

BDMAI / CPCB / 2026

8.1.2026

Shri G Thirumuthy
Director & I/C UPC
Central Pollution Control Board
PariveshBhavan
Delhi 110 032

Dear Sir

Sub: Suggestions / Inputs for Common EPR Portal
Ref: Letter No. CP/20/15/2025/-UPC-II-HO-CPCB-HO dt. 22.12.2025

Greetings from Bulk Drug Manufacturers Association of India

With reference to the above letter, we would like to submit the following suggestions / inputs, on behalf of bulk drug industries:

1. A single unified registration to be provided for all waste streams, as multiple registrations result in duplicative compliance, increased administrative burden. It helps the user in ease-of-doing-business.
2. Automated, formula-based EPR target calculation may be built into the system so that transparency is ensured.
3. Integration with GST, Customs, and other government databases is suggested, which will improve data accuracy, reduce manual reporting etc.
4. A standardized EPR credit framework across all waste streams to be adopted to prevent market distortions and ensure regulatory consistency.
5. It is suggested not to cancel once generated / utilized EPR credits retrospectively to avoid any issues at a later stage for the users.
6. If a Real-time monitoring of recycler capacity utilization is incorporated in the system, it helps in proper reporting and prevent any frauds such as over-reporting, non-compliant credit generation etc.
7. Suggested that Recycler and processor performance ratings to be visible to promote self-regulation.

8. A structured and time-bound grievance redressal mechanism to be embedded within the portal to ensure procedural fairness and uphold stakeholder confidence.
9. A detailed note may be provided in the portal / notified to the users for migration from existing portals to the common portal to avoid any compliance gaps.
10. The new common portal may be operated in parallel to the existing portals for some time, so that the transition is smooth and possibilities for missing out part compliances / credits etc., can be avoided.
11. It is suggested to make sure that only compliances status of the PIBOs is disclosed in the portal and avoid any commercially sensitive information from such disclosures.
12. It is suggested that the Common EPR Portal may function as a facilitative compliance tool rather than a control mechanism, to ensure higher compliances by the users.

We hope above suggestions may help in developing a robust portal for EPR.

We wish to bring to your notice that our Association, which is representing Bulk Drug Manufacturers in India, name is missing in your mailing list. We request you to kindly include our name, so that we will be able to extend our contribution, wherever possible.

With best regards

Ch. A.P. Rameswara Rao
Ch. A P Rameswara Rao
National President

