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MINISTRY OF ENVIRONMENT, FOREST AND CLIMATE CHANGE

EPR for importers and foreign companies selling into India

India's extended producer responsibility (EPR) rules put the duty on whoever brings a product into India, or in some regimes on whoever sells imported goods. That company registers on the Central Pollution Control Board (CPCB) portal and meets a target. Customs checks registration on some imports, such as plastic packaging. No rule says whether a foreign company can register directly.

EPR FOR IMPORTERS comes from India's EPR rules, which cover imported goods. The battery, plastic packaging and vehicle rules name the importer. The e-waste, tire, used oil and non-ferrous metal rules name whoever sells the imported goods in India, and some also name importers of used goods, used oil or waste. Each obligated company registers and meets a yearly target.

KEY FACTS

LAW

Environment (Protection) Act, 1986

PLASTIC EPR

Plastic Waste Management (Amendment) Rules, 2022

E-WASTE EPR

E-Waste (Management) Rules, 2022

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Which importers carry EPR in India?

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Which importer each EPR regime names as an obligated company

Regime	Which importer is obligated	Rule
Plastic packaging	Importers of plastic packaging, goods in plastic packaging, films and preforms, or plastic raw material such as resin	Plastic Waste Management Rules, Schedule II, paragraph 4(b) and (e)
E-waste	Sellers of imported equipment on the rules' Schedule I list, and importers of used equipment	E-Waste (Management) Rules, 2022, rule 3(1)(t)(iii) and (iv)
Batteries	Importers of batteries or of equipment containing batteries	Battery Waste Management Rules, rule 3(1)(u)(iii)
Waste tires	Sellers of imported new tires, automakers importing new tires for vehicles sold in India, and importers of vehicles fitted with new tires or of waste tires	Hazardous and Other Wastes Rules, Schedule IX, paragraph 1(e)
Used oil	Sellers of imported base oil or lubricating oil, and importers of used oil	Hazardous and Other Wastes Rules, rules 25(k) and (r), and 26(1)
End-of-life vehicles	Importers of vehicles	End-of-Life Vehicles Rules, 2025, rule 3(1)(q)(iii)
Non-ferrous metal scrap, from April 1, 2026	Sellers of imported aluminum, copper or zinc products, and importers of used products or scrap of those metals	Hazardous and Other Wastes Rules, rule 44(o)

The plastic rules leave out micro and small producers and brand owners, but not importers. For how registration, targets and certificates work, see our guide to MoEFCC rules for companies in India and EPR registration in India.

Can a foreign company register for EPR in India?

No rule we read says whether a company outside India can register for EPR directly. The rules define obligated companies by what they do in India, such as importing or selling. Plastic registration asks for a Permanent Account Number (PAN), India's tax number, and for a company its Corporate Identity Number (CIN) (Schedule II, paragraph 6.6).

Some import service pages say foreign companies can't register. No rule we read says that, and none says they can. The numbers come from G.S.R. 318(E) of April 27, 2023.

Who carries EPR when a subsidiary or distributor imports your goods?

The company that imports your goods into India carries EPR, whether it's your Indian subsidiary or an independent distributor. When a subsidiary and three distributors all import, each is an obligated producer or importer for what it brings in. The rules ask every producer or importer to apply for registration itself.

A plastic importer applies to its state board if it works in one or two states, and to CPCB if more (rule 13(2)). A battery producer registers with CPCB (rule 4(4)).

The e-waste rules also reach a reseller: a producer includes anyone who "offers to sell imported electrical and electronic equipment" (rule 3(1)(t)(iii)). See our e-waste EPR guide.

Do you need EPR registration to import for your own use or for a registered producer?

You don't need e-waste producer registration to import electronics listed in Schedule I of the e-waste rules in three cases, set out in CPCB's clarification of December 28, 2023: for a registered producer, for your own use, or to make goods you sell to registered producers. Batteries differ: a battery producer carries EPR for batteries it uses itself.

- Equipment not in Schedule I: no producer registration (CPCB clarification, paragraph 1).
- Schedule I equipment for a registered producer: give Customs your agreement with it, its EPR certificate, its letter and a self-declaration, with proof you emailed copies to CPCB (paragraph 2).
- Schedule I equipment for your own use: give Customs a self-declaration on letterhead that it isn't for sale, with proof a copy went to CPCB (paragraph 3).
- Batteries: a producer carries EPR for batteries it puts to self-use (rule 4(1)).
- Plastic packaging: the rules define an importer as a person who imports "for commercial use" (rule 3(k)). The documents we read say no more about own use.

What does Customs check for EPR when goods arrive in India?

Customs checks EPR papers on plastic packaging and plastic raw material, under a September 9, 2026 instruction from the Central Board of Indirect Taxes and Customs (CBIC). CPCB has also asked Customs to check them on batteries, base oil and lubricants, vehicles, and listed electronics brought in for a registered producer or for own use.

What Customs is asked to see under India's EPR rules, as of November 8, 2026

Goods	What Customs is asked to see	Source
Plastic packaging, packaged goods, plastic raw material	The EPR registration certificate	CBIC Instruction No. 15/2026-Customs, September 9, 2026, paragraph 4

Batteries and equipment containing batteries	The CPCB registration certificate	CPCB letter to Customs, December 23, 2022
Base oil and lubricating oils	CPCB registration, or proof of an application	CPCB letter to Customs, July 2, 2024
Vehicles	CPCB registration, or proof of an application	CPCB letter to Customs, March 5, 2026
Schedule I electronics for a registered producer	The producer's papers and a self-declaration, copied to CPCB	CPCB clarification, December 28, 2023, paragraph 2
Schedule I electronics for a consumer's own use	A self-declaration, copied to CPCB	CPCB clarification, December 28, 2023, paragraph 3

While registration is pending, the oil and vehicle letters in the table accept proof of an application. CPCB asked the same for plastic packaging in a letter of March 24, 2023, but CBIC's 2026 instruction speaks only of registration certificates. A battery producer is deemed registered if CPCB doesn't refuse it within two weeks (rule 11(3)), and a plastic applicant thirty days after a complete application (rule 13(8)).

Whether goods may be imported at all is set by India's import policy. For clearance at the port, see our guide to Indian customs.

Is a plastic EPR certificate showing one year's validity still good at Customs?

A plastic EPR certificate showing one year's validity is still good at Customs. CBIC's Instruction No. 15/2026-Customs tells officers to treat it as a one-time registration that needs no renewal, and to accept it as proof of registration for clearance (paragraph 4(b)). Plastic registration has been one time since October 30, 2023.

An April 2023 change made registration valid for one year, then for three years (rule 13(9), as substituted by G.S.R. 318(E)). G.S.R. 807(E) of October 30, 2023 made registration one time and omitted that sub-rule. See EPR certificates for plastic imports at customs.

Which EPR rules apply to a battery-powered device in plastic packaging?

A battery-powered device in plastic packaging can carry three EPR duties at once, each under its own rules. The device falls under the e-waste rules if Schedule I lists it, its battery under the battery rules, and its packaging under the plastic rules. The e-waste rules leave batteries and packaging plastics to their own rules (rule 2).

EPR rules for each part of an imported battery-powered device

Part of the product	Regime	Guide
The device, if Schedule I lists it	E-Waste (Management) Rules, 2022	E-waste EPR in India
Its battery, fitted or packed with it	Battery Waste Management Rules, 2022	Battery EPR in India
Its plastic packaging	Plastic Waste Management Rules, 2016, Schedule II	Plastic packaging EPR in India

The battery rules count "equipment containing Battery" as a battery import (rule 3(1)(u)(iii)), so the device's importer is its battery producer too.

Do plastic recycled content targets apply to importers?

Plastic packaging importers carry recycled content targets by category. For 2026-27 they are 40% for rigid packaging (Category I), 10% for flexible packaging (Category II) and 5% for multilayered packaging (Category III). Recycled plastic already in imported material doesn't count, so an importer buys certificates from companies that beat their own targets.

The targets rise to 50%, 20% and 10% in 2027-28, and 60%, 20% and 10% from 2028-29 (Schedule II, paragraph 7.3(d), as substituted on March 31, 2026). They don't apply where a law, rule or mandatory Indian standard bars recycled plastic in the packaging, and the importer cites that rule in its annual return. See plastic packaging EPR in India.

Does EU registration for packaging, batteries or WEEE count in India?

No Indian rule we read recognizes an EPR registration made in the European Union (EU) or anywhere else. India's duties attach to the company that imports or sells the goods in India. That company registers on CPCB's portal and meets India's targets. The Indian rules don't mention registrations for waste electrical and electronic equipment (WEEE) abroad.

How IndusDesk helps with EPR for importers

We watch the authorities, tell you what each change means for your products and plans, represent you while a decision is still open, and carry the work through, with every step on record in your workspace.

For foreign brands, their Indian subsidiaries and distributors, we work out which regimes your products fall under and who in your chain carries each. We prepare registration applications, returns and replies to notices, and track targets and certificates. We don't buy, sell or broker EPR certificates, and we never promise a registration: CPCB and the state boards decide.

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Latest notices and insights

- Customs to accept one-year EPR certificates as one-time registration for plastic importers (Notice, September 9, 2026)
- EPR plastic certificates accepted as one-time registration (Insight, September 9, 2026)

Frequently asked questions

Can a company with no Indian entity hold an Indian EPR registration?

No rule we read answers that either way. The plastic form asks for Indian tax and company numbers (Schedule II, paragraph 6.6), and the duty sits with the company that imports or sells in India.

If our Indian distributor imports our products, who carries the EPR?

The distributor does, as the importer. Under the e-waste, tire, used oil and non-ferrous metal rules, a company that sells imported goods in India is a producer too.

Does importing laptops for our own offices need e-waste EPR registration?

Not as an e-waste producer. Give Customs a self-declaration that the laptops are for your own use, copied to CPCB (CPCB clarification of December 28, 2023, paragraph 3). The battery rules differ: importing equipment containing batteries makes you a battery producer, including for batteries you use yourself (rules 3(1)(u)(iii) and 4(1)).

Which CBIC instruction tells Customs to check plastic EPR registration?

Instruction No. 15/2026-Customs of September 9, 2026. Officers clear plastic packaging and plastic raw material imports on verified EPR registration (paragraph 4(a)).

Do we have to renew a plastic EPR registration every year?

No. Plastic registration has been one time since October 30, 2023 (G.S.R. 807(E), rule 13(2)), and CBIC tells Customs to accept certificates that show one year's validity.

Sources

- Plastic Waste Management (Amendment) Rules, 2022, G.S.R. 133(E), February 16, 2022: Schedule II, the EPR guidelines for plastic packaging, paragraph 4 (PDF, 1.7 MB)
- Plastic Waste Management (Amendment) Rules, 2023, G.S.R. 318(E), April 27, 2023: rule 13(9) and Schedule II, paragraph 6.6 (PDF, 1.0 MB)
- Plastic Waste Management (Second Amendment) Rules, 2023, G.S.R. 807(E), October 30, 2023: rule 13(2) and the omitted rule 13(9) (PDF, 1.1 MB)
- Plastic Waste Management (Amendment) Rules, 2024, G.S.R. 201(E), March 14, 2024: rules 3(k) and 13(8), and Schedule II, paragraph 4 (PDF, 1.6 MB)
- Plastic Waste Management (Amendment) Rules, 2026, G.S.R. 237(E), March 31, 2026: Schedule II, paragraph 7.3(d) (PDF, 866 KB)
- E-Waste (Management) Rules, 2022, G.S.R. 801(E), November 2, 2022: rules 2 and 3(1)(t), and Schedule I (PDF, 1.5 MB)
- Battery Waste Management Rules, 2022, S.O. 3984(E), August 22, 2022 (PDF, 1.5 MB)
- Battery Waste Management (Amendment) Rules, 2023, S.O. 4669(E), October 25, 2023: rules 3(1)(u), 4(1), 4(4) and 11(3) (PDF, 827 KB)
- Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2022, G.S.R. 593(E), July 21, 2022: Schedule IX, paragraph 1(e) (PDF, 1.3 MB)
- Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023, G.S.R. 677(E), September 18, 2023: Chapter VII, rule 25(k) (PDF, 1.3 MB)
- Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2025, G.S.R. 438(E), July 1, 2025: Chapter VIII, rule 44(o) (PDF, 969 KB)
- Environment Protection (End-of-Life Vehicles) Rules, 2025, S.O. 98(E), January 6, 2025: rule 3(1)(q) (PDF, 2.1 MB)
- CBIC Instruction No. 15/2026-Customs, September 9, 2026: registration of importers on the EPR portal for plastic packaging and verification of registration, paragraph 4, with the Tamil Nadu Pollution Control Board letter of August 15, 2026 (PDF, 571 KB)
- CPCB letter to Customs, December 23, 2022 (File No. CP-10730/BWMR/WMD-1/2022): verifying CPCB registration when clearing imports of batteries and equipment containing batteries

- CPCB letter to CBIC, March 24, 2023 (File No. CP-20/94/2021-UPC-II-HO-CPCB-HO): clearing plastic packaging imports on proof of an application for registration
- CPCB, File No. CP-22/29/2023-WM-III-HO-CPCB-HO, December 28, 2023: clarification on registration on the E-Waste EPR Portal, paragraphs 1 to 3 and the self-declaration format
- CPCB letter to Customs, July 2, 2024: the used oil EPR portal and clearing base oil and lubricating oil imports
- CPCB letter to Customs, March 5, 2026: the EPR portal for end-of-life vehicles and clearing imported vehicles

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