

## THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.  
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Senior Vice President

**MAYUR D. SHAH**  
Vice President - Finance

**AKSHAT LADHA**  
Vice President (West Zone)

**LALIT KUMAR SINGH**  
Vice President (North Zone)

**ANIL REDDY VENNAM**  
Vice President (South Zone)

**ASHOK AGARWAL**  
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Ref. No. AIPMA/ RC/ 2020-2022

19th April 2021

**Dr. Prashant Gargava**  
**Member Secretary**  
**Central Pollution Control Board**  
**Parivesh Bhawan, East Arjun Nagar, Delhi-110032**

**Subject: EPR -SOP -Meeting on 16th April 2021-Feedback.**

Respected Sir,

Greetings from The All India Plastics Manufacturers Association.

We thank you for inviting AIPMA to the VC meeting held on 16th April 2021 with regard to **SOP for Registration of Producers, Importers & Brand-Owners (PIBOs) under provision of Plastic Waste Management Rules 2016.**

As you may be aware, AIPMA is a 75-year-old and the largest industry association representing Plastic industry in India. AIPMA represents more than 22000 members directly and through its affiliated industry bodies.

Kindly refer to our recent meeting with Shri Prakash Javadekar, Hon'ble Minister of Environment, Forest and Climate Change and Shri Piyush Goyal, Hon'ble Minister of Commerce and Industry on 15th April 2021 wherein we had reiterated that AIPMA is aligned & committed to the idea of Swacchh Bharat and to make sure that plastics waste is recycled. Various other issues with respect to draft PWM amendment and EPR were also discussed.

**We would like to make the following submission in response to the subject mentioned above for your kind consideration:**

1. We request you to kindly allow AIPMA to be an implementing agency (WMA) for discharging EPR liabilities on behalf of its industry members. This is because many MSME companies may not have the wherewithal to execute their EPR liabilities individually. However, through AIPMA, collective EPR is possible and feasible. This mechanism would be highly effective

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and will ensure wider EPR compliance from MSME manufacturers. While the formal EPR were awaited, AIPMA has taken initiative to do collective EPR on behalf of the industry and distributed entitlements to individual units. This give us understanding of the issues like limitations of MSME's and undue advantage being aggrieved by the Waste Collection organizations. We feel that a mandate to allow AIPMA as WMA for collective EPR will go a long way in making EPR success for Small and medium manufacturers/producers.

2. We would like to have your clarification on the following at the earliest with respect to draft SOP guidelines: -


- If a company pays money to a ULB for their infrastructure development would that be considered in lieu of their EPR obligations or will they have to pay the money & also discharge their EPR liabilities?

We shall be highly obliged if you can kindly consider our inputs / comments.

Thank you and best regards

Yours sincerely,

**For The All India Plastics Manufacturers' Association**

  
**Chandrakant Turakhia**  
President  
AIPMA

  
**Hiten Bheda**  
Chairman - Environment Committee  
AIPMA