



Frequently Asked Questions (FAQs) on EPR for Used Oil Management

1. What is Extended Producer Responsibility (EPR) for Used Oil in India

It means the responsibility of a Producer (manufactures/ importer) of Base oil/ lubrication oil and Importer of used oil to meet the respective targets for recycling the used oil.

This is accomplished by purchasing Re-Refining or energy recovery certificates from registered recyclers, to ensure environmentally sound management of used oil under Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023.

2. What is Base Oil?

Base oil is a primary component of lubricant oils, obtained from either crude oil during the refining process or from synthetic sources.

Further, Base oils are also used for production of oils suitable for transmitting force (hydraulic oils, etc.), and facilitating heat transfer (transformer oils, thermic fluids, etc) or surface cooling. After it intended use, these oils may become Used Oils or waste oils, that may require environmentally safe handling, re-refining, energy recovery or disposal.

3. What is Lubrication Oil?

Lubricating oils are commonly used in transport and industrial machineries to reduce friction between interacting surfaces, thereby minimizing the heat generated during their contact.

After it intended use, the lubrication oils may become Used Oils or waste oils, that may require environmentally safe handling, re-refining, energy recovery or disposal.

4. What is Used Oil?

Any oil derived from crude oil or mixtures containing synthetic oil including spent oil, used engine oil, gear oil, hydraulic oil, turbine oil, compressor oil, industrial gear oil, heat transfer oil, transformer oil and their tank bottom sludge; and suitable for reprocessing, if it meets the specification laid down in Part A of Schedule-V of Hazardous and Other Wastes (Management & Transboundary Movement) [HOWM] Rules, 2016 but does not include waste oil as defined in HOWM Rules, 2016.

5. Which individuals or entities are encompassed within the definition of 'Producer'

- a. Any person or entity, irrespective of the selling technique used such as dealer, retailer, e- retailer, who, -
 - (i) manufactures and offers to sell base oil or lubrication oil domestically under its own brand; or
 - (ii) offers to sell lubrication oil domestically under its own brand, using the base oil manufactured by other manufacturers or suppliers; or
 - (iii) offers to sell imported base oil or lubrication oil domestically;
- b. Based on above definition the types of producers are classified in EPR Portal as below:

Code	Producer
P1	Manufactures and Sells base oil
P2	Importer of base oil
P3	Manufactures base oil & Sells lubrication oil under its brand/co-brand
P4	Importer of lubrication oil
P5	Procures base oil domestically and sells base oil & its products under its brand /co-brand
P6	Procures lubrication oil domestically and sells under its brand/co-brand
P7	Procures base oil domestically and sells lubrication oil under its brand/ co-brand
P8	Procures re-refined/recycled base oil domestically and sells lubrication oil under its brand/ co-brand

P9	Manufactures and sells re-refined/recycled base oil under its brand/ co-brand
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6. Do Original Equipment Manufacturers (OEMs) falls under the category of producers? If they do, do they have any responsibilities under the Used Oil EPR framework?

The definition of a Producer is elaborated in above question no. 5.

Therefore, an OEM of cars does not become a Producer unless it itself procuring Base Oil/Lubrication Oil from the domestic or import market and sell the lubrication oil domestically under its own brand.

7. Which entities have obligation for meeting EPR targets.

Producer [defined at a.) in Q.5 i.e., (i) manufacturing and selling base oil or lubrication oil domestically under its own brand; (ii) selling lubrication oil domestically under its own brand, utilizing base oil from other manufacturers or suppliers; (iii) selling imported base oil or lubrication oil domestically.] and Importer of used oil have obligation to meet the respective targets for recycling the used oil by purchasing Extended Producer Responsibility certificates from registered recyclers.

8. Which type of oils are exempted from Used Oil EPR Target?

Oils such as white oil, process oils used in manufacturing processes, as well as lubricants such as greases, etc., which do not lead to generation of any residual used oil, may not have EPR obligation. However, the concerned Producers have to get registered on EPR Portal.

9. Who needs to register on the Used Oil Portal?

The following entities are required to register as respective entities on the portal developed by CPCB:

1. Manufactures/ Importers of Base oil/ lubrication oil/ other products manufactured from base oil shall be registered as "Producer" on the portal
2. Recycler of Used oil shall be registered as "Recycler" on the portal
3. Importer of Used oil shall be registered as "Importer" on the portal
4. Used oil Collection agent shall be registered as "Collection agent" on the portal.

10. Does the producer of exempted oil from Used Oil EPR need to register on the portal?

Yes, the Producer of oil exempted from Used Oil EPR Target, still need to register on the Used oil portal and submit the details to verify their claim.

Further upon evaluation, CPCB may exempt the EPR targets provided that the declared oil does not contribute to the generation of used oil.

11. Are units engaged in exports, have any EPR targets to meet under Used oil EPR framework?

Export-oriented entities that do not introduce base oil, lubrication oil, or used oil into the domestic market are not subject to EPR targets. However, such entities shall require to register on Used oil EPR portal.

12. What are EPR targets?

EPR targets is the quantity of used oil to get recycled based on the quantity of base oil or lubrication oil sold or imported prior to 2 years as specified in the sub- Rule (2) of Rule 27 of Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023, reproduced below:

(I) For producers of base oil or lubrication oil:

EPR Obligation for the Year	Used Oil Recycling Target
2024-25	5% of the base oil or lubrication oil sold or imported in the Year 2022-2023.
2025-26	10% of the base oil or lubrication oil sold or imported in the year 2023-2024.
2026-27	20% of the base oil or lubrication oil sold or imported in the year 2024-2025
2027-28	20% of the base oil or lubrication oil sold or imported in the year 2025-2026.
2028-29	40% of the base oil or lubrication oil sold or imported in the year 2026-2027.
2029-30	40% of the base oil or lubrication oil sold or imported in the year 2027-2028.
Extended Producer Responsibility obligation for the year 2030-2031 (Y)	

onwards shall be 50% of the base oil or lubrication oil sold or imported in the year (Y-2)

For units established after 1st April, 2024, the extended producer responsibility obligation will start after two years from the end of the financial year in which the unit was established and will be as per the target prescribed above

(II) For Used Oil Importer:

The extended producer responsibility obligation for used oil importers in year (Y) shall be 100 per cent of the used oil imported in previous year (Y-1).

13. What are the EPR targets for units established after 1st April, 2024?

The units which are established after 1st April, 2024, the extended producer responsibility obligation will start after two years from the end of the financial year in which the unit was established.

14. What are the responsibility of a Producer under the Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023?

Under the Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023, following responsibilities has been assigned to producers:

- Registration on the portal;
- Fulfilment of EPR by purchasing Extended Producer Responsibility certificates from registered Recyclers only.
- File annual returns in the form provided on the portal on or before 30th June following the financial year to which that return relates;
- Provide the contact details such as address, email address, toll free telephone -numbers or helpline numbers to consumers through their website or through advertisements or documentation so as to facilitate the process;
- Creating awareness through media, publications, advertisements, posters, or by any other means of communication.

15. What are the responsibility of the Used oil importer under the

Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023?

The used oil importers are required to:

- Registration on the portal;
- Fulfil the EPR targets;
- File annual returns in the form provided on the portal

16. What are the responsibility of the Collection Agent under the Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023?

The collection agents are required to:

- Register on the portal;
- Collect used oil from the generators and supply to the registered recycler or producer in accordance with these rules and upload information on the portal;
- File quarterly as well as annual returns in the laid down form on the portal

17. What are the responsibility of the Recycler under the Hazardous and Other Wastes (Management and Transboundary Movement) Second Amendment Rules, 2023?

The Recyclers of used oil are required to:

- Register on the portal;
- Ensure that the facility and recycling processes are in accordance with rules;
- Ensure that no damage is caused to the environment during storage, transportation and recycling of used oil;
- Ensure that the residue generated during the recycling process is disposed of in accordance the said rules;
- File quarterly as well as annual returns in the prescribed form on the portal

18. Who are bulk generators?

Bulk generator is any entity like automobile industry or railways or defence establishments or a transport company or industrial units or power transmission

company or hotels or restaurants and other such entity which is generating more than 100 metric tonnes of used oil per annum.

19. What are the responsibilities of bulk generators?

Bulk generator have the following responsibilities, but not limited to:

- Set up collection points to facilitate collection agents for collection and transportation of used oil from their premises; and
- Ensure that used oil generated by them be handed over only to the registered recyclers or producer or collection agents.

20. If an entity engages in multiple types of activities (i.e., Producer, Recycler, Collection Agent, or Used Oil Importer), what is the registration procedure?

If an entity engages in multiple types of activities (i.e., Producer, Recycler, Collection Agent, or Used Oil Importer), then the said entity is required to register separately for each activity.

21. During Sign-Up there is multiple option to choose among types of activities (i.e., Producer, Recycler, Collection Agent, or Used Oil Importer). Which of them need to choose for Sign-up?

If an entity engages in multiple types of activities (i.e., Producer, Recycler, Collection Agent, or Used Oil Importer), then the said entity is required to choose multiple activities corresponding to them provided the entities share same GST, else separate Sign-up should be practiced.

22. Is it possible to login with the same credentials for multiple entities profiles?

Choosing multiple entities during Sign-Up enables generation of single login credentials.

However, while Sign-Up simplifies access with a single login ID and password, each entity's module/profile/registration/transactions remains distinct upon logging in.

23. Is there a limit to the number of times an organization can sign up?

An organization with multiple entities (Producer/Recycler/Importer/Collection Agent) with a common GST number can register simultaneously. The same shall be selected during the sign-up.

24. In case of Proprietorship/Partnership, under company details, what should be provided?

PAN of the authorized person should be uploaded on EPR Portal.

25. What is Recycling and Re-refining of Used oil?

Recycling means any process of re-refining of used oil to produce base oil or lubrication oil or any process of energy recovery from used oil in an environmentally sound manner with facilities as elaborated in the SoP or Guidelines issued by the CPCB;

Re-refining means any process of removing undesirable impurities from used oil and making base oil or lubrication oil as end product in accordance with the SoP or Guidelines issued by the Central Pollution Control Board.

26. If producers collect used oil from the generator and hand it over to Recycler, will this be considered as Recycling and accounted for EPR target?

No, Producer can meet EPR target only by purchasing the EPR certificates from the recyclers. However, producer may have agreement or arrangement with recyclers to transfer certificates to them as per their business model.

27. What is the Extended Producer Responsibility certificate?

The Producers need to fulfil their Extended Producer Responsibility by online purchase/transfer of extended producer responsibility certificates from registered recyclers.

The EPR portal of CPCB will generate Extended Producer Responsibility certificate for Registered Recycler.

28. What is quantity eligible for generation of Extended Producer Responsibility certificate?

The Extended Producer Responsibility certificate shall be calculated as per the following formula,:-

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

Q_{EPR} - The quantity eligible for generation of the Extended Producer Responsibility certificate,

Q_p – The quantity of the end product recovered

C_F - The conversion factor (quantity of inputs required for production of one unit of output) determined by CPCB based on the technologies used by recyclers and quality of re-refined base oil produced.

W_p - The weightage for particular end product as per table given below:

S. No	End Product of recycling	Weightage allocated to the end product (WP)
1.	Producing re-refined base oil or lubrication oil	1.0
2.	Co-processing/ utilisation/ energy recovery for used oil not suitable for recycling. CPCB will fix maximum permissible percentage of these certificates.	0.25

29. If a petroleum refinery utilizes used oil in mixing with Crude oil to manufacture hydrocarbon products such as fuels, solvents, bitumen, etc., what will be the Conversion factor and Weightage Factor for such co-processing 'Used oil' at the petroleum refinery?

Currently, EPR Rules define the Weightage allocated to the end product (W_p) for either recovery of Base oil through recycling or for Co-processing/ utilization/ energy recovery from Used oil.

However, the option of mixing used oil with crude oil for product recovery is not addressed in these Rules.

30. Can used oil be imported for energy recovery?

The import of used oil is permitted for the purpose of re-refining only.

31. Are recyclers required to recover Base oil meeting the quality standards outlined by BIS?

Quality of re-refined base oil produced is one of the key factor for determining the Conversion factor (C_F for quantity eligible for generating EPR certificates) by CPCB. Accordingly, oils meeting the standards outlined by BIS will be given weightage.

32. As a Producer, should I procure Re-Refined Base Oil, EPR certificates, or both from a Used Oil Recycler to fulfill my obligations?

Currently, the Producers is obligated to fulfil their Extended Producer

Responsibility through online purchase of Extended Producer Responsibility Certificates from registered recyclers.

Nevertheless, the re-refined base oil ultimately may get utilized in production of a lubrication oil. Thus the procurement of Re-Refined Base Oil by Producers contributes to the advancement of the nation's Circular Economy goal.

33. What is the fee for Registration at EPR portal and Annual processing?

Fees for Registration under EPR Used Oil framework for entities i.e. Producers, Recyclers, Used Oil Importers and Collection Agents is given below:

Table-1: Registration fee for Producers		
S No	Sale of Base oil/Lubrication Oil (MTPA)	Registration Fees Amount (INR)
1	> 1,00,000 MT	10,00,000
2	> 50,000 - 1,00,000 MT	5,00,000
3	> 10,000 - 50,000 MT	2,00,000
4	5000-10000 MT	50,000
5	< 5000 MT	25,000

Table-2: Registration fee for Used Oil Importers		
S No	Quantity of Used oil imported (MTPA)	Registration Fees Amount (INR)
1	> 1,00,000 MT	10,00,000
2	> 50,000 - 1,00,000 MT	5,00,000
3	> 10,000 - 50,000 MT	2,00,000
4	> 1,000 - 10,000 MT	1,00,000
5	500-1,000 MT	50,000
6	< 500 MT	25,000

Table-3: Registration fee for Recyclers		
S No	Capacity of the recycling facility (MTPA)	Registration Fees Amount (INR)
1	>20,000 MT	75,000
2	> 10,000-20,000 MT	50,000
3	5,000-10,000 MT	35,000
4	< 5,000 MT	25,000

Table-4: Registration fee for Collection Agents		
S No	Capacity of the Collection facility (MTPA)	Registration Fees Amount (INR)
1	>10,000 MT	10,000
2	> 5,000 - 10,000 MT	5,000
3	> 2,000 - 5,000 MT	2,000
4	500 - 2,000 MT	1,000
5	< 500 MT	500

The Annual Processing charge is the 25% of application fees in the respective category.

34. In which cases Environmental Compensation (EC) will be levied on the entities?

EC will be levied on the following entities:

- Producers and used oil importers for non-fulfilment of obligations and transaction or use of false extended producer responsibility certificates or on any entity on violation of any provisions and guidelines issued hereunder.
- Recyclers for issue of false extended producer responsibility certificates and providing false information/invoices.
- Unregistered producers, recyclers and any entity, which aids or abets the violation of the said rules.

35. Does CPCB regulate the EPR certificates prices volatility?

CPCB will fix the highest and lowest price for exchange of EPR certificates which shall be equal to 100% and 30%, respectively of the Environmental Compensation for non-fulfilment of Extended Producer Responsibility. CPCB will publish the Environmental Compensation charges for a Tonne of used oil.

36. What is the range of EPR certificates prices?

The exchange price of EPR certificates between registered entities through the portal shall be between the highest and lowest prices as detailed in above question (Q.35).

37. How can producer purchase such EPR certificates?

For each producer, information regarding the availability of the Extended

Producer Responsibility (EPR) certificates and the list of Recyclers having such certificates will be accessible on the portal dashboard.

Producers may fulfil their Extended Producer Responsibility through purchase of extended producer responsibility certificates from registered recyclers at agreed cost within the range of price fixed by CPCB and thereafter the Recyclers transfers the agreed quantity of EPR certificates to the account of Producer. CPCB may develop a trading platform at later stage to complete such transactions.

38. How much quantity of EPR certificates can be purchased by any producers?

A producer can purchase extended producer responsibility certificates limited to its extended producer responsibility liability of current year (Year Y) plus any leftover liability of preceding years plus 10 per cent of the current year liability.

39. What is the validity of EPR certificates?

The validity of the extended producer responsibility certificate shall be two years from the end of the financial year in which it was generated and the expired certificate shall be automatically deleted or gets archived in EPR portal.

40. Whether EPR certificates are tradable between the registered Producers/ Used oil importers?

EPR certificates are not tradable between the registered Producers/ Used oil importers.

41. Is there any additional fee for late submission of the missing information sought by CPCB?

After receiving incomplete application back from CPCB, if the applicant delays re-submitting correctly filled in application beyond a stipulated period, a late fee may be applied. The details of late fee structure shall be updated in due course of time.

42. How is the EPR target calculated on the EPR Portal during registration?

At the time of registration, the Extended Producer Responsibility (EPR) target may initially be calculated based on the total amount of oil placed in the market by the Registered Producer. However, EPR target may be revised (adjusted) dynamically after the Registration process, when the registered Producer

selects the Other registered producers on the Portal who had received the material (lubrication oil/base oil) for placing on the market on his own brand. Such adjustment will happen once the other registered Producers accepts receiving of the material on the portal.
