



**Enviro Oil Savers
Association**

Driver of EPR Regime

ISSUE ONE | JANUARY 2025

Quarterly Newsletter



Inside the Issue:

- **Environmental Compensation (EC) Unveiled**
- **Important CPCB Portal Updates and more..**



Preventing Duplicity in EPR Targets – CPCB's Validation Mechanism

A Validation Mechanism will be employed for target adjustment, where the producer who supplies oil to another producer in the downstream supply chain and the producer who receives the oil acknowledge the same for accurate target division. In the case of Co-branding with producers, equal responsibility may be assigned for calculating the EPR target.

NEWS







BULLETIN

PTWA Representation Update

The Petroleum Traders and Welfare Association (PTWA) recently filed a petition before the Hon'ble High Court, seeking an exemption for Importers and Traders of Base Oil from the provisions of the Used Oil EPR Regulations. Our representatives from EOSA were present during the hearing, and the Hon'ble High Court directed PTWA to consult with the Steering Committee, which includes EOSA, for further concerns and recommendations. Updates on this representation will be shared as they become available.

"Success in the EPR frameworks for producers lies not just in compliance but in boldly exploring innovative business models."

Important CPCB Portal Updates

-  **EPR Portal for Used Oil Management launched on June 24, 2024**
-  **Registration Module for Producers launched soon after the portal went live**
-  **Recyclers' module was made available in the last week of September**
-  **As of December 2024, a total of 51 producers have registered, with 9 already granted registration, on the EPR Portal**
-  **As of December 2024, a total of 16 recyclers have registered on EPR Portal**
-  **CPCB has initiated daily virtual meetings from Monday to Saturday, 4 pm-5 pm, to address stakeholders' queries and issues related to the portal and registration process.**



Highlight Corner: Webinar on 'Navigating EPR Rules and BIS Standards for Used Oil Recycler'

On 25th October 2024, EOSA conducted a Webinar on 'Navigating EPR Rules and BIS Standards for Used Oil Recycler' where we brought together industry experts and a panel to discuss these critical topics

01

Recycling Capacity Challenges

A significant gap remains between the generated and collected volumes of used oil, pointing to the need for a more robust collection network with the coming of the EPR framework.

02

RRBO Market Outlook

In the long run, the Used Oil EPR Regime is expected to stabilize the market, discouraging unsustainable practices and promoting the adoption of RRBO.

03

EPR Responsibility

Recyclers play a vital role in EPR, but primary responsibility should rest with producers and bulk generators.

04

Testing Standards

There is a high need for accessible regional labs to ensure adherence to BIS standards as well as flexible testing schedules to reduce costs while maintaining quality.

How will the import consignments be affected by the coming of the EPR Regime?

A registration certificate will be issued after successful completion of registration of the entity on the portal. Furthermore, a notice was issued to the Customs Department to facilitate the clearance of consignments related to the import of base oil or lubrication oil till the time portal is operational where an undertaking will be taken by the respective importer/producer by the Customs authorities regarding the type and quantity of base oil or lubrication oil imported. The registration portal is currently live and the customs department has been informed of the same to ensure that the Importers of Base oil/ Lubrication oil have applied for registration on the EPR portal.

BULK GENERATORS

A bulk generator is any entity like the automobile industry, railways, defense establishments, transport companies, industrial units, power transmission companies, hotels or restaurants, and other such entities that generate more than 100 metric tonnes of used oil per annum. In the used oil EPR regime, Bulk generators have the responsibility of setting up collection points to facilitate collection agents for the collection and transportation of used oil from their premises. Moreover, they have to ensure that the used oil generated by them is handed over only to the registered recyclers, producers, or collection agents.

WHAT WILL BE THE ROLE OF BULK GENERATORS IN THE USED OIL EPR REGIME

Bulk generators are recognized as an important player in the success of the Used Oil EPR Regime. Bulk generators will play a significant role in the effective channelization of Used Oil for Recycles and its proper accounting to enable Producers to effectively meet their targets. Onboarding Bulk Generators on the portal will help in the effective collection, management, and tracing of used oil.

In the near future, bulk generators have to onboard on the portal by means of self-registration with minimal information and without fee. They may file periodic reports including annual reports. Currently, the CPCB is in the process of conducting an analysis of the quantity threshold for defining Bulk Generators.

BREAKING

ENVIRONMENTAL COMPENSATION: UNVEILED

EOSA is excited to share insights from the recent Central Pollution Control Board (CPCB) meeting on developing guidelines for Environmental Compensation (EC) under the Extended Producer Responsibility (EPR) framework for used oil management.

The Avoidance Cost Method forms the backbone of EC computation under Regime 1. The formula includes:

- Cost of Used Oil Landing (Rs/Litre)
- Cost of Processing (Rs/Litre)

Total EC (Rs/Litre) = Cost of Used Oil Landing + Cost of Processing

The framework aims to balance environmental accountability with economic viability. Proposed EC rates are designed to ensure that the cost of EPR certificates remains below the market value of virgin base oil (VBO) and re-refined base oil (RRBO).

Scan here for the latest updates on Used Oil EPR



PROPOSED ENVIRONMENTAL COMPENSATION (EC) FRAMEWORK



01. EC Regime 1

Target producers and importers of used oil who fail to meet their EPR obligations.

02. EC Regime 2

Applies to all entities violating the Hazardous and Other Wastes (Management and Transboundary Movement) Amendment Rules, 2023.