

# UK Packaging PRO: The Producer-Led Solution for pEPR Success

Karen Graley | December 2025



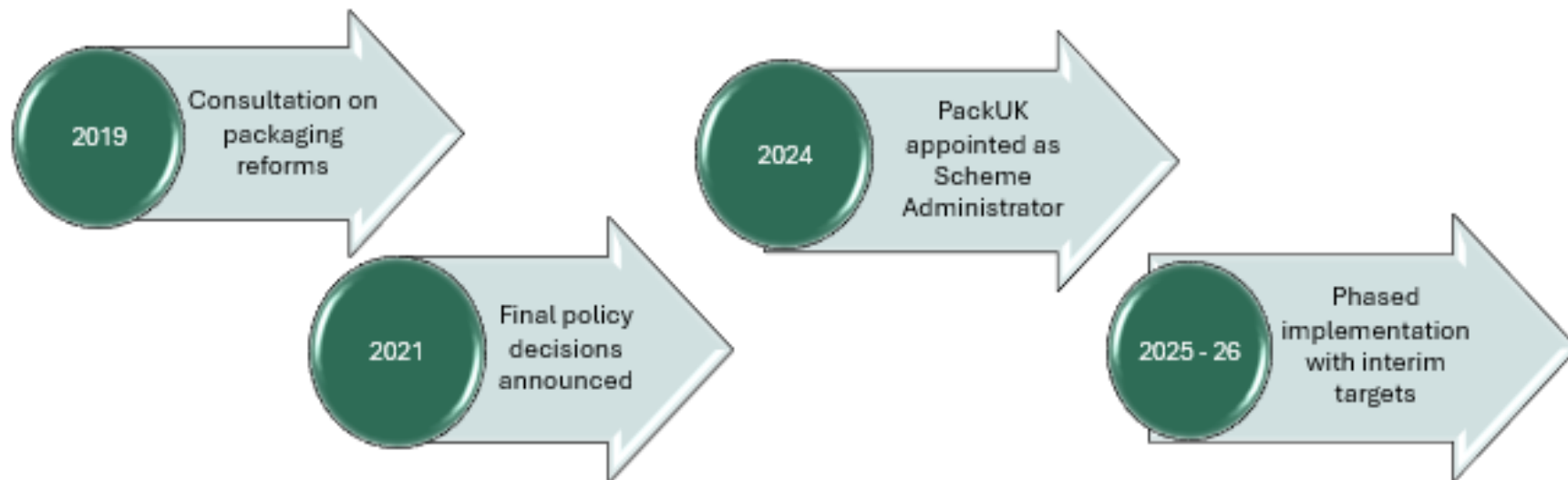
# The shift to Extended Producer Responsibility

**Packaging EPR:** a once-in-a-generation system change

Producers now responsible for full lifecycle cost of packaging = **£1.5B Industry Cost** –

**This is your opportunity to work together to invest in the UK recycling infrastructure**

**Goal:** better environmental outcomes through accountability





# Who and Why UK Packaging PRO?

- Built by 50+ producers & trade bodies
- Collaboration with the entire value chain
- Independent, no commercial conflicts
- Strong governance & advisory structures
- International best practice + UK policy expertise





# What are the targets

Material	2024 Target	2030 Target
Plastic	41%	56%
Wood	38%	39%
Aluminium	30%*	30%*
Steel	85%	92%
Paper/Card	76%	85%
Glass	71%	81%
Overall Rate	63%	73%

## Notes:

- \*Aluminium targets exclude drinks cans (covered by Deposit Return Schemes).
- Targets apply to packaging in scope of EPR, not comparable with previous PRN system.
- These targets aim to drive higher recycling and consistent collections across the UK.

[\[consult.defra.gov.uk\]](https://consult.defra.gov.uk)

If the UK doesn't hit its **pEPR recycling targets**, here's what happens:

- **Producers pay more.....**  
The system works on a “polluter pays” principle. If recycling rates are lower than expected, the cost of managing packaging waste goes up. That means producers will face higher EPR fees to cover the shortfall.
- **More packaging ends up in landfill or incineration instead of being recycled, which undermines the UK's climate and circular economy goals.**

Essentially: **Failing to meet targets = higher costs, stricter rules, and reputational risk.**



# Our clear vision and mission

**Our vision** for successful EPR in the UK has been shaped by feedback from obligated producers.

*“UK Packaging PRO will be a not-for-profit producer-led organisation committed to the principles of Extended Producer Responsibility, applied effectively and efficiently to further the development of a more circular economy for packaging in the UK”*

We will do this by:

- Actively supporting the transition to **more recyclable packaging** and **reduction of packaging waste**
- Helping ensure a **fair and transparent** approach to the determining of net cost as well as the calculation and modulation of **EPR fees**
- Improving collection and recycling outcomes across the packaging value chain
- Helping ensure an effective and efficient use of EPR funds to deliver these outcomes
- Building the capacity and capability within the PRO to support greater producer responsibility across the EPR landscape





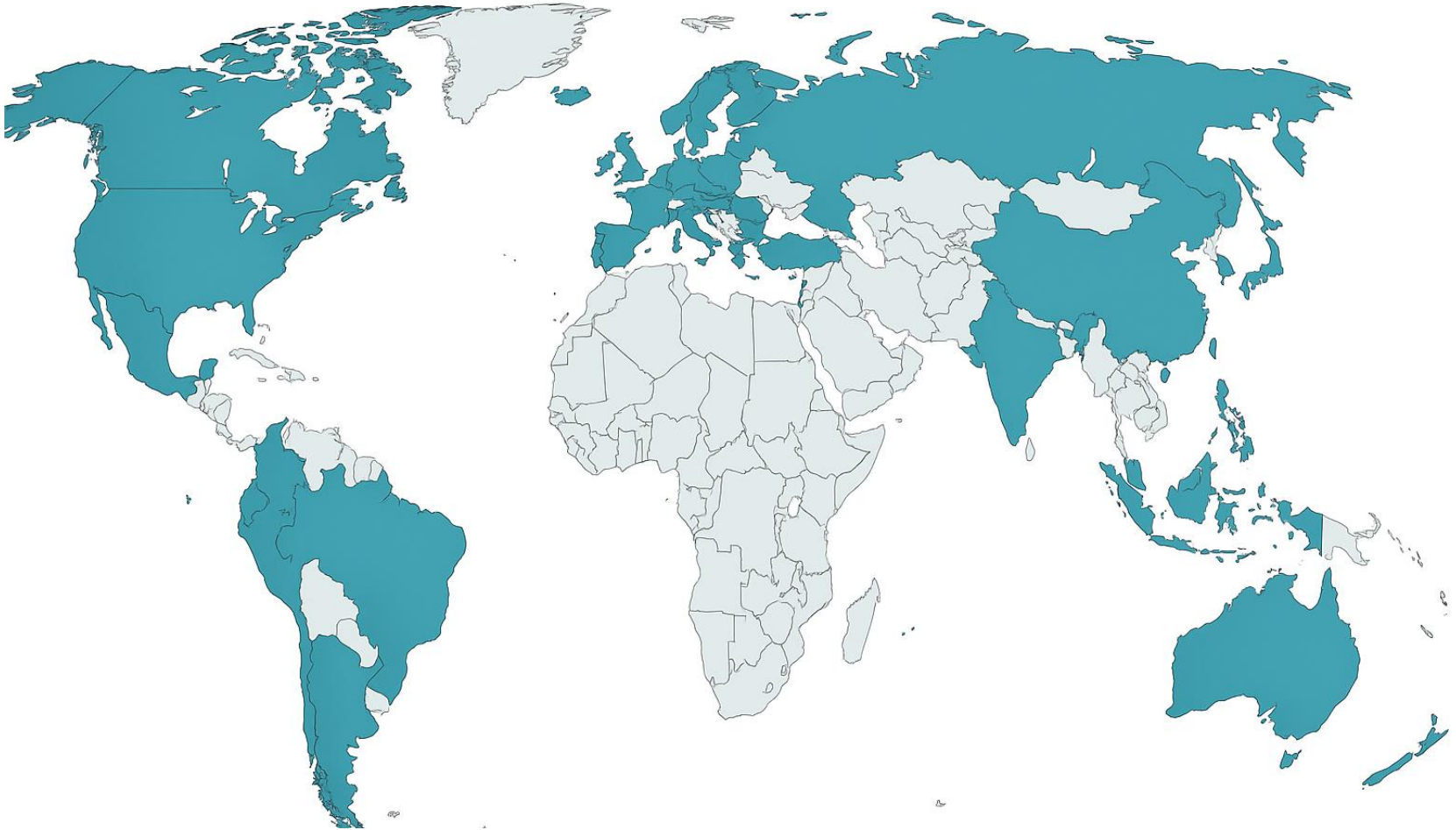
# Our key principles

- Independent oversight
- Value-chain representation for local authorities, waste companies, compliance schemes and NGOs through advisory structures
- Transparent and objective decision making free of commercial interests
- No dividends, profits, or commercial gain from PRO decisions





## Learning from around the world

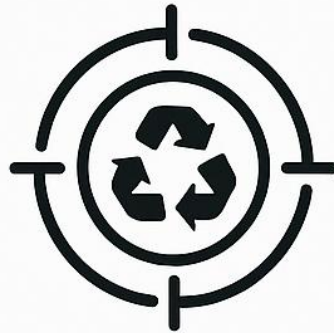




## Our *Long-Term* goals for a best-in-class PRO



Value for money



Producers collectively  
achieve regulatory  
obligations



Material security /  
access to reclaimed  
material for new  
products



## Goals & benefits of our PRO *during first 3 years*



Achieving data  
transparency



Establishing PRO  
membership and  
stakeholder relations



Building the  
foundation for a  
best-in-class PRO



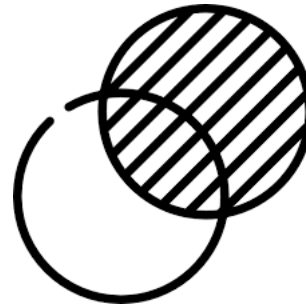
## Our shared vision



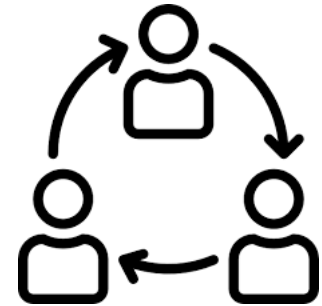
Producer led



Not for profit



Transparent



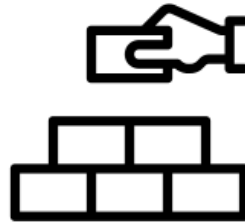
Collaborative



## Building foundation for best-in-class UK PRO



International PROs started  
with less well-established  
infrastructures



UK already have well established  
'foundations and services' developed  
over many years



# Potential role of a PRO years 1-3

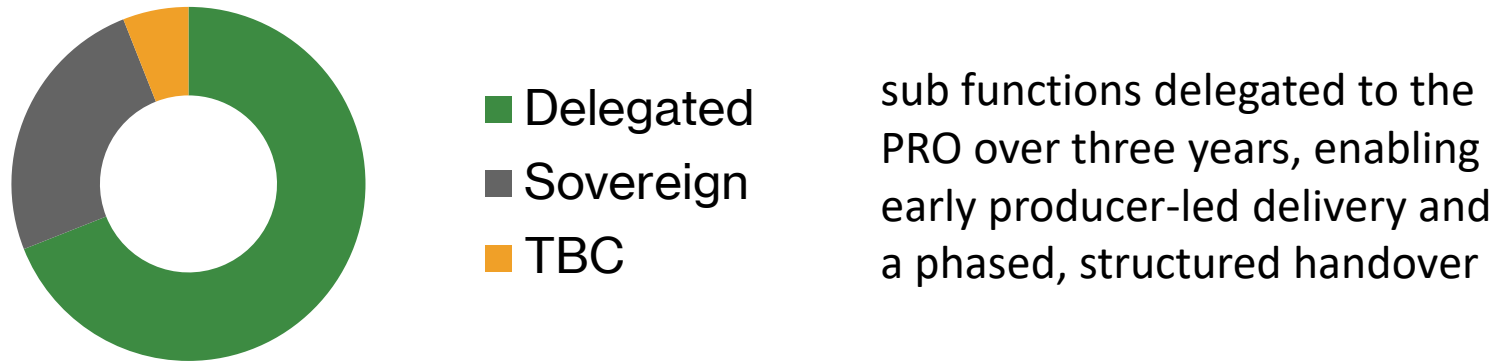
<b>1: Producer Fee Model</b>	1. Model operations, mechanics, audit. Inputs to model.
<b>2: Producer Fee Modulation</b>	2. New sub-categories, consultation, publishing, quality, audits, refine model
<b>3: Recycling Assessment (RAM)</b>	3. Run RAM Committee, publish guidance, peer audit, methodology development
<b>4: Efficiency &amp; Effectiveness (E&amp;E)</b>	4. Run E&E Committee, additional data, run model, review outputs, feedback, incorporating LA incentives, quality assurance, model development
<b>7: LA Performance Improvement</b>	7. Baseline service costs HH, public space, map shared opportunities, assess pilots, Improvement Action Plan (IAP) process
<b>6: Communication &amp; Public Information</b>	6. Develop public information strategy & plan, estimate budget, produce & deliver plan, guidance to producers and LAs
<b>9: Strategy &amp; Operational Plan</b>	9. Organisational strategy, stakeholder engagement, operational and staffing plan, annual report
<b>10: Functions not in Regulation</b>	10. List binned items w/DMO, design oversee needs assessment, expand LA annual reporting, resolve outstanding issues for dual use & De Minimis





## PackUK delegation of functions to a PRO – years 1 to 3

This sets out the overall balance of responsibility and illustrates how the majority of operational functions are proposed to delegate to the PRO under a phased 3-year approach



Delegation is front loaded in year 1, giving producers early accountability whilst maintaining oversight under the 4 Nations and PackUK.

**Overall, this is a 69% delegation of functions with 25% remaining sovereign in years 1-3 and 6% TBC**



## Next for us

- Focus on the PRO application over the coming weeks
- Continue to build support across obligated producers and packaging value chain, 60% of the application is weighted to support
- Organisational design for a PRO in years 1-3, alignment with PackUK
- Cost and budget requirements of a PRO
- Operationalising a PRO
- Governance for the PRO
- Continue collaborations where they bring added value to a PRO
- Longer term added benefits of a PRO
- Working together for a better system





# Appointment and governance

**Appointment:** 3 candidate PROs submitted expressions of interest (EOIs)

**Governance:** PackUK and the 4 Nations retain sovereignty in early years

			Slight changes to the timeline
Initial engagement with EOI applicants	w/c 7 <sup>th</sup> July		
Year 1 functions provisionally agreed	Late July		
Year 2 & 3 functions provisionally agreed	Late August		
PRO application window launches	Early October	→	5 November
PRO application window closes	Mid November	→	12 December
Assessment of applications	December / January		
PRO legislation comes into force	1 <sup>st</sup> January		
PRO appointed	February	→	March /April



# Be part of our PRO – Shape the Future of EPR

## **Key Points:**

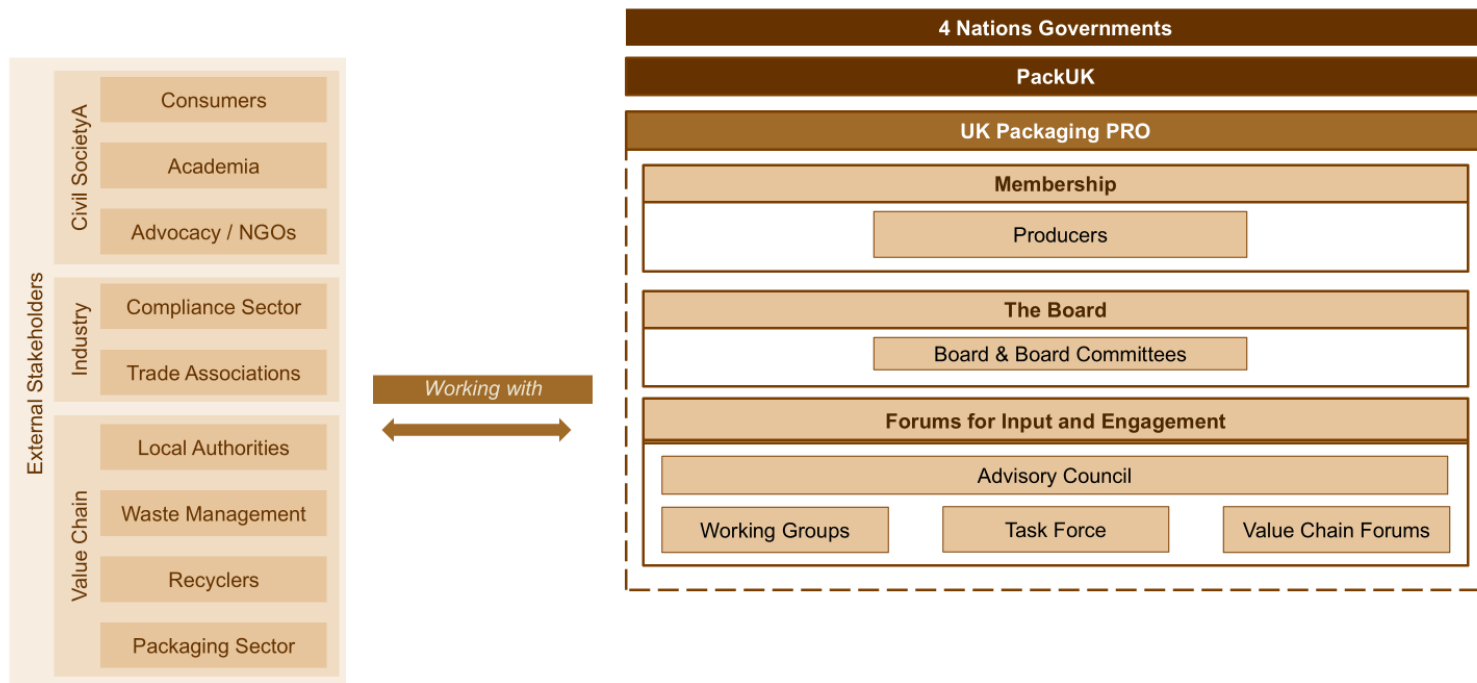
- ✓ Statement of support = no financial commitment
  - ✓ Influence decisions that affect your costs
  - ✓ Join a producer-led, transparent PRO
- 
- ✓ Sign support template → Email by Dec 10, 2026
  - ✓ Your voice matters – Act now!





# Q&A

## what is the relationship between Pack UK and the new PRO?





## Q&A

**Within the PRO what does this mean for the future of PRNs are they related?**

PRNs are not within the functions within the EPR regulations. We understand the government will be consulting on PRN reform in 2026

**For those of us new to PROs - could you explain who the alternative PROs are out there?** We are aware of 2 other applicants; “Fairpak” led by Valpak and “PackPRO” – a coalition of compliance companies.

**Do you have representations in place for each industry sector and if so, how do we find out who they will be?** Our Steering Committee is made up of representatives from across the obligated sectors including food and beverage, FMCG, electronics and white goods, DIY, retail and packaging. We will be looking to recruit representatives to various committees and working groups.

**Can we be a member of more than one PRO?** PackUK will only appoint one PRO.

