CENTRAL POLLLUTION CONTROL BOARD
IPC-V Division
(Q- Question; A- Answer)

Frequently Asked Questions (FAQs) on Extended Producer Responsibility (EPR) for Scrap of Non-Ferrous Metals under the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025

Q1. What is Extended Producer Responsibility (EPR) for Scrap of Non-Ferrous Metals?

A. EPR means the responsibility of the producer of non-ferrous metal products for meeting targets as per Schedule XI of the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025 (HOWM Amendment Rules, 2025).

Q2. Have EPR Rules been notified by Government?

A. The Ministry of Environment, Forest and Climate Change (MoEF&CC) vide notification no. G.S.R. 438 (E) dated 1st July, 2025 notified the EPR for Scrap of Non-ferrous Metals through the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025.

Q3. When will the HOWM Amendment Rules, 2025 come into force?

A. The rules shall come into force on the 1st day of April, 2026.

Q4. What are the Non-Ferrous Metals covered under HOWM Amendment Rules, 2025?

A. Non-ferrous metals mean Aluminum or Copper or Zinc or their Alloys for the purposes of these rules.

Q5. What is the definition of "business" under HOWM Amendment Rules, 2025?

A. "Business" means any activity of production, manufacturing, recycling, treatment and disposal, sale or import of products made of non-ferrous metals listed in Schedule-X or refurbishing of products made of non-ferrous metals allowed for refurbishing as listed in Schedule XII of the HOWM Amendment Rules, 2025.

Q6. What is "end of life" of the product?

A. "End-of-life" of the product means the time when the product including

refurbished products is no longer used for the intended purpose.

Q7. Which are the entities required to register on the online EPR portal developed for Scrap of Non-Ferrous Metals?

A. The following entities are required to register on the EPR Portal for scrap of Non-Ferrous Metals:

a) Manufacturer;
b) Producer;
c) Collection Agent;
d) Refurbisher; and
e) Recycler

The above entities have also been defined under the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025.

Q8. Whether an entity that falls under more than one category specified under Rule 45(1) is required to obtain separate registration under each applicable category?

A. Yes. In case an entity falls under more than one category specified under Rule 45(1), it shall be required to register separately under each applicable category. Accordingly, a separate registration must be obtained for every category under which the entity is covered.

For example, if an entity imports scrap of non-ferrous metals, recycles the scrap to manufacture utensils, and subsequently supplies the utensils to another entity for sale under the latter's brand name, the entity performs the functions of a Producer, Recycler, and Manufacturer. Therefore, the entity is required to obtain separate registrations under the Producer, Recycler, and Manufacturer categories, respectively.

Q9. What conditions must entities fulfill before commencing business operations and engaging in transactions with other entities?

A. No entity mentioned under Rule 45(1) of the HOWM Amendment Rules, 2025 shall carry out business without registration. The registered entities shall not deal with any other entity mentioned under the said rules unless they are also registered.

Q10. What are the Non-ferrous Metal Products covered under HOWM Amendment Rules, 2025?

A. Following non-ferrous metals products are listed in Schedule-X of the HOWM Amendment Rules, 2025:

1. Cans for beverages, aerosols and other such product
2. Packaging Foils for food, pharma and other such product
3. Doors, windows, shutters

4. Aluminium Composite Panel
5. Aluminium partitioning, grills and other such product
6. Utensils (cookware, canisters, storage and other such product)
7. Furniture tables, chairs, benches, ladders etc. including doorknobs, handles, hardware's
8. Roofing and Ceiling sheets
9 Motors, pumps, alternators and other such product (other than automobile grade)
10 Conductor cables and Wires, strips (other than automobile grade)
11. Sanitary ware and fittings
12. Electrical fittings (other than automobile grade)
13. Aluminium Alloy Bicycle
14. Transformer (other than automobile grade)
15. Electric Generator sets
16 Centralized air conditioning plants
17. Apparel products e.g. Belt Buckles, Zip, Shoes
18. Toys

Q11. What do you mean by other such product in the product category "Cans for beverages, aerosols and other such product"?

A. Other such product means similar metal cans or canisters used for storing or dispensing liquids, gases, solids or semi-liquids.

Q12. What do you mean by other such product in the product category "Packaging Foils for food, pharma and other such product"?

A. It refers to any packaging foils similar to those used in food and pharma, even if, they are used for other products such as Cosmetics packaging, Personal care items, Nutraceuticals or supplements, etc.

Q13. What do you mean by other such product in the product category "Aluminium partitioning, grills and other such product"?

A. Any similar aluminium fabricated items used in construction or interiors, such as Aluminium window frames, Aluminium railings / balustrades, Aluminium false ceiling frameworks, Aluminium facade structures, etc.

Q14. What do you mean by other such product in the product category "Utensils (cookware, canisters, storage and other such product)"?

A. Utensil or kitchenware item used for kitchen utilities such as cooking, storing, serving, handling food, etc.

Q15. What do you mean by other such product in the product category "Motors, pumps, alternators and other such product (other than automobile grade)"?

A. Other such product means blowers, industrial fans, etc. which are not covered

under E-Waste (Management) Rules, 2022 and amendment thereof.

Q16. Who is a Manufacturer under the HOWM Amendment Rules, 2025?

A. Manufacturer means a person or an entity or a company which is manufacturing any product or component or spare part of non-ferrous metals as specified in Schedule-X of the HOWM Amendment Rules, 2025.

Q17. What are the responsibilities of the Manufacturer?

A. Responsibilities of the manufacturer are:

i. Every manufacturer shall register itself on the portal.
ii. The manufacturer shall collect scrap of non-ferrous metals and waste generated during the manufacture of products and their components or consumables or parts or scraps and ensures its recycling or disposal.
iii. A manufacturer shall use the domestically recycled materials for the manufacture of new product as per the Schedule-XIII which shall be assessed in respect of the total weight of the new product. Provided that where it is not possible to meet the obligation in respect of use of domestically recycled materials on account of statuary or technical requirements, the exemption may be granted by the Central Pollution Control Board on case to case basis.
Note 1. Statutory requirement means the case where use of recycled material is not allowed by any other law in force.
Note 2. Technical requirement means the case where use of recycled material renders the product unfit for intended use.
iv. The manufacturer shall file a half yearly return in the form on the portal on or before 31st October of every year and shall also file annual return on or before 30th June following the financial year to which that return relates.
v. In the case of the manufacturer is having multiple offices, it may file a single annual return combining information from all the offices.
vi. The liability of minimum use of recycled material shall be ensured through purchase of recycled material from the registered recycler only.

Q18. Who is a producer under HOWM Amendment Rules, 2025?

A. Producer means any person or entity, irrespective of the selling technique used such as dealer, retailer, e-retailer, who, –

i. manufactures and offers to sell products made up of non-ferrous metals and their components or consumables or parts or spares under its own brand, using non-ferrous metals; or
ii. offers to sell under its brand products made up of non-ferrous metals and their components or consumables or parts or spares produced by other manufacturers or suppliers, using nonferrous metals; or

iii. offers to sell imported products made up of non-ferrous metals and their components or consumables or parts or spares under their own brand or original brand, using non-ferrous metals; or
iv. who imports used devices or products or scrap of non-ferrous metals.

Q19. What are the responsibilities of producers?

A. Responsibilities of producer:

i. Every producer of scrap of non-ferrous metals shall register itself on the portal.
ii. A producer shall file on the portal a half yearly returns in the form provided on the portal on or before 31st October of every year and shall also file an annual returns in the form provided on the portal on or before 30th June following the financial year to which that return relates.
iii. A producer shall create awareness through media, publications, advertisements, posters or any other means of communication.
iv. The producer shall ensure environmentally sound management of scrap of non-ferrous metals and the collection and transport of scrap of non-ferrous metals.
v. Every producer shall have responsibility of recycling of the scrap of non-ferrous metals and shall meet the EPR target specified in Schedule-XI in respect of the products listed in Schedule-X, and in doing so they may also take help of third party such as collection agent or dealer: Provided that the responsibility of EPR targets shall lie entirely on the producer only.
vi. A producer may fulfil its EPR target by purchasing EPR certificates through the online portal from registered recyclers.

Q20. Who is a refurbisher under HOWM Amendment Rules, 2025?

A. Refurbisher means any person or entity repairing or assembling used product made of non– ferrous metals as listed in Schedule- XII for extending its working life over its originally intended life and for same use as originally intended, and selling the same in the market as the same brand or in new brand name.

Q21. What are the responsibilities of refurbisher?

A. Responsibilities of refurbisher:

i. Every refurbisher shall register itself on the portal and may collect scrap of non-ferrous metals/ used product of non-ferrous metals as listed in Schedule-XII and their components or consumables or parts or scrap and ensure its refurbishing.
ii. The refurbisher shall file on the portal a half yearly returns in the form provided on the portal on or before 31st October of every year and shall file an annual returns in the form provided on the portal on or before 30th June following the financial year to which that return relates.

iii. The refurbisher shall ensure that the used product made of non-ferrous metals listed in Schedule-XII is refurbished in environmentally sound manner.

iv. The refurbisher shall ensure that waste generated during the process of refurbishing is handed over to the waste to registered recycler or disposal facility.

Q22. What are the products made of non-ferrous metals allowed for refurbishing covered under EPR?

A. The list of products made of non-ferrous metals allowed for refurbishing covered under EPR is as follows:

i. Doors, windows, shutters
ii. Aluminium Composite Panel
iii. Aluminium partitioning, grills and other such product
iv. Furniture tables, chairs, benches, ladders etc. including doorknobs, handles, hardware's
v. Motors, pumps, alternators and other such product
vi. Sanitary ware and fittings
vii. Electrical fittings
viii. Aluminium Alloy Bicycle
ix. Transformer
x. Electric Generator sets
xi. Centralized air conditioning plants

Q23. Who is a recycler under HOWM Amendment Rules, 2025?

A. Recycler means any person or entity engaged in the process of recycling scrap of non- ferrous metals.

Q24. What are the responsibilities of recycler?

A. Responsibilities of recycler:

i. Every recycler shall register itself on the portal.
ii. The recycler shall ensure that the facility and recycling processes are in accordance with these rules.
iii. The recycler shall ensure that no damage is caused to the environment during storage, transportation and recycling of scrap of non-ferrous metals.
iv. The recycler shall ensure that the residue generated during the recycling process is disposed of in accordance with prevalent rules and regulations.
v. The recycler shall file on the portal a half yearly returns in the form provided on the portal on or before 31st October of every year and shall also file an annual returns in the form provided on the portal on or before

30th June following the financial year to which that return relates.

vi. The recycler shall maintain a record of scrap of non-ferrous metals received by it and the quantity of scrap recycled, not recycled or disposed of and upload such record on the portal on regular basis.

vii. The recycler shall ensure that the fractions or material which cannot be recycled in its facility are sent to other registered recyclers where it can be recycled.

Q25. Who is a collection agent under HOWM Amendment Rules, 2025?

A. Collection agent means a person or entity that collects scrap of non-ferrous metals.

Q26. What are the responsibilities of a collection agent?

A. Responsibilities of collection agent:

i. The collection agents shall register itself on the portal and shall collect end of life (scrap of non-ferrous metals from the manufacturer, producers, bulk consumers and supply to the registered recycler and upload information relating thereto on the portal.

ii. The collection agent shall file on the portal a half yearly returns in the form provided on the portal on or before 31st October of every year and shall also file an annual returns in the form provided on the portal on or before 30th June following the financial year to which that return relates.

Q27. Who is a Bulk Consumer?

A. Bulk Consumer means any entity using at least one thousand tons of non-ferrous metal products listed in Schedule-X, at any point of time in the particular financial year, and includes e-retailer.

Q28. What are the responsibilities of a bulk consumer?

A. Responsibilities of bulk consumer:

i. set up collection points to facilitate collection agents in the collection and transportation of scrap of non-ferrous metals from their premises; and

ii. ensure that scrap of non-ferrous metals generated by them shall be handed over only to registered recyclers or refurbisher or producers or collection agents.

Q29. What action may be taken against a registered entity for furnishing false information or wilfully concealing information under the HOWM Amendment Rules, 2025?

A. Where any registered entity furnishes false information or wilfully conceals information for registration or return or report or information required to be

provided or furnished under HOWM Amendment Rules, 2025, the registration of such entity may be revoked by the Central Pollution Control Board for a period of up to five years after giving the entity concerned an opportunity of being heard, and in addition, environmental compensation charges may also be levied as per Rule 60 of the said rules.

Q30. How is an EPR certificate generated, and what formula is used for calculating the quantity eligible for generation of an EPR certificate under the HOWM Amendment Rules, 2025?

A. The CPCB will generate an EPR certificate through the online portal in favor of a registered recycler, which shall be calculated as per the following formula, namely: –

$$Q_{EPR} = Q_p \times C_f$$

Where,

Q_{EPR} : the quantity eligible for generation of the certificate
Q_p : the quantity of the end product
C_f : the conversion factor of each end product (quantity of inputs required for production of one unit of output)

Conversion factor C_f for each end product shall be determined by the CPCB based on the technologies and other factors

Q31. What is a conversion factor and how is it calculated?

A. Conversion factor (C_f) is the ratio of the quantity of non-ferrous metal scrap input to the furnace to the quantity of recycled end product (yield) produced. It is calculated using the following formula:

$$C_f = \frac{\text{Quantity of input non ferrous metal scrap to the furnance}}{\text{Quantity of recycled end product produced}}$$

For example, if 100 tonnes of aluminium scrap are processed and yield 90 tonnes of recycled end product (e.g., aluminium ingots), the conversion factor will be

$C_f = 100/90 = 1.11$

Q32. How is an EPR certificate calculated for a single-metal product, such as aluminium cans?

A. Consider a batch of 100 tonnes of aluminium can scrap. After recycling, the quantity of recycled end product (Q_p) obtained is 90 tonnes. Assuming the conversion factor (C_f) is 1.11, the quantity eligible for generation of the EPR certificate (Q_{EPR}) is calculated as follows:

$$Q_{EPR} = Q_p \times C_f$$

$$Q_{EPR} = 90 \times 1.11 = 99.9 \text{ tonnes}$$

Result: An EPR certificate for 99.9 tonnes of aluminium is generated.

Q33. How is an EPR certificate calculated for a product containing multiple non-ferrous metals, such as brass utensils?

A. For products with mixed metal compositions, the EPR certificate is generated separately for each constituent non-ferrous metal based on its percentage composition in the recycled end product.

For example, consider 100 tonnes of brass utensil scrap that yields 95 tonnes of brass ingots after recycling. Assume that the composition of the brass ingots is 60% copper and 40% zinc, and that the conversion factor (C_f) for both metals is 1.05.

The quantity eligible for generation of the EPR certificate for each metal is calculated as follows:

Copper Certificate:

$$Q_{EPR} = (95 \times 0.60) \times 1.05 = 59.85 \text{ tonnes}$$

Zinc Certificate:

$$Q_{EPR} = (95 \times 0.40) \times 1.05 = 39.90 \text{ tonnes}$$

Result: EPR certificate is generated for 59.85 tonnes of copper and 39.90 tonnes of zinc.

Q34. How are EPR certificates generated for complex electrical items such as DC motors?

A. Consider a batch of 1,000 tonnes of scrap DC motors exceeding 750 W in capacity. The scrap contains 25% aluminium, 22% copper, and 3% zinc. After recycling, the quantities of recycled end products obtained are 225 tonnes of aluminium ingots, 200 tonnes of copper ingots, and 27 tonnes of zinc ingots. Assuming a conversion factor (C_f) of 1.1 for all three metals, the quantity eligible for generation of EPR certificates (Q_{EPR}) is calculated as follows:

Aluminium (Q_{EPR}): $225 \times 1.1 = 247.5$ tonnes

Copper (Q_{EPR}): $200 \times 1.1 = 220$ tonnes

Zinc (Q_{EPR}): $27 \times 1.1 = 29.7$ tonnes

Result: EPR certificate is generated for 247.5 tonnes of aluminium, 220 tonnes of copper, and 29.7 tonnes of zinc.

Q35. Does the average life of a product affect the EPR certificate generation?

A. No, the average life (e.g., say, 1 year for Cans or 20 years for Doors) is used to calculate a producer's liability timeline, but it does not enter the formula for generating the certificate. The certificate generation is strictly based on the recovered quantity (Q_p) and the conversion factor (C_f) at the time of recycling.

Q36. Are EPR certificates issued based on the type of finished product recycled or the weight of the specific non-ferrous metal recovered?

A. Certificates are issued based on the weight of the specific non-ferrous metal (Aluminium, Copper, or Zinc) recovered, which is then used by producers to meet the liability generated by their specific products listed in Schedule X.

Q37. What is the validity time period of the EPR certificate?

A. The validity of the EPR certificate shall be 02 years from the end of the financial year in which it was generated and the expired certificate automatically extinguished after the period unless extinguished earlier as per these rules.

Q38. What are the purpose of creating online portal?

A. The Central Pollution Control Board shall establish an online portal for the registration and filing of half yearly and annual returns, fulfilling and transaction of extended producer responsibility certificate and sharing of other relevant information.

Q39. What are the EPR obligations of producers?

A. The EPR obligations of producers for recycling of products made up of non-ferrous metals as per Schedule-XI of the HOWM Amendment Rules, 2025 given in the table below:

Year (Y)	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33 onwards
Recycling Target (by weight)	10%	10%	30%	30%	50%	50%	75%
	for the quantity made of NFM in year Y-X, where X is avg. life of product						
Note: i. Units established after 1st April, 2026, EPR obligation will start after two years; ii. EPR obligation for importers of used devices or products or scrap of NFM: 100% of NFM imported in year (Y-1); iii. Recycling target may be reviewed and increase after the end of year 2033-34; and iv. Avg. life of products made of Al or Cu or Zn or their alloys shall be specified by CPCB.							

Q40. How do I determine which year's sales my current obligation is based on?

A. The obligation is calculated for the quantity of NFM in the year Y-X,

where, Y = The current reporting year; and
X = The Average Life of the product as specified by CPCB

Example: If you are calculating your target for 2026-27 for "Cans for beverages" (say, Average Life = 1 year), your 10% target is based on the NFM weight you placed on the market in 2025-26.

Q41. How is the EPR liability calculated for a product with a 1-year life span (e.g., Beverage Cans)?

A. For products with an Average Life (X) of 1 year:
Target Year (Y-1): If the current year is 2026-27, the target is based on sales from 2025-26.
Calculation: 10% of the NFM quantity placed on the market in 2025-26.

Q42. How is the liability calculated for a product with a 5-year life span (e.g., Utensils)?

A. For products with an Average Life (X) of 5 years:
Target Year (Y-5): If the current year is 2026-27, the target year is 2021-22.
Calculation: 10% of the NFM quantity placed on the market in 2021-22.

Q43. How is the liability calculated for a product with a 10-year life span (e.g., Hardware/Tools)?

A. For an Average Life (X) of 10 years:
Target Year (Y-10): If the current year is 2026-27, the target year would be 2016-17.
Calculation: 10% of the NFM quantity placed on the market in 2016-17.

Q44. How will the EPR obligation be implemented for new units established after the rules come into effect?

A. For units established on or after 1st April, 2026, the EPR obligation will not apply immediately. Such units will become liable to fulfill their EPR obligations only after completing two years of operation from the date of commencement of their operations.

Q45. What are the Extended Producer Responsibility (EPR) obligations of importers of scrap of non-ferrous metals, other than products listed in Schedule X of the HOWM Amendment Rules, 2025?

A. The Extended Producer Responsibility (EPR) obligation of an importer of scrap of non-ferrous metals in the year (Y) shall be 100% of the non-ferrous metals imported in the year (Y–1). The import of such scrap shall continue to be governed by the applicable import laws, rules, and regulations.

Q46. Illustrate the obligations for the Importers of scrap of non-ferrous metals?

A. Suppose a company imports 100 MT of scrap in a particular financial year and after sorting, the scrap contains 95 MT of non-ferrous metals content, then the obligations in the next financial year is 95 MT.

Q47. How does the purchase of EPR and refurbishing certificates affect a producer's liability and targets?

A. As soon as the producer purchases the extended producer responsibility

certificate, it will automatically be adjusted against his liability and priority in adjustment shall be given to earlier liability and the extended producer responsibility certificate so adjusted shall be automatically extinguished and cancelled.

As soon as producer purchases refurbishing certificates, its extended producer responsibility target shall be deferred automatically for the relevant quantity of the product, for the duration as laid down by the Central Pollution Control Board.

Q48. Are Manufacturers, Producers, Collection Agents, Refurbishers, and Recyclers required to file half-yearly and annual returns on the online portal?

A. Yes. Manufacturers, Producers, Collection Agents, Refurbishers, and Recyclers are required to file half-yearly returns in the prescribed form on the online portal on or before 31st October of every year. They shall also file an annual return in the prescribed form on the online portal on or before 30th June following the financial year to which the return relates.

Q49. What are orphaned products?

A. Orphaned products mean non-branded products listed in Schedule-X of the HOWM Amendment Rules, 2025; or those produced by a company which has closed its operation.

Q50. What are the responsibilities of the Central Pollution Control Board?

A. Responsibilities of Central Pollution Control Board:

i. ensure operation and maintenance of portal and monitoring of extended producer responsibility compliance;
ii. ensure coordination with State Pollution Control Boards;
iii. prepare and issue Guidelines and Standard Operating Procedures for registration on the portal, extended producer responsibility certificate generation, fulfilment of obligation, filing of returns and for collection, storage, transportation, recycling and disposal of scrap of non-ferrous metals under HOWM Amendment Rules, 2025 and also on any other issue for smooth implementation of the said rules from time to time;
iv. prepare and issue necessary forms or returns for implementation of the aforementioned rules;
v. conduct random checks for ascertaining compliance of aforementioned rules and for that purpose the Board may take the help of any other agency and take necessary action under the provisions of the Act and aforementioned rules, as may be considered appropriate;
vi. take action against violation of aforementioned rules;
vii. conduct training programmes to develop capacity building including that of State Pollution Control Board and Urban Local Bodies officials of State Governments;

viii. conduct awareness programmes; and
ix. prepare and submit an annual report to the Central Government containing the details of information relating to implementation of aforementioned rules.

Q51. What are the responsibilities of the Department of Industry in the State and Union territory or any other relevant Government agency of the State Government or the Union territory Administration?

A. Responsibilities of Department of Industry in the State and Union territory or any other relevant Government agency of the State Government or the Union territory Administration:

i. ensure earmarking or allocation of industrial space or shed for collection of scrap of non-ferrous metals and recycling units in the existing and upcoming industrial parks, estates and industrial clusters;
ii. ensure recognition and registration of workers involved in recycling;
iii. undertake industrial skill development activities for the workers involved in recycling of scrap of non-ferrous metals; and
iv. undertake annual monitoring and ensure the safety & health of workers involved in re-cycling of scrap of non-ferrous metals.

Q52. What are the responsibilities of Municipalities and Local Bodies?

A. Responsibilities of Municipalities and Local Bodies:

i. facilitate manufacturers, producers, bulk consumers or collection agents to set up a large number of collection points for collection of scrap of non-ferrous metals in their jurisdictional areas;
ii. ensure that scrap of non-ferrous metals, if found mixed with Municipal Solid Waste, is properly segregated, collected and channelized to registered entities involved in recycling;
iii. conduct training sessions to develop the capacities of the Urban Local Bodies; and
iv. ensure that scrap of non-ferrous metals pertaining to orphan products is collected and channelized to the registered recycler.

Q53. What are the responsibilities of State Pollution Control Boards and Pollution Control Committees?

A. Responsibilities of State Pollution Control Boards and Pollution Control Committees:

i. ensure proper implementation of these rules in coordination with the Central Pollution Control Board;

ii. facilitate the setting up of collection points by the collection agents;
iii. monitor the compliance of extended producer responsibility as directed by the Central Pollution Control Board;
iv. conduct random inspection of producers or collection agents or refurbisher or recyclers; and
v. create awareness through media, publications, advertisements, posters or any other means of communication; and perform any other function by the Central Government under these rules.

Q54. What is the role of Bureau of Indian Standards (BIS)?

A. The Bureau of Indian Standards shall revise existing standards and issue necessary standards with respect to these rules within six months from the date of commencement of the Hazardous and Other Wastes (Management and Transboundary Movement) (Amendment) Rules, 2025.

Q55. Is there any provision for environmental compensation under the HOWM Amendment Rules, 2025? If so, how may the environmental compensation collected be utilized?

A. Yes. Where any manufacturer, producer, collection agent, refurbisher and recycler either registered or not registered fails to comply with any provisions of these rules, thereby causing loss, damage or injury to environment or public health, he shall be liable to pay environment compensation in accordance with the guidelines issued by the Central Pollution Control Board.

The amount of environmental compensation paid under HOWM Amendment Rules, 2025 shall be utilised for restoration of loss, damage or injury caused to environment or public health through environmentally sound management including collection and recycling or end of life disposal of uncollected and non-recycled or non-end of life disposal of scrap of non-ferrous metals and remediation or removal of contamination occurred due to unscientific management of scrap of non-ferrous metals.

Q56. Is there any provision to return the amount of Environment Compensation paid by entities?

A. Yes. Where manufacturer or producer or collection agent or refurbisher or recycler subsequently complies with the obligation, the amount of environment compensation paid by him may be returned to him, if the obligation is compiled.

a) within one year, 85% of the environment compensation;
b) within two years, 60% of the environment compensation;
c) within three years, 30% of the environment compensation; and
d) after three years no environmental compensation shall be returned to the producer.

Q57. What penalties may be imposed on a recycler for furnishing false information?

A. If any false information is furnished resulting in over generation of extended producer responsibility certificates by recycler above five per cent of the actual recycled scrap of non-ferrous metals, it may result in revocation of registration temporarily and imposition of environmental compensation which shall not be returnable. Violation of provisions of these rules for three times or more shall result in permanent revocation of registration over and above the environmental compensation charges.

Q58. What is the process of Verification and Audit?

A. The Central Pollution Control Board by itself or through a designated agency shall audit the manufacturer, producers, collection agents, refurbisher and recyclers through inspection and periodic audit, as deemed appropriate and take actions against violations under rule 60 of HOWM Amendment Rules, 2025.

Q59. Are there any fees charged by CPCB?

A. Yes. As per Rule 45(8) and 62(2) of the HOWM Amendment Rules, 2025, Central Pollution Control Board from registered entities may charge registration fees, annual maintenance charges, and audit fees.

Q60. What are the registration fees applicable to manufacturers, producers, recyclers, refurbishers, and collection agents under the EPR framework for non-ferrous metals?

A. The following one-time Registration Fee shall be payable at the time of registration on the EPR portal:

Capacity of scrap/material of non-ferrous metal handled (TPA)	Registration Fees (in ₹)			
	Manufacturer/ Producer	Recycler	Refurbisher	Collection Agent
<500	2,500	1,500	1,000	500
500-1,000	5,000	3,000	2,000	1,000
1,001-5,000	25,000	15,000	10,000	5,000
5,001-10,000	50,000	30,000	20,000	10,000
10,001-20,000	1,00,000	60,000	40,000	20,000
20,001-50,000	3,75,000	2,50,000	1,50,000	1,00,000
50,001-1,00,000	7,50,000	5,00,000	3,00,000	2,00,000
>1,00,000	10,00,000	7,50,000	5,00,000	3,00,000

Q61. What amendment charges are payable in case of enhancement of registered capacity?

A. If any entity, has made any enhancement in the capacity, then 10% of the

registration fees will be charged at the time of the updation on the portal.

Q62. Is an Annual Compliance Fee (ACF) payable under the EPR framework?

A. Annual Compliance Fee (ACF) which consolidates the following shall be payable annually at the time of filing of the Annual Return:

a) Portal maintenance cost;
b) Compliance monitoring;
c) Data analytics;
d) Audit fee; and
e) Institutional and Administrative expenses.

It is calculated using the following formula:

$$ACF_n = 0.25 \; x \; RF \; x \; \frac{WPI_n}{WPI_{base}}$$

Where,

RF : Registration Fee
WPI_n : Wholesale Price Index for current year (Govt. notified)
WPI_{base} : WPI for base year 2026-27

Q63. Is there any provision for oversee the overall implementation, monitoring and supervision of EPR rule?

A. Yes, there shall be a Steering Committee constituted by the Central Government to oversee the implementation of extended producer responsibility under HOWM Amendment Rules, 2025, consisting of the following members, namely: -

a) the chairperson of the Central Pollution Control Board-Chairperson;
b) one representative each of the Ministries or Department of the Central Government dealing with-
   i. Environment, Forest and Climate Change
   ii. Mines;
   iii. Steel;
c) one representative each representing the manufacturer and producer associations;
d) one representative of recycler associations
e) one representative of the Jawaharlal Nehru Aluminium Research Development and Design Centre, Nagpur, Maharashtra 440023;
f) one representative of the State Pollution Control Board or Pollution Control Committee on rotation basis;
g) one representative of Urban and Rural Departments of States Government or Union territory Administrator on rotation basis;
h) Member Secretary of the Central Pollution Control Board;
i) The in charge of the Division of the Central Pollution Control Board dealing with non- ferrous metals - Member Convener

Q64. How are disputes relating to the implementation of Extended Producer Responsibility (EPR) resolved under the HOWM Amendment Rules, 2025?

A. The Steering Committee shall decide upon the disputes arising from time to time on the representations received in this regard, and shall refer to Central Government any substantial issue arisen or pertaining to HOWM Amendment Rules, 2025.