

EPR E-WASTE REGISTRATION GUIDE

A Practical Guide to EPR Registration, CPCB Portal Process & Compliance in India

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1. What is EPR E-Waste Registration?

EPR (Extended Producer Responsibility) under the E-Waste (Management) Rules, 2022 places defined responsibilities on applicable entities in the electrical and electronic equipment value chain. The Rules came into effect on 1 April 2023 and replaced the 2016 Rules. CPCB states that the framework covers specified manufacturers, producers, refurbishers and recyclers/dismantlers and provides for online EPR management.

2. Who Should Assess EPR E-Waste Applicability?

- Manufacturers of covered electrical and electronic equipment.
- Producers/brand owners placing covered electrical and electronic equipment on the Indian market.
- Refurbishers dealing with covered equipment within the regulatory framework.
- Recyclers and other regulated stakeholders involved in the e-waste value chain.
- Importers should specifically review whether their activity creates a producer or other regulated role under the current rules.

3. Product & Category Assessment

Before filing, identify the exact electrical/electronic products, models, components, parts and spares, and map them against the applicable Schedule-I categories. CPCB's FAQ notes that the 2022 Rules cover 106 electrical and electronic equipment items under seven categories. Product classification should be checked carefully because incorrect category or quantity information can affect compliance.

4. Basic Registration Workflow

Step 1 — Applicability review — Identify the entity's role and confirm whether the products are covered.

Step 2 — Prepare business information — Collect legal entity, PAN, GST, address, authorized-person and contact details.

Step 3 — Prepare product information — Compile product names, categories, quantities and relevant market/manufacturing/import information.

Step 4 — Portal account — Use the applicable CPCB E-Waste EPR portal and follow the current portal instructions.

Step 5 — Application filing — Enter accurate information and upload the documents/information requested by the portal.

Step 6 — Scrutiny / clarification — Respond to any deficiency, query or additional-information request from the authority.

Step 7 — Registration — After regulatory processing, registration is issued subject to applicable requirements.

Step 8 — Ongoing compliance — Maintain records and complete applicable EPR, recycling, return/reporting and certificate-related obligations.

5. Common Documents & Information Checklist

- ☐ PAN of the entity/company.
- ☐ GST registration details, where applicable.
- ☐ Certificate of Incorporation / constitution documents, as applicable.
- ☐ Registered office and communication address details.
- ☐ Authorized person details and contact information.
- ☐ Product catalogue / product descriptions and applicable EEE categories.
- ☐ Brand / trademark details, where relevant.
- ☐ Manufacturing, import, sales or production information relevant to the application.
- ☐ Previous registration details, if any.
- ☐ Recycler / downstream compliance information where required by the applicable process.
- ☐ Any additional documents or declarations specifically requested by CPCB or the EPR portal.

6. EPR Compliance After Registration

- Maintain accurate records supporting the quantities and activities reported.
- Meet applicable EPR/recycling obligations through mechanisms permitted under the Rules.
- Use registered recyclers where the regulatory framework requires recycling through registered recyclers.
- Monitor applicable quarterly and annual return/reporting requirements.
- Keep transaction, recycling and supporting documentation available for verification/audit.
- Update registration information when material business, product or other regulated details change.
- Avoid false information or unsupported EPR certificates; violations can lead to regulatory action and environmental compensation.

7. EPR Certificates & Recycling

CPCB guidance explains that registered recyclers upload relevant procurement, recycling and end-product sales information on the E-Waste EPR Portal. EPR certificates are generated through the portal based on eligible recycling information. Producers fulfil applicable EPR obligations through the mechanism prescribed under the Rules, including purchase of EPR certificates from registered recyclers where applicable.

8. Important Distinction: E-Waste, Batteries & Plastic Packaging

Waste Stream	Primary Framework	Important Note
Electrical & electronic equipment / E-Waste	E-Waste (Management) Rules, 2022	Assess covered EEE categories and applicable EPR obligations.
Waste batteries	Battery Waste Management Rules, 2022	Battery obligations should be assessed separately.
Plastic packaging	Plastic Waste Management Rules / applicable EPR framework	Do not automatically treat packaging as E-Waste EPR.

9. Common Reasons for Delay / Query

- Incorrect product category or incomplete product information.
- Mismatch between legal entity information and submitted documents.
- Incomplete quantity, production, import or sales data.
- Missing supporting documents or declarations.

- Inaccurate recycler/service-provider information where required.
- Portal validation issues or regulatory queries.
- Failure to respond to clarification requests within the applicable process.

10. Practical Compliance File Structure

No.	Recommended Compliance Folder
01	Company / legal documents
02	GST / PAN / incorporation documents
03	Authorized person documents
04	Product catalogue and EEE category mapping
05	Production / import / sales quantity records
06	EPR registration and portal correspondence
07	Recycler and recycling documentation
08	EPR certificates / transactions, where applicable
09	Quarterly / annual returns and acknowledgements
10	Queries, responses and audit records

11. Key Official References

- CPCB — E-Waste (Management) Rules, 2022 and related guidance.
- CPCB — FAQ on E-Waste (Management) Rules, 2022.
- CPCB — Guidance for EPR certificate generation / transfer for recyclers.
- CPCB E-Waste EPR Portal — always verify the current portal address and instructions before filing.

12. Important Regulatory Notes

CPCB's published material states that the E-Waste (Management) Rules, 2022 became effective from 1 April 2023. CPCB also describes quarterly and annual returns for applicable stakeholders and audit provisions. Current portal instructions, amendments, SOPs and official directions should always be checked before submission because regulatory procedures can change.

Need EPR E-Waste Registration Assistance?

Equal Consultancy Services can assist with applicability review, product/category assessment, document preparation, CPCB EPR portal filing support, clarification handling and ongoing compliance support.

Call: 7715843600 Email: equalconsultancy@gmail.com Website: equalconsultancy.com

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