

ADVISORY

EPR-Plastic Waste Management

July, 2023



Some Important Definitions:

EPR: Extended Producers Responsibility PIBOs: Producers, Importers and Brand-owners CPCB: Central Pollution Control Board SPCB: State Pollution Control Boards PWP: Plastic Waste Processors PRO: Producers Responsibilities Organization

1) What is EPR

EPR means the responsibility of a producer for the environmentally sound management of the product until the end of its life. EPR regime is under implementation in Plastic Waste Management Rules, 2016, according to which it is the **responsibility of Producers, Importers and Brand-owners** to ensure **processing of their plastic packaging waste** through recycling, re-use or end of life disposal.

2) Who needs to register?

As per the PWM 2016 guidelines, **Producers, Importers and Brand Owners (PIBOs) and PWP shall have to register** through the online centralized portal developed by the Central Pollution Control Board (CPCB) irrespective of turnover or scale of operations. Further, even those entities that do not import plastic packaging but import products with plastic packaging, are required to be registered.

3) Where do you need to register?

PIBOs who are operating in **more than two States** with CPCB and those operating in **one or two States/UTs** shall be registered with the concerned State Pollution Control Boards (SPCBs).

4) What are the categories of plastic?

- a) **Rigid package plastic** e.g., paperboard boxes, plastic bottles, laundry detergent bottles, etc.
- b) **Flexible plastic packaging** of single layer or multilayer (more than one layer with different types of plastic) e.g., shrink film, stretch film, flexible pouches, seal bands.
- c) **Multilayered plastic packaging** (at least one layer of plastic and at least one layer of material other than plastic) e.g., plastic food bags, frozen food bags, chip bags, granola bar wrappers, and more.
- d) **Plastic sheet** or like used for packaging as well as **carry bags** made of compostable plastics.



5) What are the responsibilities of PIBOs?

- a) Register at EPR Portal
- b) Submit their Action plan
- c) Fulfil obligations for:
 - Recycling
 - Use of Recycled content
 - Reuse
 - End of life disposal
 - Optional engagement in collection and recovery of the plastics
 - Submit annual returns
 - Provide proof of certificates (Plastic credits)
 - PIBOs can engage with PRO's or other agencies separately to fulfil their targets but reporting and responsibility to fulfil the obligations is completely of PIBO

6) Compliance

The PIBOs shall file annual returns on the plastic packaging waste collected and processed towards fulfilling obligations under EPR with the CPCB or concerned SPCB or Pollution Control Committee as per proforma prescribed by CPCB by the **30th June** of the next financial year. PIBOs shall have to provide the details of recycling certificates only from **registered recyclers**.

7) How can Octagona India help?

Octagona India offers assistance with the registration process and acquiring the necessary certifications. Additionally, we can facilitate connections with registered recyclers and handle annual return filing on your behalf.

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