility (EPR)**

EPR means the responsibility of a producer for the environmentally sound management of the product until the end of its life.

**2. Have EPR Guidelines been notified by Government?**

Yes. MoEF&CC vide Fourth Amendment to Plastic Waste Management Rules 2016 notified EPR Guideline on February 16, 2022

**3. Which entities shall register on the centralized portal developed by CPCB? The following entities shall register on the centralized portal developed by CPCB:**

I. Producer (P)

II. Importer (I)

III. Brand owner (BO)

IV. Plastic Waste Processor engaged in (a) recycling, (b) waste to energy, (c) waste to oil, and (d) industrial composting.

**4. What assistance is provided for filling of application?**

- AI Chat bot has been provided at right side of the login and sign up page of the portal.
- Helpline no.: 011- 43102469
- i-button with assisting provided in specific sections
- Standard Operating Procedure uploaded on website'
- Instruction sheet for filing of application uploaded on website

**5. Which PIBOs are required to register with SPCB/PCC**

PIBOs which are operational in one or two states/UTs are required to register with the concerned with SPCB/PCC

**6. Which PIBOs are required to register with CPCB**

PIBOs which are operational in more than two states/UTs are required to register with CPCB.

**Note: Brand Owners (BO) including online platforms/marketplaces and supermarkets/retail chains other than those, which are micro and small enterprises as per the criteria of Ministry of Micro, Small and Medium Enterprises, Government of India**

*For details Section 3 & 4 of aforementioned EPR Guidelines may be referred to*

**7. What are the documents required for KYC for registration of PIBOs?**

i. PDF copy of Company's PAN, CIN & GST (the combined copies of GST invoices in all the States/UTs where the PIBO is operating). ii. PDF copy of Authorized person's PAN & Aadhar.

**Note: Proprietorship and partnership firms shall provide PAN and GST number for registration on EPR portal. CIN number is applicable for the companies registered with Ministry of Corporate Affairs.**

**8. Which are the plastic packaging categories covered under EPR?**

The following plastic packaging categories are covered under EPR:

**Category I :** Rigid plastic packaging

**Category II :** Flexible plastic packaging of single layer or multilayer (more than one layer with different types of plastic), plastic sheets or like and covers made of plastic sheet, carry bags, plastic sachet or pouches

**Category III :** Multilayered plastic packaging (at least one layer of plastic and at least one layer of material other than plastic)

**Category IV :** Plastic sheet or like used for packaging as well as carry bags made of compostable plastics

*For details please refer EPR Guidelines ( Section 5)*

**9. What is Pre-consumer plastic packaging waste?**

"Pre-consumer plastic packaging waste" means plastic packaging waste generated in the form of reject or discard at the stage of manufacturing of plastic packaging and

plastic packaging waste generated during the packaging of product including reject, discard, before the plastic packaging reaches the end-use consumer of the product.

**10. What is Post-consumer plastic packaging waste?**

**"Post-consumer plastic packaging waste"** means plastic packaging waste generated by the end-use consumer after the intended use of packaging is completed and is no longer being used for its intended purpose.

**11. What is EPR target for Producers & Importers?**

EPR target is the plastic waste which is introduced in the market by the PIBO. Details given in section 7 of the EPR Guidelines may be referred to.

**12. Whether all PIBOs are required to submit Consent granted under Air & Water Act**

All producers are required to submit the consents issued to their production facilities.

Brand-owners having their own production facilities are required to submit the consents.

**13. How much application fees / annual processing/ renewal fees to be paid for**

**Registration of PIBOs/ PWP**

The details of fees to be paid by PIBO/ PWP is as given below:

**a. Application fees for Registration of PIBOs**

Sl. No.	PW Generation Slab ( TPA)	Proposed Processing Fees (Rs.) #
1	<1000	10000
2	1000-10000	20000
3	>10000	50000

**b. Application fees for Registration of PWP**

Sl. No.	Production capacity Slab ( TPA)	Proposed Processing Fees (Rs.)*
1	< 200	5000
2	200-2000	20000
3	>2000	50000

**c. Renewal fees : Same as Registration fees**

**d. Annual Processing Fees: 25% of Application fees ( for PIBOs as well as PWP)**

**14. Our entity collects plastic waste; do we need to register as PWP?**

Only entities engaged in plastic waste processing (recycling, co-processing, waste to energy, waste to oil) have to be registered as PWP.

**15. What if PIBO has inhouse recycling unit for their packaging plastic?**

PIBO will have to register as PIBO and as Recycler both with relevant documentation. Credits can only be issued to recyclers and transaction of credits to PIBO shall be documented.

**16. What are the documents required to register on the centralized portal, if entity falls in more than one sub category?**

- Different email id is required to register in each category.
- Company KYC (Company's PAN, GST & CIN) documents shall be same for each category.

**17. What shall be EPR liabilities of any entity if its falls under the category of brand owner as well as importer?**

The entity first has to register as a brand owner and provide the entire details in terms of plastic waste generation included imported plastic by the firm. After registration as brand owner the entity shall register as importer, provide details of imported plastics and the imported material sold to the said brand owner. Therefore zero liabilities has to be fulfilled by the firm as importer.

**18. What material is to be considered for EPR in case of MLP (at least one layer of plastic and at least one layer of material other than plastic)?**

Weight of the plastic layer is to be considered for EPR in case of MLP (Category-III)

**19. What is the EPR liability associated with third party manufacturer of products? If the third party does not have a brand name associated with them, the EPR liabilities are to be taken by the concerned Brand Owners/Producers to whom the product is being sold.**

**20. What is the definition of "Operations" for PIBOs ?**

Operation means selling of plastic packaging product or products with plastic packaging or carry bags or multilayered packaging or plastic sheets or like into the Indian Market.

**21. What is the definition of "Raw material" for Brand owners, Producer & Importer?**

Raw material for Brand owner and importer is plastic packaging of products or carry bags or multilayered packaging or plastic sheets or like. Further, raw material for



Producer is resin/granules being used to manufacture carry bags or multilayered packaging or plastic sheets or like.

- 22. Do PIBOs who have obtained a valid CPCB/SPCB/PCC registration also need to apply on the Centralized EPR Portal?**

All the PIBOs need to apply on the Centralized EPR portal with necessary application fee.

- 23. Are units engaged in export exempted from fulfilling EPR Obligations? Yes.**  
Export oriented units are exempted from fulfilling EPR obligations

- 24. Which category of PIBOs are exempted from fulfilling EPR obligation?**

The Micro & Small category of Brandowners are exempted from fulfilling EPR obligation. Remaining all entities are required to be registered on Centralized EPR portal in line with notified EPR Guidelines

- 29. We do not import plastic packaging but products with plastic packaging so what information should we submit under 8 (a) and 8 (b)?**

Details of plastic packaging which is imported along with the product is to be given in this section

- 30. Is EPR obligation state wise or pan India? Can PIBO purchase certificates from any state?**

EPR obligation is brand & geography neutral. The certificates have to be procured on the EPR Portal

- 31. Will fulfillment of EPR obligation of previous F.Y. be carry forwarded? if it is not be carry forwarded then will it be mandatory to fulfill 25% of EPR obligation of 2021-22?**

Surplus EPR credits can be transferred to the next year. However, the EPR Guidelines have been notified on February 16, 2022 and PIBOs have got registered in 2022-2023. EPR obligations for the period prior to February 2022 shall be fulfilled as per the EPR regime prevalent at that time and shall not get transferred to this year

- 32. Offline registered PIBOs have fulfilled EPR targets(FY 2021-22) more than the assigned target will it be carry forwarded to the FY 2022-23 ?**

Same as 3

**33. What will be the frequency of the audit?**

The frequency of audit has not been fixed and shall be reviewed on quarterly basis

**34. Labeling requirements for PIBOs**

The labelling requirements shall be in accordance with provisions of PWM Rules, as amended.

**35. Whether the certificate number remain same every year or it get changed?**

The certificate number shall remain unchanged. However, for PIBOs registered through offline mode, new Registration No. shall be provided when registered on the EPR Portal

**36. Available list of registered PWPs? Whether offline purchase of EPR credit certificate are admissible?**

List of registered PWPs is available on the EPR portal. Offline purchase of EPR credit certificates is not permissible. Certificates have to be procured through the EPR Portal.

**37. If Producer A is selling to producer B and producer B finally selling to a brand owner, will EPR obligation of producer A be deducted?**

EPR targets shall be adjusted for both producer to producer as well as producer to brandowner transactions. If X is EPR obligation of Producer 1 and he has sold Y to Producer./Brandowner, then his EPR liability shall be X-Y, provided all three entities are registered on EPR Portal

**38. What is the procedure to get exemption if it is not possible to meet obligation w.r.t. recycled plastic content?**

As per the EPR Guidelines, the exemption from use of recycled plastic is to be granted by CPCB. Target for use of recycled plastic shall be applicable w.e.f 2025

**39. Is it mandatory to fulfill EPR obligation category wise?**

Yes. Categorywise EPR targets are generated on the Portal

**40. If a producer is also a brand owner, is it required to register under EPR portal in both categories?**

Yes, the entity has to register under both categories. However, application fees shall have to be paid only once for registration on the EPR Portal

- 41. If an entity has multiple production facilities in one state, is it required to have multiple registrations?**

The matter is under consideration at CPCB

- 42. Whether granules/flakes manufacturers have any liabilities?**

No. PIBOs engaged in producing/ selling of plastic packaging / commodities wrapped in plastic packaging are required to fulfill EPR obligations as per EPR Guidelines

- 43. If an importer is selling plastic packaging materials to BO and /or Producer, will the importer get EPR obligation deduction for this?**

Yes. Reply to Q 12 to be referred to

- 44. Will recycled plastic used in imported material be counted towards fulfillment of obligation?**

No. Recycled content in imported plastic shall not be accounted for. The importer shall have to procure EPR Credits under this category for Producers/ BrandOwners

- 45. What should an importer do if his imported items are delayed at custom office under SUP.? What document an importer should provide to custom officer for clearance.**

The importer to apply for EPR registration well in time. The Registration certificate issued by CPCB / SPCB/PCC to be provided to the customs authority

- 46. Whether importers get deduction in EPR obligation if they sell their product to MSME units?**

The importer can claim for deduction in EPR obligation, if the MSME to whom it is being sold is a registered on EPR Portal However, if the MSME is a brandowner, then there shall be no corresponding deduction in EPR obligation as Micro & Small category brandowners are not required to register on the EPR Portal

- 47. What would be the operating states/UTs where importer imports in one state and sells their product in multiple states?**

The states in which the importer is selling his goods shall be considered as states in which the importer is operational

- 48. Labeling on rigid packaging is very tough, will BO can get exemption for labeling requirements?**

Labelling is to be in accordance with provision of PWM Rules

49. **If a BO is selling packaging material to other BO, will there be deduction of EPR obligation?**  
The matter is under consideration
50. **Whether the same thickness criteria is applicable to secondary packaging?**  
Yes. It is applicable to all packaging
51. **Whether third party and contract manufacturer is required to register on portal?**  
All PIBOs( excluding Micro/ Small brandowners) are required to be registered on the portal
52. **As per labeling Rules, all are required to print their details. if a brand owner procuring packaging from someone whose details shall be on the product? Brand owner or Packaging producer?**  
The labelling requirement has to be in accordance with the provision to PWM Rules
53. **If a PWP is not recycling plastic packaging but recycling other items such as Briefcase, can it EPR certificates be generated from such PWP?**  
No. EPR Certificate is to be issued only for processing of plastic packaging waste
54. **Whether credit exchange can be done between recyclers?**  
No.
55. **What are the documents that are required for purchase of plastic waste from different sources?**  
Registration No. & Invoice
56. **How to categorize MSW waste received from ULBs?**  
Quantity of plastic waste in different categories can be quantified through self-testing or through a Lab and a self- certified waste characterization report is to be submitted which can be subjected to audit,
57. **Whether ULBs are required to register at Portal to generate credit certificate?**  
Yes

**Part II: Module 1A**

**Q1. What the key features of Module 1A ?**

- Real time Capture of Procurement /Sales of Plastic Packaging
- Cross-validation of Transactions between PIBOs/PWPs  
(Invoice No. generation / Auto-population of Sales/ Procurement detail)
- Dynamic fixing of Annual EPR Target as per EPR Guidelines  
(Auto-generation of next year EPR target)
- Assessment of use of recycled plastic/reuse ( Cat I rigid plastic) EPR credits
- Facilitating error free filing of Application

(Cross validation of input data/ Integration of APIs/ Late fee mechanism)

**Q2. What are the operations during pre-registration and post registration of PIBOs**

Pre-registration: It covers operations prior to registration and includes Sign up & submission of Application for Registration

Post Registration: It covers activities/operations to be carried out post Registration including providing real time information of procurement & sales. Validation of transactions between PIBOs/PWP , assessment of the quantity of recycled plastic used as well as that of reuse of Cat I plastic packaging is done on the basis of the real time data.

**Q3.What is the basic information required during Sign-Up?**

- (i) Category (P/I/O/PWP)
- (ii) Company Details: Following information to be provided
  - Legal Name ( As per GST)
  - Trade Name ( As per GST)
  - Type of Business( Private/Public/ Proprietorship/ Co-operative etc.)
  - Type of Company ( Micro/ Small/ Medium/ large) and Supporting Document
  - Registered Address of the company
  - Company PAN Card Number
    - Company CIN Number ( Mandatory for companies registered under the Company Act and validated on the Portal)
- (iii) Authorized person: Following information to be provided
  - Name & Designation of Authorized Person

- Mobile Number of Authorized Person
- PAN Details of Authorized person
- Aadhar details of Authorized person

**Q3. Can user profile submitted during signup be edited later?**

User can change the user profile (registered mobile and email ID) as per details given below after login

- Click on the "user profile" to change the Mobile No/ email ID of authorized person. (Refer **Figure 4**)
- Edit the required details,
- OTP shall be sent to the new user details( Email id/ Phone no.) to update the credentials. ( Refer **Figure 5**)

**Q4. What are the details required to be in part A( General Information) of PIBOs form ?**

(a) Information to be provided in this section shall include:

- i. States/UTs where the PIBO is operational
- ii. Confirmation, if the PIBO , has a production facility
- iii. Year of Commencement of Operations
- iv. Details of products produced
- v. Representative Picture of Plastic Packaging /Plastic Packaging for Commodities covering different Categories
- vi. Categorywise Plastic packaging consumed in the last two years
- vii. Confirmation that the PIBO is not using / producing /selling banned SUP items

**(b) Documents Required: The following documents are required to be submitted during filing of Part A of the Application**

- PDF copy of Company's PAN, CIN & GST
- PDF copy of Authorized person PAN & Aadhar
- PDF copy of Registration in case of renewal( if applicable)
- Details (type & quantity) of products produced/ marketed (Max file size is 5MB)
- Representative picture of Plastic packaging ( Plastic packaging

covering different EPR categories) (Maxfilesizeis5MB)

- RegistrationCertificateofDistrictIndustriesCentreoftheStateGovernment orUnionterritory, if applicable. (Maxfilesizeis 5MB)
- Process flow diagram ( in case of Producer )
- IEC certificate (for importers)

**Q5. Whether single application is required for producer /PWPs having multiple manufacturing units in same or different state/UT**

Separate Application form are required to be filled in case of multiple manufacturing units by changing email addresses. Payment of application fees can be by-passed during registration for additional manufacturing units.Hence only one state is to be selected in section 1c.

**Q6. How can an entity register in different categories ( P/1/BOs/PWP)?**

If an entity is required to register in different categories, it can register on portal with different email ids for individual category. Payment of application fees can be by-passed during registration for additional category

**Q7. What are the details required to be in part B (Pertaining to Liquid Effluent & Gaseous Emissions) of PIBOs form?**

Following information is required to be filled in Part B of the application form

- Information under this section is to be provided only by those PIBOs who have production facility
- The Proforma for Part B of the Application Pertaining to Liquid Effluent & Gaseous Emissions is given in **Figure 8**
- The user will have to key in the Consent Application No. which will autofetch the date of validity of the Consents ( Under Air/ Water Act)
- The user shall be able to proceed further with filing of application only if the Consents under Air & Water Act are valid on the date of filing of application.
- The user is required to upload the physical copy of Consents under this section.

**QB. What details are to be provided to Plastic Packaging waste Generation (Part C; Section 7) in part C of PIBOs form?**

- Statewise/ categorywise Pre-consumer & Post-consumer plastic, percentage

of recycled plastic in packaging waste is to be provided for the last two years in Section 7 of the application,

- Proforma for Sec 7 ( Part C) is given in Figure 9

**Q9. What information is to be provided related to procurement of plastic packaging/raw materials by PIBOs?**

The following information is to be provided in the procurement section by the PIBOs:

- Name of entity
- Address
- Country (for importers)
- Mobile No.
- Year of procurement
- Plastic material Type
- Category of plastic (for CAT-I container size( >09L and <4.9L, >4.9L &<0.9L)
- GST details of seller
- Total quantity to be procured
- Percentage of recycled plastic ( Not applicable for importers)
- Invoice No.

**Q10. What details are to be provided in sales section of Part C (Producers & Importers)?**

The following information is to be provided in the sales section for both registered & unregistered entities:

- Name of entity
- Address
- Mobile No.
- Year of sale
- Plastic material Type
- Category of plastic (for CAT-I container size( >09L and <4.9L, >4.9L &<0.9L)
- GST details of seller
- Total quantity to be sold



- Percentage of recycled plastic
- Invoice No.

**Q11. What are the inbuilt checks and balances in the PIBOs application form?**

- If year of commencement is before the current financial year (2022-23), plastic waste consumption and generation cannot be report as zero.
- Category and year wise quantity of Total Pre and Post consumer plastic waste provided in section 7a should be less than or equal to the details provided in section 5c.
- Category and year wise quantity of Total Post consumer Plastic waste provided in section 7a should be equal to the plastic material sold to registered and unregistered entity in section 5c & 8d. (for Producers & Importers).

**Q12. What are the documents & information provided in Part D?**

- i. PDF copy of Covering letter (Max file size is 5 MB)
- ii. Scanned copy of signature (Only png / jpeg/jpg/ gif is allowed having Max file size of 150 KB)
- iii. Any other Information in PDF (Max file size is 5 MB.)

**Additional Details and Documentsrequired( for producer)**

- i. Geo tagged Picture of Facility
  - (a) Raw material storage Area
  - (b) Production Process
  - (c) Product Dispatch Area
- ii. Plant Machinery Details
- iii. Power Load of the plant (Electricitybill)
- iv. Disaster Management Plan

**Q13. What action is to be takenif application is not approved?**

PIBO is required to re-submit the application by clicking on the 'resubmit' button and edit the application based on remarks provided by concerned authority. Further processing of application shall be done as per late fee mechanism. Details are given at **Figure 25& 26**

**Q14. Who is liable to fulfill EPR liability in case a producer is selling plastic packaging to another producer?**

In a transaction between producer (buyer) and producer (seller), EPR liability shifts from

producer (seller) to producer (buyer).

**Q15. Who is liable to fulfil EPR liability in case a brandowner is selling plastic packaging (along with product) to another brandowner?**

In a transaction between brandowner (buyer) and brandowner (seller), EPR liability shifts from brandowner (seller) to brandowner (buyer).

**Q16. What are the details required for procurement (post registration)?**

Following details are to be provided:

- Name of entity
- Address
- Mobile No
- Plastic material Type
- Category of plastic (for CAT-I container size( >0.9L and <4.9L, >4.9L &<0.9L)
- GST details of seller
- Total quantity to be sold
- Percentage of recycled plastic content
- Invoice No.

In case of procurement from unregistered entities, complete details as given above have to be keyed in. For procurement from one Registered entity (seller) to other Registered entity (buyer), invoice details shall be auto populated from the seller section to the procurement section of the buyer.

**Q17. What are the details required to be provided for post sale transactions (post registration)?**

Following details are to be provided:

- Name of entity
- Address
- Mobile No
- Plastic material Type
- Category of plastic
- GST details of seller

- Bank Account Details (Account No and IFSC code) of Seller
- Total quantity to be sold
- Percentage of recycled plastic content

In case of sale to unregistered entities, complete details as given above have to be keyed in. For selling from one Registered entity (seller) to other Registered entity (buyer), invoice details shall be auto populated from the seller section to the procurement section of the buyer.

**Q18. How is EPR invoice number generated in the portal during sales?**

Invoice number is generated by the registered entities after submission of the information as listed in Q No. 17

**Q19. How is cross validation of transaction done on the portal?**

- Cross validation of transaction with different entities done on the portal as follows:
- For sale, from one Registered entity (seller) to other Registered entity (buyer), invoice details shall be auto populated from the seller section to the procurement section of the buyer.
- For sale from one Registered entity (seller) to other unregistered entity (buyer), details of invoice shall be auto populated upon keyed in during filling of application by the unregistered entity.

**Q20. How will information related to procurement details of section 8 by PIBOs be provided during filing of application?**

For procurement from unregistered entities, complete details as per Q No.9 have to be keyed in. For procurement from registered entities, EPR invoice no. has to be keyed in. The corresponding invoice details shall be auto populated.

**Part III: Module III**

**Q1 What the major operations included in Module III?**

Generation and Transfer of Certificate by PWPs.

**Q2 What is the two major sections of Module III?**

- Physical verification of PWPs.
- Generation and Transfer of Certificate by PWPs.

**Q3 When is physical verification of PWPs done?**

After completion of online registration on the Centralized EPR Portal by SPCBs/PCCs.

**Q4 Who will conduct the physical verification?**

The concerned Regional Offices of State Boards.

**Q5 When will be the Generation of Certificate feature be enabled for PWPs?**

After approval of physical verification by SPCBs.

**Q6 What are the major components covered in Physical verification?**

- Details auto fetched in Checklist from application form to be verified during physical verification.
- In addition with conversion factor confirmed by field officer during physical verification, the physical verification report shall capture the GPS location of the PWP.

**Q7 What is conversion factor?**

Conversion factor = Quantity of product output/input of plastic waste

**Q8 What is the conversion factor for various categories of PWPs?**

- Recycling: Quantity of product output/input of plastic waste
- Waste to Energy: Energy conversion factor of the boiler (Energy output of the boiler/energy input)
- Waste to Oil: Energy consumption per ton of oil in Joules.
- Co-processing: Energy consumption per ton of clinker in MJ.

**Q9 What are the steps involved in physical verification of PWPs?**

The various steps involved in Physical verification include the following:

Step 1: Creation of Login Credentials of SPCB/PCC's Regional office (RO) by Designated Officer (DO)

Step 2: Assignment of Registered PWP by DO to concerned RO for Physical Verification

Step 3: Conduction of onsite physical verification by RO & Online Filing of Checklist by RO

Step 4: Communication of Recommendations of RO to DO

Step 5: Approval /Rejection of Physical Verification of PWPs by DO based on RO's recommendations

Step 6: Activation of Certification Generation function of PWP based on approval of Physical Verification

**Q10 Who will create the login credentials for Regional Officers?**

Nodal Officer, SPCB/PCCs can add field officers in dashboard by clicking on user management>add user details and assign the role.

**Q11 What is the basic information required for creation of login credentials for RO officers.**

Name, Designation, E-mail Address and Mobile number of RO officer is required for creation of login credentials.

**Q12 What the user roles for which login credentials are created at RO level?**

Login credentials can be created for Regional Officer and assisting officers at RO level.

**Q13 What actions are taken if non-conformity is observed with respect to information submitted in application form by field officer?**

Based on findings of the Field Officer, the appropriate communication shall be sent to the applicant by SPCBs/PCCs.

**Q14 What are the major sections in Generation & Transfer of EPR Certificates by PWPs?**

This section will essential consist of various segments as given below:

- (a) Plastic Waste Procurement
- (b) Production
- (c) Inventory & Sales
- (d) Wallet: Certificate Potential, Certificate Generation & Transfer

**Q15 How will be the potential for Certificate generation created?**

The PWP shall provide requisite details in - Procurement & Production segments - based on which inventory of items shall be generated. Sales items can be selected from the inventory and Certificate generation potential shall be generated by applying conversion factor (confirmed during the physical verification), which shall be reflected in the wallet. There are interlinkages between different sections and checks & balances on the portal which contributes towards calculation of the potential.

**Q16 What are the various categories of PWPs for which EPR certificate can be generated on the portal?**

At present, following 4 categories of PWPs can generate certificate on the portal:

1. Recyclers
2. Waste to Energy (EOL)
3. Co-processing (EOL)
4. Waste to Oil (EOL)

**Q17 What details are to be provided in procurement details section of PWPs?**

The various details which have to be provided include:

- i. Name & Address of PW Supplier
- ii. Quantity of PW supplied (kg/T)
- iii. Category (1/11/111/IV) for Recyclers & Feed Quantity (for WtE/WtO and Co-processing) of PW supplied (Kg/T)
- iv. Date of Procurement of PW/ Date of Entry
- v. GST of Supplier (If GST is not available then PAN/Aadhar of Supplier has to be provided). Providing GST details of Supplier is mandatory for WtE/WtO & Co-processors.

**Q18 Is provision for bulk and single entries available in the procurement & production section?**

At present, only single entries can be made in the procurement section.

**Q19 Is there any limitation in the quantity of plastic waste which can be procured by the PWP?**

There is no limit on procurement of plastic waste by PWPs.

**Q20 What are the units for providing information for quantity of plastic waste procured?**

The information can be provided in Metric Ton/Kilo grams. Inter conversion between the two units shall be done through the portal.

**Q21 What action is to be taken if submit button is not activated after submission of details in procurement & production section of PWPs?**

All entries and messages need to be checked and corrective action to be taken accordingly.

**Q22 Is the procurement format same for all categories of PWPs?**

The following points to be noted:

- i. Category (1/11/111/IV) for Recyclers & Feed Quantity (for WtE/WtO and Co-processing) of PW supplied (Kg/T)
- ii. GST of Supplier (If GST is not available then PAN/Aadhar of Supplier has to be provided). Providing GST details of Supplier is mandatory for WtE/WtO & Co-processors.

**Q23 What information is to be provided in the production details for different categories of PWPs and what are the major outputs?**

The information to be provided is different for each category of PWP

**1. PWP (Recycler)**

Input shall include the following:

- i. Process Code
- ii. Product ( Type & Quantity )
- iii. Plastic Waste Category ( 1/11/111/IV)
- iv. Percentage of recycled plastic in the product
- v. Production date

**2. Waste to Energy**

Input shall include details related to power generation during a specified period and shall include:

- i. Dates (From/ To)
- ii. Meter Reading at Start & End of the Specified period along with pictures for power generation
- iii. Supporting Document issued by concerned Authority related to claimed power generation

### 3. Waste to Oil

- a) Dates (From/ To)
- b) Quantity of oil production

### 4. Co-processing

- a) The following shall be the input to the proforma
  - i. Date (From/To)
  - ii. Clinker Production ( T)
  - iii. Percentage of Energy contributed by Alternate Fuel ( Plastics)

\* Prior to filling in the Production details, all PWP (EOL cases) shall have to update the test report. It includes calorific value of the feed and the percentage composition of different category of plastic waste.

The Quantity of different quantity of plastic waste processed shall be auto calculated based on the input information in all PWP cases based on conversion factor confirmed during physical verification and the test report.

#### **Q24 What the checks and balances in production section?**

- a) Adequate entries for PW procurement should be made prior to production.  
There shall be a deduction in the procured waste quantity corresponding to its consumption in Production Section. Eg: If production shows 100 T of Plastic waste, then procurement equal or more than 100 T should have been made. Further, if a procurement of 200 T of Plastic waste has been made and 100 T of plastic waste has been consumed in production, then available plastic waste after production shall be 100 T.
- b) PWP Process Code shall be as per the Registration granted. The plastic waste processed & the product manufacture are linked with the Process code for which the registration is granted. For example , if a PWP is registered under R1 Code( Recycler - Cat 1 Waste to Pellets/Chips ), then the processing shall be restricted to Category 1 Plastic waste and production shall be limited to pellets and chips
- c) Cumulative Plastic Waste Processed should not exceed Processing capacity as per Registration. For example, if the processing capacity of the unit is 1000 T of



plastic waste, then processing of plastic waste cannot exceed 1000 T during the financial year.

- d) Type & Quantity of Product to be limited by the Production capacity as per the Registration granted. For example, if production capacity of unit is 800 T of pellets, then production of pellets cannot exceed 800 T during the financial year

The system shall display a message, if any discrepancy is observed as per the above listed point and will not accept the details provided.

**Q25 How is the quantity of plastic waste processed calculated based on the production details for different categories of PWPs?**

The examples illustrating assessment of plastic waste processed based on production details for different PWP classes are given below:

Recycler

- Process code R1 (Cat I to Pallets/Chips)
- Conversion factor: 0.8
- Production: 80 Tons
- Corresponding quantity of plastic waste processed (Cat-I):  $80/0.8 = 100$  Tons.

Accordingly, Corresponding quantity of plastic waste processed is 100 Tons.

**Q26 What are the formats for Test Report in EOL cases?**

Test reports include the calorific value of the feed and the percentage composition of different categories of plastic waste. The physical conversion factors as indicated in the test report shall remain fixed as per the confirmation given by the SPCBs/PCCs.

Self-attested test reports can presently be submitted subject to audit.

Formats for Test Reports for WtE, WtO and Co-processing are given at Figure 7b(1), 7c(1) and 7d(1) respectively.

**Q27 How is sales invoice generated?**

a) This Sales Details page shall have three sections:

- Production Inventory: Details of Production consignments giving details of product manufactured & corresponding Certificate potential in different category shall be displayed in this section. For example if 50 T of Product 1 with 60% recycled plastic and 60 T of Product 2 with 70% recycled plastic is

manufactured, then they will be listed as two separate items in the inventory section.

- ii. Add Sales Quantity: Sales items from different consignments can be selected from the "Available Qty" in the Production inventory. Actual sales quantity will have to be keyed in this section. For example from inventory detailed given at (i) above, 10 T of Product 1 and 20 T of Product 2 can be selected for sales. The format of Production inventory & Add Sales Quantity for Recycling, WtO & Co-processing is given in 9a, 9b & 9c respectively.

- iii. Generate Invoice: The PWP will have to key in the following details:

- Production type & Qty
- GST Details
- Bank Account details

The user can click "Generate EPR Invoice " to confirm the Entry and add another Entry, if required, by selecting additional items in "Add Sales Quantity". The proforma for Invoice Generation for Recycler, WtO & Co-processing is given in Figure 10a, 10b & 10c respectively.

For the cement/ clinker sales, an additional parameter- Final product Cement /Clinker has to be selected and qty of clinker in the final product has to be added. It has to be further checked that the clinker sales in the "Generate Invoice Section" is same as that in the "Add Sales Qty".

b) EPR Invoice No. generation button shall be activated only after complete information has been provided in the proforma.

c) Certificate Potential shall be generated after invoice is uploaded in the "Sales Details section" (Figure 8). EPR invoice No. has to be indicated on the invoice.

**Q28 What are the checks & balance in sales of PWPs?**

- The Inventory of different items is linked to the Production section
- The PWP shall ensure that Quantity of Product sold from different consignments in Add Sales details" is equal to the total product quantity sold in the Invoice Generation Section.
- "Generate invoice Button" be enabled only after all complete details in the Invoice proforma have been correctly filled in

**Q29 How is EPR potential generated?**

The following example illustrates calculation of EPR potential:

Refer Fig 9b

Production inventory shows 10,000 MT oil is produced corresponding quantity of Cat I, II & III plastic waste quantity is 1.8 Tons each. (Based on Test Report)

Hence, if 10,000 MT is sold, corresponding increase in potential is 1.8 Tons in each category.

Further, if the sale of oil is 5000 MT, corresponding increase in EPR potential for each category will be 0.9 Tons each.

**Q30 What are the main operations to be carried out in the wallet section?**

Wallet shall display the available potential for each category of waste.

Certificate generation and transfer operations can be carried out in this section.

Refer Fig 11

**Q31 How to generate certificate?**

The PWP can generate Certificate by clicking on "Generate Certificates". Certificates of different denominations (1, 10, 50, 100, 500 & 1000 T) of different categories can be generated. (Figure 12). Category of Certificates and Certificate value shall have to be keyed in by the PWP.

**32 How to transfer certificate on EPR Portal?**

The PWP can transfer the generated certificates by clicking on "Transfer Certificate" (**Figure 13**) to the Registered PIBO. Type of certificate, certificate value, entity type & name to which the certificate has to be transferred, has to be entered and specific denominations selected for transfer of certificates.

**Q33 Can multiple categories (Cat I, II, III and IV) of certificates be generated and transferred simultaneously?**

Only category wise certificate can be generated in denominations mentioned above and transferred separately.

**Q34 Can generated certificates be deleted and edited?**

Certificates once generated cannot be edited or deleted.

**Q35 What is the validity of generated certificates?**

Generated Certificates shall be valid for three years.

**Q36 What are the denominations in which certificate can be created?**

Certificates of following denominations of different categories can be generated:

(1, 10, 50, 100, 500 & 1000 T)

**Q37 Whether the denominations can be split?**

No, denominations cannot be split further.

**Q38 Where will the available of EPR Certificates generated by PWPs be displayed?**

Availability of EPR certificates of different categories of all registered PWPs shall be displayed on National Dashboard of EPR Portal.

**Q39 Can two Certificates have same ID?**

Each certificate will have a unique certificate ID number.

**Q40 Can the transfer trail and current owner of certificate be seen?**

Yes,



F.No. B-11011/UPC-II/PWM/2022-23

July 26, 2022

**NOTICE**

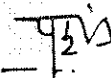
**Sub: - Registration of Plastic Waste Processors on Centralized Extended Portal for Plastic Packaging**

The Ministry of Environment, Forest & Climate Change (MoEFCC) notified Guidelines on Extended Producer Responsibility (EPR) for Plastic Packaging on 16 February, 2022 as 4th amendment to PWM Rules.

Plastic Waste Processors (PWPs) have been given certain mandates under the guidelines and they are to register themselves on a Centralized EPR Portal developed by CPCB. PWPs, already registered with the State Pollution Control Boards (SPCBs) and Pollution Control Committees (PCCs) are also required to register on the EPR Portal. It is to be noted that only the PWPs which are registered on the Portal will be able to issue certificates for plastic waste processing, which shall be considered for fulfilment of EPR obligations by Producers, Importers & Brand-Owners (PIBOs), who are also required to be registered on the same portal.

SPCBs/PCCs were requested vide letter June 01, 2022 to direct the PWPs operational in their jurisdiction to register on EPR Portal within thirty days, failing which the SPCBs/PCCs will consider revocation of Consent issued to the defaulting PWPs.

It is observed that your unit is engaged in processing of plastic waste and you have still not applied for registration of your unit on the EPR Portal. You are hereby given an opportunity to register on the EPR Portal by August 05, 2022. The EPR Portal is available on [cpcbepplastic.in](http://cpcbepplastic.in). Standard Operating Procedure for Registration of PWP, uploaded on EPR Portal may be referred for the purpose.

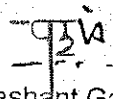
  
(Prashant Gargava)  
Member Secretary

To,

PWP (As per list attached)

Copy to:

1. Member Secretaries of SPCBs/PCCs: : To ensure that the PWP's are registered on the EPR Portal by August 05, 2022
2. Addl. Secretary, MoFE&CC : : For kind information please
3. DH (IT): : : For uploading on CPCB website
4. PA to CCB : : For kind information of CCB please

  
(Prashant Gargava)



केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. B-17011/7/PWM(MLP)/2022

Dated: 13.05.2022

To,

Registered PIBOs  
(As per list)

**Sub:- Registration of Producers, Importers & Brand-Owners (PIBOs) Under Plastic Waste Management Rules, 2016 - Reg.**

Sir,

With reference to the above-mentioned subject, this is to inform that in compliance with 'Guidelines on EPR for Plastic Packaging' notified by MoEF&CC on 16 February, 2022 in Schedule – II of PWM Rules, CPCB has developed Centralized EPR portal for Registration of PIBOs. It which is available on the link [www.cpcbepplastic.in](http://www.cpcbepplastic.in)

In view of above, you are required to submit your application for renewal of Registration on the centralized EPR portal ([www.cpcbepplastic.in](http://www.cpcbepplastic.in)) along with updated information and payment of relevant application fee. SOP & Instruction Sheet for the same is available on the website.

You are further required to submit compliance documents for 25% of EPR target for the intervening period (from date of issue of Registration certificate to till date) as per the enclosed format (Annexure-I). Softcopy of the requisite information is to be emailed in excel format to [pwm.cpcb@gov.in](mailto:pwm.cpcb@gov.in) within 15 days of receipt of the mail. The supporting documents in pdf format with reference Annexure nos. are to be annexed with the email. It is to be further noted that henceforth all compliance reports shall be filed on the EPR Portal as per the format prescribed by CPCB.

Further, it is to inform that CPCB reserves the right to take such action as deemed fit under Environment (Protection) Act, 1986, for violation of PWM Rules, 2016, if any by the concerned PIBOs for the period prior to grant of Registration also.

This issues with the approval of the Competent Authority.

Yours faithfully,

(Divya Sinha)

Addl. Director & I/c, UPC-II

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : [www.cpcb.nic.in](http://www.cpcb.nic.in)

## Annexure I

Table 1: EPR Action Plan			
Duration			
EPR Target ( TPA)			
EPR Alternative for Action Plan (Own Distribution channel/ Direct engagement with Local Body / Engagement with local body through Waste management agency)			
Sl. No.	Collection	Processing	
	Qty of Waste (TPA)	Processing	Qty of waste (TPA)

#Details of Collection through Own Distribution Channel to be provided in case EPR Alternative “ Own Distribution Channel”

[illegible]



S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
1	M/s. Varun Beverages Ltd.	Brand Owner
2	M/s. Gujarat Co-Operative Milk Marketing Federation Ltd.,	Brand Owner
3	M/s. Parle Agro Pvt. Ltd.,	Brand Owner
4	M/s. Indian Farmers Fertilizer Cooperative Ltd.,	Brand Owner
5	M/s. Hindustan Unilever Limited,	Brand Owner
6	M/s. J.K. Cement Ltd.,	Brand Owner
7	M/s. Parle Products Private Limited	
8	M/s. Johnson & Johnson Pvt. Ltd.,	Brand Owner
9	M/s. Grasim Industries Limited,	Brand Owner
10	M/s. Cipla Ltd.,	Brand Owner
11	M/s. Balaji Wafers Pvt. Ltd.,	Brand Owner
12	M/s. Samsung India Electronics Private Ltd.,	Brand Owner
13	M/s. Chambal Fertilisers and Chemicals Ltd.,	Brand Owner
14	M/s. Kandhari Beverages Pvt. Ltd.	Brand Owner
15	M/s Mother Dairy Fruit & Vegetable Pvt. Ltd.,	Brand Owner
16	M/s. Coromandel International Ltd.	Brand Owner
17	M/s. Colgate Palmolive (India) Ltd.	Brand Owner
18	M/s. Moon Beverages Ltd.,	Brand Owner
19	M/s. HeidelbergCement India Ltd.,	Brand Owner
20	M/s. Huhtamaki-PPL Ltd.,	Producer
21	M/s. The Himalaya Drug Company,	Brand Owner
22	M/s. RSPL Limited,	Brand Owner
23	M/s. Mondelez India Foods Private Limited,	Brand Owner
24	M/s. Haldiram Snacks (P) Ltd.	Brand Owner
25	M/s. Wipro Enterprises Pvt. Ltd.,	Brand Owner
26	M/s. Procter & Gamble Home Products Private Limited,	Brand Owner
27	M/s. CavinKare Pvt. Ltd.,	Brand Owner
28	M/s. Jyothy Labs Limited,	Brand Owner
29	M/s. Whirlpool of India Ltd.,	Brand Owner
30	M/s. Bunge India (P) Ltd.	Brand Owner
31	M/s. Prataap Snacks Ltd.,	Brand Owner
32	M/s. Indian Railway Catering and Tourism Corporation Ltd. (IRCTC),	Brand Owner
33	M/s. Gopal Snacks Pvt. Ltd.,	Brand Owner
34	M/s. Nirma Ltd.,	Brand Owner
35	M/s. UPL Ltd.	Brand Owner
36	M/s. Amazon Seller Services Pvt. Ltd.	Brand Owner
37	M/s. Tata Chemicals Limited,	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
38	M/s. Reckitt Benckiser (India) Pvt. Ltd.,	Brand Owner
39	M/s. Zuari Cement Ltd.,	Brand Owner
40	M/s. Balrampur Chini Mills Ltd.,	Brand Owner
41	M/s. Laxmi Snacks Pvt. Ltd.,	Brand Owner
42	M/s. Haldiram Foods International Pvt. Ltd.,	Brand Owner
43	M/s. United Breweries Ltd.	Brand Owner
44	M/s. DS Confectionery Products Ltd.,	Brand Owner
45	M/s. SLMG Beverages Pvt. Ltd.,	Brand Owner
46	M/s. Heritage Foods Ltd.	Brand Owner
47	M/s. Unicharm India Pvt. Ltd.,	Brand Owner
48	M/s. N.K. Proteins Pvt. Ltd.	Brand Owner
49	M/s. Surya Food & Agro Ltd.,	Brand Owner
50	M/s. Anmol Industries Ltd.	Brand Owner
51	M/s. Godrej & Boyce Mfg. Co. Ltd.,	Brand Owner
52	M/s. Tata Global Beverages Ltd.,	Brand Owner
53	M/s. Havells India Limited	Brand Owner
54	M/s. Nestle India Limited,	Brand Owner
55	M/s. Bikaji Foods International Ltd.	Brand Owner
56	M/s. B.L. Agro Industries Ltd.	Brand Owner
57	M/s. Bajaj Consumer Care Ltd.,	Brand Owner
58	M/s. GHCL Limited,	Brand Owner
59	M/s. Vadilal Industries Ltd.	Brand Owner
60	M/s. Dr. Reddy's Laboratories Ltd.,	Brand Owner
61	M/s. Creamy Foods Ltd.	Brand Owner
62	M/s. Khandelia Oil & General Mills Pvt. Ltd.	Brand Owner
63	M/s. Instakart Services Private Ltd.	Brand Owner
64	M/s. Ferrero India Private Limited,	Brand Owner
65	M/s. CEAT Ltd.,	Brand Owner
66	M/s. Lupin Ltd.,	Brand Owner
67	M/s. Bikanervala Foods Pvt. Ltd.	Brand Owner
68	M/s. Apricot Foods Pvt. Ltd.	Brand Owner
69	M/s. GlaxoSmithKline Pharmaceuticals Ltd.,	Brand Owner
70	M/s. Hindalco Industries Ltd.,	Brand Owner
71	M/s. Cargill India Pvt. Ltd.,	Brand Owner
72	M/s. Mars International India Pvt. Ltd.	Brand Owner
73	M/s. Hygienic Research Institute Pvt. Ltd.	Brand Owner
74	M/s. Herbalife International Pvt. Ltd.,	Brand Owner
75	M/s. Asian Paints Limited,	Brand Owner
76	M/s. Fena Pvt. Ltd.,	Brand Owner
77	M/s. Emami Ltd.,	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
78	M/s. Agro Tech Foods Limited,	Brand Owner
79	M/s. MTR Foods Pvt. Ltd.,	Brand Owner
80	M/s. Saj Food Products Pvt. Ltd.,	Brand Owner
81	M/s. Canon India Pvt. Ltd.,	Brand Owner
82	M/s. KRBL Limited.,	Brand Owner
83	M/s. DS Spiceco Pvt. Ltd.,	Brand Owner
84	M/s. Kellogg India Pvt. Ltd.	Brand Owner
85	M/s. Pidilite Industries Limited,	Brand Owner
86	Bharat Foods Co-operative Ltd.	Brand Owner
87	M/s. Emami Agrotech Ltd.	Brand Owner
88	M/s. Sheelpe Enterprises Pvt. Ltd.,	Brand Owner
89	M/s. Saurashtra Cement Ltd.	Brand Owner
90	M/s. Pfizer Ltd.,	Brand Owner
91	M/s. Haldiram Manufacturing Co. Pvt. Ltd.	Brand Owner
92	M/s. Eastern Condiments Pvt. Ltd.	Brand Owner
93	M/s. Modicare Ltd.,	Brand Owner
94	M/s. Gujarat Sidhee Cement Ltd.	Brand Owner
95	M/s. Dwarikesh Sugar Industries Limited,	Brand Owner
96	M/s. C.P. Milk & Foods Products Pvt. Ltd.,	Brand Owner
97	M/s. Super Market Groceries Pvt. Ltd.,	Brand Owner
98	M/s. Devyani Food Industries Ltd.,	Brand Owner
99	M/s. Anchor Consumer Products Pvt. Ltd.	Brand Owner
100	M/s. Sony India Pvt. Ltd.,	Brand Owner
101	M/s. Harita-NTI Ltd.,	Brand Owner
102	M/s. Hector Beverages Private Limited,	Brand Owner
103	M/s. Marico Limited,	Brand Owner
104	M/s. Ready Roti India Pvt. Ltd.,	Brand Owner
105	M/s. Simbhaoli Sugars Ltd.,	Brand Owner
106	M/s. Sanghvi Foods Pvt. Ltd.	Brand Owner
107	M/s. Dr. Oetker India Pvt. Ltd.	Brand Owner
108	M/s. Rallis India Ltd.,	Brand Owner
109	M/s. Tata Motors Ltd.,	Brand Owner
110	M/s. Godrej Consumer Products Limited,	Brand Owner
111	M/s. Dharampal Satyapal Ltd.,	Brand Owner
112	M/s. Sanofi India Ltd.	Brand Owner
113	M/s. 3M India Pvt. Ltd.	Brand Owner
114	M/s. Gharda Chemicals Limited	Brand Owner
115	M/s. Guiltfree Industries Limited	Brand Owner
116	M/s. Honasa Consumer Pvt. Ltd.,	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
117	M/s. A.V. Thomas & Co. Ltd.,	Brand Owner
118	M/s. Perfetti Van Melle India Pvt. Ltd.,	Brand Owner
119	M/s. Dow AgroSciences India Private Ltd.,	Brand Owner
120	M/s. Euro India Fresh Foods Limited,	Brand Owner
121	M/s. Frigorifico Allana Private Ltd.,	Brand Owner
122	M/s. Mohani Tea Leaves Pvt. Ltd.,	Brand Owner
123	M/s. Atul Ltd.	Brand Owner
124	M/s. Procter & Gamble Hygiene and Health Care Limited	
125	M/s. Field Fresh Foods Pvt. Ltd.	Brand Owner
126	M/s. Unibic Foods India Pvt. Ltd.,	Brand Owner
127	M/s. Heinz India Pvt. Ltd.,	Brand Owner
128	M/s. Dharampal Premchand Ltd.	Brand Owner
129	M/s. Ushodaya Enterprises Pvt. Ltd. (Foods Division)	Brand Owner
130	M/s. Coca-Cola India Pvt. Ltd.,	Brand Owner
131	M/s. Orient Electric Ltd.	Brand Owner
132	M/s. Jagannath Salt (P) Ltd.,	Brand Owner
133	M/s. Cadila Pharmaceutical Ltd.,	Brand Owner
134	M/s. Adani Wilmar Limited,	Brand Owner
135	M/s. BIC Cello (India) Pvt. Ltd.,	Brand Owner
136	M/s. Noble Hygiene Pvt. Ltd.	Brand Owner
137	M/s. Siemens Ltd.,	Brand Owner
138	M/s. Oriflame India Pvt. Ltd.	Brand Owner
139	M/s. Mankind Pharma Ltd.	Brand Owner
140	M/s. Kitty Industries Private Limited,	Brand Owner
141	M/s. V-Guard Industries Ltd.	Brand Owner
142	M/s. Exide Industries Ltd.	Brand Owner
143	M/s. Zydus Healthcare Ltd.,	Brand Owner
144	M/s. Prayagh Nutri Products Pvt. Ltd.	Brand Owner
145	M/s. Today Tea Ltd.	Brand Owner
146	M/s. Abbott Healthcare Pvt. Ltd.,	Brand Owner
147	M/s. Cera Sanitaryware Ltd.	Brand Owner
148	M/s. ID Fresh Food (India) Pvt. Ltd.	Brand Owner
149	M/s. Prime Comfort Products Pvt. Ltd.,	Brand Owner
150	M/s. Hamdard Laboratories India (Medicine Division),	Brand Owner
151	M/s. Nutricia International Pvt. Ltd.,	Brand Owner
152	M/s. Honda Cars India Limited.,	Brand Owner
153	M/s. Haldiram Ethnic Foods Pvt. Ltd.	Brand Owner
154	M/s. Rajdhani Flour Mills Ltd.	Brand Owner
155	Ozone Procon Pvt. Ltd.	Brand Owner
156	M/s. Ankur Chemfood Ltd.	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
157	M/s. Wal-Mart India Private Limited,	Brand Owner
158	M/s. Jubilant FoodWorks Ltd.	Brand Owner
159	M/s. Shriram Pistons & Rings Ltd.	Brand Owner
160	M/s. Shreeram Chemfood Pvt. Ltd.,	Brand Owner
161	M/s. Panasonic India Pvt. Ltd.,	Brand Owner
162	M/s. Shree Chem Food Ltd.,	Brand Owner
163	M/s. Sanofi Synthelabo (India) Pvt. Ltd.	Brand Owner
164	M/s. Amcor Flexible Ind. Pvt. Ltd.	Producer
165	M/s. Baidyanath Ayurved Bhawan Pvt. Ltd.	Brand Owner
166	M/s. Vasant Masala Pvt. Ltd.,	Brand Owner
167	M/s. Metro Cash and Carry India Private Limited	Brand Owner
168	M/s. South India Krishna Oil and Fats Pvt. Ltd.,	Brand Owner
169	M/s. Rudolf Atul Chemicals Ltd.,	Brand Owner
170	M/s. Terrestrial Foods Pvt. Ltd.	Brand Owner
171	M/s. Honda Motorcycle & Scooter India Pvt. Ltd.	Brand Owner
172	M/s. S.C. Johnson Products Private Limited,	Brand Owner
173	M/s. Surya Fresh Foods Limited,	Brand Owner
174	M/s. Beiersdorf India Pvt. Ltd.	Brand Owner
175	M/s. Kerry Ingredients India Private Limited,	Brand Owner
176	M/s. Gokul Agro Resources Ltd.,	Brand Owner
177	M/s. ADM Agro Industries India Pvt. Ltd.	Brand Owner
178	M/s. Drums Food International Pvt. Ltd.,	Brand Owner
179	M/s. Umang Dairies Ltd.,	Brand Owner
180	M/s. Indo Brine Industries Ltd.,	Brand Owner
181	M/s. Gillette India Limited,	Brand Owner
182	M/s. Pernod Ricard India (P) Ltd.	Brand Owner
183	M/s. India Yamaha Motor Pvt. Ltd.	Brand Owner
184	M/s. Bauli India Bakes & Sweets Pvt. Ltd.,	Brand Owner
185	M/s. Koteswar Chemfood Industries Pvt. Ltd.,	Brand Owner
186	M/s. Digital Age Retail Pvt. Ltd.,	Brand Owner
187	M/s. Girnar Food & Beverages Pvt. Ltd.,	Brand Owner
188	M/s. Fashion Suitings Pvt. Ltd.,	Brand Owner
189	M/s. Ratnamani Metals & Tubes Ltd.,	Brand Owner
190	M/s. Popular Bakery Products Pvt. Ltd.,	Brand Owner
191	M/s. CCL Products (India) Limited,	Brand Owner
192	M/s. Anik Milk Products Pvt. Ltd.,	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
193	M/s. Murugappa Morgan Thermal Ceramics Ltd.,	Brand Owner
194	M/s. Abbott India Ltd.,	Brand Owner
195	M/s. RPG Life Sciences Ltd.,	Brand Owner
196	M/s. Endurance Technologies Ltd.,	Brand Owner
197	M/s. Modi Distillery,	Brand Owner
198	M/s. Kohinoor Speciality Foods India Pvt. Ltd.,	Brand Owner
199	M/s. Keventer Agro Ltd.,	Brand Owner
200	M/s. Mohan Makin Ltd.,	Brand Owner
201	M/s. Terapanth Foods Ltd.,	Brand Owner
202	M/s. Rich Graviss Products Pvt. Ltd.	Brand Owner
203	M/s. Foodcoast International,	Brand Owner
204	M/s. Ravi Foods Pvt. Ltd.,	Brand Owner
205	M/s. Trendsutra Client Services Pvt. Ltd.,	Brand Owner
206	M/s. Apple India Pvt. Ltd.	Brand Owner
207	M/s. Organic India Pvt. Ltd.,	Brand Owner
208	M/s. Balaji Chem Food,	Brand Owner
209	M/s. Dry Blend Foods Pvt. Ltd.,	Brand Owner
210	M/s. Carrier Airconditioning & Refrigeration Ltd.	Brand Owner
211	M/s. Sekhani Industries Pvt. Ltd.	Brand Owner
212	M/s. Desai Foods Pvt. Ltd.	Brand Owner
213	M/s. Triguni Food Pvt. Ltd.	Brand Owner
214	M/s. Savancia Fromage and Dairy P Ltd.	Brand Owner
215	M/s. Blue Star Limited,	Brand Owner
216	M/s. Harsh Bakers,	Brand Owner
217	M/s. Aastha Salt Industries Ltd.,	Brand Owner
218	M/s. Vega Industries Pvt. Ltd.	Brand Owner
219	M/s. COFCO International India Private Limited	Brand Owner
220	M/s. Tiffany Foods,	Brand Owner
221	M/s. Amrit Corp. Ltd. (Unit Amrit Food),	Brand Owner
222	M/s. Waghmare Food Products Pvt. Ltd.,	Brand Owner
223	M/s. Pahal Foods Pvt. Ltd.,	Brand Owner
224	M/s. Natco Pharma Limited,	Brand Owner
225	M/s. Sandarbh Foods Pvt. Ltd.,	Brand Owner
226	M/s. A.P Organics Limited	Brand Owner
227	M/s. Merck Specialities Pvt. Ltd.	Brand Owner
228	M/s. Ajit Bakery,	Brand Owner
229	M/s. Cloudtail India Pvt. Ltd.	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
230	M/s. JCB India Ltd.	Brand Owner
231	M/s. Hewlett Packard Enterprise India Pvt. Ltd.	Brand Owner
232	M/s. Asus India Pvt. Ltd.	Brand Owner
233	M/s. John Deere India Pvt. Ltd.,	Brand Owner
234	M/s. Red Bull India Private Limited,	Brand Owner
235	M/s. Tata Starbucks Pvt. Ltd.	Brand Owner
236	M/s. Jubilant Life Sciences Ltd.,	Brand Owner
237	M/s. Soothe Healthcare Pvt. Ltd.,	Brand Owner
238	M/s. Nilons Enterprises Pvt. Ltd.,	Brand Owner
239	M/s. Tasty Bite Eatables Ltd.,	Brand Owner
240	M/s. Arvind Youth Brand Pvt. Ltd.,	Brand Owner
241	M/s. Biosash Business Pvt. Ltd.,	Brand Owner
242	M/s. Indagro Foods Pvt. Ltd.	Brand Owner
243	M/s. Welspun India Ltd.,	Brand Owner
244	M/s. Dukes Products India Ltd.,	Brand Owner
245	M/s. Skoda Auto Volkswagen India Pvt. Ltd. (SAVWIPL),	Brand Owner
246	M/s. KCM Appliances Pvt. Limited	Brand Owner
247	M/s. Rasoi Magic Foods (I) Pvt. Ltd.	Brand Owner
248	M/s. Yakult Danone India Pvt. Ltd.,	Brand Owner
249	M/s. Positive Food Ventures Pvt. Ltd.,	Brand Owner
250	Pfizer Products India Pvt. Ltd.	Brand Owner
251	M/s. Manglam Milk India Pvt. Ltd.,	Brand Owner
252	M/s. TTE Technology India Pvt. Ltd.	Brand Owner
253	M/s. 3M Electro & Communication India Pvt. Ltd.	Brand Owner
254	M/s. Novozymes South Asia Pvt. Ltd.,	Brand Owner
255	M/s. Atul Bio-Science Ltd.,	Brand Owner
256	M/s. Dima Products,	Brand Owner
257	M/s. Berger Paints India Ltd.,	Brand Owner
258	M/s. Sanofi Pasteur India Pvt. Ltd.	Brand Owner
259	M/s. Hetero Labs Ltd.,	Brand Owner
260	M/s. Fabcafe Foods Pvt. Ltd.	Brand Owner
261	M/s. Clues Network Private Limited	Brand Owner
262	M/s. Punjab Agro Juices Ltd.	Brand Owner
263	M/s. Sandvik Materials Technology India Pvt. Ltd.,	Brand Owner
264	M/s. Milk Food Ltd.,	Brand Owner
265	M/s. Dharampal Satyapal Ltd. (Silver Foil Division),	Brand Owner
266	M/s. Hetero Drugs Ltd.,	Brand Owner
267	M/s. Sandoz Private Limited,	Brand Owner
268	M/s. Be Better Personal Care Pvt. Ltd.,	Brand Owner

S.No.	Name of Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
269	M/s. Sanofi Healthcare India Pvt. Ltd.	Brand Owner
270	M/s. Nourish Organics Foods Pvt. Ltd.	Brand Owner
271	M/s. Sipwise Beverages Pvt. Ltd.,	Brand Owner
272	M/s. Merck Performance Materials Pvt. Ltd.	Brand Owner
273	M/s. Amazon Retail India Pvt. Ltd.,	Brand Owner





केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No. B-17011/7/PWM(MLP)/2022

Dated: 13.05.2022

To,

Registered PIBOs  
(As per list)

**Sub:- Registration of Producers, Importers & Brand-Owners (PIBOs) Under Plastic Waste Management Rules, 2016 - Reg.**

Sir,

With reference to the above-mentioned subject, this is to inform that in compliance with 'Guidelines on EPR for Plastic Packaging' notified by MoEF&CC on 16 February, 2022 in Schedule – II of PWM Rules, CPCB has developed Centralized EPR portal for Registration of PIBOs. It which is available on the link [www.cpcbepplastic.in](http://www.cpcbepplastic.in)


In view of above, you are required to migrate your application to the new centralized EPR portal ([www.cpcbepplastic.in](http://www.cpcbepplastic.in)) along with updated information and payment of relevant application fee. SOP & Instruction Sheet for the same is available on the website.

You are further required to submit compliance documents for 25% of EPR target for the intervening period (from date of issue of Registration certificate to till date) as per the enclosed format (Annexure-I). Softcopy of the requisite information is to be emailed in excel format to [pwm.cpcb@gov.in](mailto:pwm.cpcb@gov.in) within 15 days of receipt of the mail. The supporting documents in pdf format with reference Annexure nos. are to be annexed with the email. It is to be further noted that henceforth all compliance reports shall be filed on the EPR Portal as per the format prescribed by CPCB.

Further, it is to inform that CPCB reserves the right to take such action as deemed fit under Environment (Protection) Act, 1986, for violation of PWM Rules, 2016, if any by the concerned PIBOs for the period prior to grant of Registration also.

This issues with the approval of the Competent Authority.

Yours faithfully,

  
(Divya Sinha)  
Addl. Director & I/c, UPC-II

‘परिवेश भवन’ पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : [www.cpcb.nic.in](http://www.cpcb.nic.in)

## Annexure I

### Table 1: EPR Action Plan

Table 1: EPR Action Plan			
Duration			
EPR Target ( TPA)			
EPR Alternative for Action Plan (Own Distribution channel/ Direct engagement with Local Body / Engagement with local body through Waste management agency)			
Sl. No.	Collection	Processing	
	Qty of Waste (TPA)	Processing	Qty of waste (TPA)
#Details of Collection through Own Distribution Channel to be provided in case EPR Alternative “ Own Distribution Channel”			

### Table 2: Details of Plastic Waste Processing

[illegible]

S.No.	Name of the Registered Producer/Importer/Brand Owner	Producer/Importer/ Brand-owners
1	M/s. ICA Pidilite Private Limited, (Renewal)	Brand Owner
2	M/s. Dabur India Limited,(renewal)	Brand Owner
3	M/s. DFM Foods Ltd.,(Renewal)	Brand Owner
4	M/s. GlaxoSmithKline Asia Private Limited, (Renewal)	Brand Owner
5	M/s. Hershey India Private Limited,(Renewal)	Brand Owner
6	M/s. Glenmark Pharmaceuticals Limited, (renewal)	Brand Owner
7	M/s. LG Electronics India Pvt. Ltd, (renewal)	Brand Owner
8	M/s. Hero MotoCrop Ltd.,(Renewal)	Brand Owner
9	M/s. Torrent Pharmaceuticals Limited,(renewal)	Brand Owner
10	M/s. Jubilant Agri and Consumer Products Ltd., (Renewal)	Brand Owner
11	M/s. Amway India Enterprises Pvt. Ltd., (Renewal)	Brand Owner
12	M/s. General Mills India Private Limited, (renewal)	Brand Owner
13	M/s. Capital Foods Pvt. Ltd., (Renewal)	Brand Owner
14	M/s. Louis Dreyfus Company India (P) Ltd. (renewal)	Brand Owner
15	M/s. The Delhi Flour Mills Co. Ltd.,(renewal)	Brand Owner
16	M/s. Mahindra and Mahindra Limited,(Renewal)	Brand Owner
17	M/s. McCain Foods India Private Limited,(Renewal)	Brand Owner
18	M/s. Glaxosmithkline Consumer Private Limited, (Renewal)	Brand Owner
19	M/s. Cadila Healthcare Ltd.,(Renewal)	Brand Owner
20	M/s. Mitsubishi Electric India Pvt. Ltd., (renewal)	Brand Owner
21	M/s. Sharp Business (India) Pvt. Ltd., (renewal)	Brand Owner
22	M/s. Mead Johnson Nutrition (India) Pvt. Ltd.,	Brand Owner
23	M/s. Ajanta Pharma Limited	Brand Owner





**CENTRAL POLLUTION CONTROL BOARD  
DELHI**

No. F. No. B-17011/7/PWM/2021

October 20, 2021

**Notice regarding  
Registration Process of Producers, Importers & Brandowners (PIBOs) Under  
Plastic Waste Management (PWM) Rules 2016**

CPCB is presently registering PIBOs in accordance with provision of PWM Rules, 2016, as amended. CPCB had issued Standard Operating Procedure and launched online portal in this regard. MoEF&CC has notified Draft Regulations on Extended Producer Responsibility (EPR) for Plastic Packaging on October 06, 2021.

In view of the Draft Notification issued by MoEF&CC on the matter, it is to hereby inform that Registration process of PIBOs under PWM Rules at CPCB is being kept in abeyance for a period of three months with immediate effect. The same shall be resumed upon final Notification of EPR Regulations by MoEF&CC. The PIBOs may take initiatives to realign their EPR plan as per the said draft Notification during the intervening period. Necessary adjustments, in the application fees paid by the PIBOs who have submitted the application the online portal, shall be made as required.

CPCB shall keep the PIBOs informed of the required action to be taken by them in this regard, in due course of time.

Prashant Gargava  
(Member Secretary)



8/5/2021/UPC-II-HO



**CENTRAL POLLUTION CONTROL BOARD  
DELHI**

**NOTICE FOR  
REGISTRATION OF PRODUCERS, IMPORTERS & BRANDWONERS (PIBOs)  
UNDER PROVISION OF PLASTIC WASTE MANAGEMENT (PWM) RULES  
(As per provision 9(1&2) & 13(2) of PWM Rules, 2016, as amended)**

**No. B-17011/7/PWM/2021**

**June 16, 2021**

In continuation of Notice No. B-17011/7/PWM/2021 dated May 14, 2021 issued by CPCB on the subject, this is to inform that in view of prevailing Covid pandemic conditions, the last date for submission of complete application to CPCB by PIBOs (for those operating in more than two States/UTs), who have not yet applied for Registration, is hereby extended to August 01, 2021.

(Member Secretary)







POWERING PROGRESS THROUGH PLASTICS  
ISO 9001:2008 Certified

# AIPMA



## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.

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OFFICE BEARERS : Ref: AIPMA/2021-22/PA/MoEF/04

7th May, 2021

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President

KISHORE SAMPAT  
Senior Vice President

MAYUR D. SHAH  
Vice President - Finance

AKSHAT LADHA  
Vice President (West Zone)

LALIT KUMAR SINGH  
Vice President (North Zone)

ANIL REDDY VENNAM  
Vice President (South Zone)

ASHOK AGARWAL  
Vice President (East Zone)

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13<sup>th</sup> Floor, Office No.1306/1307,  
S.G. Highway, Near Wide Angle  
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Ahmedabad - 380 015.  
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Shri. Rameshwar Prasad Gupta  
Secretary  
Ministry of Environment, Forest and Climate  
Change Government of India  
Indira Paryavaran Bhawan, Jor Bagh,  
New Delhi

**Subject: Draft notification issued on 11th March 2021 for amendments in Plastic Waste Management Rules, 2016 – Suggestions and recommendations**

Respected Sir,

Hope you are doing well.

Please refer to our meeting with Hon'ble Minister of Environment, Forest and Climate Change, Shri Prakash Javadekar and Hon'ble Minister of Commerce and Industry, Shri Piyush Goyal on 15th April 2021 regarding the impact of draft notification issued on 11th March 2021 for amendments in Plastic Waste Management Rules, 2016 along with deliberations on the way forward. As informed during our meeting, we reiterate our stand that the plastics industry associations are aligned with the vision of Hon'ble Prime Minister towards clean and Swachh India.

With reference to the proposed draft notification for amendments in Plastic Waste Management Rules, 2016, please find enclosed (Annexure I) our suggestions/recommendation along with justification for your kind consideration. In addition to our enclosed clause-wise submissions, following are our general submission for your kind consideration: -

- **Uniform policy across country:** This provision of the law can only be effectively implemented when there is One Law across the country. You may be aware that although MOEF, Govt. of India had formulated the PWM Rules 2016 with an intention to implement across the country, various State Governments have modified the rules without any scientific reasons resulting in poor implementation of PWM rules 2016 and economic distress to industrial units. Therefore, it is very important to ensure that there is one law for the entire country.
- **Any action towards restricting manufacturing and use of any plastics product and replacing with alternative material should take in to consideration the following: -**
  - a. Reasons for the selection and use of plastics in various daily and critical applications are, apart from its light weight, easy processing and inert properties, least energy consumption, least greenhouse gas emission,

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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### OFFICE BEARERS :

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President

**KISHORE SAMPAT**  
Senior Vice President

**MAYUR D. SHAH**  
Vice President - Finance

**AKSHAT LADHA**  
Vice President (West Zone)

**LALIT KUMAR SINGH**  
Vice President (North Zone)

**ANIL REDDY VENNAM**  
Vice President (South Zone)

**ASHOK AGARWAL**  
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Ahmedabad - 380 015.  
Tel No.: 079 2970 5124  
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least value of BOD and COD in water compared to the alternatives like glass, metals, paper, wood etc.

- b. A study, "Impact of Plastics Packaging on Life Cycle Energy Consumption & Greenhouse Gas Emissions" conducted by Franklin Associates for American Chemistry Council found that replacing major plastic packaging with non-plastic alternatives would require 4.5 times as much packaging material by weight, increasing the amount of packaging used by nearly 55 million tons ; increase energy use by 80 percent and result in 130 percent more global warming potential equivalent to adding 15.7 million more cars to our roads (in US). LCA study results would be similar in other countries too. This shows environmental benefits of plastics. We are required to use plastics responsibly by managing its waste properly and not indulging in littering. Plastics are 100% recyclable / energy recoverable."

The above is for your kind consideration.

Thanks and best regards.

Yours sincerely,

Sr.No.	Name	Designation	Organization
1.	Mr. Chandrakant Turakhia	President	The All India Plastics Manufacturers' Association (AIPMA)
2.	Mr. Mahendra Sanghvi	President	Organization of Plastics Processors of India
3.	Mr. Arvind Goenka	Chairman	Plexconcil
4.	Mr. Ramesh Kr. Rateria	President	Indian Plastics Federation (IPF), Kolkata
5.	Mr. Vijay Kumar	President	Karnataka State Plastics Association
6.	Mr. Ravi Jashnani	President	Maharashtra Plastics Manufacturers Association
7.	Mr. Shailesh Patel	President	Gujarat State Plastics Manufacturers Association
8.	Mr. Balakrishna Bhat Kakunje	President	Kerala Plastics Manufacturers Association
9.	Mr. Vimallesh Gupta	President	Telangana and Andhra Plastics Manufacturers Association
10.	Mr. B.A. Nazeer	President	Canara Plastic Manufacturers & Traders Association

### Copy to:

1. **Shri. Yogendra Tripathi, Secretary, Department of Chemicals and Petrochemicals, Ministry of Chemicals & Fertilizers, Government of India.**
2. **Shri Shiv Das Meena, Chairman, Central Pollution Control Board**

Enclosed: Annexure I - Suggestions & Recommendations

## Annexure I- '6 Pages'

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
1	Rule 2(1), after the word Importers, the word, Brand owner, plastic waste processor (recycler, co-processor, etc.) shall be inserted.	a. Include Raw material (Polymer) manufacturers.	a. Include all stakeholders in the ambit of PWM. Raw material manufacturers are large companies including PSU's with good financial strength and CSR funds. Their involvement would make large difference on the ground in managing plastics waste.  b. Stakeholders across plastic value chain comprises of raw material manufacturers, producers, importers, brands and users (consumers). Unless there is a uniform action plan involving all the stakeholders with clear objectives, implementation of successful waste management will get diluted. This necessitates that the largest and most resourceful stakeholder i.e. raw material manufacturers ought to be part of the waste management as they are the most likely beneficiaries of the resource once chemical recycling catches on.
2	Rule 3, after clause V, clause (Va) is added- Single Use Plastic item is a plastic commodity intended to be used once for the same purpose before being disposed of or recycled.	a. Products should be classified as Single Use Plastics only if its waste is found to cause substantial impact on the environment based on waste audit.  b. MoEF should conduct "Life Cycle Analysis" (LCA) and Environment Impact Assessment (EIA) studies for Plastics as against nearest alternatives or replacements prior to qualifying any product/s as SUP.  c. Single Use Plastic items banned should be mentioned clearly with product name to	a. In absence of clarity, individual states may decide to qualify certain items as SUP taking shelter of PWM and thus creating undue disruption for the processing industry.

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
3	Rule 4, sub rule I, clause (c)- Carry bag made of virgin or recycled plastic, shall not be less than one hundred and twenty (120) microns in thickness with effect from 30.9.21.	<p>avoid confusion in understanding and successful implementation.</p> <p>a. Thickness suggested as "120 microns" should be revised to "75 microns"</p> <p>b. It should be clarified in the notification that the thickness consideration only applies to CARRY BAGS and not to PLASTIC PACKAGING or PLASTIC PACKAGING MATERIALS used for Integral Packaging of all types.</p> <p>c. PLASTIC PACKAGING or PLASTIC PACKAGING MATERIALS should not be less than 50 Microns in thickness except where the thickness of such plastics packaging/packaging material has technical/functional constraints.</p> <p>d. Pictorial depiction of carry bag is highly recommended so as to bring clarity and avoid any misinterpretation of the provision by local implementing authorities.</p>	<p>a. These current machines are typically with an output level of 40-50 kg/hour and film width in the range of 315 – 600 mm, 14 inches (i.e. 355 mm) being a standard size.</p> <ul style="list-style-type: none"> <li>For producing a 120-micron film of standard width, output will remain the same (extruder limitation) and line speed will be 8 m/min but then for such a thick film cooling will be a constraint.</li> <li>For producing a 120-micron film of above width, cooling will need to be increased and to maintain the same line speed, output will need to be increase to around 95 kg/hour which means complete extruder will need to be changed.</li> <li>Further, 120-micron film is thick and even the winder will need to be change since pulling capacity of the nip and winder will need to higher as compared to that required for a 50-micron film.</li> <li>Tower height will also need to be increased to enhance cooling efficiency.</li> </ul> <p><b>These will necessitate change in Extruder, Air ring, Tower, Nip capacity and winder leading to substantial investment.</b></p> <p>b. There would also be technical challenges in fabrication of carry bags of such thickness as follows: -</p> <ul style="list-style-type: none"> <li>The sealing jaws for a 120-micron machine need more heat as compared to that for a 50-micron film. Further, if there is a side gusset implying four layers of film, 120 x 4 = 480 microns of film</li> </ul>

## Annexure I- '6 Pages'

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
4	<p>Rule 4, (3)- the manufacture, import, stocking, distribution, sale and use of following single use plastic commodities shall be prohibited from 01st July, 2022- Single use plastic (including polystyrene) items: plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping / packing films around sweet boxes; invitation cards; and cigarette packets, plastic / PVC banners less than 100 microns, stirrers.</p>	<p><b>Single Use Plastics (Non Foamed) – Following items should be allowed:</b></p> <ol style="list-style-type: none"> <li>Rigid (non-foamed) plates, trays, cups or glasses: -</li> <li>Rigid and non-foamed plates, glasses and cups will not be less than 150 microns thick.</li> <li>Rigid and non-foamed trays will not be less than 120 microns thick.</li> <li>The cups and glasses shall not be less than 205 ml in</li> </ol>	<p>needs to be cut and sealed as compared to a 50 x 4 = 200 microns film. Even the unwinders (where the blownfilm roll is mounted for feeding in the machine) need to be of higher capacity for a 120-micron film to be unwound as compared to that for a 50-micron film.</p> <p>c. Globally, carry bags are not made at thickness beyond 75 microns. This would put immense economic burden on manufacturers &amp; would potentially lead to closures, loss of jobs. It is our estimate that thousands of units across India would be directly impacted leading to loss of jobs.</p> <p>d. Increasing the thickness of Plastic Film/Packaging would only mean increase in polymer consumption and would be negative from the perspective of environment or resource efficiency.</p> <p>a. The blanket ban on all type of Plates, cups, glasses and trays without any specifications will harm the agricultural/ food/ industrial items from electronics field and health &amp; hygiene category in a very detrimental manner.</p> <p>b. Many of these items are made by thermoforming and ban of this type will render more than 200000 persons directly and affect more than 400000 persons indirectly. Besides the investment of several thousand crores in machinery will become useless.</p> <p>c. Use of plates, trays, cups and glasses in industries such as airlines, restaurants, hospitals as well as army jawans in the remote areas &amp; the Institutional waste generators like marriage halls, offices, schools etc. where the collection of use products is very efficient.</p> <p>d. Since these products are made from single family of plastics such as Polypropylene, PET or Polystyrene, the recycling is done very well.</p>

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
		<p>capacity and minimum weight of 5 gm.</p> <p>e. Plates shall not be less than 10 gm in weight (Min Size: 6-inch diameter)</p> <p>f. Trays shall not be less than 12 gm in weight (Min Size: 5.5 inch by 4 inch)</p> <p>g. The above weight is for the smaller sizes with increase in size the weight can go up to 3 times.</p>	<p>e. This industry is poised for exports of more than Rs 4,000 crores in next five years.</p> <p>f. Packaging of food, Beverages &amp; Agricultural produce will have significant impact on health &amp; hygiene. This kind of packing performs in providing the shelf life and keeps the products safe &amp; hygienic during storage and transportation till the end use. These products have been a saviour in corona times serving food in hygienic manner to corona patients and healthcare workers.</p> <p>g. Thermoforming process has a feasibility to manufacture green products by using PCW (post-consumer waste) up to 30% in the middle layer. Three-layer structure can be used in food application without compromising food safety, proper regulation required on this.</p>
5	Rule 4, (3)- the manufacture, import, stocking, distribution, sale and use of following single use plastic commodities shall be prohibited from 01st July, 2022 ☐ Single use plastic (including polystyrene) items: plates, cups, glasses, cutlery such as forks, spoons, knives, straw, trays, wrapping / packing films around sweet boxes; invitation cards; and cigarette packets, plastic / PVC banners less than 100 microns, stirrers.	<p><u>Foamed Disposable plates, trays, cups, glasses to be allowed:-</u></p> <p>a. For Flexible foamed plates, trays, cups, bowls or glasses: Minimum thickness of 3000 microns and a minimum weight as specified below:</p> <ul style="list-style-type: none"> <li>Plates should have minimum weight of 6.0 gms.</li> <li>Cups, bowls and Glasses above 201 ml capacity should have minimum weight of 6.0 gms.</li> </ul>	<p>a. These products are used to protect the food items as well as fruits and vegetables from dirt and water. They maintain the hygiene and safety of products during storage and transportation before the packed product is consumed. These have very low conductivity of heat and therefore, these can be used for hot and cold beverages and food. The low weight due to foamed nature makes these products an excellent choice for use in airlines. These are made from single family plastic such as polystyrene and therefore these are recycled very easily. These products are essentially used by Institutional waste generators and hence easily collected and recycled. During Covid fight these products were very helpful to hospitals. During Covid and before covid these were not littered due to use by airlines, hospitals and other Institutional waste generators. These products have tremendous potential for the export. The Institutional waste is recycled to the tune of more than 90 %. The alternatives including compostable plastics cannot fulfil the essential functions of these products.</p>

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
		b. The Foamed Plates, Trays, Cups and glasses with Lamination with Rigid coating will make the product Multi-use. Hence such product should be permitted to be sold.	b. Foamed Products should be permitted for use only by institutional waste generators such as Airlines, restaurants, hospitals, marriage / party halls, schools, etc., it will save the industry worth more than 2000 crores. Currently the major market of these products is institutional who could assist proper Segregation & collection for waste for ease in recycling.
6	Rule 4, (3), ii- Compostable Plastics	a. The thickness and weight specifications should be applicable to compostable plastic products also. A separate number of say 8 may be given for identification of compostable products. b. For compostable plastics specific colour should be made compulsory along with number.	a. A separate identification code for compostable products will help the waste collectors and recyclers to separate from non-compostable plastics. This will smoothen the recycling of all plastics.
7	Rule 4- Manufacturing of restricted item for Exports	a. Manufacturing for the purpose of exports should be allowed for all exporters	a. Manufacturing for exports should be allowed as per the rules of the destination country. b. The global export business should not be handed over to China.
8	Rule 4 (d)-Packaging Material	b. Packaging material for exports of goods should be allowed as per the rules of the destination country.	a. Every country has different rules on SUP, e.g. Germany; following the rules of the destination country will help India maintain its global exports.

## Annexure I- '6 Pages'

S. No	PWM 21 amendment as per MoEF Draft Notification	Suggestions/Recommendations	Justification
9	Timelines for prohibiting certain SUP products as mentioned in the Draft Notification	a. The timelines for prohibiting certain SUP products may be extended by 1 year.	a. In view of the current second wave of pandemic and lockdowns across the country, units are under tremendous personal and economic stress. These industries would take some time to stand back on their feet. Considering the same, the timelines for restricting certain SUP products may be extended by at least 1 year.





Regs. No :- E - 11007 Thane

# *Thermoformers & Allied Industries Associations*

## **PLASTIC RIGID PACKAGING FOR FOOD INDUSTRY**

7th May 2021

**Shri. Rameshwar Prasad Gupta Secretary**  
**Ministry of Environment, Forest and Climate Change.**  
Government of India.  
Indira Paryavaran Bhawan, Jor Bagh, New Delhi.

**Subject: Draft notification issued on 11th March 2021 for amendments in Plastic Waste Management Rules, 2016 – Suggestions and recommendations.**

**Respected Sir,**

Greetings from TAIA!

**TAIA - Thermoformers and Allied Industries Association** is a registered association having registration no E-11007 and has 850 members involved in manufacturing of rigid plastic packaging for food, beverages & agricultural produce.

With reference to the proposed draft notification for amendments in Plastic Waste Management Rules, 2016, please find enclosed (Annexure I) our suggestions/recommendation along with justification for your kind consideration. In addition to our enclosed clause-wise submissions, following are our general submission for your kind consideration: -

- ☐ **Uniform policy across country:** This provision of the law can only be effectively implemented when there is One Law across the country. You may be aware that although MOEF, Govt. of India had formulated the PWM Rules 2016 with an intention to implement across the country, various State Governments have modified the rules without any scientific reasons resulting in poor implementation of PWM rules 2016 and economic distress to industrial units. Therefore, it is especially important to ensure that there is one law for the entire country.

**Treasurer - Mr. Rajesh Gandhi | PRO - Mr. Harshit Mehta, Mr. Satish Pandey | Committee Members - Mr. Vinay Agrawal, Mr. Sharad Bagga, Mr. Ashokan, Mr. Ramesh Gupta**  
**Registered office (Mumbai) - 212, Lodha Supremus, Road No 22, Wagle Estate, Thane – West, Maharashtra – 400604**  
**TAIA Delhi Office – Mr. Ankur Nagpal, AG 4, Shalimar Bagh, Basement, Near Metro Station, Gate No 2, Delhi – 110088**  
Email – [info@taiaindia.com](mailto:info@taiaindia.com) | Phone – 022 25418484



Regs. No :- E - 11007 Thane

# *Thermoformers & Allied Industries Associations*

## *PLASTIC RIGID PACKAGING FOR FOOD INDUSTRY*

- ☐ Any action towards restricting manufacturing and use of any plastics product and Replacing with alternative material should take into consideration the following:
- a) Reasons for the selection and use of plastics in various daily and critical applications are, apart from its light weight, easy processing and inert properties, least energy consumption, least greenhouse gas emission, least value of BOD and COD in water compared to the alternatives like glass, metals, paper, wood etc.
  - b) A study, "Impact of Plastics Packaging on Life Cycle Energy Consumption & Greenhouse Gas Emissions" conducted by Franklin Associates for American Chemistry Council found that replacing major plastic packaging with non-plastic alternatives would require 4.5 times as much packaging material by weight, increasing the amount of packaging used by nearly 55 million tons ; increase energy use by 80 percent and result in 130 percent more global warming potential equivalent to adding 15.7 million more cars to our roads (in US). LCA study results would be similar in other countries too. This shows environmental benefits of plastics. We are required to use plastics responsibly by managing its waste properly and not indulging in littering. Plastics are 100% recyclable / energy recoverable."

The above is for your kind consideration.

Thanking You,

Your's Faithfully,

**Ramswaroop Thard**  
(President)

**Treasurer** - Mr. Rajesh Gandhi | **PRO** - Mr. Harshit Mehta, Mr. Satish Pandey | **Committee Members** - Mr. Vinay Agrawal, Mr. Sharad Bagga, Mr. Ashokan, Mr. Ramesh Gupta  
**Registered office (Mumbai)** - 212, Lodha Supremus, Road No 22, Wagle Estate, Thane – West, Maharashtra – 400604  
**TAIA Delhi Office** – Mr. Ankur Nagpal, AG 4, Shalimar Bagh, Basement, Near Metro Station, Gate No 2, Delhi – 110088  
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SPEED-POST / E-MAIL

केन्द्रीय प्रदूषण नियंत्रण बोर्ड  
CENTRAL POLLUTION CONTROL BOARD  
पर्यावरण, वन एवं जलवायु परिवर्तन मंत्रालय भारत सरकार  
MINISTRY OF ENVIRONMENT, FOREST & CLIMATE CHANGE GOVT. OF INDIA

F. No.B-17011/7/UPC-II-PWM (MLP)/2021

Dated: 01.12.2021

To,

The Chairperson,  
Central Board of Indirect Taxes and Customs  
North Block, Secretariat Building,  
New Delhi - 110001

Sub: Registration of Importers as per provision of Plastic Waste Management Rules, 2016 as amended

Sir,

Ministry of Environment, Forest and Climate Change has notified Plastic Waste Management (PWM) Rules 2016 (copy enclosed) to give thrust to plastic waste management including source segregation, processing and disposal of plastic waste based on the "Polluter Pays Principle"

As per Section 9 of PWM Rules, Producers, Importers & Brand Owners (PIBOs) who introduce plastic waste in the market due to their products in form of carry bags, multi-layered packaging, plastic sheets or like, are required to fulfill Extended Producer Responsibility to ensure environmentally sound management of this plastic waste.

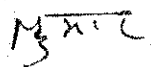
The PIBOs are further required to obtain Registration from concerned State Pollution Control Board (SPCB)/ Pollution Control Committee (PCC) or Central Pollution Control Board in accordance with Section 13(2) of the PWM Rules which provides that:

*"Every producer or brand-owner shall, for the purpose of registration or for renewal of registration, make an application in Form-I to*

- "The concerned State Pollution Control Board or Pollution Control Committee of the Union territory, if operating in one or two States or Union Territories"; or*
- "The Central Pollution Control Board, if operating in more than two States or Union Territories"*

For effective implementation of the above, you are requested to get the necessary instructions issued to the concerned to ensure verification of registration obtained from CPCB/SPCB/PCC (as applicable) at the time of clearing the consignment of Importers of plastic carry bags/multi-layered packaging/plastic sheets or like.

Yours faithfully,

  
(Tanmay Kumar)  
Chairman

Encl.: As above

'परिवेश भवन' पूर्वी अर्जुन नगर, दिल्ली-110032

Parivesh Bhawan, East Arjun Nagar, Delhi-110032

दूरभाष/Tel : 43102030, 22305792, वेबसाइट/Website : www.cpcb.nic.in





**CENTRAL POLLUTION CONTROL BOARD  
DELHI**

**NOTICE FOR REGISTRATION OF PRODUCERS, IMPORTERS & BRAND-OWNERS  
UNDER PROVISION OF PLASTIC WASTE MANAGEMENT(PWM) RULES**  
**(As per provisions 9 (1&2) &13(2) of PWM Rules, 2016, as amended)**

Producers, Importers & Brand-owners (PIBOs) are required to fulfill Extended Producers Responsibility (EPR) for the plastic waste generated due to the products introduced by them in the market. EPR is responsibility of a producer/ importer/ brand-owner for environmentally sound management of the product till the end of its life.

PIBOs are required to obtain registration from CPCB, if operating in more than two States/ UTs and from concerned SPCB/PCC, if operating in one or two States/UTs only.

This notice is being issued to inform all the PIBOs to obtain Registration from CPCB/SPCB/PCC (as applicable). Those PIBOs who have not yet applied for registration are informed that they shall submit application for registration complete in all respects, to CPCB (for those operating in more than two States/UTs) latest by May 15, 2021. Action, as deemed fit under the Environment (Protection) Act, 1986, including levying of Environmental Compensation and closure of PIBO's operations, shall be taken against defaulters.

CPCB reserves the right to take such action as deemed fit under Environment (Protection) Act, 1986 for violation by the concerned PIBO for the period prior to grant of registration.

(Member Secretary)

