



Handbook on EPR Guidelines for Plastic Packaging

**By
Tamil Nadu Pollution Control Board**

April 2024

Preface

In today's regulatory landscape, the effective management of plastic packaging waste is paramount. Compliance with Extended Producer Responsibility (EPR) regulations emerges not only as a legal obligation but as a pivotal stride towards a greener future.

With a commitment to fostering understanding and action, the Tamil Nadu Pollution Control Board (TNPCB) unveils the Handbook on EPR Guidelines for Plastic Packaging Waste. Tailored for Producers, Importers, Brand Owners, Manufacturers, and plastic waste processors this handbook serves as an important resource, shedding light on the intricacies of EPR guidelines for plastic packaging.

It elucidates the roles and responsibilities of each stakeholder, of EPR for plastic packaging. The objective of this guidelines is to empower businesses by assisting them in comprehending and fulfilling their obligations seamlessly in accordance with the provisions of the PWM Rules, as amended from time to time.

While this handbook offers valuable insights, it is important to recognize that it should not be the sole reference for legal or regulatory compliance. For detailed, up-to-date and accurate information kindly visit the official EPR portal maintained by the Central Pollution Control Board at <https://eprplastic.cpcb.gov.in/#/plastic/home>.

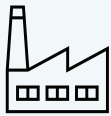
For any further inquiries or clarifications, readers are invited to reach out to us using the contact details provided below:

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Email: pwmsec@tnpcb.gov.in

Tamil Nadu Pollution Control Board

Definitions



Producer (P)

Person engaged in manufacturing of plastic packaging and, includes a person engaged in manufacture of intermediate material to be used for manufacturing plastic packaging, and also the person engaged in contract manufacturing of products using plastic packaging or through other similar arrangements for a brand owners



Importer (I)

Person who imports for commercial use, any plastic packaging or any commodity with plastic packaging or carry bags or plastic sheets or like material, or plastic raw material including in the form of resin or pellets, or intermediate material to be used for manufacturing plastic packaging such as films or preforms



Brand Owner (BO)

Person or company who sells any commodity under a registered brand label or trademark



Manufacturer (M)

Person engaged in production of plastic raw material, including compostable plastics and biodegradable plastics



Plastic Waste Processor (PWP)

Plastic Waste Processors means recyclers of plastic waste as well as entities engaged in using plastic waste for energy (waste to energy) including in coprocessing or converting plastic waste to oil (waste to oil) except in cases where feedstock chemicals are produced for further use in the production of plastic which may then be considered under recycling , industrial composting



Pre-Consumer Plastic Packaging Waste

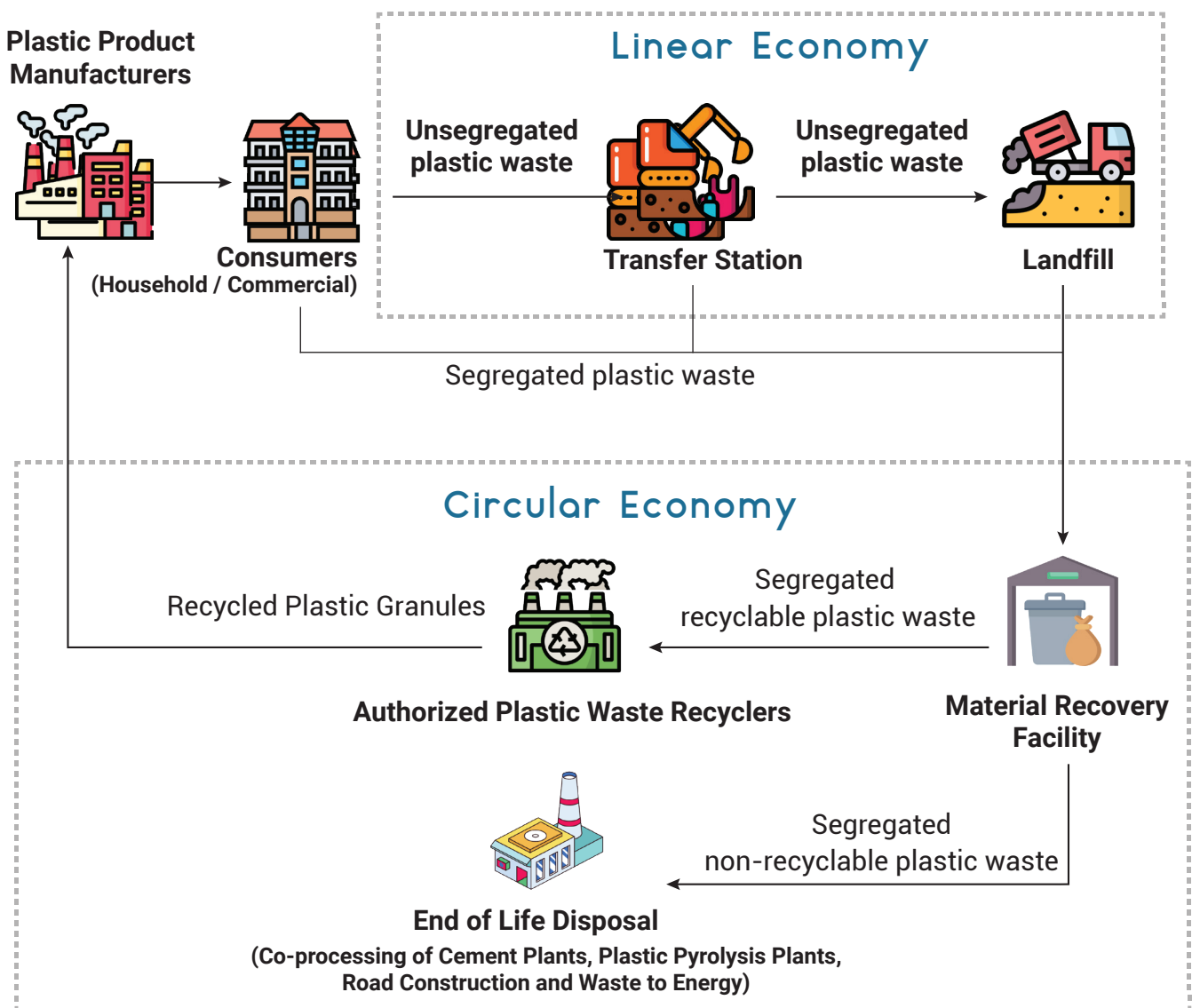
Plastic packaging waste generated in the form of reject or discard at the stage of manufacturing of plastic packaging and plastic packaging waste generated during the packaging of product including reject, discard, before the plastic packaging reaches the end-use consumer of the product



Post-Consumer Plastic Packaging Waste

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

Extended Producer Responsibility



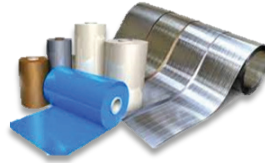
EPR and its Advantage

- ▶ Extended Producer Responsibility (EPR) is a policy approach assigning Producers, Importers, Brand Owners & Manufacturers (PIBOMs) responsible for managing end-of-life disposal or recycling of products
- ▶ It promotes durable, recyclable plastic products aligning with circular economy ideals
- ▶ Encourages eco-design for resource efficiency and waste reduction
- ▶ Drives resource-efficient practices, decreasing consumption
- ▶ Improves recycling rates via producer responsibility
- ▶ Contributes to sustainability by reducing waste and conserving resources
- ▶ Reduces the burden of urban local bodies on the collection and the disposal of plastic waste

Plastic Packaging Types Under EPR



Category I - Rigid Plastic



Category II - Flexible Plastic



Category III - Multi-Layer Plastic

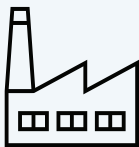


Category IV - Compostable Plastic



Category V - Biodegradable Plastic

Obligated Entities



Producer (P)



Importer (I)



Brand Owner (BO)

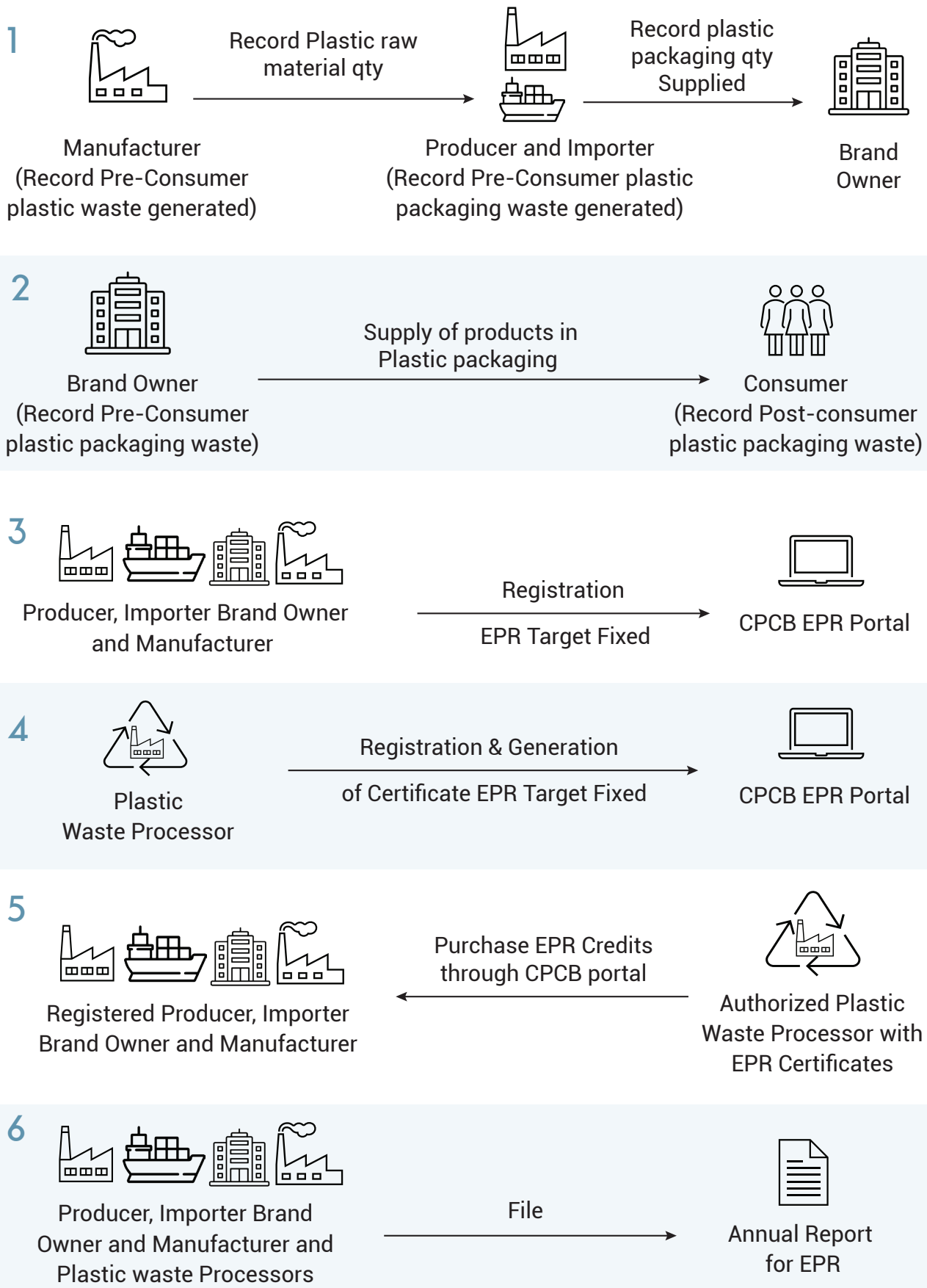


Manufacturer (M)



Plastic Waste Processor (PWP)

Role of PIBOMs



Obligations of PIBOMs

Formula to Calculate EPR Target for Producers & Importers

$$\text{Eligible Quantity (MT)} = \frac{(\text{A}) + (\text{B})}{2} - (\text{C})$$

(A) Total qty of Pre-Consumer plastic packaging waste produced in last two FY

(B) Total qty of Post-Consumer plastic packaging material sold in last two FY

(C) Total qty of plastic packaging supplied to brand owners in the last FY

Formula to Calculate EPR Target for Brand Owners

$$\text{Eligible Quantity (MT)} = \frac{(\text{A}) + (\text{B})}{2}$$

(A) Total qty of Pre-Consumer plastic packaging waste produced in last two FY

(B) Total qty of post-Consumer virgin plastic packaging material purchased and introduced in market in last two FY

- ▶ EPR targets to be met by buying EPR credit from Plastic Waste Processors
- ▶ PIBOMs could also buy EPR credits from other PIBOMs who have surplus EPR targets

Obligations of PIBOMs

EPR Target of Eligible Quantity for Producers, Brand Owners and Importers



FY 21-22



FY 22-23







FY 23-24 and onwards

Note:

- Brand Owners falling under Micro and Small category are exempted from Registration in the portal
- Producers falling under Micro and Small category are exempted only from EPR obligations, however they have to get Registered in the portal

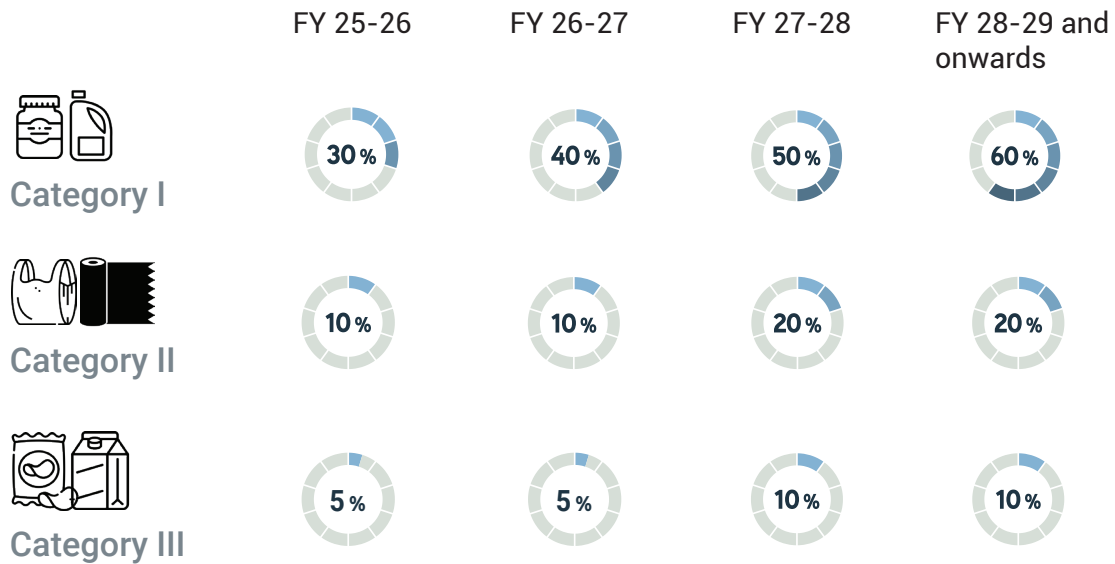
Mandatory Minimum Recycling Target of EPR Target for Brand Owners, Producers, Importers and Manufacturers

	FY 24-25	FY 25-26	FY 26-27	FY 27-28 and onwards
 Category I	50%	60%	70%	80%
 Category II	30%	40%	50%	60%
 Category III	30%	40%	50%	60%
 Category IV	50%	60%	70%	80%

- ▶ PIBOs could send plastic packaging for co-processing after achieving their mandatory recycling target
- ▶ The manufacturers or importers of raw material (for Category I, II and III categories) of plastic would be liable for EPR, in case of micro or small producers are selling to other small or micro producers or brand owners
- ▶ Manufacturer of biodegradable plastics shall fulfil their EPR obligations by obtaining EPR certificates generated by local authorities, as per agreed modalities and also have to fulfill their EPR target for compostable plastic

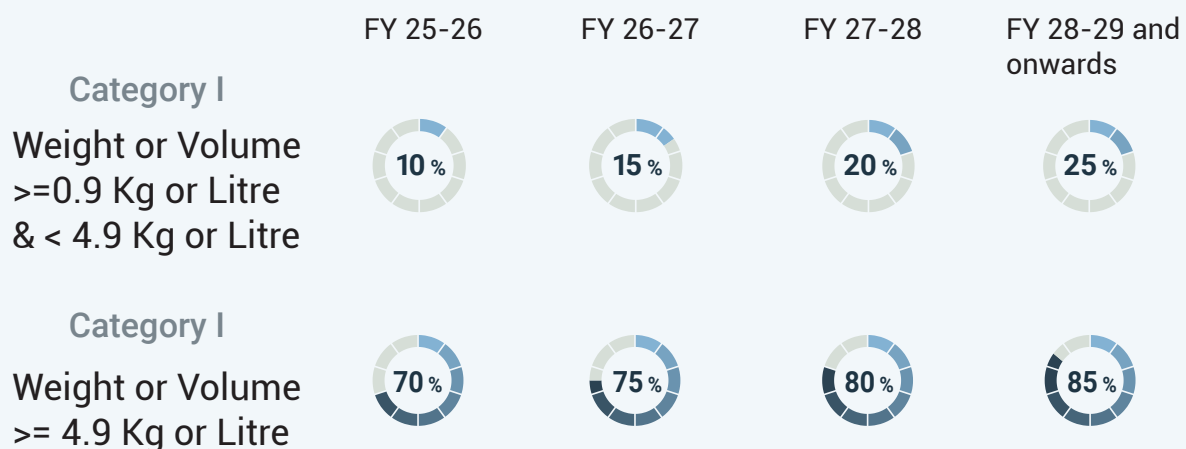
Obligations of PIBOMs

Usage for Recycled Content Target (as Percentage of Manufacture plastic) for Brand Owners, Producers and Importers



- ▶ PIBOs need to use certain percentage of recycled content (as indicated above) in their plastic packaging introduced in market, starting from FY 2025-26 and quantity used would be deducted from EPR target. However, Brand Owners falling under micro and small category are exempted
- ▶ Importers have to fulfill the target by purchasing certificates from other PIBOs who have used recycled content in excess to their obligation

Reuse Target for Brand Owners



- ▶ Obligations for reuse are applicable on Brand Owners for plastic packaging only under the rigid category starting from FY 2025-26 and quantity reused would be deducted from EPR target

Important Resources

1

Website of EPR portal for Plastic packaging and related notifications



<https://eprplastic.cpcb.gov.in/#/plastic/home>

2

Guidance document for PIBOs, PWP's & ULBs on EPR registration and filing Annual Report



https://eprplastic.cpcb.gov.in/assets/pdfs/Guidance_Manual.pdf

3

Guidance document for PIBOs on bulk upload of EPR related documents



https://eprplastic.cpcb.gov.in/plastic/downloads/Guidance_Manual_Bulk%20Upload.pdf

4

FAQs for registration of PIBOs as per EPR guidelines



<https://eprplastic.cpcb.gov.in/plastic/downloads/FAQs.pdf>

5

To Lodge complaint on EPR Portal issues related to Registration and filing Annual Report



<https://www.eprsupport.cpcb.gov.in/>



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Plastic Waste Management Cell