

### **Which entities have to seek registration under the Extended Producer responsibility obligations?**

The amended rules of 2024 have provided that the following entities shall register on the centralised portal developed by the CPCB namely

- I. Producer (P) including micro and small enterprises as defined under the Micro, Small and Medium Enterprises Development Act, 2006.
- II. Importer
- III. Brand owner
- IV. Plastic waste processor engaged in recycling, waste to energy, waste to oil and industrial composting.
- V. Manufacturers of items made from compostable plastics or biodegradable plastics.

It has been provided in the amendment rules of 2022 (GSR 133E dated 16-02-2022) that the designated entities required to seek a registration will not carry on any business without any registration obtained through online portal of the CPCB and shall also not deal with any entity not registered through online centralised portal developed by the Central Pollution Control Board.

In the event of concealment of information or submission of false information or any deviation from the conditions stipulated while obtaining registration under these guidelines, the registration would be revoked after giving a proper opportunity to be heard. The entities whose registration has been revoked shall not be able to register afresh for the period of registration.

The definition of "Producer" needs to be clarified because of being drastically different in the guidelines of Feb. 2022 (Schedule II) which includes Industries using plastic packaging for packing their products in the definition of "Producer" and the amendment of 2024 which excludes Industries using plastic packaging for packing their products from the ambit of being "Producers".