



Dr. Ranjeet Mehta

CEO & Secretary General

8th January 2025

Shri Bharat Kumar Sharma
Member Secretary
Central Pollution Control Board (CPCB)
Ministry of Environment, Forest, and Climate Change
Parivesh Bhawan, East Arjun Nagar
Delhi-110032

Dear Shri Bharat Kumar Ji,

Urgent Appeal to CPCB for Support in Addressing Critical Challenges Faced by the Flexible Packaging Industry

The flexible packaging industry in India is a vital contributor to the nation's economy, providing efficient, sustainable, and cost-effective packaging solutions across various sectors. However, the industry is currently facing significant challenges in its interactions with the Central Pollution Control Board (CPCB), which are hindering its growth and operational efficiency.

To address these critical issues, we humbly request the CPCB's support in the following areas:

1. Extension of Deadline for Annual Return Submission:

- Many companies were unable to submit their Annual Return for the year 2023-2024 due to persistent portal issues, including OTP non-receipt and User ID account lockouts for insignificant reasons.
- We request an extension to the deadline to allow for timely compliance.

2. EPR Liability Adjustment for Unregistered Parties:

- The current system does not allow for EPR liability adjustment against sales made to unregistered parties who subsequently register on the CPCB portal.
- We urge the CPCB to implement a mechanism to facilitate such adjustments.

3. EPR Liability Adjustment for "Bill to" and "Ship to" Discrepancies:

- The current system does not allow for EPR liability adjustment when the "Bill to" party is unregistered and the "Ship to" party is registered.
- We propose a more flexible approach to accommodate such scenarios.

PHD CHAMBER OF COMMERCE AND INDUSTRY

"Voice of Industry & Trade"

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4. EPR Liability Adjustment for Unregistered "Bill to" and "Ship to" Parties:

- In cases where both the "Bill to" and "Ship to" parties are initially unregistered but the "Ship to" party subsequently sells to a registered party, we request the CPCB to allow for EPR liability adjustment based on the "Ship to" party's undertaking.

5. Registration of Intermediate Product (like film) Sellers:

- Currently, the CPCB's "SIMP" portal only allows for the registration of plastic raw material sellers.
- We urge the CPCB to expand the registration criteria to include sellers of intermediate products like films.

6. Transfer of Excess EPR Credits:

- We request the CPCB to allow for the transfer of excess EPR credits between multiple producer login accounts under the same PAN/Company.

7. Streamlining the Mobile Number Change Process:

- The current process for changing a mobile number on the CPCB portal is time-consuming and can lead to difficulties in accessing accounts.
- We request the CPCB to expedite this process.

To effectively address these pressing issues, we propose an interactive session with the CPCB to facilitate open dialogue and find practical solutions. PHDCCI will host this session at its office in PHD House as per the convenience of the CPCB.

We believe that a collaborative approach between the CPCB and the industry will help create a more conducive regulatory environment and promote sustainable packaging practices in India.

Thank you for your time and consideration. We look forward to a positive and productive dialogue with the CPCB.

With best regards,

Yours sincerely,



(Dr. Ranjeet Mehta)