EPR PLASTIC WASTE MANAGEMENT COMPLIANCE

Practical Compliance Guide for Producers, Importers & Brand Owners (PIBOs)

Scope: Plastic packaging EPR compliance under the Plastic Waste Management framework and CPCB's EPR system.

2026 Portal Update: CPCB states that the existing Plastic EPR Portal was discontinued with effect from 28 June 2026 and registered-user data was migrated to the newly developed Common EPR Portal. Existing users should verify migrated data and use the Common EPR Portal for current updates and activities.

1. What is EPR Plastic Waste Management Compliance?

Extended Producer Responsibility (EPR) makes applicable Producers, Importers and Brand Owners responsible for ensuring processing of their plastic packaging waste through applicable environmentally sound routes. CPCB describes routes including recycling, reuse and permitted end-of-life disposal such as co-processing, waste-to-energy, plastic-to-oil, roadmaking and industrial composting.

2. Key Compliance Areas

- Maintain valid registration under the applicable EPR framework.
- Accurately report plastic packaging sales, consumption and procurement data as required by the portal.
- Determine and fulfil applicable annual EPR obligations/targets.
- Use applicable EPR certificates/credits and transactions through the authorized portal mechanism.
- Maintain invoices, packaging records, quantity calculations and supporting evidence.
- File applicable annual returns and other reports within the prescribed requirements.
- Keep company, authorized-person and registration information updated.
- Respond to CPCB/SPCB/PCC queries and correct discrepancies when required.
- Maintain traceability of plastic packaging and EPR compliance transactions.
- Monitor amendments, portal notices and applicable compliance deadlines.

3. Typical Compliance Workflow

Stage	Compliance Activity
1	Identify PIBO category and applicable registration authority.
2	Compile company, GST/PAN, authorized-person and packaging information.
3	Register/link the entity on the current CPCB Common EPR Portal as applicable.
4	Submit accurate plastic packaging sales/procurement/consumption information.
5	Review the system-generated or applicable annual EPR obligation/target.
6	Fulfil the applicable obligation through permitted compliance mechanisms.
7	Maintain transaction, invoice and EPR certificate/credit evidence.
8	File applicable annual returns and respond to regulatory queries.
9	Review the next compliance year and update data/targets as required.

4. Compliance Records to Maintain

• GST and company registration records

• Company PAN and applicable CIN/business constitution documents

• Authorized-person identification and portal details

• Plastic packaging product/category records

• Sales, procurement, import and packaging quantity records

• Relevant purchase/import/sales invoices

• EPR registration and amendment records

• EPR certificate/credit and transaction records

• Annual return/report submissions and acknowledgements

• Authority correspondence, query responses and supporting evidence

5. Common Compliance Risks

• Mismatch between GST/PAN/company information and portal data.

• Incorrect plastic packaging category or quantity reporting.

• Unsupported or unreconciled sales/procurement figures.

• Failure to monitor annual EPR obligations.

• Missing supporting invoices or transaction evidence.

• Late filing or incomplete reporting.

• Failure to verify migrated data after the 2026 portal transition.

• Using outdated portal instructions instead of current CPCB/Common EPR Portal notices.

6. Mumbai & Maharashtra Support

Equal Consultancy Services can provide consultancy support for EPR Plastic Registration and Plastic Waste Management Compliance for businesses operating in Mumbai, Greater Mumbai, Navi Mumbai, Thane and Maharashtra, including documentation, data preparation, portal support and compliance coordination.

7. 2026 Portal Reference

CPCB's legacy Plastic EPR Portal notice states that operations ceased from 28 June 2026 and data was migrated to the Common EPR Portal. To link an existing account, CPCB instructs users to use the same Authorized Person PAN and Company PAN as the previous account, with PAN details matching exactly.

Official sources: CPCB Plastic EPR Portal, CPCB Guidance Manual and CPCB Plastic Waste Management dashboard.