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BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI
ORIGINAL APPLICATION NO. 993 OF 2024

IN THE MATTER OF:

News Item Titled "PACKAGE Where has the plastic waste disappeared"
appearing in Times of India dated 30.07.2024

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Punjab Pollution
Control Board

Punjab: Brand Audit of Plastic Waste (2025)

by

Punjab Pollution Control Board (PPCB)



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1. Executive Summary






The Punjab Pollution Control Board has taken a first-in-the-country initiative of carrying out a formal brand audit of the plastic waste in the state. The activity involved segregating plastic waste from the municipal solid waste (MSW), counting and documenting to identify the brand owners responsible for plastic pollution. This report presents a focused analysis of plastic waste from the brand audit conducted across six major cities in Punjab - Amritsar, Bathinda, Jalandhar, Ludhiana, Mohali, and Patiala. Out of a total 6,991 kg of municipal solid waste audited, 613 kg (~8.8%) was identified as plastic. Within the plastic fraction, Flexible Plastic constituted the majority at 64.7%, followed by Multi-Layered Plastic (MLP) at 22.9%, and Rigid Plastic at 12.4%. Flexible plastics and MLPs together formed up to 88% of all plastic waste, indicating a high proportion of non-recyclable materials. A brand audit of MLP packaging revealed 11,810 identifiable packets, with the top 15 brands accounting for 60% of total MLP waste (Table 1).

Table 1 – Data of Top 15 brands identified in the Plastic Audit

Ranking	Brand Owner	Total Count	Punjab Daily Estimate (Based on 4,008 TPD ¹ MSW)	Most Common Items	Most Common Products
1		1299	744728	Milk Packets, Milk Products	Verka
2		983	563562	Chips, Namkeen	Haldiram's

¹ TPD = Tonnes Per Day

Ranking	Brand Owner	Total Count	Punjab Daily Estimate (Based on 4,008 TPD ¹ MSW)	Most Common Items	Most Common Products
3		935	536043	Chips, Snacks	Lays, Kurkure, Doritos
4		639	366344	Washing powder/detergent, Ketchup, Tea	Surf Excel, Vim, Kissan, Brooke Bond, Comfort
5		576	330226	Biscuits	Parle G
6		535	306720	Noodles, Coffee, Milk Powder	Maggie, Nescafe
7		491	281494	Biscuits	Good Day, Marie Gold, Tiger, Milk Bikis, Bourbon, Nutri Choice
8		321	184032	Milk packets, Milk Products	Amul
9		276	158233	Chips, Biscuits	Bingo, Sunfeast

Ranking	Brand Owner	Total Count	Punjab Daily Estimate (Based on 4,008 TPD ¹ MSW)	Most Common Items	Most Common Products
10		256	146767	Chips	Crax
11		208	119248	Milk Packets	baba milk
12		173	99182	Chocolate wrappers	Cadbury, Gems
13		156	89436	Bread, Biscuits	Bonn, Americana
14		137	78543	Tea, Salt	Tata
15		99	56758	Bread, Biscuits	Cre mica, English Oven

Identification of brands in the waste stream demonstrates the presence of post-consumer plastic packaging associated with the concerned Producer, Importer or Brand Owner (PIBO) and reinforces the statutory responsibilities imposed under Rule 9 and Schedule II of the Plastic Waste Management Rules, 2016, as amended.

The piling waste of top polluting fast-moving consumer goods (FMCG) companies proves that actions, and not announcements, are needed to reduce the plastic that causes pollution. The mounting plastic footprints of these companies make a mockery of their stated commitments to tackle pollution. Further, EPR targets should not remain geographically neutral; obligations must be state-specific and

proportionate to the volume of plastic waste generated by a company in a particular state, so that heavily burdened states are not left to bear a disproportionate share of unmanaged plastic pollution.

2. Introduction

It is worth pausing to reflect on a time when the umbilical cord between man and nature remained firmly intact, when living in harmony with the environment was neither unusual nor frowned upon. India's history is replete with sustainable practices, where individuals and communities relied on cloth bags, paper bags, reusable utensils, and other simple means to meet daily needs. Life was marked by a close, almost organic relationship with the earth, and the concept of waste, as we understand it today, scarcely existed.

This delicate balance, however, was disrupted by a whirlwind of technological advancements and the rapid expansion of commerce and consumerism. Traditional practices were gradually replaced by an overwhelming dependence on Multi-Layered Plastics (MLPs) and Flexible Plastics. Convenience became the guiding principle, and the relentless drive for efficiency and profitability eclipsed ecological considerations. Plastics, once a marvel of innovation, transformed into a pervasive threat, externalizing the costs of production and consumption onto the environment and society.

Externalisation simply means the outsourcing of responsibility and causing harm to third parties which perhaps finds its clearest expression in the behaviour of brand owners. Driven primarily by short-term profits, these entities are among the most prolific contributors to plastic pollution worldwide. There is a pressing need to shift the primary onus to these producers, rather than placing accountability solely on consumers, citizens, or government authorities. Brand owners not only possess the resources to effect meaningful change but also bear a profound moral responsibility. Mere legal compliance is insufficient. The leviathan of plastic pollution moves faster than regulatory frameworks can keep pace, with cumulative, often irreversible consequences for humans, wildlife, and ecosystems. Cows die routinely from ingesting plastic that obstructs their digestive tracts, rivers and lakes remain clogged, and landscapes are increasingly marred by waste. Plastic, in all its conventional forms, is essentially non-biodegradable, an unwelcome outsider in the natural order. Microplastics and nanoplastics persist indefinitely in soil, water bodies, oceans, and even within living organisms, silently infiltrating the food chain.

Recognizing the urgency of the crisis, the Government of India introduced the Plastic Waste Management Rules, 2016, which tightened screws on the reporting framework and introduced the concept of Extended Producer Responsibility (EPR), though the detailed rules were notified only in the 2022 Amendment. These rules mandated that producers, importers, and brand owners (PIBOs) assume responsibility for the collection and management of the plastic waste generated from their products. The Plastic Waste Management (Amendment) Rules, 2018, further clarified the treatment of MLPs, stipulating that only those that are non-recyclable, non-energy recoverable, or lack alternative use must be phased out. But the broader challenge remains: technologies claiming to recycle or repurpose MLPs carry unresolved environmental risks, and a complete ban may be the only truly sustainable solution. The 2018 rules also introduced a centralized registration system via the CPCB and prescribed graded, time-bound targets for compliance.

The legal basis of Extended Producer Responsibility (EPR) is contained in Rule 9 and Schedule II of the Plastic Waste Management Rules, 2016, as amended, which impose obligations upon Producers, Importers and Brand Owners (PIBOs) for environmentally sound management of plastic packaging waste. The EPR framework introduced through the Plastic Waste Management (Amendment) Rules,

2022 prescribes category-wise obligations relating to recycling, reuse, use of recycled plastic content and end-of-life disposal of plastic packaging waste, linked to the quantity of plastic packaging introduced into the market by obligated entities.

In the 2022 Amendment, further regulatory measures were enacted: certain categories of SUPs were prohibited, and minimum thickness standards for plastic carry bags were increased. While these developments were welcome, enforcement on the ground remains inconsistent. Daily life continues to witness widespread violations, underscoring the gap between regulatory intent and practical reality. There have been amendments to the rules in 2024 and 2025 especially with regards to biodegradable plastics, traceability, use of recycled plastic, penalties and role of local bodies but the foundational and existential concerns keep staring at the face.

A critical concern within the EPR framework is that targets are “geo-neutral,” meaning that plastic pollution in one state, such as Punjab, can be offset by questionable remediation efforts in another. This complicates monitoring and auditing for State Pollution Control Boards and undermines local accountability. Despite an existing legal regime touted to be successful, it only takes a pair of eyes to witness the horrendous level of plastic pollution all around us, bypassing ragpickers and recyclers alike and inevitably ending in ever increasing dump sites. The compliance certificates must also be audited, to make sure that claimed quantity of waste is actually being collected and recycled and is not merely an eyewash.

It is against this backdrop that the present brand audit of plastic polluters in Punjab was conceived. While EPR targets may appear fulfilled on paper, on-the-ground realities warrant deeper investigation. By systematically identifying the principal contributors to plastic waste in the state, this audit aims to provide actionable insights, reinforce accountability, and support a transition towards a cleaner, more sustainable environment. In doing so, it underscores a central tenet: the responsibility for plastic pollution cannot rest with consumers alone, the onus must begin with those who produce and profit from it.

3. Methodology

The study was conducted across six major cities of Punjab – Amritsar, Patiala, Mohali, Bathinda, Ludhiana, and Jalandhar – to assess the composition of municipal solid waste with a focus on plastic waste generation and its sources (Fig. 1). These cities were selected because of the high density of their urban population as well as presence of industrial clusters with high residential, commercial and manufacturing activity. The study was led by Punjab Pollution Control Board and conducted in co-ordination with its Regional Offices (ROs) and Municipal Corporations (MCs) in the respective districts. The methodology adopted involved a stepwise approach comprising waste sampling, segregation and brand auditing. Pictures from the audit activities undertaken are provided at the end of the report (Appendices: Fig. 1-3).

In compliance with the directions given by the competent authority of the Punjab Pollution Control Board, the brand audit exercise was undertaken under the supervision of Er. Rajiv Goyal, then Chief Environmental Engineer, Punjab Pollution Control Board (PPCB), with active coordination from Er. Parveen Kumar Saluja, Senior Environmental Engineer, and Er. Gurkaran Singh, Environmental Engineer as Nodal Officer for the brand audit exercise. The audit team further comprised Er. Gurjeet Kaur, Environmental Engineer; Er. Harmandeep Singh Sandhu and Er. Akshit Kapil, Assistant Environmental Engineers; Sh. Dhruv Suri and Ms. Gurshagan Kandhola, Senior Good Governance Fellows; Ms. Swati Dey, Consultant from Center for Study of Science, Technology and Policy (CSTEP);

and Sh. Yash Pilia, Senior Research Officer from Punjab Development Commission (PDC). The exercise was conducted in close collaboration with the officers from Regional Offices of PPCB at Amritsar, Bathinda, Jalandhar, Ludhiana, Mohali and Patiala, along with the staff from respective Municipal Corporations. The officers played a critical role in planning, waste sampling, data collection, verification and field supervision wherein on-ground assistance from Municipal Corporations were instrumental in the successful execution of the audit.



Figure 1 – Map of Cities covered in Plastic Audit

In each city, five key waste generation sources were identified for sampling: low-income residential areas (LIG), high-income residential areas (HIG), industrial points, commercial points, and mixed-use areas. The exact locations of each source point from each city are provided in the table below (Table 2). From each source point, approximately 200 ± 30 kg of mixed, unprocessed waste (including wet and dry fractions) was collected from secondary collection points, representing the waste stream as it would typically arrive at the MRF/dumpsite. The collected waste was transported to the nearest Material Recovery Facility (MRF), which provided the necessary space and infrastructure for systematic segregation. All samples were weighed upon arrival using calibrated weighing machines.

A team of 7-8 trained waste segregators, supervised by PPCB officials and Regional Officers (ROs), carried out the first stage of segregation, where 10 broad categories of waste were identified: plastic, construction and demolition (C&D)/inert, organic/compostable, wood, glass, metal, cardboard/paper, clothes/rags/shoes, e-waste, and miscellaneous waste (Fig. 2). Each fraction was weighed separately, and the data was recorded using standardized data sheets to ensure consistency across cities. The plastic waste fraction was then preserved for further detailed categorization. It was segregated into three subcategories: Rigid Plastics (Category 1 - PET, HDPE, LDPE), Flexible Plastics (Category 2), Multi-Layered Plastics (Category 3) and particular emphasis was placed on MLPs, as they are generally non-recyclable and a major focus area of the study.

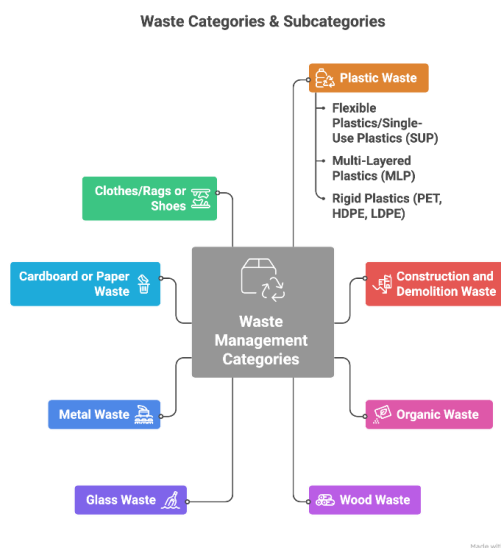


Figure 2 – Categories of Waste Segregated during Audit

The final stage involved a brand audit of the plastic waste, primarily focusing on MLP/Flexible plastic items. The PPCB audit team examined branded packaging to identify the companies contributing to plastic waste generation in each city. This process enabled the mapping of key producers responsible for significant volumes of non-recyclable plastic packaging. This systematic methodology ensured the generation of reliable and comparable data across cities and waste sources, providing insights into both the quantitative and qualitative dimensions of plastic waste in urban Punjab.

Table 2: Locations of the five waste sampling source points for each city.

	Residential HIG	Residential LIG	Industrial	Commercial	Mixed
Amritsar	Ranjit Avenue	Hindustani Basti	Industrial / Focal Point	IDH Market (near bus stand)	Hall Bazar
Bathinda	Vishal Nagar	Powerhouse Road (near Barnala bye- pass)	Industrial Area near ITI Chowk	Near MC, Bathinda Station Road	Dr. Bakshi Hospital Road
Jalandhar	Urban Estate 1 & 2 + Jyothi Nagar	Basti Sheikh Dussehra Ground	Industrial Area Transport Nagar	Adarsh Nagar	BMC Chowk (near bus stand)
Ludhiana	Sharaba Nagar	Pratap Chowk	Cheema Chowk	Pavilion	Civil Hospital
Mohali	Sector 69	Phase 9	Phase 8	Phase 3B-2	Phase 3B-2 & 8 + Sector 69
Patiala	Model Town	Sanauri Adda	Focal Point	Leela Bhawan	Anardana Chowk

4. Limitations

While this study provides valuable insights into the composition and sources of plastic waste in six major cities of Punjab, certain limitations must be acknowledged. The brand audit conducted cannot claim to be wholly representative of all plastic waste generated across Punjab because several other smaller cities and rural areas were not included due to paucity of time and resources. The diversity of brand names, labelling practices, and parent company affiliations posed challenges in building a fully comprehensive database, and as a result, some linkages between local brands and their parent companies may have been missed. Despite these limitations, the aggregated findings offer a robust picture of plastic waste generation patterns and highlight the significant role of non-recyclable plastics in the urban waste stream.

5. Findings and Analysis

An audit of solid waste across six cities recorded 6991.3 kg of total waste, of which 613.4 kg (8.8%) was plastic. Among the plastic types, flexible plastic dominated at 64.7% of total plastic, followed by MLP at 22.9% and rigid plastic at 12.4% (Fig. 3).

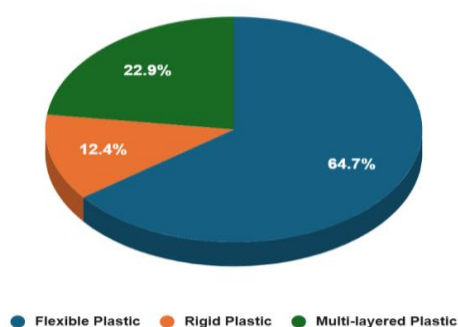


Figure 3 – Sub-Categorization of Plastic Waste

Focusing on MLP/Flexible plastics, a total of 11,810 packets were collected from six cities. In our audit, top 15 brands contributing to 60% of MLP/Flexible waste were identified (Table 3; Fig. 4). Verka (11%), Haldiram's (8.3%), and PepsiCo (7.9%) were the largest contributors, while other major brands like HUL, Parle, Nestle, and Britannia also accounted for significant shares (Fig. 4). City wise analysis of total

waste collected, along with breakdown of plastic fractions and data on top 10 MLP/Flexible plastic polluting brands identified in each city, are presented in subsequent tables (Tables 4-10; Annexures I-VI).

This analysis highlights two key insights: a small set of brands dominates generation of MLP/Flexible waste and Flexible Plastic forms the largest share of plastic waste overall, providing clear targets for brand-specific interventions and reduction strategies.

Table 3: Top 15 brands identified, with a combined share of 60% of total MLP/Flexible waste collected from six cities.

Rank	Brand	Total Packets	% of Total (11,810)
1	Verka	1,299	11 %
2	Haldiram's	983	8.3 %
3	PepsiCo	935	7.9 %
4	HUL	639	5.4 %
5	Parle	576	4.9 %

6	Nestle	535	4.5 %
7	Britannia	491	4.2 %
8	Amul	321	2.7 %
9	ITC	276	2.3 %
10	DFM Foods	256	2.2 %
11	Baba Milk	208	1.8 %
12	Mondelez	173	1.5 %
13	Bonn Group	156	1.3 %
14	Tata	137	1.2 %
15	Mrs. Bector Foods	99	0.8 %
	Total	7,084	60%

Figure 4: Pie-chart representing the % share of each top polluter.

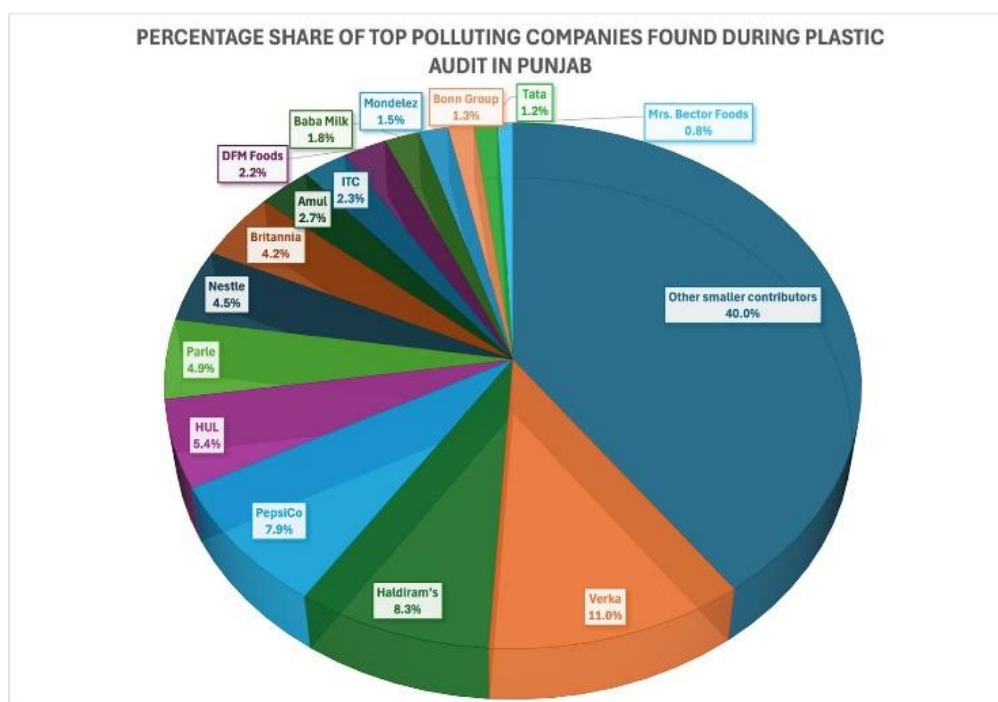


Table 4: Amritsar – 1005 packets collected. Top 10 brands, with 467 packets, had 46.5% share in total MLP/Flexible waste (Annexure I).

Rank	Brand	Packets	% of Total (1005)
1	Haldiram's	152	15.1 %

2	HUL	62	6.2 %
3	Britannia	58	5.8 %
4	PepsiCo	52	5.2 %
5	Amul	36	3.6 %
6	ITC	28	2.8 %
7	Tata Group	21	2.1 %
8	Verka	21	2.1 %
9	DFM	19	1.9 %
10	Vadilal	18	1.8 %
	Total	467	46.5%

Table 5: Jalandhar – 3,125 packets collected. Top 10 brands, with 1,950 packets, had 62.4% share in total MLP/Flexible waste (Annexure III).

Rank	Brand	Packets	% to Total (3125)
1	Verka	444	14.2 %
2	HUL	335	10.7 %
3	PepsiCo	265	8.5 %
4	Haldiram's	212	6.8 %
5	Amul	138	4.4 %
6	Britannia	135	4.3 %
7	DFM Foods	135	4.3 %
8	Nestle	129	4.1 %
9	ITC	97	3.1 %
10	Chanakya Dairy Products	60	1.9 %
	Total	1,950	62.4%

Table 6: Bathinda – 1,927 packets collected. Top 10 brands, with 870 packets, had 45.1% share in total MLP/Flexible waste (Annexure II).

Rank	Brand	Packets	% to Total (1,927)
1	Haldiram's	218	11.3 %
2	Baba Dairy	195	10.1 %
3	PepsiCo	140	7.3 %
4	Verka	53	2.8 %
5	Saras Dairy	49	2.5 %
6	Bonn Group	48	2.5 %
7	Nestle	45	2.3 %
8	Britannia	44	2.3 %
9	ITC	41	2.1 %
10	HUL	37	1.9 %
	Total	870	45.1%

Table 7: Mohali – 1,984 packets collected. Top 10 brands, with 1,301 packets, had 65.6% share in total MLP/Flexible waste (Annexure V)

Rank	Brand	Packets	% To Total (1,984)
1	Verka	492	24.8 %
2	Parle	167	8.4 %
3	Nestle	167	8.4 %
4	PepsiCo	140	7.1 %
5	Haldiram's	107	5.4 %
6	Britannia	100	5.0 %
7	Bonn	34	1.7 %
8	Amul	33	1.7 %
9	ITC	31	1.6 %
10	Mondelez	30	1.5 %
	Total	1,301	65.6%

Table 8: Ludhiana – 2,000 packets collected. Top 10 brands, with 945 packets, had 47.3% share in total MLP/Flexible waste (Annexure IV).

Rank	Brand	Packets	% To Total (2,000)
1	Haldiram's	202	10.1 %
2	Verka	180	9.0 %
3	PepsiCo	139	7.0 %
4	HUL	92	4.6 %
5	Amul	70	3.5 %
6	Nestle	62	3.1 %
7	DFM Foods	58	2.9 %
8	Britannia	58	2.9 %
9	ITC	52	2.6 %
10	Bonn Group	32	1.6 %
	Total	945	47.3 %

Table 9: Patiala – 1,769 packets collected. Top 10 brands, with 1,072 packets, had 60.6% share in total MLP/Flexible waste (Annexure VI).

Rank	Brand	Packets	% To Total (1,769)
1	Parle	289	16.3 %
3	PepsiCo	199	11.2 %
4	Nestle	118	6.7 %
5	Verka	109	6.2 %
6	Britannia	96	5.4 %
7	Haldirams	92	5.2 %
8	HUL	76	4.3 %
9	Mondelez	51	2.9 %
10	Archian Foods	42	2.4 %
	Total	1,072	60.6%

Table 10: City-wise summary of plastic audit including percentage analysis

City	Total Sample (kg)	Total Plastic (kg)	Flexible plastic(kg)	Rigid Plastic (kg)	MLP (kg)
Amritsar	1104.0	27.1	15.0	4.2	7.9
Jalandhar	911.8	178.6	117.7	9.3	51.6
Bathinda	995.0	50.5	28.0	5.0	17.5
Mohali	926.6	149.0	88.5	37.2	23.3
Ludhiana	988.5	147.3	110.8	15.6	20.8
Patiala	2,065.4	60.9	36.8	4.5	19.5
Total	6991.3	613.4	396.8	75.8	140.7
Average	1165.2	102.2	66.1	12.6	23.5
%		8.8%	64.7	12.4	22.9
		(of total sample)	(of total plastic)	(of total plastic)	(of total plastic)

6. Findings on Extended Producer Responsibility (EPR) in Punjab and Concerns surrounding Geo-Neutrality

Brands identified as biggest contributors to plastic pollution in the state were summoned by PPCB and asked to submit their EPR data. The analysis of EPR compliance submissions furnished by major Plastic Waste Producers, Importers and Brand Owners (PIBOs) identified through PPCB's Plastic Brand Audit reveals a significant structural limitation in the current geo-neutral EPR framework. While most entities appear to be complying with their EPR obligations on paper through the purchase of EPR certificates, the overwhelming majority of such certificates have been sourced from recyclers and waste processors located outside Punjab (Annexure VII). For several large brands examined during the exercise, including major FMCG and food-sector companies, less than 5-10% of their EPR obligations were fulfilled through Punjab-based recyclers despite substantial consumption and plastic waste generation within the State. In some cases, virtually all EPR credits were procured from recyclers outside Punjab.

The fundamental objective of Extended Producer Responsibility is not merely to enforce legal compliance but to ensure that plastic waste generated in the marketplace is collected, processed, and recycled in an environmentally sound manner. Under the present geo-neutral regime, a company can generate significant quantities of plastic waste in Punjab, derive substantial revenue from consumers within the State (Annexure VIII), and yet discharge most of its EPR obligations through collection and recycling activities undertaken hundreds or thousands of kilometres away. Consequently, while compliance is reflected in national databases, the corresponding investments in collection systems, Material Recovery Facilities (MRFs), recycling infrastructure, employment generation, and waste

recovery ecosystems do not necessarily accrue to the State where the waste burden is actually experienced.

The findings of PPCB's Plastic Brand Audit demonstrate that the principle of Extended Producer Responsibility should evolve beyond certificate procurement and towards ensuring that a meaningful proportion of plastic waste generated within a jurisdiction is also collected, processed, and recycled within that jurisdiction. Such an approach would better align the objectives of EPR with the broader goals of resource efficiency, circular economy development, and environmental accountability.

PPCB therefore submits that geoneutrality within EPR must be done away with, to strengthen the existing EPR framework. While retaining a degree of flexibility for industry, the framework should incentivize or mandate that a reasonable proportion of EPR obligations be fulfilled within the State of waste generation. Such an approach would improve traceability of plastic waste flows, reduce transportation-related environmental impacts, and create a direct linkage between plastic consumption and plastic recovery. Most importantly, it would ensure that States actively undertaking plastic waste management and enforcement efforts are able to realize tangible environmental benefits from EPR implementation on the ground.

The existing framework may also be examined in light of the Polluter Pays Principle, recognized by the Hon'ble Supreme Court of India as part of environmental jurisprudence under Article 21 of the Constitution. The principle requires that environmental costs be borne by the polluter and not transferred to society at large. A system where plastic waste generated in one jurisdiction is offset entirely through activities in another jurisdiction risks diluting the nexus between pollution generation and environmental remediation.

Punjab Pollution Control Board, being the prescribed authority under the Plastic Waste Management Rules, 2016 for enforcement and monitoring within the State, shall continue to undertake inspections, compliance reviews and other regulatory actions in accordance with applicable law.

7. Way Forward

The findings of this study underscore the urgent need for collective, sustained action by brand owners, regulators, and waste management stakeholders to address the mounting challenge of non-recyclable plastics, particularly MLPs and Flexible Plastic. Most local and national brands, which contribute significantly to MLP and Flexible Plastic waste streams, are now largely registered on CPCB's EPR portal, though compliance in most cases remains largely just on paper. This not only limits traceability but also undermines the intent of the EPR regime. To bridge this enforcement-compliance gap, there is a need for greater transparency and third-party verification of compliance claims, ensuring that EPR targets reflect the actual quantity of plastic introduced, collected and processed.

State-specific EPR obligations should be incorporated into the existing framework to strengthen accountability and improve environmental outcomes. At present, EPR targets are calculated and fulfilled on a nationally aggregated basis, without adequately reflecting the geographic distribution of plastic consumption and waste generation. CPCB should require Producers, Importers and Brand Owners (PIBOs) to furnish state-wise data regarding the quantity of plastic packaging introduced into the market in each State. Based on such disclosures, the EPR portal should calculate corresponding state-level collection, recycling and end-of-life disposal obligations. Compliance should be assessed

not merely at the national level but also against state-specific performance. State Pollution Control Boards should have complete and effective access to all data, along with adequate enforcement powers to ensure effective compliance. Such a framework would also ensure that States bearing the burden of plastic pollution receive proportionate investments in collection systems, material recovery facilities, recycling infrastructure and waste processing capacity. It would further significantly improve traceability, facilitate regulatory oversight by State Pollution Control Boards, and establish a direct nexus between plastic consumption and plastic recovery within the same jurisdiction, thereby advancing the objectives of Extended Producer Responsibility and the Polluter Pays Principle.

PPCB strongly urges all producers, importers, and brand owners – to enrol and comply with EPR norms without delay, both in letter and spirit. Smaller and local producers should be brought into the EPR ecosystem through simplified registration processes and capacity-building support, including partnerships with NGOs and social enterprises, which have demonstrated expertise in integrating the informal sector and enabling inclusive EPR implementation. Increased compliance will ensure that post-consumer plastics are diverted away from landfills and open environments and redirected instead towards responsible treatment and recycling pathways.

To manage Flexible Plastics and MLPs already present in the waste stream, multiple technological and industrial solutions can be deployed simultaneously. Pyrolysis offers one viable method, converting mixed plastic waste into pyro-oil, a high-calorific-value fuel resource that can be refined for industrial use. Another high-impact route is co-processing in cement kilns, where plastic waste serves as Alternative Fuel and Raw Material (AFR). The CPCB has issued SOPs and guidelines for plastic co-processing, and several major cement manufacturers are already equipped to use plastic waste in their clinker production units. During the process, plastics are completely combusted or chemically destroyed at temperatures exceeding 1400°C, with zero residue and full energy recovery, thus preventing any residual microplastic formation. These cement manufacturers also issue EPR certificates to producers as proof of environmentally sound disposal. Plastic-to-clinker is a cleaner solution compared to repurposing of plastic waste in road construction projects, where plastic is only physically immobilized in bitumen, thus lowering its immediate environmental risk but not completely eliminating microplastic release in the long-term.

Similarly, a growing number of waste-to-energy companies in India are capable of processing mixed solid waste, including plastics, into usable energy through controlled incineration and energy recovery systems. Both plastic-to-clinker and plastic-to-energy pathways represent legitimate, scalable mechanisms to reduce plastic pollution while contributing to India's energy and circular economy goals. PPCB urges brand owners and producers to actively explore partnerships with these sectors as part of their proactive EPR compliance strategies.

However, while these interventions offer effective short to medium-term solutions, they do not address the root cause of the problem, i.e., the continued production of non-recyclable plastics. The long-term objective must be to phase out MLPs and Flexible Plastics altogether and transition toward sustainable, circular material systems. This requires embracing the principles of REVEAL, REDUCE, and REDESIGN:

- REVEAL the types, quantities, and lifecycle impacts of plastics being produced and disposed;
- REDUCE overall dependence on flexible and multi-layered plastics through material substitution and demand reduction; and
- REDESIGN packaging, product systems, and supply chains to eliminate the need for non-recyclable materials altogether.

PPCB is committed to combining stringent regulatory enforcement with facilitating collaboration with relevant stakeholders to go beyond managing plastic waste to fundamentally eliminating it from the environment, paving the way for a cleaner and sustainable Punjab.

8. Appendices:

Fig. 1: Waste Sampling

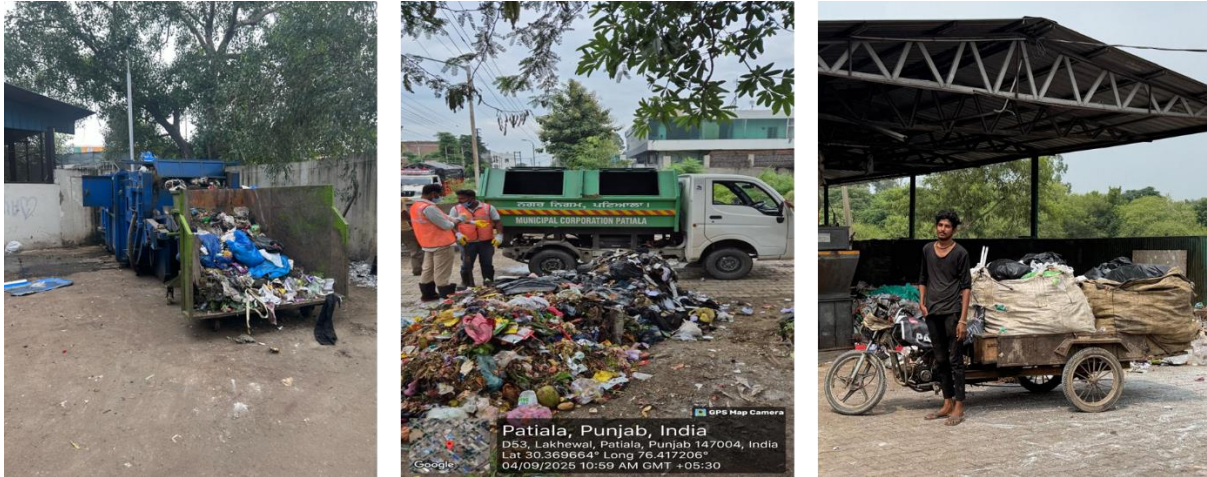


Fig. 2: Weight Segregation & Weighing



Fig. 3: Brand Audit



9. Annexure I (Amritsar):

a. Solid Waste Sample Audit Sheet - Amritsar:

Solid Waste Sample Audit Sheet											
District/RO: Amritsar											
Official: Er. Harmandeep Singh Sandhu (AEE, HQ-3), Er. Sukhmani Singh (AEE), Er. Yugyadveer Singh (JEE)											
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Plastic (kg)	C&D Waste (kg)	Organic / Compostabl	Wood (kg)	Glass (kg)	Cloth (kg)	Misc. (kg)	Solid Waste Generated per day (Kg)
HIG Residential	16.09.2025	Ranjit Avenue	185	3.1	3.7	170.88	2.52	1.5	3.3	-	3600
Industrial	15.09.2025	Industrial/Foca	285	5.65	15	222.5	9.4	3.5	11.65	17.3	2900
Commercial	16.09.2025	IDH market,	205	8.67	5.6	164.13	4.25	3.8	4.65	13.9	550
Mix Use	16.09.2025	Hall Bazar	194	5.04	2.15	165.46	3.3	1.78	7.32	8.95	1000
Total			1104	27.11	38.2	931.42	24.47	12.38	30.27	40.15	8550

b. Plastic Waste Sample Audit Sheet - Amritsar:

Plastic Waste Audit Sheet						
District/RO: Amritsar						
Official: Er. Harmandeep Singh Sandhu (AEE, HQ-3), Er. Sukhmani Singh (AEE), Er. Yugyadveer Singh (JEE)						
Sample Area	Date of Sampling	Place of Sampling	Total Weight	Flexible/SUP (kg)	Rigid Plastic (kg)	
					(PET/HDPE/LDPE)	MLP (kg)
LIG Residential	16.09.2025	Hindustani	4.65	2.65	-	2
HIG Residential	16.09.2025	Ranjit Avenue	3.1	1	1.5	0.6
Industrial	15.09.2025	Industrial/Focal	5.65	3.65	0.9	1.1
Commercial	16.09.2025	IDH market,	8.67	5.17	1	2.5
Mix Use	16.09.2025	Hall Bazar	5.04	2.5	0.8	1.74
Total			27.11	14.97	4.2	7.94

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Amritsar:

Sr. No.	Brand	MLP Count
1	Local/Regional Brand	341
2	Haldiram's Group	152
3	HUL	69
4	Britannia Industries	58
5	PepsiCo	52
6	GCMMF	36
7	ITC Limited	28
8	Milkfed Punjab	21
9	Tata Group	21
10	DFM Foods Ltd.	19
11	Godrej Consumer Products	18
12	Vadilal Industries Ltd.	18
13	Americana Group	17
14	Mondelez	17
15	Parle Products Pvt. Ltd.	17
16	Nestlé	14
17	Kuber Group	12
18	Unicharm Corporation	11
19	Nirma Ltd.	9
20	Adani Wilmar Ltd.	7
21	Bikanervala Foods Pvt. Ltd	6
22	MDH Spices Pvt. Ltd.	6
23	Mysore Deep Perfumery H	6
24	Anmol Industries Ltd.	5
25	Surya Food & Agro Ltd.	5
26	Bonn Group of Industries	4
27	Bunge India	4
28	Cremica Food Industries Lt	4
29	Pan Parag India Ltd.	4
30	Farmley (Indian D2C brand	3
31	SC Johnson	3
32	Bikaji Foods International I	2
33	Drools Pet Food Pvt. Ltd.	2
34	Patanjali Ayurved Ltd.	2
35	Perfetti Van Melle	2
36	Amazon India	1
37	Bambino Agro Industries Lt	1
38	Dabur India Ltd.	1
39	Dharmani Deni Pvt. Ltd.	1
40	Dr. Reddy's	1
41	Guiltfree Industries Ltd. (Rf	1
42	IFFCO	1
43	Mars Inc.	1
44	MTR Foods Pvt. Ltd. (owne	1
45	RJ Corp (Devyani Food Indu	1
	Total	1005

10. Annexure II (Bhatinda):

a. Solid Waste Sample Audit Sheet - Bathinda:

Solid Waste Sample Audit Sheet													
District/RO: Mohali	Bathinda												
Official:	EE Daljit Singh, AEE Akshit Kapil (HQ3/4) & JEE Supinder												
Sample Area	Date of	Place of	Total Weight	Plastic	C&D/In	Carboar	E-	Metal	Organic	Wood	Glass	Clothes	Misc.
LIG Residential	16-Sep-25	Power House	192.00	4.40	21.55	1.56	0.00	0.00	160.53	0.80	0.40	2.22	0.50
HIG Residential	16-Sep-25	Vishal Nagar,	218.00	9.37	46.45	1.21	0.00	0.00	154.68	0.80	1.25	4.29	0.00
Industrial	15-Sep-25	Industrial Area	205.00	14.07	78.35	4.99	0.00	0.00	102.49	-	0.00	3.88	1.21
Commercial	15-Sep-25	Near M.C	195.00	9.54	0.00	4.91	0.00	0.83	165.72	5.76	0.55	7.69	0.00
Mixed Use	16-Sep-25	Dr. Bakshi	185.00	13.13	51.47	4.10	0.00	1.25	103.00	0.49	0.30	8.76	2.50
Total			995.00	50.51	197.82	16.77	0.00	2.08	686.42	7.85	2.50	26.84	4.21

b. Plastic Waste Sample Audit Sheet - Bathinda:

Plastic Waste Sample Audit Sheet						
District:	Bathinda					
Official:	EE Daljit Singh, AEE Akshit Kapil (HQ3/4) & JEE Supinder					
Sample Area	Date of	Place of Sampling	Total	Flexible	Rigid	MLP
LIG Residential	16-Sep-25	Power House Road,	4.44	2.84	0.00	1.60
HIG Residential	16-Sep-25	Vishal Nagar, Bathinda	9.37	4.28	1.25	3.84
Industrial	15-Sep-25	Industrial Area Near	14.07	8.35	1.10	4.62
Commercial	15-Sep-25	Near M.C Bathinda	9.46	4.91	2.65	1.90
Mixed Use	16-Sep-25	Dr. Bakshi Hospital	13.17	7.63	0.00	5.54
Total			50.51	28.01	5.00	17.50

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Bathinda:

Sr. No.	Brand	MLP Count	Sr. No.	Brand	MLP Count
1	Local Brands	586	37	FieldFresh Foods (Del Monte JV)	5
2	Haldiram Snacks Private Limited	218	38	Kothari Products Ltd.	5
3	Baba Dairy	195	39	Quick Eats Pvt. Ltd.	5
4	PepsiCo	140	40	Rajshree Group	5
5	Punjab State Cooperative Milk Producers' Federation (MILK)	53	41	Bikanervala Foods Pvt. Ltd.	4
6	Saras (Rajasthan Cooperative Dairy Federation - RCDF)	49	42	Prataap Snacks Limited	4
7	Bonn Group of Industries	48	43	Dabur India Ltd.	3
8	Nestlé	45	44	Jyothy Labs	3
9	Britannia Industries	44	45	KRBL Ltd.	3
10	ITC Limited	41	46	Nabati Foods (Indonesia)	3
11	Hindustan Unilever Limited (HUL)	37	47	Zydus Wellness Ltd.	3
12	Kitty Industries Pvt. Ltd.	37	48	Godrej Consumer Products Limited	2
13	Gujarat Cooperative Milk Marketing Federation (GCMMF)	35	49	Greendot Health Foods Pvt. Ltd.	2
14	Manikchand Group	32	50	Guilfree Industries (RP-Sanjiv Goenka Group)	2
15	DFM Foods	22	51	JK Cement Ltd.	2
16	Creteca Food Industries Ltd.	21	52	McCain Foods Ltd. (Canada)	2
17	Parle Products	21	53	MDH Pvt. Ltd.	2
18	Adani Wilmar Ltd.	20	54	Mother Dairy Fruit & Vegetable Pvt. Ltd. (NDDB)	2
19	Bikaji Foods International Ltd.	20	55	PRAN-RFL Group (Bangladesh)	2
20	Ruchi Soya Industries Ltd. (now owned by Patanjali Group)	20	56	The Americana Group (Kuwait Food Company)	2
21	TRDP Happy World Private Limited	20	57	Vimal Pan Masala - Dhariwal Industries	2
22	Shyam Rass Snacks	18	58	3M	1
23	Mondelez International	12	59	Ansul Pvt. Ltd.	1
24	Badshah Bikaner Food Products Pvt. Ltd.	11	60	Bunge India Pvt. Ltd.	1
25	Surya Food & Agro Ltd.	11	61	Conagra Brands	1
26	Tata Consumer Products	11	62	Devyani Food Industries Ltd.	1
27	TRDP Group	11	63	Dharampal Premchand Ltd (DPPCL)	1
28	Unicharm Corporation (Japan)	11	64	Dr. Oetker India Pvt. Ltd.	1
29	Lotte Confectionery	9	65	Everest Spices	1
30	Shikhar Group	9	66	Kellogg's Company	1
31	Veeba Foods Pvt. Ltd.	9	67	Lindt & Sprüngli	1
32	Nirma Limited	8	68	Procter & Gamble (P&G)	1
33	Satmola Group	8	69	Tara Health Foods Ltd.	1
34	Perfetti Van Melle	7	70	Trident Group	1
35	Babaji Namkeen	6	71	Wipro Consumer Care	1
36	DS Group (Dharampal Satyapal Group)	5			
		Total			1850

11. Annexure III (Jalandhar):

a. Solid Waste Sample Audit Sheet - Jalandhar:

Solid Waste Sample Audit Sheet													
District/RO: Jalandhar													
Official: Swati Dey (Consultant), Dhruv Suri (Senior Fellow), Jaspreet (RO), Harpreet (RO)													
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Plastic (kg)	C&D Waste (kg)	Organic / Compostable (kg)	Wood (kg)	Glass (kg)	Cloth (kg)	Misc. (kg)	E-Waste (kg)	Metal (kg)	Cardboard/ Paper (kg)
LIG Residential	15.09.2025	Basti Sheikh Dussehra Ground	201.9	29.7	1.6	141.2	0.9	2.1	19.5	0	0.1	0	6.8
HIG Residential	15.09.2025	Urban Estate 1 & 2 + Jyothi Nagar	180.5	39	0	127.7	0.12	1.5	8	0	0.11	0	4.1
Industrial	15.09.2025	Transport Nagar	186.9	40.8	0	118	1.1	1.8	17.6	0	0.2	0	7.4
Commercial	15.09.2025	Adarsh Nagar	214.1	23.8	0	173.1	0	0	7.1	0	0.12	0.1	9.9
Mix Use	15.09.2025	BMC Chowk, Near Bus Stand	128.3	45.3	0	62.2	0.12	1.9	6.2	0	0.1	0	12.5
Total			911.8	178.6	1.6	622.2	2.2	7.3	58.4	0.0	0.6	0.1	40.7

b. Plastic Waste Sample Audit Sheet - Jalandhar:

Plastic Waste Audit Sheet						
District/RO: Jalandhar						
Official: Swati Dey (Consultant), Dhruv Suri (Senior Fellow), Jaspreet (RO), Harpreet (RO)						
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Flexible/SUP (kg)	Rigid Plastic (kg) (PET/HDPE/LDPE)	MLP (kg)
LIG Residential	15.09.2025	Basti Sheikh Dussehra Ground	29.7	19.2	2.8	7.7
HIG Residential	15.09.2025	Urban Estate 1 & 2 + Jyothi Nagar	39	24.6	2.4	12
Industrial	15.09.2025	Transport Nagar	40.8	28.3	2	10.5
Commercial	15.09.2025	Adarsh Nagar	23.8	14.9	1.9	7
Mix Use	15.09.2025	BMC Chowk, Near Bus Stand	45.3	30.7	0.178	14.4
Total			178.6	117.7	9.278	51.6

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Jalandhar:

Sr. No.	Brand	MLP Count	Sr.	Brand	MLP Count	Sr.	Brand	MLP Count
1	Verka	444	35	Micro Labs	11	69	McCain	2
2	Local brands	421	36	Patanjali	11	70	Nexa ORS	2
3	HUL	335	37	Hersheys	9	71	Peepul Capital LLC	2
4	PepsiCo	265	38	Marico	8	72	Prataap Snacks	2
5	Haldiram's	212	39	Surya Food & Agro	8	73	Rajdhani Group	2
6	Amul	138	40	Conagra Brands	7	74	Baba Ramdev Chem Food	1
7	Britannia	135	41	Jyothy Labs	7	75	BD Agro Foods	1
8	DFM Foods	135	42	Kiwi Foods	7	76	CavinKare	1
9	Nestle	129	43	Bunge India	6	77	Coca-Cola Company	1
10	IITC	97	44	Comfort	6	78	Colgate-Palmolive	1
11	Chanakya Dairy Products	60	45	Drools	6	79	DS Group	1
12	Parle	60	46	Mansi	6	80	Ferrero Group	1
13	Mondelez International	42	47	Metro Milk Products	6	81	Flair Writing Industries	1
14	P&G	38	48	Nabati Group	6	82	Godfrey Phillips	1
15	Adani Wilmar	37	49	TRDP group	6	83	Karnataka Milk Federation (Nandnee)	1
16	Godrej Group	35	50	GuiltFree Industries	5	84	LT Foods	1
17	Tata	35	51	M/S SUDERSHAN TOBACCOS	5	85	Mars Petcare	1
18	Babaji Snacks	33	52	Novelty Group	5	86	Mehrotra Consumer Products	1
19	Unicharm Corporation	31	53	Today Tea	5	87	Milky Mist	1
20	Kitty Industries Pvt. Ltd.	28	54	Ananda Dairy	4	88	Parivar Healthcare	1
21	Bonn Group of Industries	22	55	Cool Lip	4	89	PCI Pest Control	1
22	Dabur	18	56	Morecare	4	90	Pidilite Industries	1
23	Mother Dairy	18	57	Nirma	4	91	RS Foods	1
24	JK Foods	17	58	Parkash masale	4	92	RSPL Group	1
25	Avenue Supermarts	16	59	Uttam Group	4	93	Shakti Bhog Foods	1
26	Bambino Agro Industries	14	60	Amar Biscuit Co	3	94	Shree Renuka Sugars Limited	1
27	MDH	14	61	CVC Capital Partners	3	95	Simbhaoli Sugars	1
28	Mrs. Bector's Food Specialties	14	62	Johnson & Johnson	3	96	Trimurti Fragrances	1
29	Baba Milk	13	63	VRB Consumer Products	3	97	Walmart	1
30	Perfetti Van Melle	13	64	Bikaji Foods International	2			
31	Lotte India	12	65	CG Corp Global	2			
32	Reckitt Benckiser	12	66	Golden King	2			
33	Bikanervala Foods	11	67	Haleon	2			
34	Fena	11	68	J.G. Hosiery	2			
							Total	2915

12. Annexure IV (Ludhiana):

a. Solid Waste Sample Audit Sheet - Ludhiana:

Solid Waste Sample Audit Sheet														
District/RO: Ludhiana														
Official: Yash Palaria (SRO PDC), EE Rantej Sharma (PPCB), AEE Sahil Vinayak (PPCB), Maheshwar Singh (MC Ludhiana).														
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Plastic (kg)	C&D/Inert (kg)	Cardboard/paper	E-waste	Metal	Organic / Compostable (kg)	Wood (kg)	Glass (kg)	Clothes/rag s/shoes (kg)	Misc. (kg)	Total
LIG Residential	15.09.2025	Pratap Chowk	182.21	25.64	31.43	9.36	-	0.37	68.96	8.8	0.73	20.6	12.17	165.89
HIG Residential	16.09.2025	Sharaba Nagar	177.3	45.62	24.9	4.14	-	0.53	76.3	2.01	1.63	3.65	16.25	175.03
Industrial	15.09.2025	Cheema Chowk	224.42	37.27	38.25	1.71	-	1.98	52.22	3.24	1.23	23.3	59.22	218.42
Commercial	15.09.2025	Pavilion	194.78	16.52	21.84	9.14	-	0.91	71.5	0.72	1.35	21.55	49.46	182.99
Mix Use	15.09.2025	Civil hospital	209.83	22.2	22.21	10.23	-	11.72	71.85	2.4	3.48	8.62	53.5	206.21
Total	-	-	988.54	147.25	138.63	34.58	0	15.51	340.83	17.17	8.42	77.72	178.43	958.54

b. Plastic Waste Sample Audit Sheet - Ludhiana:

Plastic Waste Audit Sheet						
District/RO: Ludhiana						
Official: Yash Palaria (SRO PDC), EE Rantej Sharma (PPCB), AEE Sahil Vinayak (PPCB), Maheshwar Singh (MC Ludhiana).						
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Flexible/SUP (kg)	Rigid Plastic (kg) (PET/HDPE/LDPE)	MLP (kg)
LIG Residential	15.09.2025	Pratap Chowk	25.64	19.02	3.02	3.6
HIG Residential	16.09.2025	Sharaba Nagar	45.62	39.8	2.13	3.68
Industrial	15.09.2025	Cheema Chowk	37.26	31.27	1.78	4.21
Commercial	15.09.2025	Pavilion	16.515	8.1	4.41	4.01
Mix Use	15.09.2025	Civil Hospital	22.2	12.6	4.25	5.34
Total	-	-	147.235	110.79	15.59	20.84

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Ludhiana:

S.No.	Brand	MLP Count	S.No.	Brand	MLP Count
1	Local Brands	751	35	MDH	4
2	Haldirams	202	36	Shiva Tobacco	4
3	Verka	180	37	VOFL	3
4	Pepsico	139	38	Archit Tobacco	3
5	HUL	92	39	Raj Group	3
6	Amul	70	40	GTPPL	3
7	Nestle	62	41	RSPL	3
8	Britannia	58	42	Aviva Life Sciences	2
9	DFM Foods	58	43	Mother Dairy	2
10	ITC	52	44	Marico	2
11	Bonn	32	45	Sai Food Products	2
12	Cremica	22	46	Anmol Industries	2
13	Parle	22	47	Goldiee	2
14	Mondelez	21	48	Cocobites	2
15	P&G	20	49	Morde	2
16	Sethi Super Store	15	50	Coca-Cola	2
17	Jagdamba	15	51	Bichu Chhap Bidi	2
18	Tata	15	52	Ananda	2
19	Kitty	11	53	Givaudan	2
20	Adani	11	54	LT Foods	2
21	Bunge	10	55	Raja Udyog	2
22	JK Group	9	56	Nirma	1
23	Patanjali	9	57	DS Group	1
24	Godrej	8	58	KRBL	1
25	Mohit Foods	7	59	Solis Hygeine Pvt Ltd	1
26	TRDP Group	7	60	Uttam Sugar	1
27	Surya Foods	7	61	Bikanervala	1
28	HariHar Food Products	6	62	Shakti Bhog	1
29	Fena	5	63	Diamond Foods	1
30	Unicharm	5	64	Perfetti	1
31	Bharat Zarda Factory	5	65	Unibic	1
32	Veeba	5			
33	Rajshree	4			
34	Babaji Snacks	4			
				Grand Total	2000

13. Annexure V (Mohali):

a. Solid Waste Sample Audit Sheet - Mohali:

Solid Waste Sample Audit Sheet													
District/RO:	Mohali												
Official:	Gurshagan Kandhola Arshdeep Kang Amanjot Kaur												
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Plastic (kg)	C&D/Inert (kg)	Carboard / Paper (kg)	E-Waste (kg)	Metal (kg)	Organic / Compostable (kg)	Wood (kg)	Glass (kg)	Clothes / Rags / Shoes (kg)	Misc. (kg)
LIG Residential - Phase 9	15-Sep-25	MRF Sector 69	140.40	20.28	-	9.72	0.80	-	90.02	-	4.50	10.08	5.00
HIG Residential - Sector 69	15-Sep-25	MRF Sector 69	230.55	25.82	-	20.00	-	2.74	155.15	-	4.42	10.92	11.50
Industrial - Phase 8	16-Sep-25	MRF Sector 69	155.00	38.70	-	43.34	1.92	1.44	46.68	-	1.88	1.32	19.72
Commercial - Phase 3B-2	16-Sep-25	MRF Sector 69	189.76	21.12	-	19.38	-	5.22	110.98	-	24.56	4.50	4.00
Mixed Use - Phase 3B-2 + Phase 8 + Sector 69	16-Sep-25	MRF Sector 69	210.84	43.10	-	56.92	-	0.94	94.45	-	1.71	5.60	8.12
Total			926.55	149.02	-	149.36	2.72	10.34	497.28	-	37.07	32.42	48.34

b. Plastic Waste Sample Audit Sheet - Mohali:

Plastic Waste Audit Sheet						
District/RO:	Mohali					
Official:	Gurshagan Kandhola Arshdeep Kang Amanjot Kaur					
Sample Area	Date of Sampling	Place of Sampling	Total Weight (kg)	Flexible / SUP (kg)	Rigid Plastic (PET/HDPE/LDPE) (kg)	MLP (kg)
LIG Residential - Phase 9	15-Sep-25	MRF Sector 69	20.28	9.96	6.84	3.48
HIG Residential - Sector 69	15-Sep-25	MRF Sector 69	25.82	12.16	8.36	5.30
Industrial - Phase 8	16-Sep-25	MRF Sector 69	38.70	29.32	3.70	5.68
Commercial - Phase 3B-2	16-Sep-25	MRF Sector 69	21.12	9.34	7.50	4.28
Mixed Use - Phase 3B-2 + Phase 8 + Sector 69	16-Sep-25	MRF Sector 69	43.10	27.70	10.82	4.58
Total			149.02	88.48	37.22	23.32

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Mohali:

S.No.	Brand	MLP Count	S.No.	Brand	MLP Count	S.No.	Brand	MLP Count	S.No.	Brand	MLP Count
1	Verka	492	23	GSK - GlaxoSmithKline	6	45	Badshah Bikaner Food Products Pvt. Ltd.	3	67	Reliance Retail	1
2	Local Brands	393	24	Kitty Industries Pvt. Ltd.	6	46	McCain Foods Ltd.	3	68	Rajdhani Standard Bakery	1
3	Nestle	167	25	Ameon	6	47	Cool Lip	2	69	Colgate-Palmolive	1
4	Parle	167	26	Domino's	5	48	Radhakrishna Food Services Pvt. Ltd.	2	70	Ravi Foods Pvt. Ltd.	1
5	PepsiCo	140	27	Marico Ltd.	5	49	Pagro Frozen Foods Pvt. Ltd.	2	71	GM Foods Pvt. Ltd.	1
6	Haldiram's	107	28	MDH	5	50	GTPPL - Gujarat Tea Processors & Packers Ltd.	2	72	The Hershey Company	1
7	Britannia	100	29	Kulture Forever Pvt. Ltd.	5	51	Godrej	2	73	Sanjay Flour & General Mills	1
8	Bonn Nutrients Pvt. Ltd.	34	30	Uttam Sugar Mills Ltd.	4	52	Agnesi	2	74	Simbhaoli Sugars Ltd.	1
9	Amul	33	31	VRB Consumer Products Pvt. Ltd.	4	53	Orion Corporation	2	75	Kellogg's	1
10	ITC Ltd.	31	32	Orkla India	4	54	Bikaji Foods International Ltd.	2	76	Loreal	1
11	Mondelez	30	33	Guilfree Industries Ltd.	4	55	Babaji Snacks Pvt. Ltd.	2	77	Mars Petcare	1
12	HUL	23	34	Darshan Foods Pvt. Ltd.	3	56	Bunge India Pvt. Ltd.	2	78	Country Delight	1
13	Organic India	23	35	Shakti Bhog Foods Ltd.	3	57	Reckitt & Colman	2	79	IT Foods	1
14	Tata Group	19	36	Mother Dairy	3	58	Patanjali	2	80	Arjun Flour & Oil Industries	1
15	AWL - Adani Wilmar Limited	19	37	Fena	3	59	DFM Foods	2	81	Dhampur Sugar Mills Ltd.	1
16	Mrs. Bector Food Specialties Ltd.	14	38	Balaji Traders	3	60	Surya Food & Agro Ltd.	2			
17	Bikaner Foods Pvt. Ltd.	11	39	Henkel Group	3	61	Chirag Traders	2			
18	Rajdhani Flour Mills Ltd.	8	40	Jalani Enterprises Pvt. Ltd.	3	62	KS Overseas Pvt. Ltd.	2			
19	Unibic Foods India Pvt. Ltd.	7	41	Recorn Foods Pvt. Ltd.	3	63	Terrestrial Foods Ltd.	2			
20	Bisleri International Pvt. Ltd.	7	42	Anand Food Products	3	64	Perfetti Van Melle	1			
21	P&G	7	43	Greendot Health Foods Pvt. Ltd.	3	65	Conagra Brands	1			
22	Hector Beverages Pvt. Ltd.	7	44	Vadilal Industries Ltd.	3	66	Jyothy Labs Ltd.	1			
										Grand Total	1984

14. Annexure VI (Patiala):

a. Solid Waste Sample Audit Sheet - Patiala:

District	Municipal	Sample Type	Location
Patiala	Patiala	Commercial	Leela Bhawan
Category	Sub-category	Weight (kg)	% of Total
Recyclables	Flexible Plastic	15.41	7.91%
	Rigid Plastic	2.78	1.43%
	Multi-layer Plastic	6.9	3.54%
	Glass	1.63	0.84%
	Clothes/Textiles	9.32	4.78%
	Cardboard/Paper	2.44	1.25%
Inorganic	C&D Waste	11.26	5.77%
Biodegradable	Organic & Inert	145.2	74.48%
Total		194.94	100%

b. Plastic Waste Sample Audit Sheet - Patiala:

	Total	Plastic Total	Flexible	Rigid	MLP
Commercial	194.94	25.09	15.41	2.78	6.9
Industrial	810.5	17.91	9.37	1.76	6.78
HIG	355	3.38	1.33	0	2.05
LIG	415	11.12	8.52	0	2.6
Mixed	290	3.37	2.2	0	1.17
	2065.44	60.87	36.83	4.54	19.5

c. Brand-wise Count of Multilayered/Flexible Plastic collected in Patiala:

S.No.	Brand	MLP Count	S.No.	Brand	MLP Count	S.No.	Brand	MLP Count	S.No.	Brand	MLP Count
1	Parle	289	26	Prataap Snacks	7	51	Suryfoods Agro Ltd	2	76	Super Chek	1
2	Local Brands	250	27	Johnson & Johnson	7	52	Saarang International F&B	2	77	Darshan Foods	1
3	PepsiCo	199	28	Fena	6	53	Aneji Sweets	2	78	Super Milk	1
4	Nestle	118	29	Bikanervala Foods	6	54	Nirma Group of Industries	2	79	G.D. Foods	1
5	Milkfed	109	30	Kanta Enterprises	5	55	M C Traders	2	80	Ekam	1
6	Britannia	96	31	BP-Sanjiv Goenka Group	5	56	Murugappa Group	2	81	Sony Group Corp	1
7	Haldiram	92	32	Bunge India	5	57	BambinoAgro	2	82	Bikaji Foods	1
8	HUL	76	33	Cadway Life Sciences	4	58	Satyam	2	83	Trishul Home Care	1
9	Mondelez	51	34	Kanak Overseas	4	59	Reckitt's	2	84	Creambell	1
10	Archian Foods Pvt Ltd	42	35	JK Foods	4	60	Kivi Foods	2	85	GuiltFree Industries	1
11	Unbranded	39	36	Raja Udyog	4	61	Colgate-Palmolive	1	86	Kamco	1
12	Tata Group	36	37	P&G	4	62	Chanakya Dairy Products	1	87	Mother Maid	1
13	ITC	27	38	Packed Vegetable Packets	4	63	Rajesh Oil Mill	1	88	Raj Industries	1
14	Veeba Foods	24	39	Ansul	4	64	KK Tobacco Company	1	89	Muskan	1
15	Mrs. Bector's Food	24	40	Adani Group	4	65	Glori	1	90	Grupo Bimbo	1
16	DFM Foods	20	41	Carborundum Universal	3	66	JSG Group	1	91	Gujarat Tea Processors & Packers Ltd	1
17	Nutriplus	20	42	MDH	3	67	Nagaur's Famous	1	92	NARI'YAL™ cosmetics	1
18	Mother Dairy	16	43	My Dream Foods	3	68	Reliance	1	93	Shri Ram	1
19	Bonn Group of Industries	16	44	DS Group	3	69	Hector Beverages	1	94	Greendot Health Foods	1
20	The Coca-Cola Company	10	45	Havells - QRG Group	3	70	Liv	1	95	Ananda Dairy	1
21	Perfetti Van Melle	9	46	Unicharm Corporation	3	71	Push Henna	1	96	Anmol Industries	1
22	Amul	9	47	Pidlite Industries	2	72	Sudha bidi	1	97	Satmola Products	1
23	Baba Ramdev Chemfood Industries	9	48	Patanjali	2	73	Orion	1	98	TRDP Group	1
24	Godrej Group	8	49	Gagan Bakers	2	74	Madhu Beedi Works	1	99	Weikfield Foods Pvt. Ltd	1
25	Laxmi Snacks	8	50	Chakshu	2	75	Jyothy Labs Ltd	1	100	Ashoka Masale	1
										Grand Total	1769

15. Annexure VII: EPR Data submitted by Brand Owners against PPCB Notice/Hearing

1. Name of the Company: Verka

a. EPR Numbers:

- i. BO-27-000-06-AAAAP1208Q-22
- ii. PR-09-PUN-10-AAAAT5977G-22
- iii. BO-26-PUN-04-AAAAA0503F-23

b. EPR Targets by CPCB:

- i. FY 2022-23: 124 MT
- ii. FY 2023-24: 452 MT
- iii. FY 2024-25: 456 MT

c. Punjab Recyclers - from which they bought EPR:

- i. Aqua Fiber Industries
- ii. IPCA Recycling Plant - Patiala
- iii. Ahuja Plastic Industry
- iv. API Plastic Recyclers Private Limited
- v. Shri Hunny Singla Pvt Ltd
- vi. Mahadev Products
- vii. Singla Plastic Industries

d. Outside Punjab Recyclers - from which they bought EPR:

- i. IPCA Recycling Plant - Greater Noida
- ii. Silvertown Pulp and Papers Private Limited
- iii. Shiva Textfabs Limited
- iv. Sutluj Textile & Industry Limited
- v. EKV Plastic Innovation Pvt. Ltd.
- vi. GARG DUPLEX & PAPER MILLS Ltd.
- vii. PARAMOUNT RECLAIM INDUSTRIES
- viii. Ryzen Oil Energy Solutions
- ix. Rollz India Waste Management
- x. Yashraj Industries
- xi. Mahalakshmi Spintex Pvt Ltd.
- xii. Birla Textile Mills
- xiii. Dalmia Cement Bharat Ltd.
- xiv. Delhi MSW Solutions Ltd.
- xv. JBM environment
- xvi. Mahalakshmi Crafts & Tissues Pvt Ltd
- xvii. Uma Industries
- xviii. KGN Traders
- xix. Fly Ostrich Recycling Pvt Ltd.
- xx. Prakash Industries
- xxi. Smt ANJU SHAW PWP
- xxii. M/s Travencore Plastic Industries
- xxiii. Rizvaan PWP
- xxiv. Arti Plastic PWP

xxv. ACC Ltd

e. Observations:

- i. They have 12 Units across Punjab each with a unique EPR registration number.
- ii. Chandigarh and Mohali were the earliest to obtain EPR in 2022
- iii. RLG System India Pvt Ltd is a PRO (Producer Responsibility Organization) for Verka in EPR Purchase
- iv. Verka got majority of its EPR credits from outside Punjab

2. Name of the Company: Haldiram Snacks Food Pvt Ltd

a. EPR Numbers:

- i. BO-11-000-04-AAGC6000C-25

b. EPR Targets by CPCB: N/A

c. Punjab Recyclers - from which they bought EPR: N/A

d. Outside Punjab Recyclers - from which they bought EPR: N/A

e. Observations:

- i. The company received the registration certificate from CPCB on 11th April 2025, hence no EPR filed.

3. Name of the Company: Pepsico

a. EPR Numbers:

- i. BO-13-000-07-AAACP1272G-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 16557 TPA
- ii. FY 2023-24: 27727 TPA
- iii. FY 2024-25: 30202 TPA

c. Punjab Recyclers - from which they bought EPR:

- i. Aqua Fiber Industries
- ii. API Plastic Recyclers Private Limited
- iii. Shri Hunny Singla
- iv. Mahadev Products
- v. Singla Plastic Industries
- vi. Shiva Texfabs Limited
- vii. Max Speciality Films Limited

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Dalmia Cement (Bharat) Limited (multiple units: Yadwad Belagavi, Rajgangpur, etc.)
- ii. Indian Pollution Control Association
- iii. Shri Laxmi Traders and Process
- iv. KGN Traders
- v. Soutrika Industries Private Limited
- vi. M/s Shiv Shakti Polymers
- vii. Bhumi Green Energy Private Limited
- viii. Shri Man Narayan Polytax Pvt. Ltd. (Pratappura)

- ix. Aqua Fiber Industries
- x. Shakeel MalikBio Mining India Pvt. Ltd.
- xi. EKV Plastic Innovation Pvt. Ltd.
- xii. M/s Maa Shyama Polycraft
- xiii. East Delhi Waste Processing Company Private Limited
- xiv. Jabalpur MSW Pvt. Ltd.
- xv. Selvaganapathy Traders
- xvi. Safar Polyfibre Pvt. Ltd.
- xvii. Yashoda Paribartan Plastic
- xviii. Ganesha Ecosphere Limited (Bilaspur Unit also cited)
- xix. Rollz India Waste Management Pvt. Ltd.
- xx. Paramount Reclaim Industries
- xxi. Verde Polysfy Private Limited
- xxii. Deepak Jasuja
- xxiii. API Plastic Recyclers Private Limited
- xxiv. Hyderabad MSW Energy Solutions Pvt. Ltd.
- xxv. Pashupati Polytex Private Limited
- xxvi. Yashraj Industries
- xxvii. Santosh Plastic Industries (Old Name: Dayaram Plastic)
- xxviii. A One Industries
- xxix. Jay Plastic Industries
- xxx. Shree Bajrang Plastic
- xxxi. Ajmeri Enterprises
- xxxii. Khushi Polymers
- xxxiii. Shree Krishna Polymers
- xxxiv. Amaani Polyflakes
- xxxv. Uma Industries
- xxxvi. Gokul Polymers / Gokul Plastic
- xxxvii. Mahadev Plastic
- xxxviii. Naman Plastic (Old Name: Krishna Polyplast – Unit 2)
- xxxix. Smt Anita Devi
 - xl. Badri Ecofibres Private Limited
 - xli. Spreco Recyclers
 - xl.ii. M/s S.D. Polymer Private Limited
 - xl.iii. S A Enterprises
 - xl.iv. A S Trading
 - xl.v. Shri Subhash Sonal Chopada
 - xl.vi. Eminent Dealers Private Limited
 - xl.vii. Shri Mayank Tekriwal
 - xl.viii. UltraTech Cement Limited (Aditya Cement Works, Gujarat Cement Works, etc.)
 - xl.ix. Shri Hunny Singla
 - I. Shri Adeshwar Industries Pvt. Ltd.
 - li. Rajasthan Plastic Industries

- iii. HP India Sales Private Limited (Brand Owner)
- liii. J K Cement Works Mangrol (Rajasthan)
- liv. M/s Nepra Resource Management Private Limited (Brand Owner)
- lv. Mishra Traders
- lvi. M/s Arti Plastic
- lvii. The Shakti Plastic Industries
- lviii. M/s JBM Environment Management Private Limited
- lix. Mahadev Products
- lx. Alliance Fibres Limited
- lxi. Hind Polymers
- lxii. Jainarain Fabtech Private Limited
- lxiii. Vipul Plastic Industries
- lxiv. Ghanshyam Polymers
- lxv. Sampurnearth Environment Solutions Pvt. Ltd.
- lxvi. Birla Textile Mills Unit II
- lxvii. M/s Kanchan India Ltd. (Spinning Unit)
- lxviii. Kashi Vishwanath Textile Mill (P) Ltd.
- lxix. Max Speciality Films Limited
- lxx. Moogambigai Metal Refineries

e. Observations:

- i. FY 2022-23: 1482 / 16557 MT (<10% are from Punjab recyclers)
- ii. FY 2023-24: 2136 / 27727 MT (<10% are from Punjab recyclers)
- iii. FY 2024-25: 1321 / 30202 MT (<10% are from Punjab recyclers)

4. Name of the Company: HUL

a. EPR Numbers:

- i. BO-14-000-03-AAACH1004N-24

b. EPR Targets by CPCB:

- i. FY 2022-23: 76104 MT
- ii. FY 2023-24: 117142 MT
- iii. FY 2024-25: 46647 MT

c. Punjab Recyclers - from which they bought EPR:

- i. Not mentioned in the response

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Not mentioned in the response

e. Observations:

- i. EPR Data not submitted in the response.

5. Name of the Company: Parle G

a. EPR Numbers:

- i. BO-13-000-07-AAACP0485D-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 41109 TPA
- ii. FY 2023-24: Not Mentioned
- iii. FY 2024-25: Not Mentioned

c. Punjab Recyclers - from which they bought EPR:

- i. Aqua Fiber Industries
- ii. API Plastic Recyclers Private Limited
- iii. Mahalakshmi Spintex Private Limited
- iv. Singla Plastic Industries
- v. Shiva Textfabs Limited
- vi. Shri Hunny Singla
- vii. Mahadev Products
- viii. Max Specialty Films Limited

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Ahuja Plastic Industry
- ii. Delhi MSW Solutions Limited
- iii. JBM Environment Management Pvt. Ltd.
- iv. Krishna Industries
- v. Lavinia Plural Cement (possibly a cement unit, non-Punjab)

e. Observations:

- i. The company purchased more EPR certificates from outside Punjab recyclers.

6. Name of the Company: Nestle

a. EPR Numbers:

- i. BO-13-000-07-AAAN0757G-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 15496 TPA
- ii. FY 2023-24: 23181 TPA
- iii. FY 2024-25: 24646 TPA

c. Punjab Recyclers - from which they bought EPR:

- i. Aqua Fiber Industries
- ii. Shiva Textfabs Limited
- iii. Sutlej Textiles And Industries Limited
- iv. Ahuja Plastic Industry
- v. Delhi MSW Solutions Limited
- vi. JBM Environment Management Pvt Ltd
- vii. Mahadev Products
- viii. Singla Plastic Industries
- ix. Mahalakshmi Spintex Pvt Ltd
- x. API Plastic Recyclers Private Limited
- xi. IPCA Recycling Plant, Greater Noida

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Badri Cotsyn Private Limited
- ii. RPG Industrial Product Private Limited
- iii. Deepak Jasuja
- iv. Dalmia Cement (Bharat) Limited (multiple units: Yadwad Belagavi, Rajgangpur, North East, etc.)
- v. UltraTech Cement Limited (Aditya Cement Works, Gujarat Cement Works, etc.)

- vi. RSWM Ltd.
- vii. Bhumi Green Energy Private Limited
- viii. Deeya Panel Products Private Limited
- ix. API Plastic Recyclers Private Limited
- x. Aqua Fiber Industries
- xi. J K Cement Works Mangrol
- xii. Jabalpur MSW Pvt. Ltd.
- xiii. Indian Pollution Control Association
- xiv. M/s Maa Shyama Polycraft
- xv. Nirmal Fibres Private Limited
- xvi. Ganesha Ecosphere Limited
- xvii. Rollz India Waste Management Pvt. Ltd.
- xviii. EKV Plastic Innovation Pvt. Ltd.
- xix. Hyderabad MSW Energy Solutions Pvt. Ltd.
- xx. Shri Kumar Abhay Singh
- xxi. Kundana Techno Tex Private Limited
- xxii. Yashraj Industries
- xxiii. Yashoda Paribartan Plastic
- xxiv. Mysuru City Corporation (ULB)
- xxv. Pashupati Polytex Private Limited
- xxvi. Siyaram Polymers
- xxvii. Rajasthan Plastic Industries
- xxviii. Eminent Dealers Private Limited
- xxix. Khushi Polymers
- xxx. Shree Krishna Polymers
- xxxi. Hi Touch Plastic
- xxxii. Gayatri Enterprises
- xxxiii. Jignesh Bariya
- xxxiv. Kashi Vishwanath Textile Mill (P) Ltd.
- xxxv. Mahalakshmi Spintex Pvt. Ltd.
- xxxvi. Ansh Modeling and Trading
- xxxvii. Mishra Traders
- xxxviii. Birla Textile Mills Unit II
- xxxix. Shree Renga Polyester Private Limited
- xl. Zero Waste Management
- xli. Alpine Polymers
- xlii. Ayaz Khan
- xliii. Nestle India Limited (Brand Owner)
- xliv. ACC Limited Kymore
- xlv. The Shakti Plastic Industries
- xlvi. Ambuja Cements Limited Rabriyawas
- xlvii. East Delhi Waste Processing Company Private Limited
- xlviii. M/s Nepra Resource Management Private Limited
- xlix. Tehkhand Waste to Electricity Project Limited

- I. M/s Enviro Recycle Private Limited
- ii. Shiva Textfabs Limited

e. Observations:

- i. FY 2022-23: 1017 / 15496 TPA (<10% are from Punjab recyclers)
- ii. FY 2023-24: 958 / 23181 TPA (<5% are from Punjab recyclers)
- iii. FY 2024-25: 1019 / 24646 TPA (<5% are from Punjab recyclers)

7. Name of the Company: Britannia

a. EPR Numbers:

- i. BO-23-000-08-AACB2066P-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 25211 TPA
- ii. FY 2023-24: Not Mentioned
- iii. FY 2024-25: Not Mentioned

c. Punjab Recyclers - from which they bought EPR:

- i. AJANTA PLASTIC
- ii. M/s CHAUHAN INDUSTRIES
- iii. M/s VIJAY PLASTIC
- iv. AQUA FIBRE INDUSTRIES
- v. SINGLA PLASTIC INDUSTRIES

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Shreenathji Plastics
- ii. Meenu Paper Mills Private Limited
- iii. Bindlas Duplux Limited
- iv. RSWM Ltd.
- v. J B Ecotex Limited
- vi. UltraTech Cement Limited (Aditya Cement Works, Gujarat Cement Works)
- vii. Dalmia Cement (Bharat) Limited (Yadwad Belagavi, Rajgangpur, multiple units)
- viii. Akshar Polymers
- ix. Shree Hari Polymers
- x. Shri Gangoji Rao Achutha Rao
- xi. Gokul Plastic
- xii. Shri Laxmi Traders and Process
- xiii. Bhosale Plastic Industries
- xiv. Shri Pradeep Singh
- xv. K K Duplex and Paper Mills Private Limited
- xvi. Yashoda Paribartan Plastic
- xvii. Ajanta Plastic
- xviii. N R Agarwal Industries Limited
- xix. M/s Chauhan Industries
- xx. M/s Vijay Plastic
- xxi. Bharmal Trading
- xxii. Gayatri Enterprises

- xxiii. Bio Mining India Private Limited
- xxiv. Atulya Porima Limited
- xxv. Ultra Recyclers
- xxvi. Rama Waste Private Limited
- xxvii. Junaid Ali
- xxviii. JB RPET Industries Private Limited
- xxix. Rajratan Green Products
- xxx. Birla Textile Mills Unit II
- xxxi. Dodhia Synthetics Limited
- xxxii. Kay Plast Product Pvt Ltd
- xxxiii. Gorecycle Private Limited
- xxxiv. Citizen Plastics
- xxxv. Jabalpur MSW Pvt. Ltd.
- xxxvi. Shri Mohammad Islam
- xxxvii. Nirmal Fibres Private Limited
- xxxviii. Ganesha Ecosphere Limited
- xxxix. Paramount Reclaim Industries
 - xl. Shakeel Malik
 - xli. Maruti Papers Private Limited
 - xlii. Shree Krishna Industries
 - xliii. M/s Kannapiran Polymers Limited
 - xliv. 2 Degrees Clicon Pvt Ltd (Formerly GK Industries)
 - xlv. Shree Renga Polyester Private Limited
 - xlvi. Hyderabad MSW Energy Solutions Pvt Ltd
 - xlvii. Shri Kumar Abhay Singh
- xlviii. Avid Industries Private Limited
- xliv. Infinity Poly Plast
 - l. VP Plast
 - li. Patidar Polymers
 - lii. R K Hitech Plast
 - liii. S A Enterprises
 - liv. Pinnacle Industries
 - lv. FF Polymers
 - lvi. MS Plastics
 - lvii. Abhinav Strips
- lviii. Smt Anju Shaw
- lix. Shri Dilshad Ali
- lx. Anchal Plast India Pvt Ltd
- lxi. Suraj Plastic Company
- lxii. Rajasthan Plastic Industries
- lxiii. Yes Polymers
- lxiv. Shri Subhash Sonal Chopada
- lxv. M/s Chettinad Cement Corporation Pvt Ltd
- lxvi. Bahl Paper Mills Limited

- lxvii. Adiva Polymers
- lxviii. Timarpur-Okhla Waste Management Company Limited
- lxix. Shreeji Plastic
- lxx. Aqua Fiber Industries
- lxxi. Singla Plastic Industries
- lxxii. M/s JBM Environment Management Pvt Ltd
- lxxiii. Rollz India Waste Management Pvt Ltd
- lxxiv. Kapila Enterprises
- lxxv. ACC Limited Kymore
- lxxvi. M/s Nextgen Solutions
- lxxvii. Ambuja Cements Limited (Bhatapara, Rabriyawas)
- lxxviii. Watair Envisol Recycling Solutions
- lxxix. M/s Nepra Resource Management Pvt Ltd
- lxxx. Technova Recycling India Pvt Ltd
- lxxxi. Enviro Recyclean Private Limited
- lxxxii. Gangotri Polymers Industries
- lxxxiii. Datar Polymers
- lxxxiv. Krishna Industries
- lxxxv. Alliance Fibres Limited
- lxxxvi. Spreco Recyclers
- lxxxvii. Asha Recyclean India Pvt Ltd
- lxxxviii. Kashi Vishwanath Textile Mill Pvt Ltd
- lxxxix. Badri Ecofibres Pvt Ltd
- xc. Sneha Plastic
- xc. Nova Polychem Pvt Ltd (Chitegaon)
- xcii. Sampurnearth Environment Solutions Pvt Ltd
- xciii. Sevenstar Polytex Pvt Ltd
- xciv. Prakash Industries
- xcv. Banyan Sustainable Waste Management Pvt Ltd
- xcvi. India Glycols Limited
- xcvii. Revalyu Recycling (India) Limited
- xcviii. KGN Traders
- xcix. Fly Ostrich Recycling Pvt Ltd
- c. Uma Industries
- ci. Kosal Pipe Industries
- cii. Pratiks Waste Resources Management LLP

e. Observations:

- i. The company purchased more EPR certificates from outside Punjab recyclers.

8. Name of the Company: Amul

a. EPR Numbers:

- i. BO-13-000-07-AAAAG5588Q-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 45225 TPA

- ii. FY 2023-24: Not Mentioned
- iii. FY 2024-25: Not Mentioned
- c. **Punjab Recyclers - from which they bought EPR:**
 - i. Shiva Textfabs Limited
 - ii. Aqua Fiber Industries
 - iii. S.D. Polymers
 - iv. KGN Traders
 - v. Vedica Waste Recyclers
 - vi. Mahalakshmi Spintex Pvt Ltd
- d. **Outside Punjab Recyclers - from which they bought EPR:**
 - i. Rollz India Waste Management Pvt Ltd.
 - ii. Timarpur Okhla Waste Management Co. Ltd.
 - iii. Kanchan India Limited
 - iv. Hyderabad Integrated MSW Ltd.
- e. **Observations:**
 - i. The company purchased more EPR certificates from outside Punjab recyclers.

9. Name of the Company: ITC

- a. **EPR Numbers:**
 - i. BO-09-000-03-AAACI5950L-23
- b. **EPR Targets by CPCB:**
 - i. FY 2022-23: 36057 TPA
 - ii. FY 2023-24: 54318 TPA
 - iii. FY 2024-25: 64438 TPA
- c. **Punjab Recyclers - from which they bought EPR:**
 - i. Not mentioned in the response
- d. **Outside Punjab Recyclers - from which they bought EPR:**
 - i. Not mentioned in the response
- e. **Observations:**
 - i. Not mentioned in the report. However, they have provided the transaction IDs against EPR purchases.

10. Name of the Company: DFM Foods Ltd

- a. **EPR Numbers:**
 - i. BO-27-000-06-AAACD1017B-22
- b. **EPR Targets by CPCB:**
 - i. FY 2022-23: 3014 TPA
 - ii. FY 2023-24: 4344 TPA
 - iii. FY 2024-25: 1246 TPA
- c. **Punjab Recyclers - from which they bought EPR:**
 - i. Not mentioned in the response
- d. **Outside Punjab Recyclers - from which they bought EPR:**
 - i. Dalmia Cement (Bharat) Limited (multiple Karnataka entries)
 - ii. Enviro Recyclers Private Limited (Madhya Pradesh)
 - iii. Hyderabad MSW Energy Solutions Private Limited (Telangana)

- iv. Indore MSW Solutions Private Limited (Madhya Pradesh)
- v. M/s Dundigal Waste 2 Energy Private Limited (Telangana)
- vi. M/s JBM Environment Management Private Limited (Haryana)
- vii. Maa Shakumbari Plastic Udyog (Uttar Pradesh)
- viii. Silverton Papers Limited (Uttar Pradesh)
- ix. The Shakti Plastic Industries (Maharashtra)

e. Observations:

- i. All credits the company bought are from outside Punjab.

11. Name of the Company: Baba Milk

- a. **EPR Numbers: N/A**
- b. **EPR Targets by CPCB: N/A**
- c. **Punjab Recyclers - from which they bought EPR: N/A**
- d. **Outside Punjab Recyclers - from which they bought EPR: N/A**
- e. **Observations:**

- i. Small Scale Industry as per MSME. Machinery values less than 10 Cr, EPR Policy is not applicable.

12. Name of the Company: Mondelez

- a. **EPR Numbers:**
 - i. BO-03-000-06-AAACC0460H-22
- b. **EPR Targets by CPCB:**
 - i. FY 2022-23: 9194 MT
 - ii. FY 2023-24: 14574 MT
 - iii. FY 2024-25: 17303 MT
- c. **Punjab Recyclers - from which they bought EPR:**
 - i. Aqua Fiber Industries
 - ii. API Plastic Recyclers Pvt. Ltd.
 - iii. Singla Plastic Recyclers Pvt. Ltd.
 - iv. Ajanta Plastics
- d. **Outside Punjab Recyclers - from which they bought EPR:**
 - i. Not mentioned in the response
- e. **Observations:**

- i. They are ready to recycle 886 MT of plastic during FY 2025-26 from Punjab. Haven't purchased credits from Punjab recyclers in the past.

13. Name of the Company: Bonn

- a. **EPR Numbers:**
 - i. BO-05-000-07-AABCB5189P-23
- b. **EPR Targets by CPCB:**
 - i. FY 2022-23: 451 TPA
 - ii. FY 2023-24: 702 TPA
 - iii. FY 2024-25: 758 TPA
- c. **Punjab Recyclers - from which they bought EPR:**
 - i. Not mentioned in the response
- d. **Outside Punjab Recyclers - from which they bought EPR:**
 - i. Bio Mining India Pvt Ltd

- ii. Paswara Papers Ltd
- iii. M/s CRYSTAL BALAJI INDUSTRIES
- iv. Timarpur-Okhla Waste Management

e. Observations:

- i. All credits the company bought are from outside Punjab.

14. Name of the Company: Tata

a. EPR Numbers:

- i. BO-21-000-06-AABCT0602K-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 11684 TPA
- ii. FY 2023-24: Not Mentioned
- iii. FY 2024-25: Not Mentioned

c. Punjab Recyclers - from which they bought EPR:

- i. Aqua Fiber Industries
- ii. Sutlej Textiles and Industries Ltd
- iii. Shiva Textfabs Ltd
- iv. Singla Plastic Industries
- v. API Plastic Recyclers Private Ltd
- vi. Mahadev Products
- vii. Mahalakshmi Spintex Pvt Ltd
- viii. Shri Hunny Singla

d. Outside Punjab Recyclers - from which they bought EPR:

- i. EKV Plastic Innovation Pvt. Ltd
- ii. Birla Textile Mills Unit II
- iii. Indian Pollution Control Association
- iv. Delhi MSW Solutions Ltd

e. Observations:

- i. The company purchased more EPR certificates from outside punjab recyclers.

15. Name of the Company: MRS. BECTORS FOOD SPECIALITIES LTD.

a. EPR Numbers:

- i. BO-21-000-10-AABCM9495K-22

b. EPR Targets by CPCB:

- i. FY 2022-23: 1343 MT
- ii. FY 2023-24: 2137 MT
- iii. FY 2024-25: 2462 MT

c. Punjab Recyclers - from which they bought EPR:

- i. Not mentioned in the report

d. Outside Punjab Recyclers - from which they bought EPR:

- i. Karma Ecotech Private Limited aka EcoEx

e. Observations:

- i. This agency (EcoEx) is responsible for the collection and recycling of post-consumer plastic waste across the country. They provide EPR services to brands.

16. Annexure VIII (Gross Turnover (GTO) Data of the Brand Owners):

Revenue of the identified brands from sales within Punjab:

S No	Brands/units	Revenue of the identified brands/units from sales within Punjab						TOTAL	Cr (INR)
		GTO_2020_21	GTO_2021_22	GTO_2022_23	GTO_2023_24	GTO_2024_25	GTO_2025_26		
1	Verka	6003427137	7391538527	6487989705	5773521095	9129035387	4715719090	39501230941	3950
2	Haldiram Snacks food pvt ltd	68905414	181741691	355625317	521820062	612097441	355143142	2095333067	209.53
3	Pepsico	20235075972	23979832302	31961967596	33129074266	38557074708	18720382684	166583407528	16658
4	HUL	0	0	0	0	11897958535	7868133697	19766092232	1976.6
5	Parle	3836614463	4530932192	4171804785	4021637059	4356426162	2393949266	23311363927	2331
6	Nestle	27781265607	27951480864	31961505364	34779217070	33685041850	16550749967	172709260722	17270
7	Britannia	327639095	363420396	388198068	383741398	414524548	203699944	2081223449	208.12
8	Amul	6937337789	10897154302	13909688579	15879676865	18105354303	10381139171	76110351009	7611
9	ITC	9759682196	11779537134	8850846544	10117252564	11928466340	6106851739	58542636517	5854.26
10	DFM Foods Ltd	0	0	0	32838494	300219597	159208639	492266730	49.22
11	Baba Milk	12301518	17199802	15698501	10717014	6748846	4849903	67515584	6.75
12	Mondelez	8201786220	9390813122	11520052511	13256571584	10523702479	5163334090	58056260006	5805.62
13	Bonn	2937475802	3731476928	4716494494	5199152888	5390396203	3174721845	25149718160	2514.97
14	Tata	3041699485	3006028514	3686330813	4948136284	5692705822	3147231741	23522132659	2352.21
15	MRS. BECTORS FOOD SPECIALITIES LTD.	5690849007	5465576905	7562065518	8320808488	8681682137	4781406432	40502388487	4050.24

BEFORE THE NATIONAL GREEN TRIBUNAL, NEW DELHI
ORIGINAL APPLICATION NO. 993 OF 2024

IN THE MATTER OF:

**News Item Titled “PACKAGE Where has the plastic waste disappeared”
appearing in Times of India dated 30.07.2024**

VAKALATNAMA

KNOWN ALL to whom these presents shall come that I, Gurjeet Kaur, Environmental Engineer (HQ-3/2) and the authorised representative of the State of Punjab (Respondent No. 7) through the Punjab Pollution Control Board having its office at Vatavaran Bhawan, Nabha Road, Patiala-147001, do hereby appoint in the present matter: Mr. Apar Gupta (D/500/2007), Ms. Indumugi C. (D/5685/2022), Mr. Naman Kumar (D/6574/2023), and Ms. Avanti Deshpande (MAH/2073/2023), E-215, East of Kailash, New Delhi: 110065, Tel:- 9990000256 (hereinafter called the ‘**Advocates**’) to be the Advocates for the Respondent No. 7 through the Punjab Pollution Control Board in the above-mentioned causes, to do all the following acts, deeds and things or any of them, that is to say:-

1. To act, appear and plead in the above-mentioned cause in this Court or any other Court in which the same may be tried or heard in the first instance or in appeal or letters patent appeal or review or revision or execution or in any other stage of its progress until its final decision.
2. To present pleadings, appeals, letters patent appeal, petition of appeal to the Supreme Court, High Courts, cross-objections, or petitions or execution, review, revision, withdrawal compromise or other petitions or affidavits or other documents as shall be deemed necessary or advisable for the prosecution of the said cause in all its stages.
3. To withdraw or compromise the said cause or submit to arbitration any differences or dispute that shall arise touching or in any manner relating to the said cause.

4. To receive moneys and grant receipts thereof and to do all other acts and things which may be necessary to be done for the progress and during the prosecution of the said cause.
5. To employ any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred on the advocates whenever they may think fit to do so.

AND I hereby agree to ratify whatever the advocates or their substitute shall do in the premises.

AND I hereby agree not to hold the Advocates or their substitute responsible for the result of the said cause in consequence of their absence from the Court when the said cause is called up for hearing.

AND I hereby agree that in the event of the whole or any part of the fee agreed by me to be paid to the Advocates remaining unpaid, they shall be entitled to withdraw from the prosecution of the said cause until the same is paid.

IN WITNESS WHEREOF I hereunto set my hand to these presents and the contents of which have been explained to and understood by me, this 03 day of July 2026

Gupta
03/07/2026
Accepted
(Client)

Apur Gupta
APAR GUPTA
(D/500/2007)

Environmental Engineer
Punjab Pollution Control Board
Patiala.

Indumugi C.
INDUMUGI C.
(D/5685/2022)

Naman Kumar
NAMAN KUMAR
(D/6574/2023)

Avanti
AVANTI
DESHPANDE
(MAH/2073/2023)

