

EPR BATTERY COMPLIANCE GUIDE

Practical Compliance Reference for Producers, Importers & Brand Owners

EQUAL CONSULTANCY SERVICES

EPR Battery Registration • EPR Compliance • Documentation • Annual Obligations

Updated reference: Battery Waste Management Rules, 2022 and amendments available through 2025.

1. EPR Battery Compliance – Overview

The Battery Waste Management Rules, 2022 establish Extended Producer Responsibility (EPR) obligations for producers. CPCB guidance states that producers must register through the centralised battery EPR system and fulfil applicable recycling or refurbishing obligations for batteries introduced into the market. Waste batteries are to be channelised to appropriate authorised/certified recycling or refurbishment systems.

2. Who Needs to Comply?

The producer definition covers, among other cases, an entity manufacturing and selling batteries including refurbished batteries under its own brand, selling batteries under its own brand manufactured by another manufacturer or supplier, and importing batteries or equipment containing batteries. Applicability should be checked against the latest Rules, amendments and CPCB portal requirements.

3. Main Compliance Areas

- CPCB EPR Battery registration
- Correct identification of battery type and category
- Accurate sales, battery-material and quantity/weight data
- EPR planning and target fulfilment
- Channelisation of waste batteries through appropriate recycling/refurbishment arrangements
- Obtaining and using EPR certificates as applicable
- Maintaining supporting records
- Periodic/annual submissions required by the Rules and portal
- Updating CPCB when registered information changes.

4. CPCB Registration – Practical Workflow

Step 1: Determine whether the entity is a producer under the Rules.

Step 2: Identify battery types, brands, applications and quantities.

Step 3: Prepare company, authorised-person and product documentation.

Step 4: Create/login to the CPCB battery EPR portal account.

Step 5: Complete the application sections covering general information, battery type, sales data, battery material, documents and applicable fees.

Step 6: Submit the application and monitor CPCB queries/clarifications.

Step 7: After approval, maintain registration and fulfil continuing EPR obligations.

5. Documentation Preparation

Keep a controlled compliance file containing: company incorporation/constitution documents, PAN, GST details where applicable, IEC for importers where applicable, registered address, authorised person details, contact information, brand information, battery/product specifications, battery category/type, sales and quantity data, battery weight/material information, and other supporting documents requested by the portal. Documents should be consistent with the legal entity and portal data.

6. EPR Targets & Recycling

CPCB's battery EPR SOP explains that producers fulfil EPR obligations by ensuring waste batteries are recycled through certified waste-battery recyclers to meet assigned EPR targets. Producers obtain EPR certificates from recyclers according to the quantity of waste batteries recycled and use those certificates to meet applicable targets. Actual target calculations should be made using the current Rules, schedules, portal methodology and applicable battery category.

7. EPR Plan & Reporting

The Rules prescribe an EPR Plan mechanism and reporting requirements. The original 2022 Rules specify submission of the EPR Plan in Form 1(C) by 30 June each year for batteries manufactured in the preceding financial year. Because amendments and portal procedures may change filing requirements, the latest CPCB instructions should be checked before each filing.

8. Annual Compliance Checklist

- Verify CPCB registration details
- Review brands and battery categories
- Reconcile sales/import/manufacturing data
- Calculate applicable battery quantities and weights
- Review EPR target obligations
- Arrange compliant recycling/refurbishment channelisation
- Obtain required EPR certificates
- Complete applicable annual/periodic submissions
- Maintain invoices, records and supporting evidence
- Report material changes to CPCB where required.

9. Battery Categories

The CPCB registration format identifies Portable Battery, Automotive Battery, EV Battery and Industrial Battery as battery types. Correct classification is important for compliance data and target calculations. Use the current CPCB portal categories and applicable schedules rather than an old or unofficial category list.

10. Changes, Renewal & Record Keeping

The Rules require registered entities to comply with the Environment (Protection) Act, 1986 and related rules. The registration framework also requires changes to approved EPR information to be communicated to CPCB. The 2022 Rules specify applying for renewal before sixty days of expiry. Maintain records supporting registration, quantities, recycling and EPR certificate utilisation for future verification.

11. 2025 Amendment – Important Reference

The Battery Waste Management Amendment Rules, 2025 amended the 2022 framework. Among other changes, the 2025 notification introduced provisions concerning information to CPCB and displaying an EPR registration number through a barcode or QR code on the battery/battery pack or equipment having a battery/battery pack, subject to the conditions in the notification. Businesses should review the complete notification before implementing labelling changes.

12. Common Compliance Mistakes

Common problems include using inconsistent company names, incorrect GST/address information, incomplete battery weight data, mixing equipment weight with battery weight, incorrect category selection, unsupported sales figures, missing documents, failure to reconcile EPR certificates, and ignoring CPCB clarification requests. A documented internal reconciliation process reduces these risks.

13. FAQ

Is EPR Battery registration required for importers? Producers covered by the Rules include importers of batteries and equipment containing batteries, subject to the applicable definition and requirements.

Can one registration cover multiple battery types? The CPCB application/registration framework records the battery types placed on the market. The exact scope should be determined from the approved registration and current portal requirements.

Are EPR certificates important? Yes. CPCB's SOP describes obtaining EPR certificates from recyclers according to recycled quantities and using them toward applicable EPR targets.

Should registration information be updated? Changes to approved EPR information should be communicated to CPCB as required by the Rules.

Where can the official Rules be checked? Use CPCB and MoEFCC official publications and the current CPCB battery EPR portal instructions.

Official Reference Sources

CPCB – Battery Waste Management Rules, 2022 and amendments.

CPCB – EPR Portal for Battery Waste Management / SOP for producer registration.

MoEFCC – official Battery Waste Management Rules and amendment notifications, including the 2025 amendment.

Important Disclaimer: This guide is intended for general compliance information and document preparation. It is not a substitute for the current legislation, official CPCB directions, portal instructions or professional legal advice. Requirements, forms, fees, targets and portal processes can change; verify the latest official requirements before filing.

EQUAL CONSULTANCY SERVICES

Professional Compliance & Certification Consultancy in India