



# Mastering the RAM

9<sup>th</sup> September 2025





# Introducing Valpak:

Leading environmental compliance and sustainability solutions



## Who *we* are



**Part of Reconomy**, a global leader in circular economy solutions



**The UK's largest compliance scheme** for packaging, WEEE, and batteries



**Over 25 years of expertise** in reporting and navigating complex legislation like EPR (Extended Producer Responsibility)



**Sustainability consultancy specialists**, supporting businesses' environmental objectives

## Our *impact*



**55+ million SKUs**

Home to the industry-leading packaging and product database

**Supporting brands, industry, and government** with accurate data and analysis for big change

## A *sustainable* business



**Awarded Platinum sustainability rating by EcoVadis**, placing Valpak in the top 1% of 130,000 companies worldwide



# Today's Presenters

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Sam Dove – New  
Business Manager



Danny Stapleton Torres –  
Policy Advisor



Phil Powell – Strategic  
Account Manager



# EPR Overview

- EPR is a system that aims to hold businesses financially accountable for managing the waste generated from their packaging.
- Under EPR, large producers must finance the collection, sorting, and recycling of their packaging waste through EPR fees and PRNs/PERNs – transferring the costs from local authorities to producers.

## Obligated Producers



### Large producer obligations

- Register on the RPD portal
- Report packaging quantities by 1<sup>st</sup> April and 1<sup>st</sup> October
- Pay EPR fees
- Purchase necessary PRNs/PERNs equivalent to tonnages of packaging placed on the market
- Pay admin fees to PackUK and the environmental regulator

### Small producer obligations

- Register on RPD portal
- Report packaging quantities by 1<sup>st</sup> April
- Pay registration fee to the environmental regulator

Producer Thresholds	Turnover		
	≤£1 million	£1m - £2m	>£2 million
Packaging Tonnage			
<25 tonnes	No obligation	No obligation	No obligation
25-50 tonnes	No obligation	Small Producer	Small Producer
>50 tonnes	No obligation	Small Producer	Large Producer

# The RAM - Legislative Background

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## Resources & Waste Strategy for England

December 2018

### Our framework for EPR

We have developed a set of core principles that will act as a framework for reviewing our existing producer responsibility schemes and developing new EPR schemes:

- 1 Clear outcomes, objectives, targets and responsibilities** are set for individual EPR schemes to support long-term planning, investment, and research and development by producers in specified sectors and the resource management sector.
- 2 Producers bear the full net cost of managing their products at the end of their life<sup>42</sup>,** including impacts on the environment and society so that objectives and targets are met.
- 3 Modulated fees or other measures** are used to encourage producers to make more sustainable design, production and purchasing decisions in line with the waste hierarchy and our resources and waste priorities. For example, producers may pay a lower fee for products which are easy to reuse, repair or recycle and a penalty for those that are not.
- 4** Schemes are designed and implemented to make it **easy for consumers to play their part**, whether through their choices at point of purchase, during ownership of a product, or at the end of its life.

# The RAM - Legislative Background

*Environment Act 2021 (c. 30)*  
*Schedule 5 – Producer responsibility for disposal costs*  
*Part 1 – Requirements*

- (5) The regulations may make provision as to how the disposal costs of products or materials are to be calculated.

*Calculation of sums payable*

- 3 (1) The regulations may make provision as to how the sums payable under the regulations are to be calculated.
- (2) They may include provision for the sums payable under the regulations to vary according to the design or composition of the products or materials to which the regulations relate, the methods by which they were produced or any other factor.

The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024

**Obligation to report results of recyclability assessments**

37.—(1) A producer that is a liable producer for the purposes of Part 5 must report to the appropriate agency every 6 months the results of its recyclability assessments of the household packaging supplied by the producer, in accordance with paragraphs (2) and (3) and regulation 39.

(5) If P is a liable producer for the purposes of Part 5, P must retain records of recyclability assessments carried out in accordance with regulation 25(3) for at least 7 years after the record is made.

RAM has been subject to industry consultation across Q3 and Q4 2024





# What is the RAM?

- The RAM is PackUK's standardised method for assessing the compatibility of packaging with UK recycling infrastructure.
- Packaging will be given a rating of either **red**, **amber**, or **green**.
- Producer EPR fees in **2026/27** will be modulated according to these **RAG** ratings.
- **Applies to all large producers responsible for household primary packaging going onto the UK market from 2025.**





# How does the RAM work?

## The RAM contains material-specific guidance on 9 materials:

- Paper & board
- Fibre-composites
- Plastic (flexibles)
- Plastic (rigids)
- Steel
- Aluminium
- Glass
- Wood
- Other

Each component must be assessed through four key stages to determine its recyclability

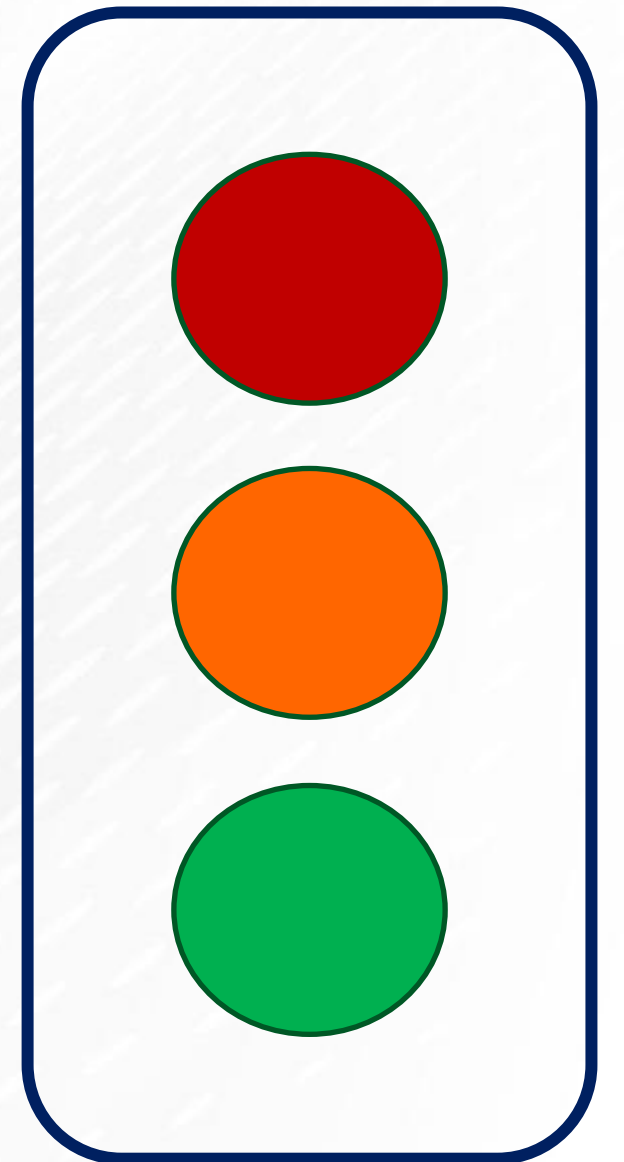
**Collection:** is the material widely collected at kerbside or via take-back schemes?

**Sortation:** can the material be effectively sorted at recycling facilities?

**Reprocessing:** does the items' composition affect its ability to be reprocessed?

**Application:** is output quality of sufficient quality to be used?

The item's interaction with each stage is considered to produce a RAG rating





# How to assess packaging under the RAM?

		Tray	Film cover	Sleeve
Assessment	Packaging item assessed in RAM	Plastic - rigid	Plastic - flexible	Paper & board
	RAM Output	Red	Red/amber*	Green
Reporting	Reported as on RPD	Plastic rigid - Red	Plastic flexible – Red/amber	Paper & board - Green

\*producers reporting amber due to existence of take-back scheme, will need to meet PackUK evidencing requirements





# Kerbside collection research – flexible plastics

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Where producers are reporting packaging as amber by virtue of the existence of a take-back scheme, they are obligated to evidence that it meets certain criteria, which are aligned to OPRL standards;

- Accessible to at least 75% of the UK population
  - Does not conflict with LA kerbside collections
  - Is not restricted to one brand or product
  - Does not require a purchase to be made before an item can be deposited
  - Have full transparency that the collected material is recycled
- To assist members in evidencing the accessibility of flexible plastic packaging take-back points, Valpak Consulting undertook population modelling of take-back points operated by seven large grocery retailers in the UK.

To assist members in evidencing the traceability of flexible take-back schemes, we are engaging with material recycling facilities that manage the material.





# How to assess packaging under the RAM?

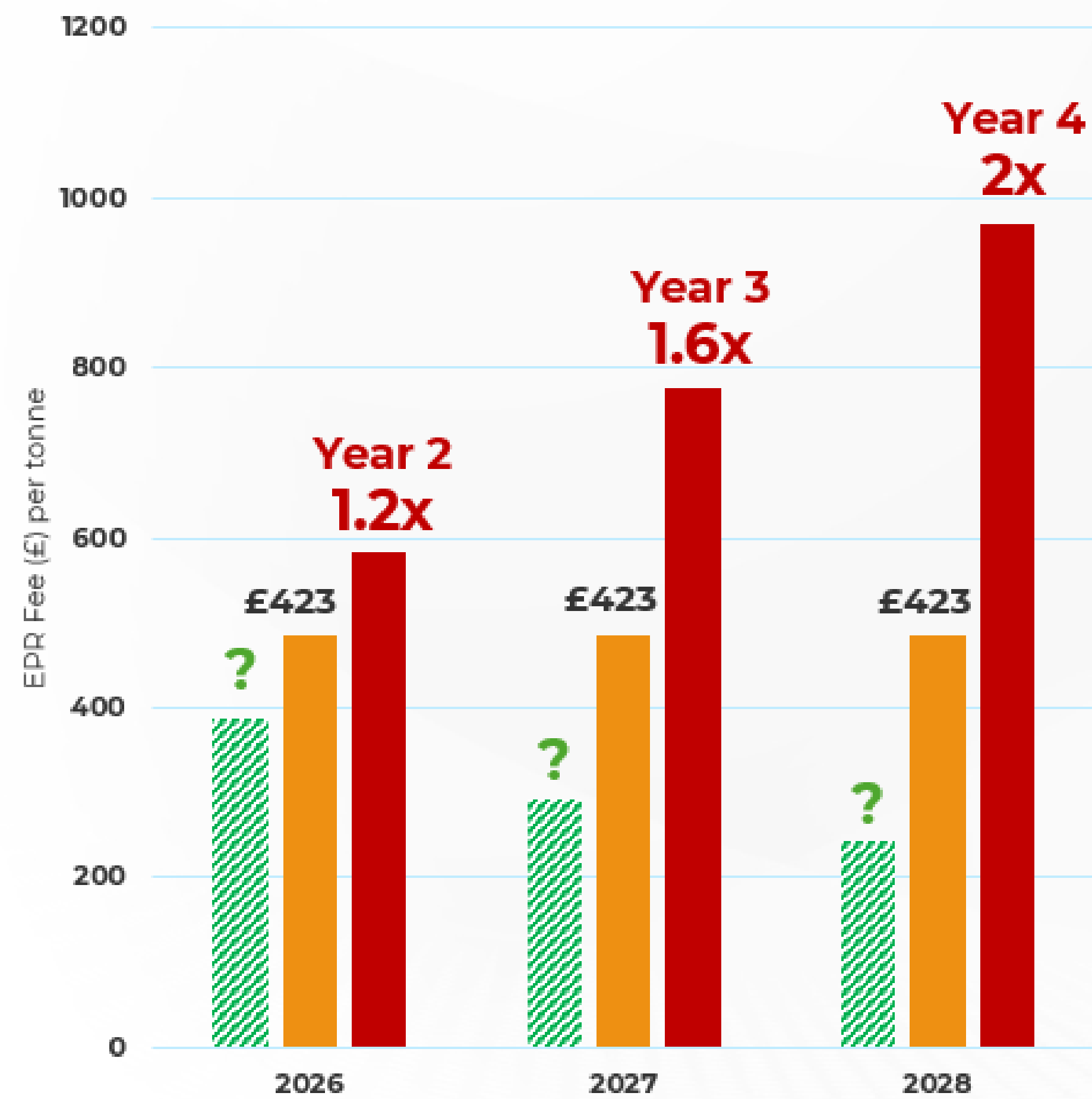
		Bottle	Label	Wax	Cork
Assessment	Packaging item assessed in RAM	Glass	Glass	Glass	Other
	RAM Output	Amber	Amber	Amber	Red
Reporting	Reported as on RPD	Glass - Amber	Paper & board – Amber	Other - Amber	Other – Red





# EPR Fee Modulation

Example of eco-modulation  
plastic EPR fees



## Approach across first 3 years of modulation confirmed

- In FY26/27, 2025 **red**-rated packaging will face 1.2x base fee
- In FY27/28, 2026 **red**-rated packaging will face 1.6x base fee
  - In FY28/29, 2027 **red**-rated packaging will face 2.0x base fee

Penalties raised by red packaging will subsidise reduction in green fees by same % across each material

Material	Final EPR Fees (£/tonne)
Aluminium	266
Fibre-based composite	461
Glass	192
Paper & board	196
Plastic	423
Steel	259
Wood	280
Other	259



# Technical Example – Jam Jar 454g\*

Components of the packaging will be discarded together, as they are not easily separable by hand.

## Labels + Jar

In this example the label is not easily separable by hand they are assessed collectively in the RAM taking on the rating of the predominant component by weight. However, they are recorded in their respective materials.

### Jar – Glass – 200g - Green

- No restricted inks or contaminants
- No mirrored, heat-resistant, lead, or decorative
- One of accepted glass colours (clear, green, blue or brown/amber)

### Label – Paper – 0.9g - Green

- Takes on Jar rating but recorded as paper.

### Lid – Steel – 8.9g - Green

- No restricted inks or contaminants
- Not larger than 300mm
- Steel makes up >70% of weight



**EPR Fee Cost**  
~£0.04



\*Illustrative examples only



# Technical Example – Canned Food 400g\*

Components of the packaging are separable by hand and so will be assessed individually.

In this example the steel lid is expected to be removed by the end user.

## Can – Steel – 48.9g - Green

- No restricted inks or contaminants
- Component is <300mm in all dimensions
- Food can is widely recyclable
- Steel makes up >70% of weight

## Lid – Steel – 6.2g – Green

## Label – Paper – 1.6g – Green

- No restricted inks, contaminants, or coatings
- Not greaseproof, parchment, siliconized or waxed
- >40mm in 2 dimensions



**EPR Fee Cost**  
~£0.014





# Regulatory Position Statement – RAM Reporting

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This RPS confirms that agencies will not take enforcement action against producers who do not submit their H1 2025 household packaging data with the recyclability assessments by the 1 October 2025.

- With this RPS, producers may either submit H2 2025 data with recyclability assessments or submit both H1 and H2 2025 data with the recyclability assessments by **1 April 2026**.

**For producers who do not submit RAM data for H1 2025, PackUK will extrapolate the producers' H2 2025 RAM data based on ratios instead of total tonnages.**





# Regulatory Position Statement – Fibre-based Composites

This RPS confirms an amendment to the material definition of FBCs to ensure it aligns with the definition in the RAM. The current definition in the regulations remains:

*“packaging material which is made of paperboard or paper fibres, **with a layer of plastic**, and which may also have layers of other materials, to form a single unit that cannot be separated by hand”*

- The RAM definition is based on a 5% plastic content threshold that differentiates between FBCs and paper/board.
- Agencies have states that **either definition can be used** when undertaking EPR/RAM reporting.

Packaging suppliers that can evidence that any plastic coating or layers make up 5% or less of the total packaging weight should report the packaging as paper & board.





# Steps for effective RAM compliance

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The Recyclability Assessment Methodology (RAM) can present a **significant challenge to producers**, with detailed data and evidencing requirements. However, a **structured approach** makes compliance more straightforward. Key steps include:

- **Reviewing available packaging data** to ensure it is comprehensive
- **Using available resources** to build understanding of the RAM and its requirements
- **Ensuring evidence is available** for packaging reported as green or amber
- **Forecasting fees** to support effective budgeting and planning

Following these steps helps **reduce the compliance challenge** of the RAM, and allows producers to **take advantage** of the opportunities presented by modulated fees through **sustainable decision making**.

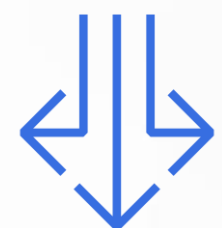


# Valpak's RAM Support Services

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**RAM** requirements introduce a previously unseen level of **reporting complexity** under packaging EPR regulations

Valpak offer **varying** RAM support service options including:



**RAM decision trees** to support in-house assessments



**Managed assessments** completed by Valpak staff



**Outsourced data collection** to gather all required fields for RAM reporting

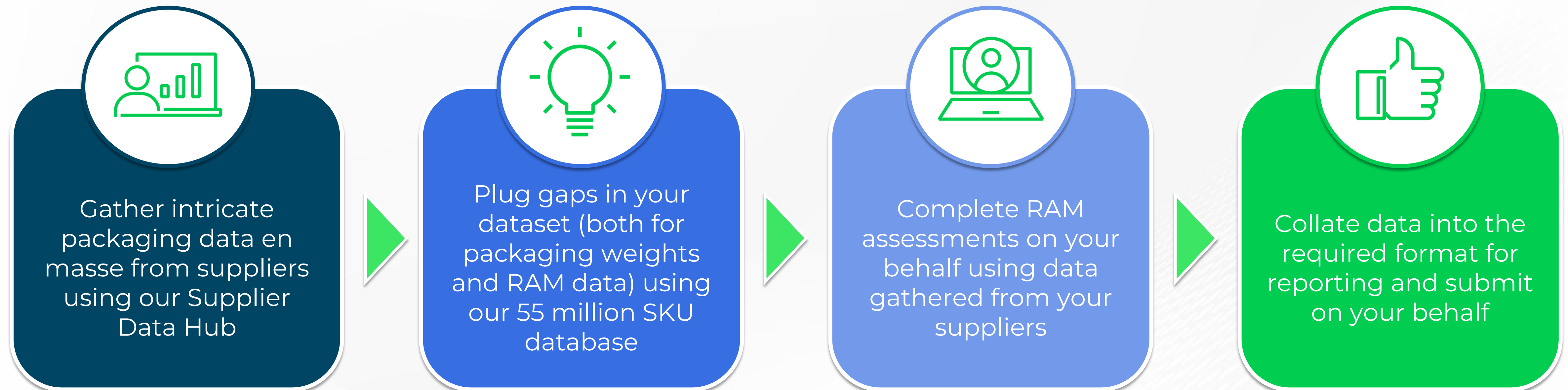




# Valpak's RAM Data Solution

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Valpak can offer a **fully outsourced RAM support service**, fully alleviating the burden of RAM reporting from your business.



This **dedicated, account managed solution** has saved hundreds of businesses **time and money** through reduce resource burdens, more accurate submissions and invaluable data insights.

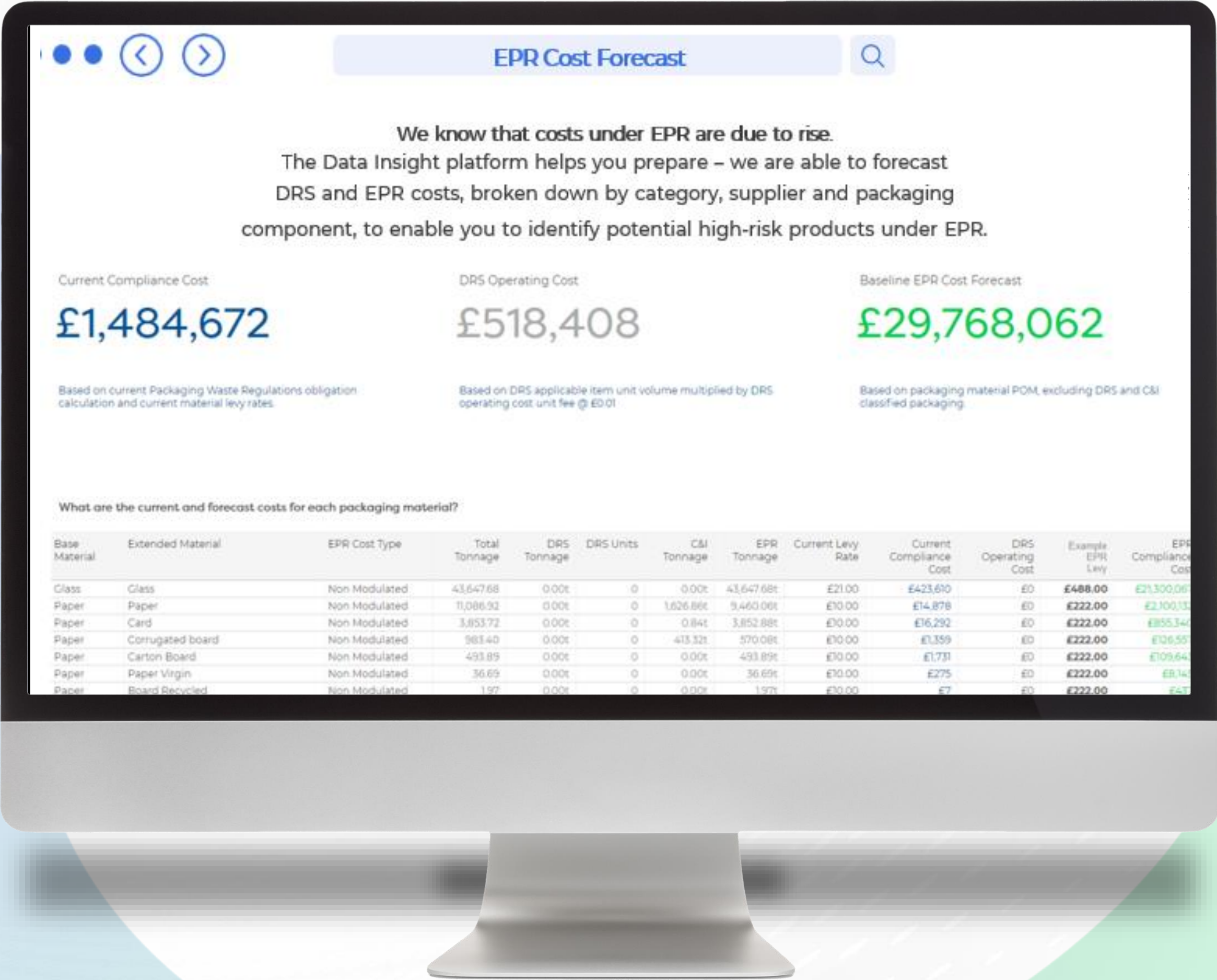


# Data Insights Platform

To support in **effective EPR budgeting and cost planning**, Valpak have developed the Data Insights Platform.

This tool provides businesses with:

- Visibility of SKU-level packaging data
- Access to packaging recyclability information and RAM ratings
- Detailed granular cost forecasts, providing key insight for EPR budgeting







# Questions?