

Recyclability Assessment Methodology (RAM) Update

What's changed & how we can help

May 2025



Agenda

- 1 Context of the RAM
- 2 Material specific updates
- 3 How Ecosurety can help



Context of the RAM



The Recyclability Assessment Methodology (RAM)


The RAM was designed to:

- help **determine current packaging recyclability**
- **inform the appropriate Waste Management Fee eco-modulation category:**
 - Red
 - Amber
 - Green

It is intended to **incentivise the use of more recyclable packaging.**



Data reporting

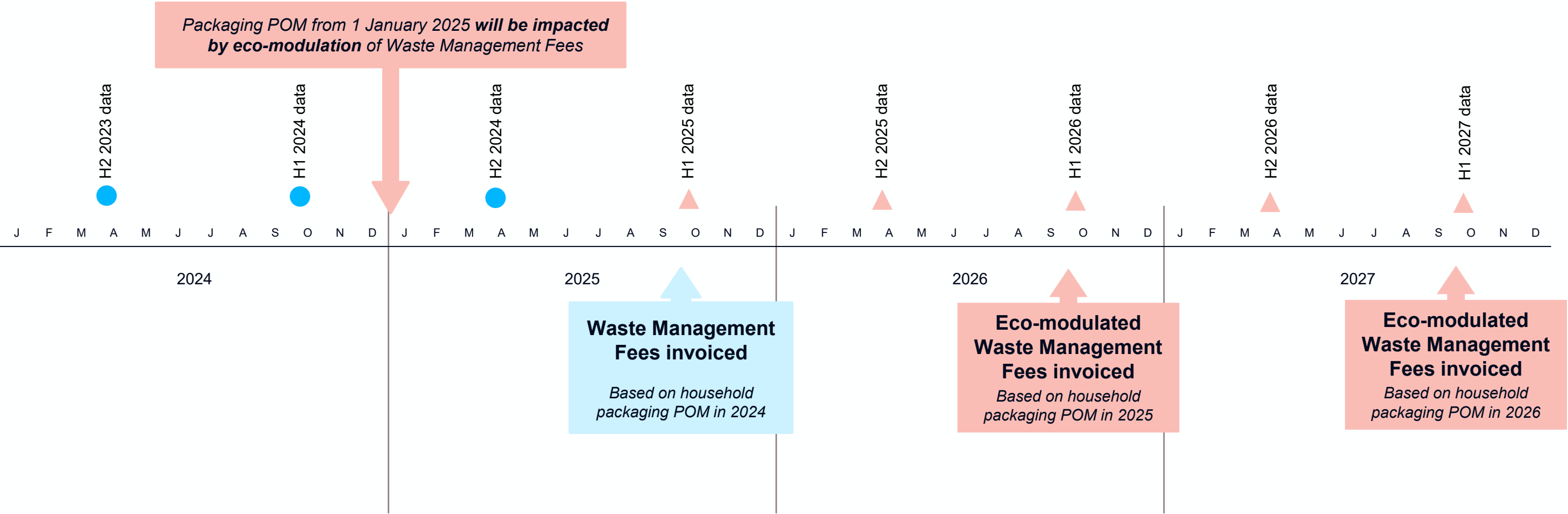


**First data submission
including recyclability
assessment due to
Ecosurety in
July 2025**

- **Large producers** will be required to submit recyclability assessment data for all **household and commonly street binned primary packaging** placed on the market
- Submitted with the **EPR submission** through the RPD service
- First set of RAM outcomes will be required in the October 2025 submission, which will need to be **submitted to Ecosurety in July 2025**



Context: EPR regulation dates



NOTE: This slide relates to Waste Management Fees & reporting obligations for large producers only. Large producers will also be obligated to continue paying for Packaging Recycling Notes (PRNs).

KEY

- EPR submission due
- ▲ EPR submission due, including RAM results

RAM outputs

RED

Packaging has specifications that make it **difficult to recycle** at scale.

AMBER

Packaging may **experience challenges** during collection and sortation, requires specialist infrastructure for reprocessing, the efficiency and output quality of reprocessing is affected, or there is some secondary material loss.

GREEN

Packaging is **widely recyclable** in the current UK infrastructure.

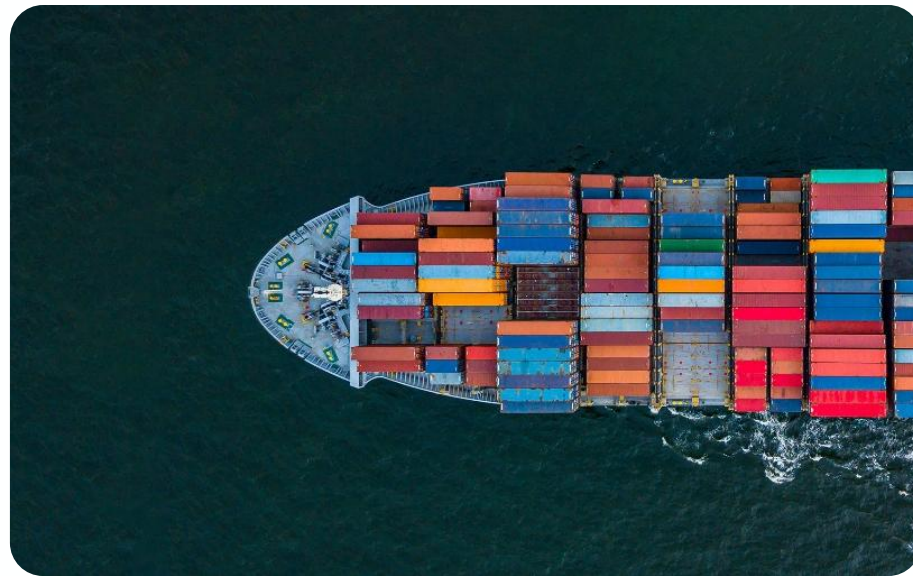


Source: <https://www.gov.uk/guidance/recycling-assessment-methodology-how-to-assess-your-packaging-waste#outputs-the-red-amber-green-scale>

What is the RAM applicable to?

The RAM is only applicable to **primary household & commonly street binned packaging**.

Exemptions:



Packaging **exported** from the UK by the producer



Where packaging is **reused***
(other than reusable packaging imported into the UK)



Drinks containers eligible under DRS



**Only needs to be assessed against the RAM the first year it is placed on the market*

Governance

- RAM will be **reviewed & updated annually** by the appointed **Technical Advisory Committee (TAC)**
- This will allow for innovation, evolving market conditions and regulatory changes
- **Any changes will be published ahead of the October deadline**



Applying the RAM

The RAM must be **applied individually to components that are easily separated by hand.**

Component: refers to the different parts of a whole packaging unit that are separable by hand without the need for tools or excessive force.

For materials that are not easily separable, these should be processed together in the RAM.



Applying the RAM



Drinks containers in-scope of the DRS are no longer required to be assessed under the RAM

Scenarios where different RAM assessments are required:

Packaging that is not a drinks container under DRS

Example

Glass jar with a paper label and metal lid = **2 assessments**

1. Jar with the label
2. Lid

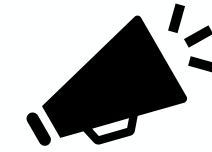


Except if...

The cap/closure/lid is under the size threshold, and can be attached to the bottle, the whole package should be assessed as **one component**



Applying the RAM



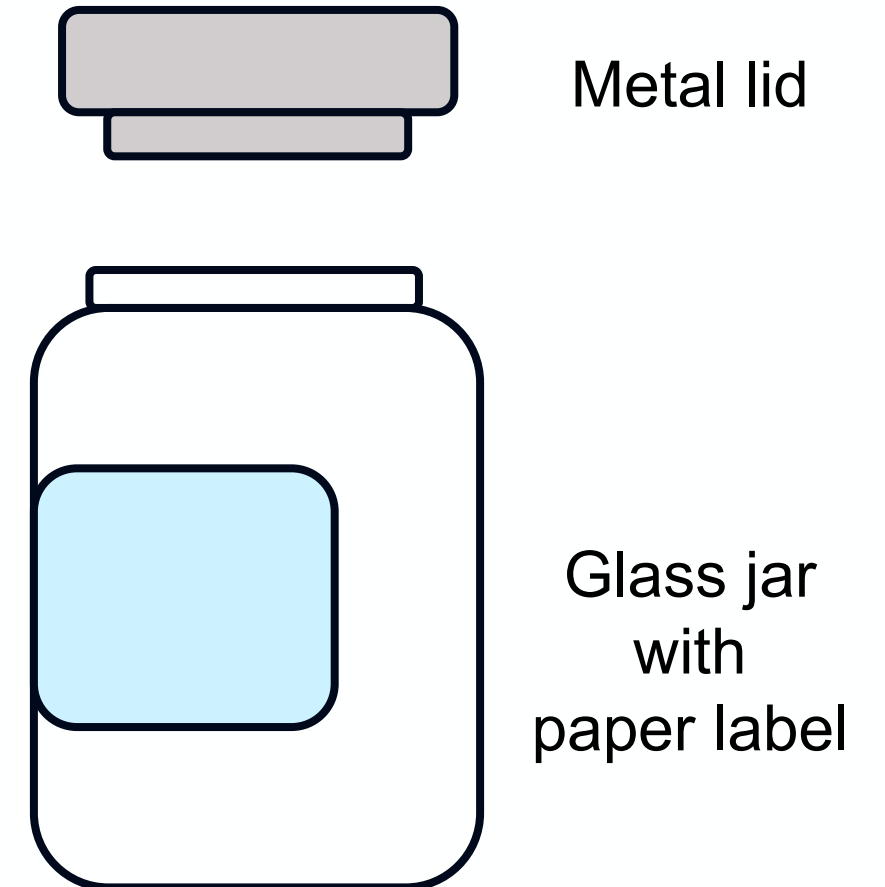
A label covering more than 60% of the total surface area will no longer trigger an amber rating

Secondary material that cannot be separated inherits a RAG result.

Example

When assessing this glass jar, the paper label would be considered in how it impacts the recyclability of the glass jar.

If the result for the glass jar is GREEN, the paper label will inherit this GREEN result.



Automatic 'red' result – problematic packaging

Integrated electrical components or batteries that would be classed as Electrical and Electronic Equipment (EEE) - for example, boxes that include LED lights

Inks that are **manufactured in compliance with the EuPIA** Exclusion Policy for Printing Inks and Related products

Any of the **substances of very high concern** (SVHC) under UK REACH

Perfluoroalkyl and polyfluoroalkyl substances (PFAS) that have been **intentionally added to certain packaging types**



Intentionally added PFAS to glass, steel or aluminium packaging no longer triggers an automatic 'red' result

Stages of the RAM



Paper and board



Plastic (flexible)



Steel



Glass



Other



Fibre-based
composite



Plastic (rigid)



Aluminium

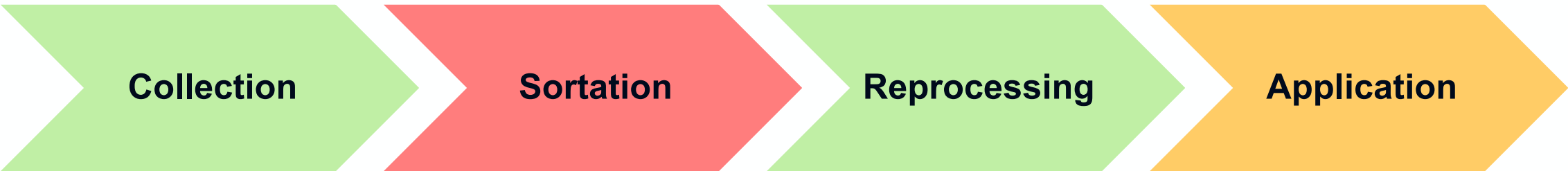


Wood



Example RAG results

A component may receive a different RAG result at each stage of the RAM.



The highest result to appear will be what category the related packaging metrics need to be reported under:



Overview of changes



No change to the threshold, but don't forget:

Paper & Board



$\leq 5\%$ plastic by weight

Fibre-based Composite



$> 5\%$ plastic by weight

Paper content can be determined by:

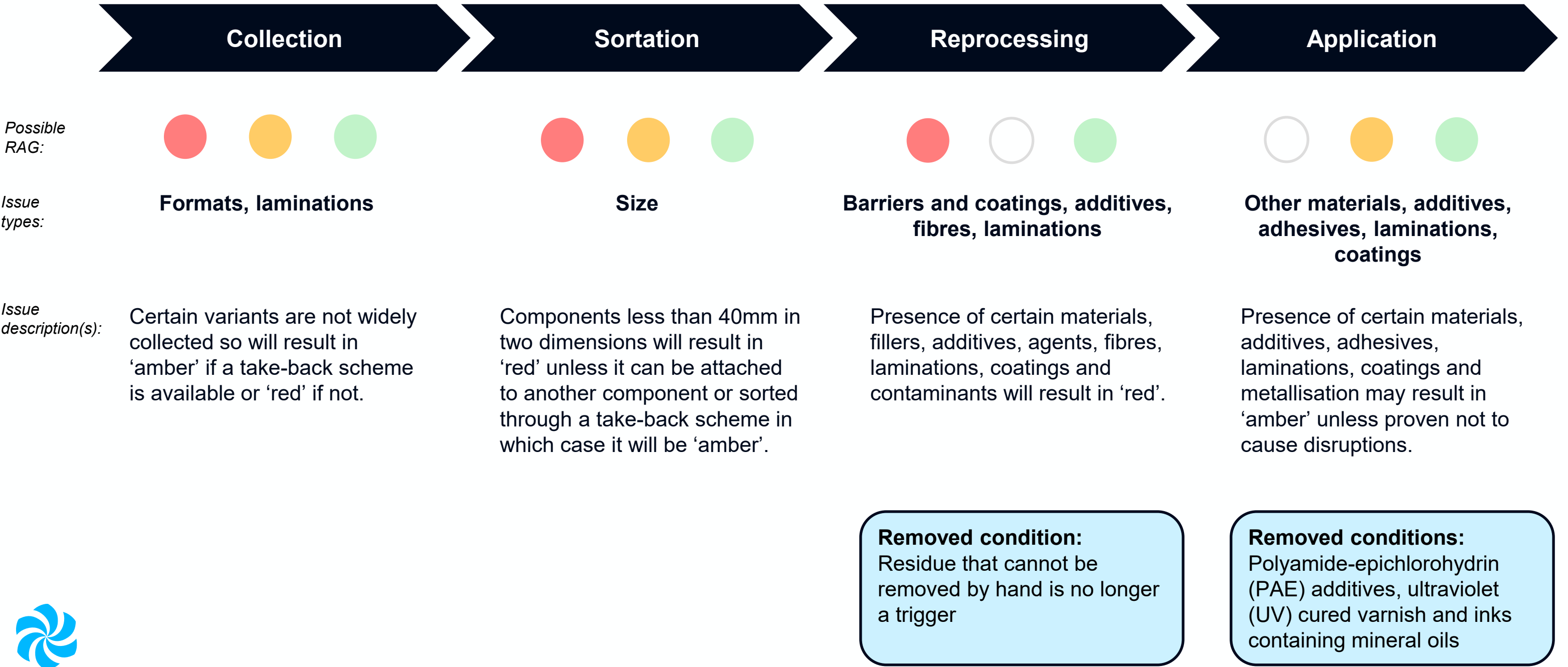
Paper content (w%) = (fibre + filler + water + additive + colour coating) (gsm) / total mass (gsm)



Paper & board

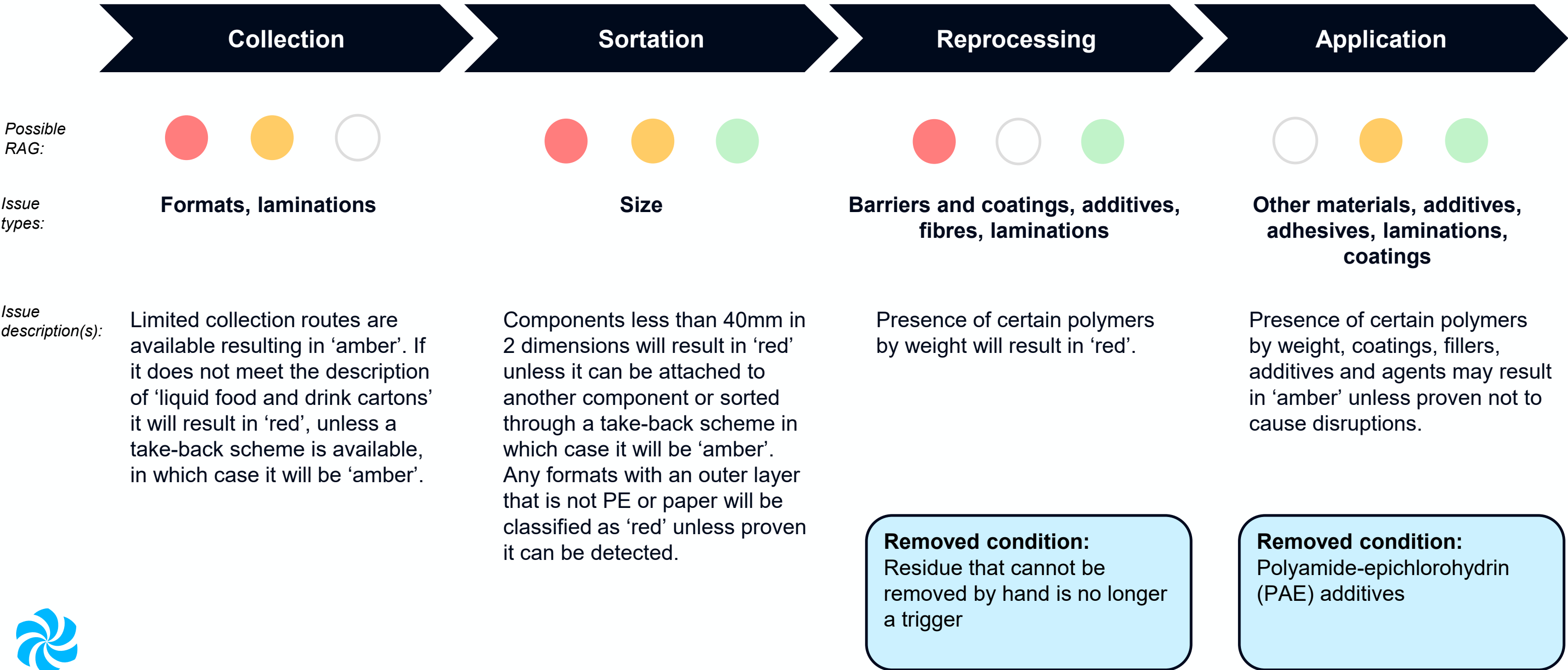
Lowest result possible:

GREEN



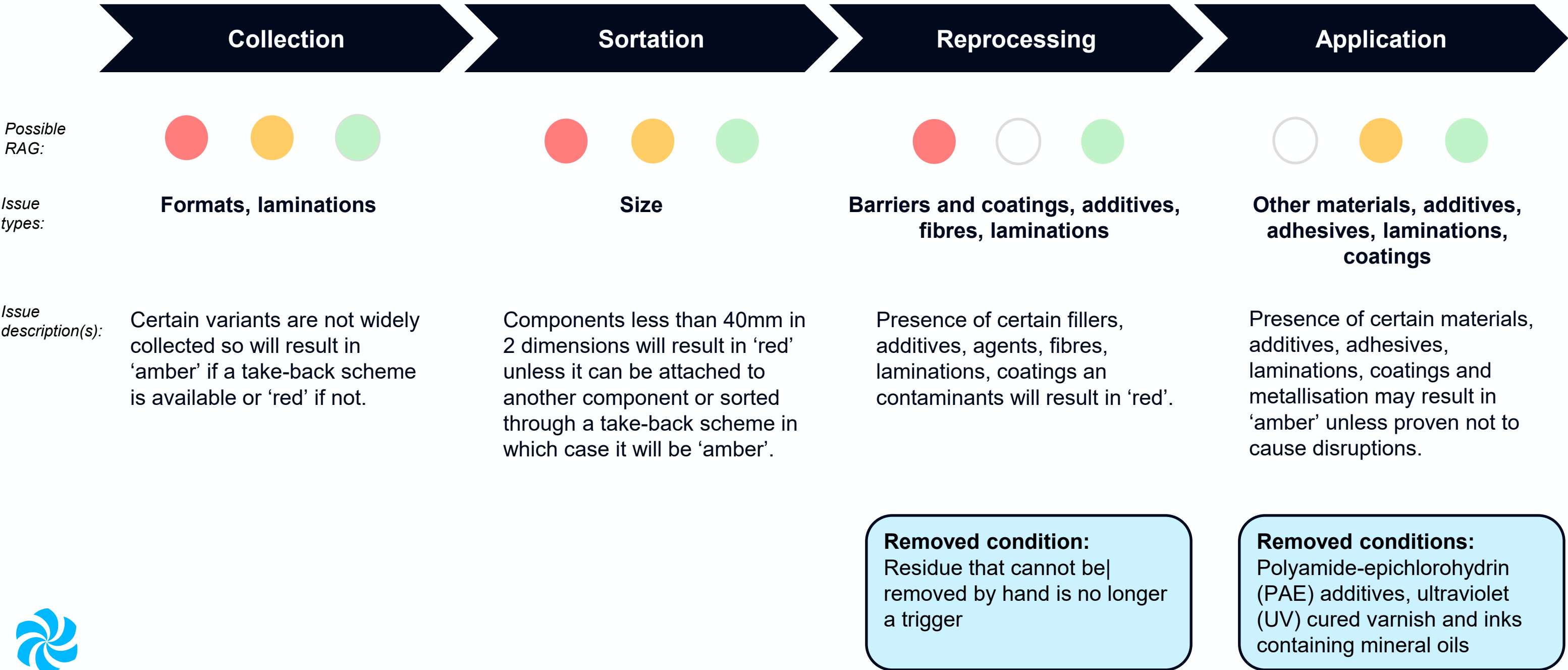
Fibre-based composite (liquid cartons)

Lowest result possible:
AMBER



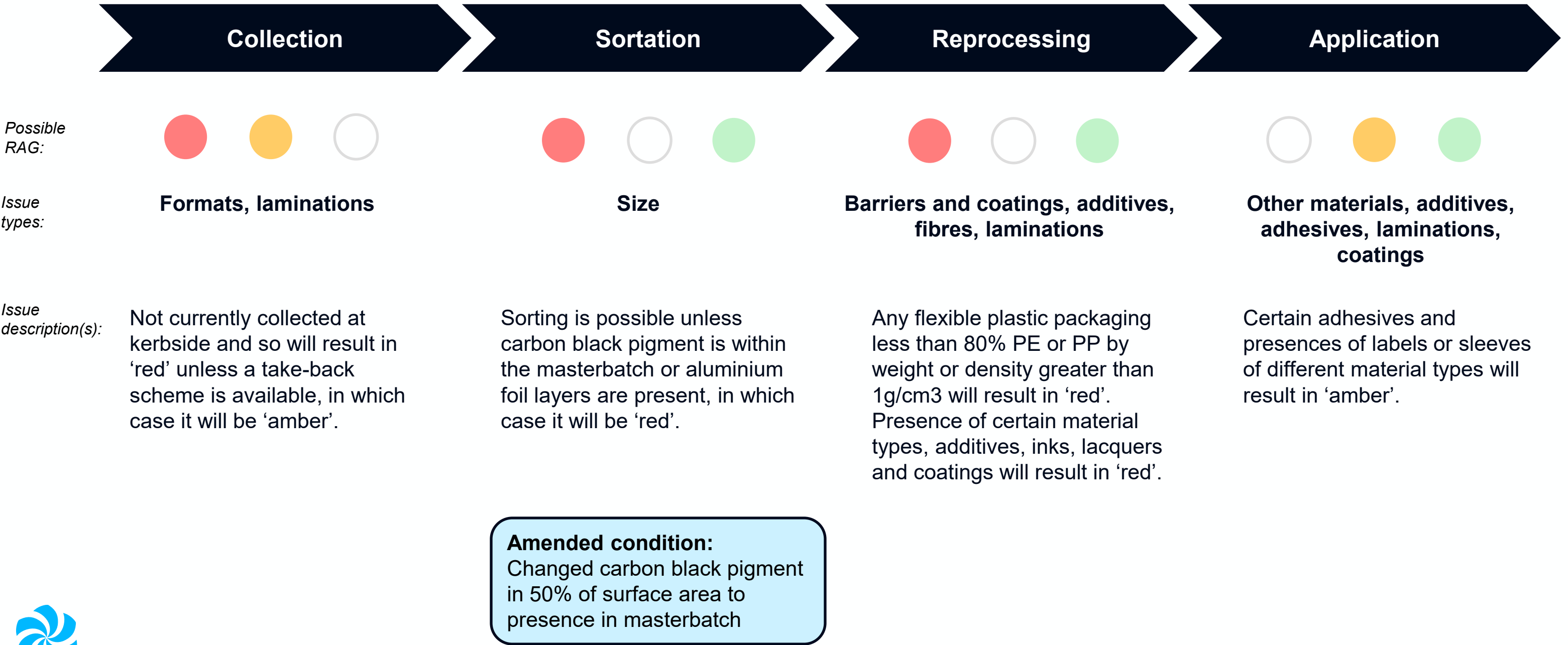
Fibre-based composite (non-liquid cartons)

Lowest result possible:
GREEN



Flexible plastic

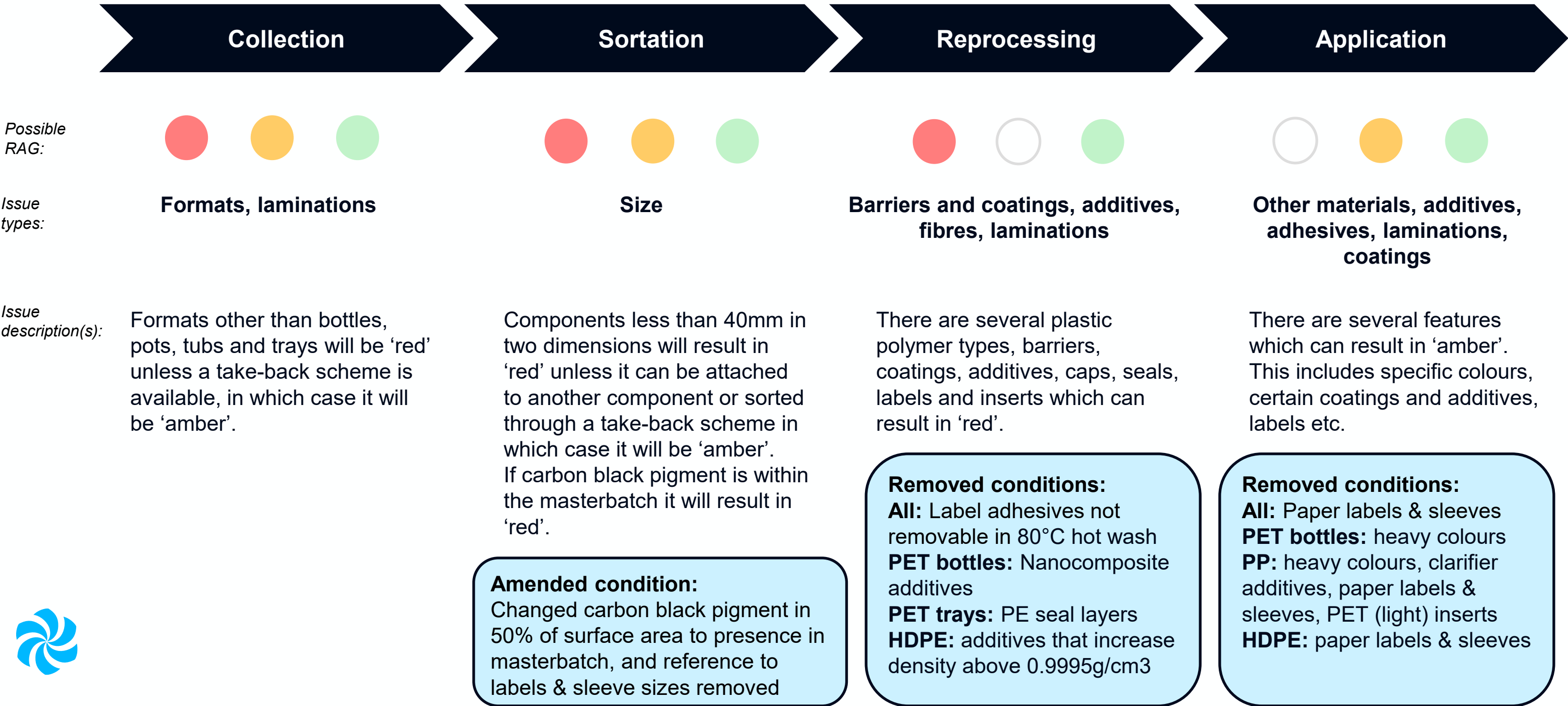
Lowest result possible:
AMBER



Rigid plastic

Lowest result possible:

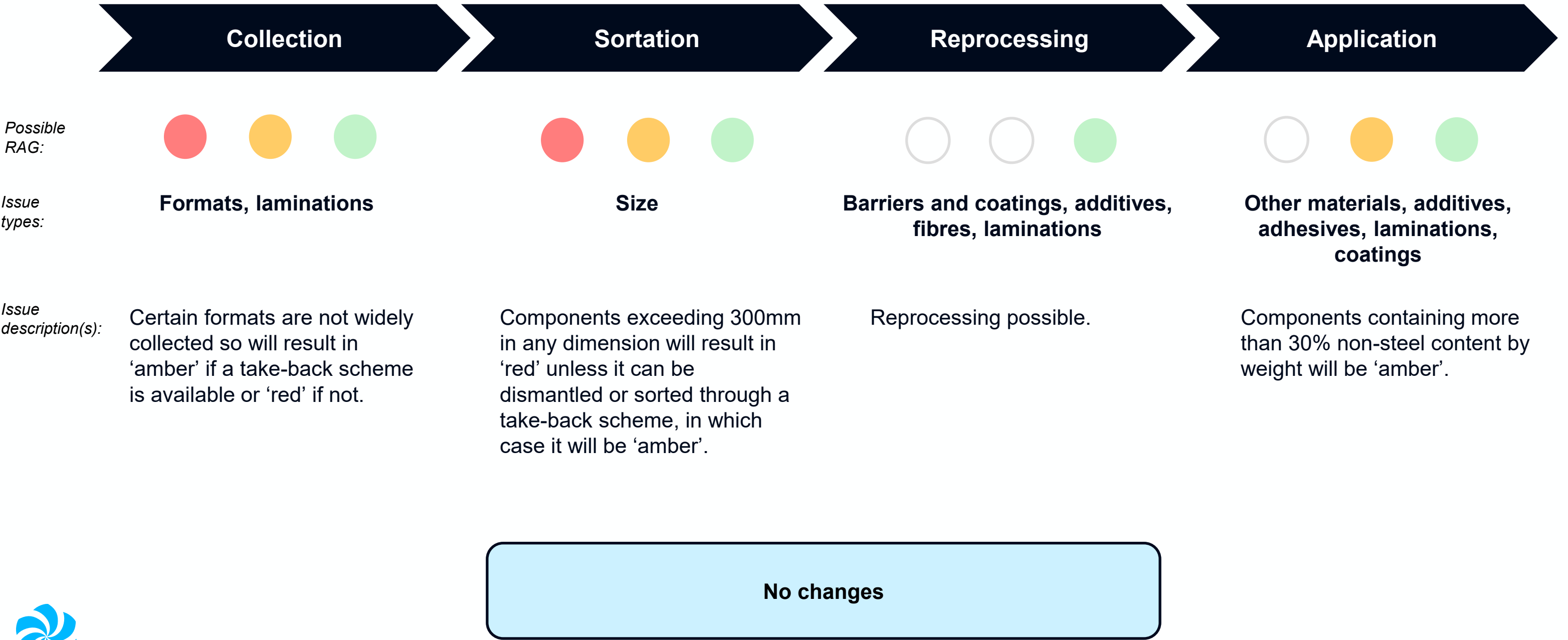
GREEN



Steel

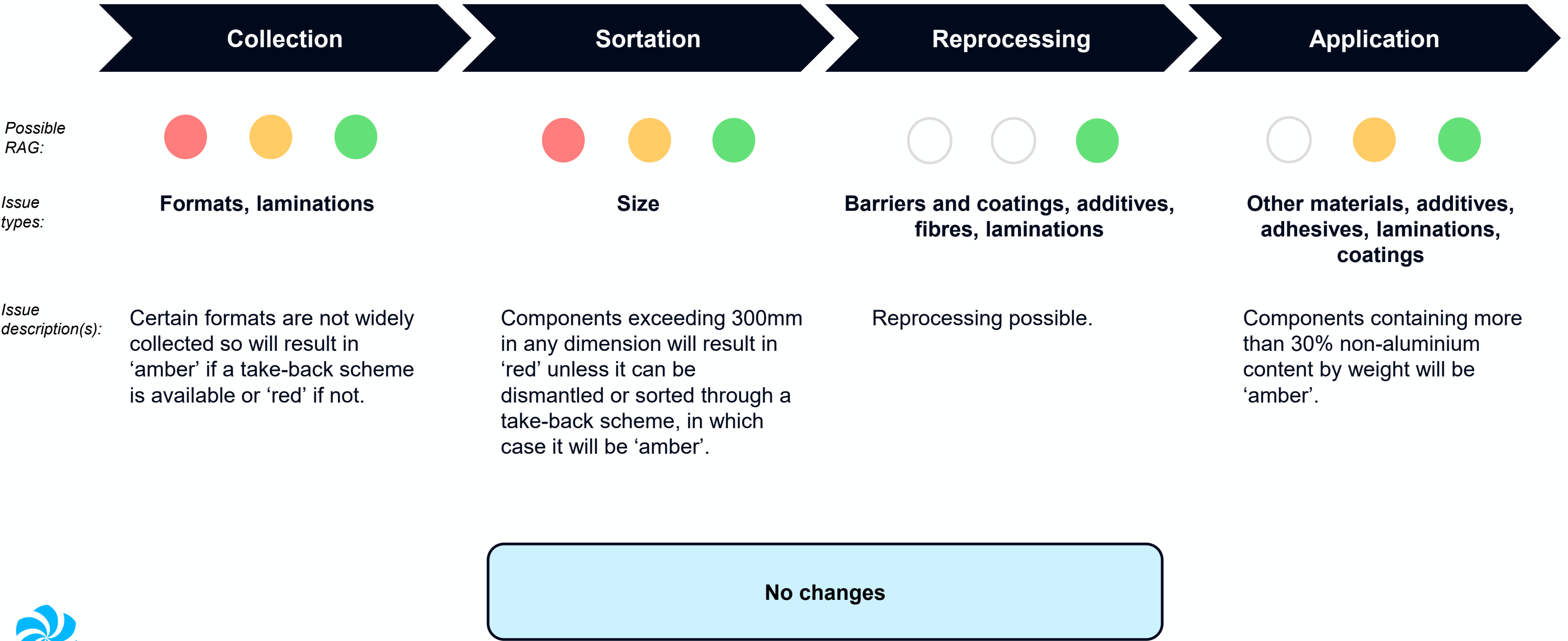
Lowest result possible:

GREEN



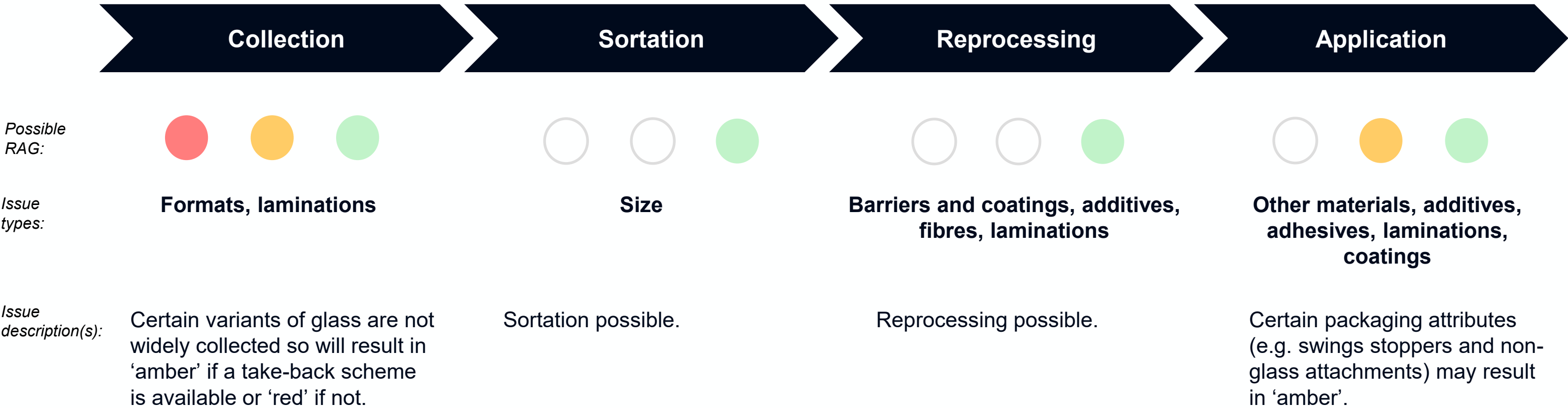
Aluminium

Lowest result possible:
GREEN



Glass

Lowest result possible:
GREEN



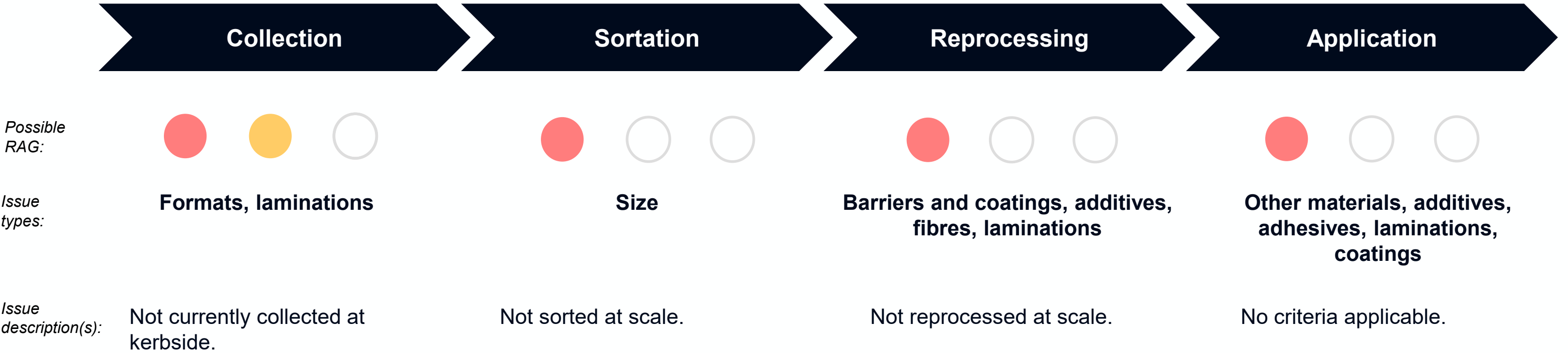
Removed condition:
Attached labels covered
>60% total surface area



Wood

Lowest result possible:

RED



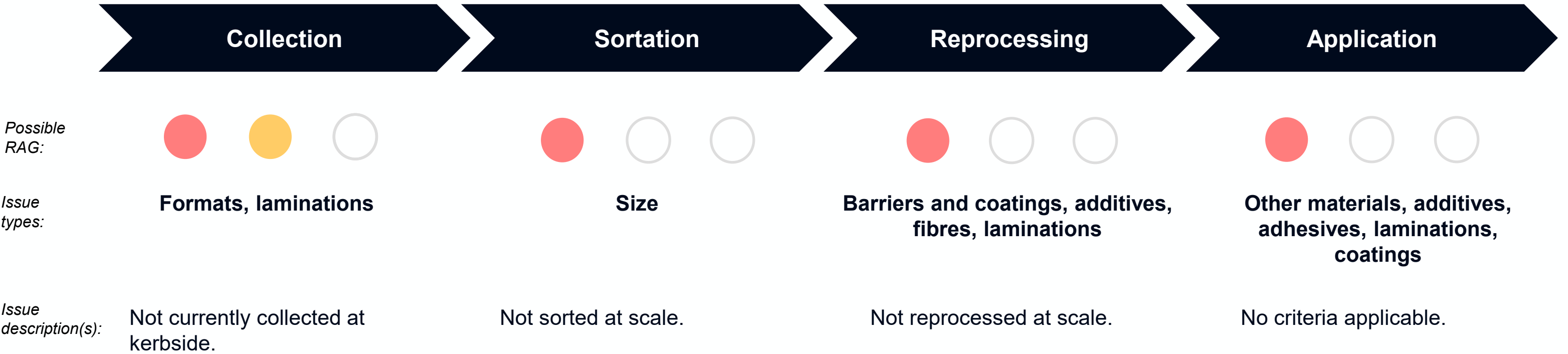
No changes



Other

Lowest result possible:

RED



No changes

How Ecosurety can help



Where to start

1. Identify what main packaging materials you have
2. Understand what will impact the RAG result
3. Identify gaps in your packaging data
4. Ensure you have evidence to back up RAG result claims
5. Request required detail from packaging suppliers

Next steps:

Focus on packaging resulting in “red” or “amber” RAG outcome to improve recyclability.



Get started on the RAM with our new guidance

To help you understand how your packaging may be impacted, we have a new series of exclusive RAM knowledge articles, including material-specific guidance:



Understand the
Recyclability Assessment
Methodology (RAM)

29 Jan 2025



RAM frequently asked
questions

10 Feb 2025



Identify RAM outcomes
for rigid plastic packaging

7 Feb 2025



Identify RAM outcomes
for flexible plastic
packaging

7 Feb 2025



Identify RAM outcomes
for glass packaging

7 Feb 2025



Identify RAM outcomes
for paper and board
packaging

7 Feb 2025



Identify RAM outcomes
for fibre-based
composite packaging

7 Feb 2025



Identify RAM outcomes
for steel and aluminium
packaging

7 Feb 2025



Identify RAM outcomes
for wood and 'other'
packaging

7 Feb 2025



Ecosurety support



New! Additional RAM support per EPR submission level

| For producers who have household packaging and are required to provide RAM data points as part of their EPR submissions. | | | |
|--|--|--|--|
| Basic | Review | Calculate | Outsource |
| For members who require minimal support to submit EPR and RAM data themselves. | For members who want reassurance their EPR and RAM data work is correct. | For members who want consultation and guidance on their EPR and RAM data work. | For members who require extra support for their EPR and RAM data submissions. |
| <div>✓ Access to extensive RAM knowledge guidance</div> <div>✓ Access to RAM component checker for self-assessment</div> | <div>✓ Access to extensive RAM knowledge guidance</div> <div>✓ Access to RAM component checker for self-assessment</div> <div>✓ Review of RAM methodology and calculation by Ecosurety</div> | <div>✓ Access to extensive RAM knowledge guidance</div> <div>✓ Initial RAM assessment by Ecosurety based on EPR data</div> <div>✓ Review of outstanding RAM outputs with Ecosurety, using RAM component checker</div> <div>✓ Ecosurety consolidate your EPR and RAM data</div> | <div>✓ Access to extensive RAM knowledge guidance</div> <div>✓ Initial RAM assessment by Ecosurety based on EPR data</div> <div>✓ Review of outstanding RAM outputs with Ecosurety, using RAM component checker</div> <div>✓ Ecosurety consolidate your EPR and RAM data</div> |
| Complex RAM data processing | | | |
| We will charge for additional processing support to Calculate and Outsource members who have complex RAM data that will require additional time to process. This will be due to diverse household packaging, products, material types and/or packaging components. | | | |

Please note that in some cases it will not be possible to identify a RAM output due to missing information. We will highlight where further information is needed.



RAM component checker

- ✓ Available to all members
- ✓ Access online in the Ecosurety Hub
- ✓ Use across 12 material types
- ✓ Export results as a PDF



ECOSURETY | RAM component checker | Plastic (rigid) Instructions ?

A coloured border will appear when your final component RAG status is determined, which can also be viewed at the bottom of the page. Clear all answers

PART 1: Automatic reds ('problematic packaging')

1) Does the component contain an integrated electrical components or batteries that would be classed as Electrical and Electronic Equipment (EEE) - for example, boxes that include LED lights? ☐ I don't know ☒ No ☐ Yes **G**

2) Does the component contain any of the substances of very high concern (SVHC) under UK REACH? ☐ I don't know ☒ No ☐ Yes **G**

3) Does the component contain inks that are not manufactured in compliance with the EuPIA Exclusion Policy for Printing Inks and Related products? ☐ I don't know ☒ No ☐ Yes **G**

4) Does the component contain perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) that have been intentionally added? ☐ I don't know ☒ No ☐ Yes **G**

PART 2: Plastic (rigid)

1.1) Is the component any of the following formats?
Bottle / Pot / Tub / Tray ☐ I don't know ☒ No ☐ Yes **G**

1.2) If no, is there a takeback scheme? ☐ I don't know ☒ No ☐ Yes

2.1) Is the component greater than 40mm in at least two dimensions? ☐ I don't know ☒ No ☐ Yes **G**

2.2) If no, is there a takeback scheme? ☐ I don't know ☒ No ☐ Yes

3) Does the component contain any of the following problematic materials?
- PVC (including non-PVC with PVC components)
- Polystyrene (including but not limited to HIPS, expanded & extruded)
- Oxy-degradable, biodegradable or compostable plastics
- Non-polyolefin foamed plastics e.g. non-PP and non-PE ☐ I don't know ☒ No ☐ Yes **G**

4) Does the component's masterbatch contain carbon black pigment? ☐ I don't know ☐ No ☒ Yes **R**

5) Does the component contain any of the following problematic materials?
- Use of foil
- Ethylene-vinyl alcohol (EVOH) exceeding 5% of the total weight ☐ I don't know ☒ No ☐ Yes **G**

Clear all answers

Component RAG status **Red**

Question number for the RAG Output 4

← Full user instructions available

← No regulatory knowledge needed – answer yes/no/don't know

← Clear RAM output per component

← Identification of RAM output reason

Identify the RAM output of your packaging components

Our online **RAM component checker** efficiently identifies the RAM output of a specific packaging component, plus:

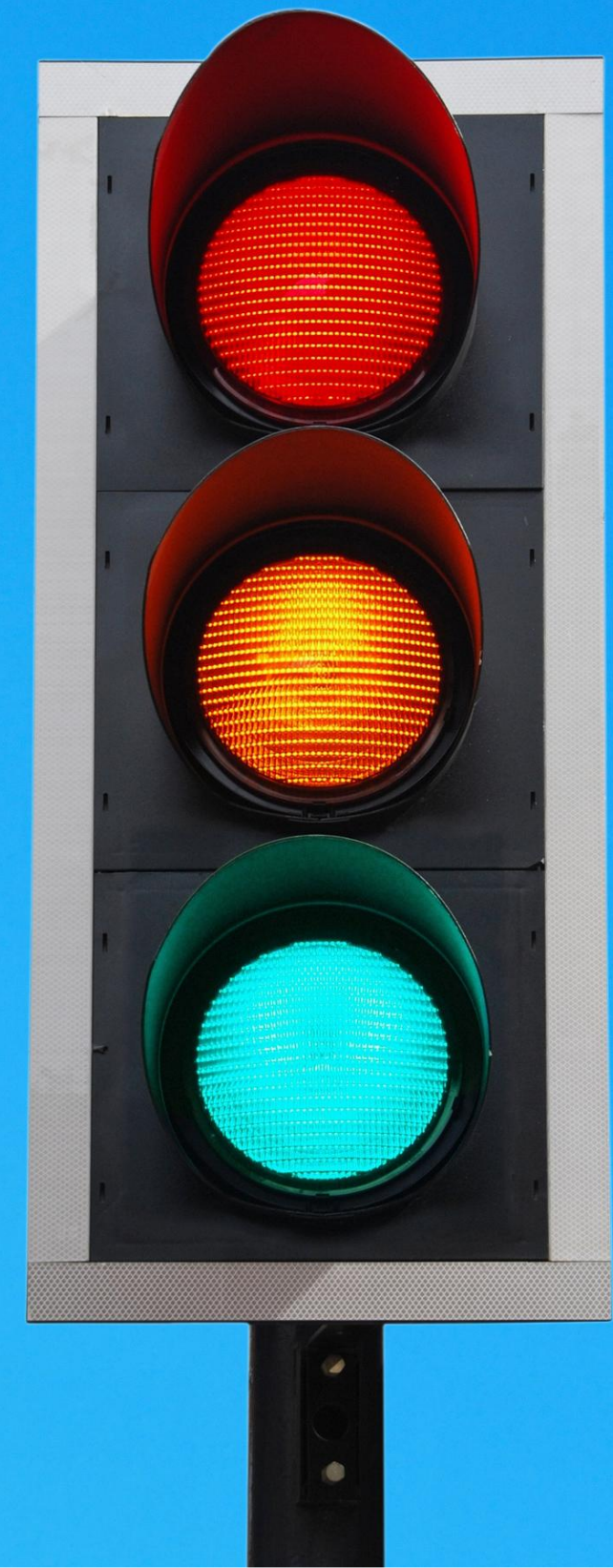
- ✓ **Pinpoint problem areas** – See what's causing a red output
- ✓ **Get actionable insights** – Understand what specification changes can improve outputs
- ✓ **Fill the gaps** – Identify missing information you need from suppliers
- ✓ **Updated** with the latest version of RAM from Government



Save time identifying your RAM outputs

Our **initial RAM assessment** will save you time and improve the accuracy of your RAM outputs. We will use your EPR data to:

- ✓ **Recommend a RAM output** – including a confidence level and explanation for your packaging components
- ✓ **Identify the gaps** - we will indicate which products require further investigation to determine the RAM output
- ✓ **Recommend next steps** – we will suggest priority products to investigate first, to improve the accuracy of your waste management fees



Processing complex RAM data

If your RAM data is significantly complex, we will need additional data processing time to ensure you can achieve a higher percentage of confirmed RAM outputs and avoid applying red statuses by default.

Additional data processing support will be allocated to you if you have significantly diverse:

- ✓ Household packaging
- ✓ Products
- ✓ Material types
- ✓ Packaging components



Additional support options



Understand how to improve your RAM outputs

After your first RAM submission we can provide bespoke analysis and advice to support you to improve your RAM outputs.

Our **RAM advisory services** can help you:

- ✓ Identify your biggest opportunities to improve your RAM outputs
- ✓ Refine your RAM approach and identify issues caused by lack of data
- ✓ Model the impact of potential changes to your packaging portfolio



RAM advisory services – how it works

Our advisory support is offered as a two-step process, consisting of an **initial discovery workshop** and **optional further analysis** depending on your requirements and the complexity of your packaging portfolio.

1. RAM discovery workshop

A two hour workshop with our advisory team.

Quickly understand the potential for improving your packaging to achieve better RAM outputs.

2. RAM analysis & action plan

A deep-dive analysis project with our advisory team lasting between two to six weeks.

Identify specific, recommended actions to improve your RAM outputs and reduce your waste management fees.

Explore the cost impact of potential packaging changes.





Any questions?



0333 4330 370

info@ecosurety.com

www.ecosurety.com