

UK Packaging PRO Ltd

Expression of Interest Application to Defra

Proposal for the role of the Producer Responsibility Organisation (PRO)

10 June 2025

Candidate details
Organisation name and registered address: UK Packaging PRO
Primary contact name, job title, email, phone: Karen Grale, acting Head of pEPR Producer Responsibility Organisation
Organisations endorsing these proposals: Organisations endorsing this proposal include industry and material sector representative bodies, between them representing a membership of thousands of obligated packaging producers. This proposal is also endorsed by WRAP and OPRL. See Appendix 2 for full list of 60 individual named organisations who are endorsing this application.
Organisations consulted on these proposals and how consulted with: Consultation has taken place with a wide range of organisations across the packaging material value chain including obligated and non-obligated packaging producers including brands, retailers and packaging manufacturers from across all sectors, compliance organisations, material bodies, local authorities and local authority bodies, waste management companies and reprocessors, environmental NGOs, and others. Methods of consultation have involved face to face and online meetings and email correspondence. See Appendix 3 for full list.

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Note on term 'sustainable' - throughout this EoI document, the term 'sustainable' in relation to packaging refers to it as defined in UK Packaging Extended Producer Responsibility regulations which came into effect Jan 2025

Introduction

UK Packaging PRO

UK Packaging PRO is a newly established, not-for-profit organisation set up to deliver delegated functions of PackUK and the four UK governments to successfully deliver pEPR in the UK. Following several Defra led co-design processes and discussions with ministers and officials over many years, the organisation has been developed by a consortium of more than 50 leading multi sector packaging producers who operate in the four UK nations and packaging producer representative bodies. It has been facilitated by The Food and Drink Federation (FDF), The Industry Council for Packaging and The Environment (INCPEN) and The British Retail Consortium (BRC).

We are proud that this UK Packaging PRO expression of interest (Eoi) is supported by obligated packaging producers representing more than 95 brands, many of them trusted household names. These producers account for over 50 % of the UK's packaging placed on the market. Many of these producers are already operating under pEPR and Producer Responsibility Organisations in 26 countries in Europe and globally.

During the forming of UK Packaging PRO and this Eoi submission, consultation has taken place with the full range of organisations across the packaging material value chain. Obligated and non-obligated packaging producers including brands, retailers and packaging manufacturers from across all sectors, compliance organisations, material bodies, local authorities and local authority bodies, waste management companies and reprocessors, environmental NGOs, and others.

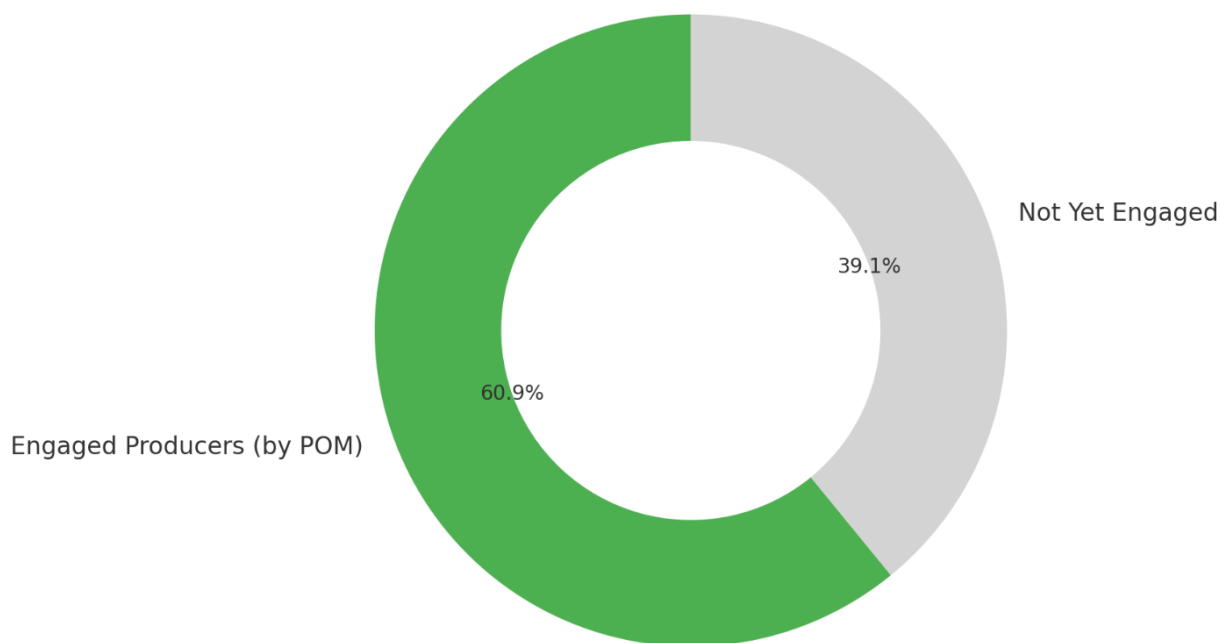


Figure 1: Breakdown of obligated producers (OPs) and other organisations endorsing UK Packaging PRO

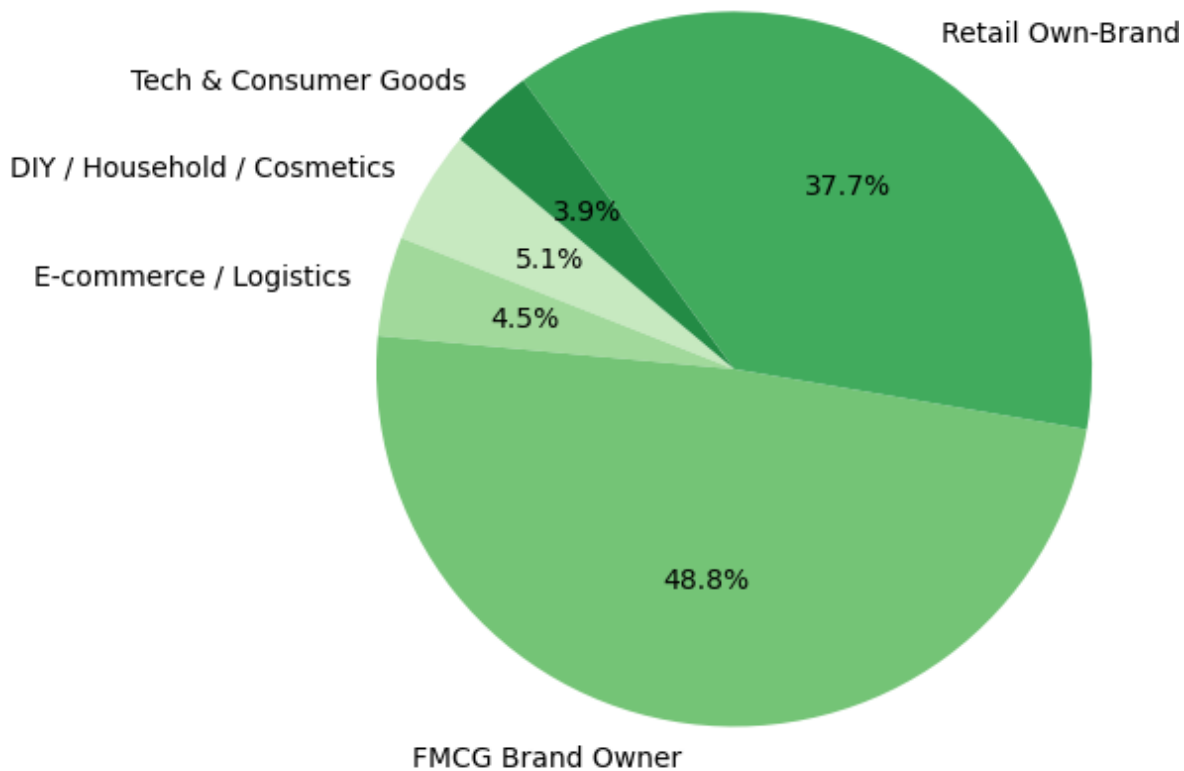


Figure 2: UK Packaging PRO's obligated producers split by category

UK Packaging PRO Vision and Benefits of a Producer Led pEPR Scheme

Our vision for the UK is one shared with the four governments and multiple stakeholders across our material value chain: a world class packaging system which uses resources with maximum efficiency in a circular economy to achieve environmental sustainability goals with maximum value for money for public and private sector.

Producer-led pEPR has much to offer in making this vision reality:

- **Cost efficiency and accountability** – ensuring minimal cost and maximum efficiency through leveraging the inherent culture of productivity and cost-saving within the private sector.
- **Short term agility, long term investment and innovation** – able to react with speed and flexibility to some short-term opportunities and market changes, and to plan investments and developments over medium and long-term horizons. The latter gives stability that allows producers to sponsor emergent technologies and drive faster environmental and technological progress.
- **Circularity and material security** - promotes the circular supply of high-quality packaging materials as producers have deep experience of global material markets and have a clear interest in driving investment and advancements.

- **Collaboration across the value chain** - promotes collaboration between producers, local authorities, waste management companies, retailers, compliance schemes, material reprocessors and other stakeholders to bring multiple benefits including enhanced knowledge sharing, data gathering and utilisation.
- **Consumer engagement and behavioural influence** – with proven capability to complement and scale up existing public sector and NGO engagement, producers are in a strong position to engage UK citizens effectively, leveraging consumer insights and trusted relationships to drive behavioural change. Expertise in marketing and communication of emotionally resonant, impactful campaigns, enhancing public participation in sustainable initiatives.
- **Existing pEPR experience** - many of the producers associated with this proposal have been directly involved in the design and delivery of EPR functions in multiple jurisdictions globally and have decades of experience in discharging these obligations working with PROs. This gives them direct access to business knowledge, data, technologies, business processes, research, case studies and the practical lessons learned.

UK Packaging PRO taking on functions of PRO

This consortium proposes that, by the end of the first three years of the PRO, delivery of all non-sovereign functions is transferred from PackUK to the PRO. This transfer would be graduated, reflecting realistic timeframes for the practicalities of establishing a new organisation and to allow time for deep level collaboration and consultation with other players in the material value chain.

This collaboration and consultation in the early stages would have an emphasis on improving and consolidating knowledge and data. In particular, UK Packaging PRO will work with compliance schemes and producers on improved data around all aspects of packaging, and work with local authorities and those who work with them on how we obtain more robust and transparent data on waste collection costs. This will include data to support additional functions such as household/non household waste definitions.

Note on delivery methods

This document outlines high level timings and benefits of functions/sub -functions moving to the management of UK Packaging PRO under PackUK supervision. It does not cover mechanisms for how work will be delivered or by whom. In its first three years (and beyond), UK Packaging PRO would expect to work with other organisations in the materials sector, and from other specialisms who have expertise, knowledge and experience in function/subfunction areas. In practical terms, we expect this to mean procurement and/or delivery partnerships in some areas of pEPR development and delivery from the outset.

Function 1: Calculation of Producer Fees

1.1 Run Producer Fee Calculator using LA disposal costs, RPD packaging data, public information costs, impairments and (from 2026/27) modulation criteria to determine individual producer fees

Year 1 (2026/27): Emphasis on improving data and knowledge

- Incorporate latest estimates of efficient and effective waste management costs provided by LAs.
- Use producer-submitted data detailing packaging placed on the market, categorised by material type and recyclability.
- Factor in costs associated with national and local citizen communication campaigns.
- Account for anticipated non-payments or defaults.
- Apply fee adjustments based on recyclability of packaging materials, as determined by the Recycling Assessment Methodology (RAM).

Year 2 (2027/28): Intermediate phase with expanded responsibilities

- Implement the fee formula as outlined by Defra, ensuring each producer's fee reflects their specific packaging profile and associated collection and waste management costs.
- Operationalise a dynamic, responsive, and transparent fee calculator using high-quality inputs.

Year 3 (2028/29): Full operational responsibility

- Maintain comprehensive data inputs, including local authority disposal costs, producer data, public information costs, impairments, and modulation criteria.
- Implement clear and documented standardised procedures for the calculation of producer fees.

1.2 Review Calculation Results

Year 1 (2026/27):

- Cross-verify calculated fees against historical data and benchmarks to identify anomalies or discrepancies.
- Engage with the PRO Steering Committee as per the governance structure (as outlined in Function 9), producers and external stakeholders to assess fairness and accuracy of fee calculations.

Year 2 (2027/28):

- Establish protocols for recalculating fees in response to identified errors or significant data changes.
- Conduct comparative analyse against historic fees, benchmarks, and cross-sector data.

Year 3 (2028/29):

- Maintain agility in recalculating fees justified by updated data or emerging anomalies.
 - Involve a formal PRO Board and governance structure and sector experts to validate fee outputs and confirm fairness and accuracy.
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1.3 User Feedback (Producers, LAs)

Year 1 (2026/27):

- Develop dedicated platforms (e.g., online portals, helpdesks) for producers and LAs to submit queries or concerns regarding fee calculations.
- Implement standardised procedures for addressing feedback, including timelines for responses and escalation pathways for complex issues.

Year 2 (2027/28):

- Launch interactive portals, helpdesks, and contact points for producers and LAs.
- Implement robust SLAs for response times and escalation handling.

Year 3 (2028/29):

- Monitor and categorise feedback to track common issues and identify improvement areas.
 - Analyse feedback trends to inform future enhancements to the fee calculation process and tools.
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1.4 Quality Assurance

Year 1 (2026/27):

- Perform rigorous assessments of input data for completeness, accuracy, and consistency.
- Regularly audit the fee calculation process to ensure adherence to established protocols and identify areas for improvement.

Year 2 (2027/28):

- Validate input data for accuracy, completeness, and format compliance.
- Conduct internal audits of the full calculation workflow.

Year 3 (2028/29):

- Maintain documented logs of assumptions, versions, and protocol changes.
 - Maintain comprehensive records of methodologies, data sources, and decision-making processes to support transparency and accountability.
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1.5 Commissioning Fees Calculator Audit

Year 1 (2026/27):

- Engage third-party auditors to evaluate the integrity and reliability of the fee calculator.
- Ensure the audit covers all aspects of the calculator, including data inputs, calculation logic, and output accuracy.

Year 2 (2027/28):

- Commission third-party audits to test data integrity and logic consistency at suitable points after major changes
- Publish key findings and updates to reinforce confidence in the system.

Year 3 (2028/29):

- Document audit findings and implement recommended improvements to enhance the calculator's performance and compliance.
 - Ensure alignment with Policy (Defra) methodology and performance under multiple usage scenarios.
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1.6 Model / Calculator Development

Year 1 (2026/27):

- Continuously update the fee calculator to reflect changes in regulations, data availability, and stakeholder needs.
- Optimise the calculator's usability, ensuring it is accessible and intuitive for all users.

Year 2 (2027/28):

- Develop functionalities that allow seamless integration with other systems, such as the RPD portal and LA data platforms.
- Design calculator architecture to be modular, scalable, and interoperable.

Year 3 (2028/29):

- Prioritise ease-of-use with an intuitive user interface and guided workflows.
- Identify opportunities for smarter use of data and reduce burden to obligated producers.

1.7 Develop Public Information Strategy and Plan Activity

See Function 6 for Communications and public information over Years 1-3

1.8 Estimate Public Information Costs for Year Ahead

See Function 6 for Years 1 – 3

Feed in costs from national and local citizen communications strategy and communications plan.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 1: Calculation of Producer Fees – Stakeholder Benefits
Producers	As data originators, producers enable high-quality, timely submissions, reducing errors and enabling earlier strategic design adjustments linked to modulation. PRO leadership ensures tools and feedback mechanisms evolve with their needs.
Local Authorities	A PRO can improve accuracy and fairness of LA cost inputs, moving from current modelled costs to more accurate/up to date cost estimates to facilitate more transparent and accurate allocation of payments based on real disposal costs. Enables two-way feedback and co-development.
Reprocessors / MRFs	By incorporating real recyclability and infrastructure data, a PRO can better reflect end-of-life packaging realities, aligning fees and design incentives with processing capabilities and challenges.
Regulators	A PRO working alongside PackUK enhances system-wide data reliability, auditability, and responsiveness. This supports adaptive policy, clearer accountability, and continuous improvement aligned with regulatory goals.
Citizens	Fairer, more accurate fees incentivise better design and support citizen-facing recycling systems. Feedback mechanisms and communication strategies are more responsive and user-centred under a producer-led model.
Environment	A data-driven, design-aware PRO improves recyclability outcomes and supports transition to circular economy packaging. Better tools and planning promote sustainable material flows and lower environmental impact.

Function 2: Producer Fee Modulation

2.1 Consulting with Producers and Regulators to Develop Additional Packaging Sub-Categories

Year 1 (2026/27): Initial development and stakeholder consultation

- Organise workshops and consultations with producers, regulators, and industry experts, to identify packaging types requiring distinct sub-categories based on recyclability, material composition, and environmental impacts. Using evidence of positive outcomes and case studies from established PROS.
- Analyse packaging data to determine common materials and formats that may benefit from specific modulation criteria.
- Ensure proposed sub-categories align with existing regulations, and other international standards that are currently in development such as PPWR.

Year 2 (2027/28): Pilot implementation and refinement

- Facilitate structured workshops and expert panels with producers, regulators, and technical experts.
- Analyse real-world packaging data to identify material or format types with different recyclability or environmental impact profiles.
- Justify modulation by functionality (e.g., multi-material laminates vs. mono-polymer films).

Year 3 (2028/29): Full-scale implementation and ongoing evaluation

- Ensure alignment with UK packaging EPR regulations, PPWR (EU) including labelling, and global recyclability standards (e.g., APR, RecyClass).

2.2 Publishing Additional Packaging Sub-Categories for the Coming Year

Year 1 (2026/27):

- Develop comprehensive documentation outlining the new sub-categories, including definitions, criteria, and examples.
- Disseminate information through official channels, ensuring all stakeholders are informed of the changes well in advance of implementation.

Year 2 (2027/28):

- Produce detailed documentation that includes sub-category definitions, classification logic, and real-world examples for producers to benchmark against.

- Disseminate early and widely to allow producers time for internal planning and design reformulation.

Year 3 (2028/29):

- Maintain open feedback loops to evolve sub-categories before finalisation.
- Ensure compliance scheme alignment.

2.3 Reviewing / Recommending Degree of Modulation for Packaging Sub-Categories

Year 1 (2026/27):

- Annual re-evaluation of the current eight sub-category materials based on factors such as recyclability, environmental impact, market demand and dynamics and other factors that may yet be identified in the drive to a more circular packaging system. UK Packaging PRO would, of course, be completely agnostic on materials.
- Develop recommendations for fee adjustments, incentivising the use of sustainable packaging materials and designs.

Year 2 (2027/28):

- Assess environmental performance and real recyclability of each sub-category.
- Use evidence from MRF trials, life cycle analyses, and end-market demand to create a scoring/rating mechanism and recommend precise fee differentials. Liaise with other PROs internationally to understand key learnings and approaches to greater harmonisation.

Year 3 (2028/29):

- Engage stakeholders to validate modulation levels before publishing proposals.

2.4 Publication of Fee Modulation Criteria/Policy Statement

Year 1 (2026/27):

- Draft a clear and concise policy statement outlining the criteria and rationale for fee modulation.
- Ensure the policy is publicly accessible and communicated effectively to all stakeholders.

Year 2 (2027/28):

- Draft and regularly update a clear policy statement covering modulation rationale and structure, key scoring metrics (e.g. ease of sorting, contamination, ease of reprocessing), update schedule, and review triggers.

Year 3 (2028/29):

- Ensure all documents are publicly available, simple to navigate, and version-controlled.

2.5 User Feedback (Producers, MRFs, Reprocessors, LAs, DGs, and Other Including Environment Orgs)

Year 1 (2026/27):

- Implement systems for collecting feedback from a diverse range of stakeholders, including producers, material facilities (MRFs), reprocessors, local authorities (LAs), devolved governments (DGs), and environmental organisations.
- Analyse feedback to identify trends, concerns, and areas for improvement, and report findings to relevant committees and stakeholders.
- Use available channels and those set up by the PRO (e.g. Knowledge Hub and Technical Advisory Committee) to maintain ongoing insights on new and emerging materials and technologies.

Year 2 (2027/28):

- Create systems to gather structured feedback from producers, MRFs and reprocessors, local authorities, devolved governments, NGOs, and environmental experts.
- Analyse feedback and produce trend reports with actionable insights.
- Work within the packaging value chain to monitor and measure new and emerging materials and technologies.

Year 3 (2028/29):

- Develop time-bound action plans to address valid concerns and suggestions, demonstrating a commitment to continuous improvement.
- Close the loop with published responses and implemented improvements.
- Continue to work with packaging value chain to monitor and measure new and emerging materials and technologies.

2.6 Monitoring Impact of Incentives on Amount/Type of Packaging Placed on the Market & Feeding Impact Evaluation into Modulation Reviews

Year 1 (2026/27):

- Start to track changes in packaging types and volumes in response to modulation incentives.
- Assess the effectiveness of fee modulation in driving sustainable packaging choices.

Year 2 (2027/28):

- Track shifts in packaging volumes, material choices, and design trends.

- Develop indicators to assess reduced use of non-recyclable formats and increased adoption of sustainable designs.

Year 3 (2028/29):

- Use evaluation findings to inform future modulation strategies and adjustments.
- Feed findings into regular modulation policy reviews.

2.7 Assessing the Regulatory Barriers to Medical Products Using More Sustainable Packaging

Year 1 (2026/27):

- Examine existing regulations that may hinder the adoption of sustainable packaging in medical products and how this may evolve under the guidance of the MHRA. Assess similar markets to UK for any shared learnings.
- Engage with medical product manufacturers, healthcare professionals, and regulators to identify challenges and opportunities.

Year 2 (2027/28):

- Identify blockers within MHRA/EMA regulations and safety or hygiene standards.
- Work with pharma producers, healthcare providers, and regulators.

Year 3 (2028/29):

- Develop proposals for regulatory adjustments or exemptions that facilitate the use of sustainable packaging without compromising safety and efficacy.
- Encourage trials of compliant sustainable alternatives.

2.8 Quality Assurance

Year 1 (2026/27):

- Under guidance of and in collaboration with Environment Agency, conduct regular audits of the fee modulation process to ensure accuracy, fairness, and compliance with established criteria.
- Implement robust data verification procedures to maintain the integrity of the modulation system.

Year 2 (2027/28):

- Schedule periodic audits of the modulation process, continuing to work with EA.
- Conduct pre and post modulation checks on data validity, fee accuracy, and sub-category integrity.

Year 3 (2028/29):

- Establish mechanisms for identifying and addressing process inefficiencies or inconsistencies.
 - Maintain transparency via audit logs and incident tracking ensuring strong feedback loops with EA.
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2.9 Commissioning Audit & Peer Reviews

Year 1 (2026/27):

- Support PackUK to develop and implement a fair and effective approach to fee modulation.
- Facilitate peer reviews by industry experts to validate methodologies and outcomes.

Year 2 (2027/28):

- Appoint third-party auditors to validate process compliance and fee equity.
- Facilitate peer reviews with subject matter experts across industry, academia, and NGOs.

Year 3 (2028/29):

- Publish audit and review findings to maintain stakeholder trust and confidence.
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2.10 Model Development

Year 1 (2026/27):

- Develop and refine analytical models to support dynamic and responsive fee modulation.
- Incorporate scenario planning capabilities to anticipate the impacts of various modulation strategies.

Year 2 (2027/28):

- Create adaptive models with capabilities including scenario planning (e.g., material bans, design shifts, price volatility) and real-time modulation simulations.
- Ensure models are user-friendly and accessible to relevant stakeholders for transparency and collaboration.

Year 3 (2028/29):

- Design for accessibility with dashboards and decision tools for producers.
- Provide public-facing summaries to improve understanding and accountability.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 2: Producer Fee Modulation – Stakeholder Benefits
Producers	Faster consultation cycles and clear guidance help producers reformulate earlier and with confidence. Granular sub-category development ensures modulation reflects real-world design decisions and promotes sustainable innovation.
Local Authorities	Better differentiation of materials allows more targeted incentives, helping LAs improve recycling outcomes and to secure investment planning for infrastructure. Fee impacts align better with real disposal costs.
Reprocessors / MRFs	Real-world infrastructure realities are fed directly into fee modulation design, reflecting what is practically sortable, possible to reprocess when and in what capacity. In turn increases system efficiency and supports infrastructure investment.
Regulators	Producer-led insight brings pragmatic proposals that are aligned with regulation but also anticipatory of innovation. Transparent audit and policy statement processes that can improve compliance and oversight.
Citizens	Modulation drives packaging changes that make recycling easier and more consistent across the UK, with visible alignment to what citizens can recycle at home. Improves trust and engagement.
Environment	Evidence-based modulation links fees to recyclability, reducing non-recyclable formats and incentivising circular design. Supports net-zero goals through smarter, lower-impact packaging such as reuse models that reduce single use packaging.

Function 3: Recycling Assessment Methodology (RAM)

3.1 Running RAM Expert Advisory Committee

Year 1 (2026/27):

- Take on the RAM Technical Advisory Committee being set up by PackUK, comprising experts from various sectors, including packaging producers, recyclers, local authorities, environmental organisations, and academic institutions.
- Responsibilities:
 - Provide guidance on the development and refinement of the RAM.
 - Review data and guidance available from material-specific D4R associations.

- Review and validate recyclability assessments and classifications.
- Provide an approach allowing for innovation within packaging materials and formats.
- Advise on emerging technologies and materials that may impact recyclability.
- Ensure transparent operations with published minutes and decisions and establish protocols for conflict-of-interest management.

Year 2 (2027/28):

- Leverage year 1 insights:
 - Use feedback and data from year 1 to refine recyclability assessment methodologies and classification logic.
 - Address gaps or challenges identified in year 1, ensuring a more robust and comprehensive approach.
 - Deepen collaboration with PackUK's cross-sector RAM Technical Advisory Committee (TAC) by involving more/alternative stakeholders and ensuring balanced representation.
 - Evaluate the potential to merge with OPRL's TAC to streamline efforts and avoid duplication.
- Committee responsibilities include:
 - Reviewing recyclability assessment methodologies and classification logic
 - Advising on future risks and opportunities related to packaging design, technologies, and markets both current and emerging
 - Ensuring the methodology is evidence-based and reflective of real-world recycling infrastructure
 - Considering unforeseen consequences and impacts

Year 3 (2028/29):

- Governance principles:
 - Transparent operations, including published minutes and recommendations
 - Robust conflict of interest policies and expert selection procedures
 - Clear rotation and succession plan

3.2 RAM & Guidance Publication

Year 1 (2026/27):

- Develop comprehensive guidance documents detailing the RAM criteria, assessment processes, and classification outcomes.
- Ensure that guidance materials are easily accessible to all stakeholders, including producers, compliance schemes, and local authorities.

Year 2 (2027/28):

- Develop comprehensive RAM guidance detailing:
 - Criteria for assessing recyclability and recoverability
 - How materials and formats are classified under the methodology
 - Practical examples and case studies for producers
- Ensure accessibility and usability:
 - Provide open access to the guidance for all obligated producers and stakeholders
 - Maintain a living document approach with scheduled reviews

Year 3 (2028/29):

- Keep guidance up-to-date annually:
 - Align updates with emerging packaging innovations, new sorting capabilities, and end-market shifts and trends
 - Reflect new regulatory drivers (e.g., PPWR, Extended Producer Responsibility frameworks)

3.3 User Feedback (Producers, MRFs, Reprocessors, LAs, and DGs)

Year 1 (2026/27):

- Establish channels for stakeholders to provide input on the RAM, including surveys, consultation events, and online platforms (e.g. lead in times needed for changes in labelling requirements, can be up to 18 months).
- Implement procedures for reviewing and responding to feedback, ensuring that stakeholder concerns are addressed in a timely manner and unintended consequences considered.

Year 2 (2027/28):

- Embed a continuous improvement loop via stakeholder feedback mechanisms:
 - Routine surveys, virtual consultations, and regional engagement events

- Digital feedback platforms to enable submission of concerns or improvement suggestions

Year 3 (2028/29):

- Feedback process should include:
 - Transparent review and response timelines
 - Consideration of unintended consequences (e.g. impacts on SME producers or local authority collections)
 - Integration of feedback into RAM evolution and guidance materials
-

3.4 RAM Methodology Development

Year 1 (2026/27):

- Define clear, evidence-based criteria for assessing recyclability, including considerations for functional requirements, contamination, composite materials, and design features.
- Conduct studies to evaluate the recyclability of various packaging materials and formats, considering factors such as collection infrastructure, sorting capabilities, and end-market demand.

Year 2 (2027/28):

- Pilot test the RAM methodology with a range of packaging types to ensure accuracy and reliability.
- Invest in evidence generation and real-world testing:
 - Commission lifecycle and recyclability studies across diverse packaging formats
 - Simulate performance in varied MRF and reprocessing environments

Year 3 (2028/29):

- Ensure robust, objective criteria by:
 - Including parameters for design-for-recycling, contamination risks, material composition, and ease of sorting
 - Testing packaging formats against multiple local authority collection scenarios
 - Interface with other standards and frameworks:
 - Maintain alignment with OPRL, labelling regulations, PPWR, and other international standards
 - Clarify interactions and dependencies to avoid duplicative compliance burdens
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Proposed Governance Framework

- **PackUK retains sovereign responsibility for:**
 - Final sign-off on RAM methodology changes.
 - Ownership and compliance alignment of the methodology.
- **PRO leads operational delivery, including:**
 - Advisory Committee convening and management.
 - RAM development, testing, guidance, and stakeholder engagement.

This shared model balances regulatory oversight with the pace, innovation, and practicality that only a producer-led body can deliver.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 3: Recycling Assessment Methodology (RAM) – Stakeholder Benefits
Producers	Clearer planning horizons that can link to business plans, faster incorporation of new materials, more actionable guidance, and design-for-recycling support tailored to commercial realities.
Local Authorities	RAM criteria reflect real-world collection capabilities and avoid unrealistic assumptions, helping LAs optimise service design and investment planning.
Reprocessors / MRFs	Improved alignment between packaging formats and actual reprocessing outcomes ensures better material yields and supports infrastructure investment.
Regulators	Evidence-based assessments increase compliance confidence. Collaboration with PRO ensures decisions are both enforceable and grounded in operational insight.
Citizens	More recyclable packaging on shelves, fewer inconsistencies between labelling and actual recyclability, leading to less confusion and higher participation and capture rates, less contamination and ‘wish cycling’.
Environment	Accelerates the phase-out of non-recyclable packaging, promotes eco-design, and increases end-of-life value recovery for a more circular system.

Function 4: Local Authority (LA) Cost Modelling

4.1 Running Efficiency & Effectiveness Expert Advisory Committee

Year 1 (2026/27):

- Engage with umbrella and leadership LA organisations such as LA Waste Networks chairs, NAWDO, LARAC, WLGA, COSLA, LGA.
- Invite TAC members to participate in both RAM and E&E advisory committees.
- Consider amalgamating RAM and E&E TACs.

Year 2 (2027/28):

- Establish a structured advisory committee with representatives from the mentioned organisations.
- Facilitate collaboration between TAC members across both committees.

Year 3 (2028/29):

- Ensure continuous engagement and feedback from advisory committee members.
- Implement recommendations from the advisory committee to improve efficiency and effectiveness.

4.2 Additional Data Collection

Year 1 (2026/27):

- Maximise use of available data such as LAPCAP, PackFlow and Recycle Now
- Collaborate with WRAP/WRAP Cymru and Zero Waste Scotland.
- Utilise expertise from KBT/KWT/KST on binned and street litter.
- Apply learnings from the 2025 pilot projects on the IAP.

Year 2 (2027/28):

- Work with ESA/waste management businesses to understand issues at MRF level.
- Commission surveys and research, including compositional studies.

Year 3 (2028/29):

- Continuously update data collection methods to reflect new insights and technologies.
- Integrate additional data sources to enhance model accuracy.

4.3 Waste Disposal Cost / Expected LA Waste Income Data Checks and Preparation

Year 1 (2026/27):

- Understand local geography and its impact on waste disposal costs (e.g. Scottish Highlands and Islands).

Year 2 (2027/28):

- Conduct detailed checks and prepare data on waste disposal costs and expected LA waste income.

Year 3 (2028/29):

- Regularly update and validate data to ensure accuracy and relevance.
-

4.4 Running Model to Determine Efficient Disposal Cost for Each Material for Each LA

Year 1 (2026/27):

- Reform the existing Local Authority Packaging Cost and Performance (LAPCAP) model to gain more accurate insights into real-world data.
- Focus on primary packaging costs and address data limitations for plastic and aluminium.

Year 2 (2027/28):

- Consider a system dynamics model to predict municipal waste generation and management costs.
- Account for nation-specific cost factors affecting disposal (e.g. Scottish Landfill ban on municipal waste).

Year 3 (2028/29):

- Continuously refine the model to improve accuracy and reliability.
 - Integrate WasteDataFlow data and other relevant sources.
-

4.5 Review Model Outputs

Year 1 (2026/27):

- Partner with experts to validate data (e.g., Natural Resources Wales for Welsh LAs).

Year 2 (2027/28):

- Conduct regular reviews and validations of model outputs.

Year 3 (2028/29):

- Implement feedback from experts to enhance model accuracy and reliability.
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4.6 User Feedback (LAs, LA Bodies, & DGs)

Year 1 (2026/27):

- Collect feedback through troubleshooting, LA bodies, and independent validation.

Year 2 (2027/28):

- Work with LA bodies through the E&E committee on a data expert subgroup to review the model and data accuracy.

Year 3 (2028/29):

- Submit feedback to independent organisations for validation and approval.
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4.7 Monitoring Impact of Financial Incentives on LA Performance & Feeding Impact Evaluation into LA Cost Model Reviews

Year 1 (2026/27):

- Apply learnings from initial 2025 pilots and develop a rolling program of LA pilots.

Year 2 (2027/28):

- Work closely with WLGA and Welsh Government to understand the impact of Waste Improvement Programme (WIP) and statutory recycling targets.

Year 3 (2028/29):

- Continuously monitor and evaluate the impact of financial incentives on LA improvements including ensuring that improvement across material categories is focussed on all streams, not only the ones with greatest value/highest tonnage.
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4.8 Quality Assurance

Year 1 (2026/27):

- Prevent quality issues through a robust model and expert advisory group (TAC).
- Establish an escalation process for troubleshooting.

Year 2 (2027/28):

- Disseminate learnings from high performing LAs.
- Assign a named individual within the PRO responsible for QA.

Year 3 (2028/29):

- Maintain a customer-centric approach and integrate process improvements.

4.9 Commissioning Audit & Peer Reviews

Year 1 (2026/27):

- Covered in sections 4.2 and 4.4.

Year 2 (2027/28):

- Covered in sections 4.2 and 4.4.

Year 3 (2028/29):

- Covered in sections 4.2 and 4.4.

4.10 Model Development

Year 1 (2026/27):

- Covered in sections 4.4, 4.5, and 4.7.

Year 2 (2027/28):

- Covered in sections 4.4, 4.5, and 4.7.

Year 3 (2028/29):

- Covered in sections 4.4, 4.5, and 4.7.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 4: Local Authority (LA) Cost Modelling – Stakeholder Benefits
Producers	Improved accuracy in LA disposal costs supports fairer producer fees and allows for earlier visibility of fee impacts to guide sustainable design decisions.
Local Authorities	Tailored engagement and data review processes ensure local needs and geographic factors are better reflected in cost models, improving funding fairness and incentives.
Reprocessors / MRFs	Greater LA cost transparency drives clarity on material sorting economics and informs investment decisions in infrastructure and to what capacity and when required.
Regulators	Higher quality data and model governance support stronger enforcement, compliance monitoring, and continuous policy improvement.

Citizens	Greater fairness in funding for local services enables better public service delivery and reinforces trust in the recycling system and the four nations.
Environment	Improved funding allocation and LA improvement that is monitored helps increase recovery rates, reduce waste, and minimise landfill dependency.

Function 6: Communications & Public Information

6.1 Develop Public Information Strategy and Plan Activity

Year 1 (2026/27):

- Facilitate and lead the new PackUK Expert Working Group on Comms and Behaviour Change with members from across four nations and cross sector orgs with expertise in citizen behaviour change and national and local campaigns, including also experts in monitoring impact. To cover citizens in all locations – at home, work, away from home.
- Work with partners across value chain to gather, evaluate and review available knowledge and insight data on citizen behaviours, barriers and motivations relating to effective recycling – both in UK nations and best practice from other pEPR nations.
- Work with partners across value chain to gather, evaluate and review existing communication campaigns and comms resources across four nations on recycling including material specific campaigns.
- Working in collaboration with others, use outputs from above to inform and develop a UK-wide citizen and business communication and information strategy working with others across sector and value chain with proven expertise in this area.
- Design strategy to achieve behaviour change needed across households and businesses (dealing in household like packaging waste) to meet the four UK nations' waste targets and maximise the impact of packaging waste reforms.
- Lead on work to develop comprehensive a multi-year communications delivery plan, aligned to on-the-ground nation differences (e.g. Welsh language campaigns) and/or changes to waste services (e.g. roll out of soft plastics collections).
- Strategy and plan to include distribution mechanism and strategy for most efficient and impactful use of resources for local level campaigns.

Year 2 (2027/28):

- Commence delivery of communications plan. Include ongoing use of existing successful communication campaigns across nations or specific material streams where this is the most cost-efficient and effective means of achieving the desired behaviour changes.
- Continue to use the Comms Working Group as a source of knowledge and to achieve collaboration and cross packaging chain consistency on Comms and Behaviour Change.
- Work closely with other sector organisations with valid expertise in this area across all four nations, both within and outside the expert working group including those with expertise in packaging labelling.
- Roll out resources for local campaigns using agreed distribution methodology and impact measurements.

Year 3 (2028/29):

- Emphasise the use of evidence-based communication activities to achieve maximum impact.
- Include appropriate monitoring and evaluation throughout the delivery period based on valid metrics to ensure desired impact is being achieved and resources are best used.
- Work closely and collaboratively with sister waste reform organisations (e.g., DRS DMO) on consistent and joined-up messaging and cost-effective behaviour change communications.
- Address specific behaviours and work with other sector organisations on labelling as a key component of citizen understanding and behaviour.

6.2 Estimate Public Information Costs for Year Ahead

Year 1 (2026/27):

- Develop an action plan that includes costed budgets for delivery of communication activities at both national and local levels, likely using a tiered approach for different resource options.

Year 2 (2027/28):

- Seek cost efficiencies using existing campaigns and materials where they are effective.
- Work across the sector for consistency on messaging relating to recycling confusion on 'sub rules' – simpler and consistent messages are easier to communicate (which affects cost).

Year 3 (2028/29):

- Seek cost efficiency on citizen engagement tools like recycling locators, apps, and shared communication materials.

6.3 Producing Communications and Public Info Campaigns

Year 1 (2026/27):

- Deliver communications campaigns to be rolled out to citizens via multiple communication channels and multiple sector stakeholders – local authorities, public-facing producers like brands and retailers, etc.

Year 2 (2027/28):

- Base campaigns on evidence and insight, leveraging PRO value from existing knowledge and data over time.

Year 3 (2028/29):

- Continuously refine and adapt campaigns to ensure effectiveness and relevance.

6.4 Guidance to Producers & Local Authorities

Year 1 (2026/27):

- Develop a strategy and action plan that includes the production of communication resources and tools for use by all stakeholders who interact with citizens and provide valid communication channels with them – including local authorities, packaging producers, material organisations, waste management companies, etc.

Year 2 (2027/28):

- Ensure consistency of message is a key consideration in this work.
- Provide support and guidance with expert information, training, and advice on ‘how to’ do communications based on evidence of what works.

Year 3 (2028/29):

- Develop ‘one to many’ resources, materials, and tools flexible enough to be amended for local variation but avoid ‘reinventing the wheel’ and paying multiple times for similar materials to be produced by different stakeholders.
- Work closely with other sector organisations in the development of resources that suit their needs in their part of the value chain, harnessing existing experiences and knowledge.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 6: Communications & Public Information – Stakeholder Benefits
Producers	Sector-led strategy focused on impactful, brand-aligned messaging. Economies of scale in campaign production and

	message consistency. Improve clarity for packaging labelling, reducing customer confusion and reputational risk.
Local Authorities	High-quality, co-branded materials that reduce duplication. Campaigns designed with input from councils, reflecting local infrastructure and behaviour trends. Improved clarity and consistency in citizen messaging to boost participation and trust. Access to additional, trusted communication channels (e.g. through retailers and familiar brands) and resources available from producers.
Reprocessors / MRFs	Higher public compliance with correct recycling behaviours, reducing contamination rates and 'wish cycling'. Higher capture rates for materials. Campaigns can reinforce what is genuinely recyclable, aligned with infrastructure and how reuse and repurpose can support social economics.
Regulators	Stronger evidence base for communications expenditure and public impact. Clear alignment of behaviour change communications with policy objectives (e.g. Simpler Recycling, DRS and reuse).
Citizens	Consistent, clear, and relatable messaging across brands and councils. Easier understanding of recycling rules and correct behaviours. Enhanced trust in the system and reduced confusion through more joined-up comms.
Environment	Improved recycling rates and reduced contamination through behaviour change. Better citizen engagement leads to longer-term sustainable habits and reduction in waste leakage.

Function 7: Local Authority (LA) Recycling Improvement (performance)

7.1 Developing LA Effectiveness Assessment Methodology

Year 1 (2026/27):

- Work collaboratively with LAs and those who work with them, to undertake a joint Needs Assessment.
- Establish a shared understanding of the baseline for household and public space collections.
- Work together to determine baseline service costs including with third parties as required.
- Map processing capacity, contamination levels, and end markets in partnership.

- Identify shared opportunities for service expansion, innovation, and emerging new technologies.
- Assess shared learnings and good practice across LA communications and explore opportunities for joint improvement, including working with others who support LA communications.

Year 2 (2027/28):

- Work together with LAs to refine the Needs Assessment methodology through learnings from year 1.
- Engage closely with LAs to validate and enhance the assessment criteria and ensuring relevance across all four nations.

Year 3 (2028/29):

- Work with LAs to continue evolving the methodology to reflect changes in waste management practices and emerging innovation and technologies.
- Use feedback and data insights to co-drive ongoing improvements.

7.2 Assessing LA Effectiveness

Year 1 (2026/27):

- Support the 6 LA pilot projects to co-develop and test the IAP process.
- Work with PackUK to share findings and form an LA/PRO IAP network Disseminate learnings and work with these 6 LAs to set up an LA/PRO IAP network.
- Work with PackUK to share findings and form an LA/PRO IAP shared learning network or utilise existing LA learning networks as appropriate.
- Work closely with the WLGA and Welsh Government to understand the impact of the Waste Improvement Programme (WIP).

Year 2 (2027/28):

- Work together to analyse the impacts of the pilot IAPs and refine based on LA feedback.
- Partner with four nation LA representative organisations to expand the pilot programme to a further 16 LAs.
- Co-design IAPs with local teams that reflect real world challenges and unlock practical solutions for improving recycling rates.

Year 3 (2028/29):

- Provide ongoing, evidence led support to LAs to help enhance their waste and recycling services, recognising the breadth of services provided in addition to packaging. Work with others who support LAs in this.

- Maintain a culture of continuous improvement and shared progress and outcomes.

7.3 Improvement Action Plan (IAP) Process

Year 1 (2026/27):

- Use available data to jointly identify LAs that may benefit the most from additional support.
- Partner with the LA community to explore shared challenges and collaborative problem solving. Share best practice and case studies where LAs have common characteristics or challenges. Continue work with experienced third parties to provide LA support.

Year 2 (2027/28):

- Prioritise early engagement with the LAs with potential to benefitting most from support, ensuring their voice helps shape the outcomes.
- Co – create tailored IAPs that address specific local barriers and opportunities for LAs.

Year 3 (2028/29):

- Support roll out of IAPs and collaboratively assess their impact for effectiveness and efficiency.
- Continuously refine the IAP process based on LA feedback and performance data. Use learning loops and data to evolve the IAP process with LA partners.

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 7: Local Authority (LA) Recycling Improvement (Performance) – Stakeholder Benefits
Local Authorities	Co -designed and tailored Improvement Action Plans (IAPs) based on specific requirements, leading to more effective waste services and recycling outcomes.
Reprocessors / MRFs	Improved quality and consistency of collected materials from LAs, leading to better processing efficiency, greater consistency and quality of collected materials.
Regulators	Transparent evidence led improvements aligned with statutory targets across the four nations. Stronger oversight and clear evidence of recycling improvements delivered through collaboration.
Citizens	More reliable, regular and clear communications. Higher levels of understanding and confidence in recycling. More comprehensive and consistent recycling services.

Environment	Higher recycling rates and lower contamination levels resulting in improved environmental outcomes.

Function 9: Other (binned and littered items covered under function 10)

9.1 Organisation strategy, operational plan and annual report

3-Year Operational Plan (2026/27 to 2028/29)

Vision: To deliver a producer-led, transparent, and effective extended producer responsibility (EPR) system that improves recycling outcomes, empowers stakeholders, and supports a circular economy across the four UK nations.

Governance Structure (Years 1–3)

Governance	Purpose	Composition
Board of Directors	Legal oversight, chaired independently	Independent Chair, legal, risk and audit experts, and senior representatives from obligated producers
Steering Committee	Strategic guidance and oversight	Senior leaders from producer members, including representation from four nations, SMEs and all major sectors
Executive Team	Day-to-day management and delivery of PRO functions	CEO, COO, Data & Analytics, Public Engagement Lead, Regulatory Affairs
Advisory Committees	Technical and stakeholder input to core functions (e.g. through PackUK TACs, RAM, LA E&E, CBC)	LAs, NGOs, academics, reprocessors, brands, compliance schemes, material organisations, waste operators
Audit & Assurance Board	Oversight of financial integrity, ESG impact, and operational performance	Appointed non-execs with legal, ESG, and financial audit credentials
Producer Member Council	Democratic accountability to fee-paying members	Elected representatives from large, medium, and SME producers by sector

Governance Principles

Transparency – Open, clear decision-making with published methodologies, audits, and visible governance.

Inclusivity – Engaging stakeholders across the value chain including SMEs, NGOs, and Local Authorities (LAs).

Accountability – Clear roles, independent audit, and reporting to PackUK.

Adaptability – Agile, evidence-led evolution in response to change and innovation.

Year 1 (2026/27): Establishment Phase

Key Actions:

- Finalise incorporation, governance appointments, and operational protocols.
- Support PackUK on fee calculator, RAM, and data transition.
- Begin foundational work on:
 - Public communications strategy
 - RAM stakeholder engagement
 - LA engagement strategy
 - First annual report and accounts
- Recruit core staff and commission external delivery partners/and or third parties taking into account four nation representation.
- Develop digital infrastructure (knowledge hub, reporting platform, feedback tools).

Focus Areas:

- Stakeholder engagement and trust-building
- Early visibility and accuracy in fee setting inputs
- Behavioural insight and improvement baselining
- Close coordination with the four nations and PackUK

Year 2 (2027/28): Build and Scale Phase

Key Actions:

- Deliver PRO-led fee calculator using real LA cost data and modulation criteria
- Publish updated RAM and producer modulation guidance
- Carry out nation appropriate public information campaign with PackUK and third parties

- Expand Pilots with Local Authorities for Improvement Action Plans (IAPs)
- Expand advisory committees and build collaborative evidence base
- Increase staffing FTEs across key functions or third-party resource taking into account four nation representation
- Publish annual report and accounts

Focus Areas:

- Quality assurance, audit, and transparency
- Active feedback loops with all stakeholder groups
- Data modelling and impact forecasting
- Trial new approaches to continuous improvement and best practice sharing

Year 3 (2028/29): Full Operational Delivery

Key Actions:

- Develop a proposal for next phase transfer of any statutory functions under EPR including:
 - Producer fee calculation and modulation
 - RAM updates and recyclability assessments
 - four nation public information delivery
 - LA improvement benchmarking and funding allocation
- Publish annual report and accounts including cost allocations and improvements outcomes.
- Extend IAP process to all priority LAs using pilot outcomes as a basis.
- Increase staffing FTEs, embedding regional and function specialists and /or third parties taking into account four nation representation.

Focus Areas:

- Regulatory alignment with UK targets and PPWR
- Integration with DRS, PRN and PackFlow systems
- Long-term packaging innovation (reuse, de minimis, dual-use)
- Continuous learning from citizen behaviour change and impact evaluation

Cross-Cutting Themes (2026/27–2028/29)

- Partnership with PackUK and DRS DMO

- Commitment to inclusive, transparent, equitable stakeholder governance
- Investment in scalable data systems and analytics
- Citizen-centred strategy based on evidence and insight
- Analysis and data on commonly littered and binned items – working collaboratively with cross sector organisations and NGOs
- Measurable progress on circularity and system innovation

Success Measures

- High satisfaction from four nations, PackUK, producers, LAs, regulators and citizens
- Timely, accurate, transparent and fair fee structures
- Impactful modulation incentives that drive the required design change
- Proven uplift in LA collection improvement plan
- Demonstrable improvement in recycling rates and improved material quality
- Increased citizen engagement and confidence in the system

This operational plan will be reviewed annually to ensure alignment with statutory requirements and PackUK's regulatory framework, evolving with the needs of stakeholders and the wider system.

Function 10: Functions Not Specified in the Regulations

- Sec 4. As a function of LA Cost modelling, developing a PRO accounting methodology that models & compares cost outcomes determined by different contractual material ownership approaches. (Longer term the aim is to produce an evidence base that feeds into the reform & integration of PRN's)
-

Funding Sources:

- PackUK funding for services carried out
 - Voluntary Producer funding through the PRO
 - Contributions from LAs, Waste Management companies, or others in the value chain
 - Government grants
-

10.1 Customer Support

Year 1 (2026/27):

- Conduct educational workshops for producers.

- Work with DMO and others to identify and quantify a proportional list of commonly binned or littered items, including determination of appropriate metrics.
- Undertake surveys in Needs Assessment project design to understand current LA & citizen communication needs.
- Closely track PPWR for maximum alignment in the UK.
- Working in partnership with established businesses, organisations and NGO such as compliance schemes and WRAP. Ensure open communication to prevent duplication and that UK Packaging PRO builds on best practice and is an open source (as far as possible with data restrictions).

Year 2 (2027/28):

- Develop calculators to support Producer's PoM reporting and fee estimation.
- Evaluate best practice methodologies to calculate producer fees for commonly binned or littered items.
- Using Needs Assessment survey results and identified priorities, design consistent national and local messaging templates.
- Consider the outcomes of PPWR and the need for simplicity and consistency for consumers and the potential impact of this on labelling and packaging.

Year 3 (2028/29):

- Pilot having select volunteer producers report PoM data in parallel to the PRO.
- Explore coordination across DRS and EPR to not duplicate resource or cost for obligated producers.
- Link labelling and communication tools for coordinated clear citizen messages.

10.2 Monitoring and Evaluation

Year 1 (2026/27):

- Work with LAs and the value chain to expand annual reporting of actual LA costs and performance data using consistent definitions.
- Design audit procedures to supplement LA reporting performance by material and collection classes, and pilot small-scale sampling.
- Align emerging requirements for binned and littered waste, simpler recycling, and DRS with EPR roles and responsibilities.
- Build coordinated relationships with LA (consortium) PRO and DMO for efficiency and effectiveness.

Year 2 (2027/28):

- Undertake comprehensive audits to measure baseline performance by material class against regulation targets.

Year 3 (2028/29):

- Prepare an annual report of system-wide recycling costs by material type.
-

10.3 Continuous Improvement

Year 1 (2026/27):

- Undertake ‘Needs Assessments’ as appropriate in four nations, to examine recycling material flows, bottlenecks, contractual terms and infrastructure needs and opportunities as measured against regulatory targets.
- Review and evaluate the status of discussions in 2025 and Q1 2026 to resolve challenges associated with the approach and mechanisms to manage the:
 - Allocation of responsibility for de Minimis packaging obligations
 - Determination and allocation of responsibility for dual use, ‘household like’ packaging
- Should gaps remain, further examination of international EPR schemes to explore Best Practice mechanisms. As EPR in other jurisdictions mature, continuously monitor to identify opportunity for further pilots.
- Based on research and LA pilot results, recommend four nation criteria and methodology for de Minimis.
- Based on research, recommend four nation criteria and methodology for dual use packaging (including recommended amendments to Regulations if required).
- Examine international best practices to encourage reuse within EPR. Support Wales pilot and incorporate learnings.

Year 2 (2027/28):

- From Needs Assessment, identify priorities and develop a work plan, timeline, and budget to achieve regulatory targets.
- From reuse evaluation, consider tools and targets linked to producer fee models and E&E methodologies including logistics.
- Using Year 1 research and pilot data, continue to recommend improvement opportunities to further enhance innovation and investment.

Year 3 (2028/29):

- From Needs Assessment and work plan, pilot proposed initiatives in select LAs or four nation infrastructure to confirm direction.
- Assist with the introduction of revised de minimis and dual-use packaging requirements.
- Continue to propose best practice tools, targets, and methodologies to encourage reuse.

- Establish a methodology for building sponsorship and alignment to further develop models and calculations at sovereign level that could extend to an arbitration process.
- Further work within value chain to understand ever evolving needs, opportunities and investment requirements for the longer term that are outside of the current system to advance circularity within the packaging value chain

Summary of benefits for a not-for-profit and producer - led PRO taking on this function

Stakeholders	Function 10: Functions Not Specified in the Regulations – Stakeholder Benefits
Producers	Enhanced education, data tools, and fee calculators improve reporting accuracy and planning. Clear, open communication with compliance bodies reduces duplication and cost. Improved system visibility enables data-led fee setting and cost allocation transparency. Tailored workplans to meet regulatory targets and support innovation (e.g. reuse, de minimis, household and non-household definition).
Local Authorities	Targeted surveys and citizen needs assessment will improve communication strategies and reduce littering. Fairer comparisons between councils based on consistent and transparent metrics. Opportunity to feed into service redesigns aligned with regulatory targets.
Reprocessors / MRFs	Supports improved material streams through better citizen sorting behaviour. Highlights areas for investment or reform based on accurate throughput and quality data. Evidence-driven upgrades and flow improvements support quality and value.
Regulators	Strengthens compliance readiness through better industry understanding and preparation. Ensures robust governance and audit trails to support intervention where necessary. Strategic direction based on best practice and pilots reduces regulatory uncertainty longer term.
Citizens	Access to clearer, more consistent recycling and aligned labelling information. Improved recycling outcomes due to better-targeted interventions and transparency. Simplified messaging and better systems increase recycling participation, the easier we make it the more intuitive it becomes.
Environment	Improved upstream understanding across all functions of the packaging value chain leads to more sustainable packaging design and disposal. More accurate tracking of materials improves environmental outcomes across the system, leading to a more incentivised shift towards circular practices including reuse and system innovation.