

EPR BATTERY FREQUENTLY ASKED QUESTIONS

Professional FAQ Guide for Producers, Importers & Brand Owners

EQUAL CONSULTANCY SERVICES

EPR Battery Registration • Compliance • Recycling • EPR Certificates

Reference framework: Battery Waste Management Rules, 2022 and subsequent amendments, including 2025.

1. What is EPR Battery Registration?

It is the registration and compliance framework under the Battery Waste Management Rules, 2022 for producers to fulfil their Extended Producer Responsibility obligations for batteries placed on the Indian market.

2. Who is considered a Producer?

The Rules cover, among other cases, entities manufacturing and selling batteries under their own brand, selling batteries under their own brand manufactured by another manufacturer or supplier, and importing batteries or equipment containing batteries.

3. Is EPR Battery registration applicable to importers?

Import of batteries or equipment containing batteries is included in the producer definition, subject to the applicable Rules and CPCB requirements.

4. What battery types are covered?

The CPCB framework identifies Portable Battery, Automotive Battery, Electric Vehicle Battery and Industrial Battery categories.

5. What is the main responsibility of a Producer?

A producer must fulfil applicable EPR obligations, including applicable recycling/refurbishment targets, proper channelisation of waste batteries, record keeping and reporting through the CPCB system.

6. What documents are generally needed?

Typical preparation includes company details, PAN/GST information where applicable, authorised person details, registered address, brand information, battery/product details, quantity and weight information, and supporting documents requested by the CPCB portal. Exact requirements can vary by applicant and current portal fields.

7. How is registration applied for?

The application is completed through the CPCB battery EPR system. The producer provides general information, battery details, sales/quantity data, supporting documents and other information requested by the portal, then submits the application for CPCB processing.

8. What is an EPR Certificate?

Under the CPCB battery EPR framework, EPR certificates are generated in relation to waste batteries recycled by certified recyclers. Producers use applicable certificates to meet their EPR obligations.

9. Can any recycler be used?

Waste batteries should be channelised through the applicable authorised/certified recycling or refurbishment system. CPCB guidance refers to certified waste-battery recyclers.

10. What are EPR targets?

Targets depend on the applicable battery type, quantities placed on the market and the methodology prescribed by the Rules and CPCB system. The current applicable calculation should be used rather than an outdated fixed percentage.

11. Is annual compliance required?

Yes. Producers have continuing obligations that may include EPR planning, target fulfilment, record keeping and prescribed reporting/submissions.

12. When is the EPR Plan submitted?

The 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. Current amendments and CPCB portal instructions should be checked before filing.

13. Is renewal required?

The 2022 Rules specify that an application for renewal should be made before sixty days of registration expiry.

14. What if company or registration information changes?

Changes to information contained in the registration should be communicated to CPCB as required under the Rules and current portal procedure.

15. What did the 2025 amendment introduce?

The Battery Waste Management Amendment Rules, 2025 introduced provisions allowing producers, subject to specified conditions and written information to CPCB, to print a barcode or QR code containing the EPR registration number on batteries/battery packs, equipment containing them, or relevant packaging.

16. Does EPR apply to equipment containing batteries?

Import of equipment containing batteries can fall within the producer definition under the Battery Waste Management Rules, subject to the applicable requirements.

17. What records should be maintained?

Maintain registration details, battery/product information, sales/import/manufacturing records, quantities and weights, recycling documentation, EPR certificates and applicable returns/submissions so reported information can be supported.

18. What are common compliance mistakes?

Common issues include incorrect battery classification, inconsistent legal/entity information, inaccurate quantities or weights, incomplete documents, poor reconciliation of EPR certificates and failure to respond to CPCB clarification requests.

19. Can Equal Consultancy Services assist with EPR Battery compliance?

Yes. Equal Consultancy Services can assist with documentation, application preparation, EPR Battery registration support and ongoing compliance documentation.

20. Where should the latest requirements be checked?

Always verify the latest CPCB portal instructions, Battery Waste Management Rules and amendment notifications before filing because regulatory requirements and portal procedures can change.

Official Reference

CPCB – Battery Waste Management Rules, 2022 and amendment notifications. The 2025 amendment introduced provisions concerning barcode/QR-code display of EPR registration numbers subject to specified conditions.

Disclaimer: This FAQ is for general information and compliance-preparation purposes. It does not replace the latest official CPCB directions, portal instructions or legal advice. Verify the current requirements before submission.

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