Common EPR Compliance Filing Mistakes to Avoid

Filing for Extended Producer Responsibility (EPR) is a regulatory necessity, but many businesses-especially first-timers-make critical errors that result in delays, penalties, or outright rejections from the CPCB. This guide outlines the most common mistakes companies make when preparing or submitting their EPR compliance and how you can avoid them.

1. Incomplete or Mismatched Documentation

One of the most frequent reasons for EPR registration rejection is submitting incomplete or mismatched data. Ensure your GST, PAN, CIN, and brand/product details are consistent across all documents. Mismatches raise red flags for regulators.

2. Ignoring PRO Validation Requirements

Simply tying up with any PRO is not enough. The PRO must be registered with CPCB or State Pollution Control Boards and authorized for the exact waste category you deal with (e.g., plastic, e-waste). Failing to validate this leads to compliance breaches.

3. Underestimating Waste Quantities

Providing underestimated waste generation figures may seem harmless, but it's risky. CPCB may audit or challenge your declarations, especially if your sales data or product types suggest otherwise. Always back your estimates with realistic sales projections and SKU mapping.

4. Delayed Quarterly/Annual Filing

Businesses often assume registration is enough. It is not. EPR mandates ongoing reporting (quarterly/annual) of waste collection, recycling, and PRO activity. Missing these deadlines can lead to non-compliance status or even blacklisting on the CPCB portal.

5. Not Maintaining Collection Proofs

Having a PRO agreement isn't sufficient-you must maintain proper collection and recycling documentation. This includes geo-tagged images, pickup receipts, recycler certificates, and monthly summaries. These are vital for audit trails and renewals.

6. Using a Generic Filing Template

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Each product category (plastic, battery, e-waste) has slightly different formats and reporting metrics. Using a one-size-fits-all template can lead to misreporting. Ensure your filing format is category-specific and CPCB-aligned.

7. No Internal EPR Coordinator

Many businesses delegate compliance to vendors without internal oversight. This leads to missed updates or file errors. Designate an internal EPR SPOC (Single Point of Contact) who monitors status, tracks deadlines, and communicates with Prgenix or your PRO.

At Prgenix, we have helped dozens of businesses avoid these costly missteps. Our team reviews every filing line-by-line to ensure full compliance, accuracy, and readiness for CPCB scrutiny. Reach out to us for expert support.