

FROM CONFUSION TO COMPLIANCE: NAVIGATING EPR AS AN SME

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1997

one of the first approved **COMPLIANCE SCHEMES**



Services include:

- ✓ Packaging EPR Compliance
- ✓ WEEE Compliance
- ✓ Plastic Packaging Tax
- ✓ Environmental Legislation
- ✓ WEEE Collections
- ✓ Net Zero & Carbon Management





EPR OVERVIEW

What is EPR?

Extended Producer Responsibility (EPR) is a policy tool which requires packaging producers to be responsible for the full net cost of managing the packaging they place on the UK market at the end of its life. It aims to incentivise the use of recyclable materials, improve recycling rates, and reduce packaging waste.

You must take action to comply with EPR if all the following apply...

You're an individual business, subsidiary or group

You have an annual turnover of £1 million or more

You're responsible for over 25 tonnes of packaging in a calendar year (January to December) under the following 7 EPR packaging activities...

WHAT IS PACKAGING?

Packaging is products made of any materials which are used for the containment, protection, handling, delivery and presentation of goods from the producer to the user or the consumer. This includes anything that is intended to be filled at the point of sale.

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OBLIGATED PRODUCER CRITERIA

The 7 EPR packaging activities include:

- **Brand Owner** supplying packaging under your brand
- Packer/Filler packing or filling unbranded packaging
- Importer importing packaging
- Distributor manufacturing/importing empty packaging and supplying it on as empty to non-large producers
- > **Service Provider** hiring or loaning out reusable packaging to other organisations
- Online Marketplace (OMP) Owning a website/app that allows non-UK businesses to sell into the UK
- **Seller** (nation reporting only) Supplying packaging to a consumer or organisation where they are the end user

A business may perform more than one of these activities. When calculating your tonnage towards the thresholds you must consider packaging supplied or imported under all 7 activities and each item of packaging must only be counted once, even if more than one activity is performed.



PRODUCER TYPES



Under EPR, businesses obligations depend on whether they are classed as a Small or Large Producer. This is determined by its annual turnover and the amount of packaging it supplies or imports each year.

Large Producers must report twice a year and finance their obligations. **Small Producers** must report data annually and are not required to finance their obligations. Regulator reporting deadlines are 1st October and 1st April.

The table shows the turnover and packaging thresholds that determine this:

		TURNOVER		
		Under £1m	£1m to £2m	More than £2m
TONNAGE	Under 25 Tonnes	No Obligation	No Obligation	No Obligation
	25 to 50 Tonnes	No Obligation	Small Producer	Small Producer
	More than 50 Tonnes	No Obligation	Small Producer	Large Producer

Tonnage = packaging supplied or imported in the calendar year 2 years prior to the relevant obligation year under all 7 activities

Turnover = turnover as of 7th April in the reporting year (the year before the relevant obligation year)

Example = for a company operating in the 2026 relevant year (2025 data reporting), this would be tonnage of packaging supplied/imported in 2024, and turnover as of 7^{th} April 2025



EPR OBLIGATIONS









*Importers, OMPs, Service Providers, Distributors & Sellers. However, this is not currently being enforced by regulators (see RPS 330). It is anticipated that this will be required for 2026 data.

^{*&#}x27;household' packaging includes relevant primary, shipment, street binned and glass HH drinks containers.



WHAT DATA DO YOU NEED TO COLLECT?

You'll need to collect data about the packaging you've handled and supplied through the UK market. There are four key parts to the data:

- > Packaging activity this is how you put the packaging on the market
- Packaging type household, non-household, street binned, drinks container, reusable or self-managed*
- Packaging class primary, secondary, shipment/e-commerce or tertiary/transit
- Packaging material and weight in kilograms (kgs)
- Nation reporting* if you are an importer, distributor, service provider, online marketplace or seller, you may also be required to submit data information about which country in the UK your packaging has been sold, hired, loaned, gifted or discarded in from the 2026 reporting year onwards.

*Under a Regulatory Position Statement (RPS 330) both self-managed waste and nation data is not required for reporting to the regulator until the 2026 reporting year onwards



PACKAGING ACTIVITY





- Brand Owner supplied under your brand
- Packer/Filler packed or filled as unbranded
- Importer imported packaging
- **Distributor** manufacturing/importing empty packaging and supplying it on as empty to non-large producers
- Service Provider hiring or loaning out reusable packaging to other organisations
- Online Marketplace (OMP) owning a website/app that allows non-UK businesses to sell into the UK
- **Seller** (nation reporting only) supplying packaging to a consumer or organisation where they are the end user





















PACKAGING TYPE



Packaging Type – what type of waste the packaging is likely to become when it's discarded.

Large Producers will need to report whether the packaging is:

- Household
- Non-Household
- Street Binned

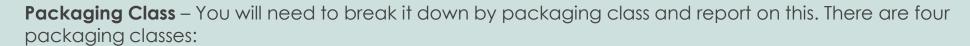
- A Drinks Container
- Reusable
- Self-Managed Waste

Small Producers will need to report whether they have supplied packaging to the UK market that is a drinks container. They do not need to break down their data into the other waste types.



PACKAGING CLASS





- **Primary Packaging** is the individual container that you store goods in to sell to consumers. This includes multipack packaging. This is called a 'sales unit'.
- Secondary Packaging is for grouping several 'sales units' for selling or transit purposes.
- **Shipment Packaging** is used for shipping single or multiple sales units directly to consumers. This includes cardboard boxes, bubble wrap and mail bags.
- **Tertiary/Transit Packaging** is used to group secondary packaging units together to protect them while being transported or handled through the supply chain.









PACKAGING MATERIAL & WEIGHT

After you've categorised your data into the relevant packaging activities, you must report the weight of the individual materials in kilograms (kg).

REPORT WEIGHTS IN KGs! (not tonnes)



You should categorise your data by the following materials:



Fibre-based Composite



Plastic

*split into Rigid or Flexible for HH packaging



Aluminium



Steel



Glass



Wood



Paper or Cardboard



'Other'*

*you must report each material type separately not as a combined 'other'.

'HOUSEHOLD' PACKAGING

Under the RAM 'household' packaging will receive different 'RAG' ratings - Red, Amber or Green.

Your reporting for 'household' packaging will be required by the total packaging supplied under each material 'RAG' rating. For example, 1000kg > Plastic Rigid > Amber.

EXEMPTIONS



Exports – exported packaging is exempt from reporting and obligations. However, you must have a robust audit trail to prove the packaging was exported.



Duty Free Goods – due to strict HM Custom rules on duty free goods, the Agencies consider duty free goods as exports, therefore are exempt from reporting and obligations.



Reused Packaging – reused primary, secondary, and tertiary/transit packaging is exempt unless it was imported. Evidence is required to prove the packaging was reused.



PROCUREMENT CONTROL: BUILDING AN EPR-READY PROCESS

A procurement process that requests the EPR reporting information at the buying stage and integrates this into your system will save you time!



UNDERSTAND THE DATA REQUIREMENTS: What materials do you supply? What is the packaging class? What is the weight of the packaging material in kgs? Is further data required for recyclability assessments?



ESTABLISH PROCUREMENT CRITERIA: For example, all packaging materials must be reported under the correct material, function and weight in kilograms. If relevant, seek packaging formats that are rated 'green' according to the RAM.



SUPPLIER EVALUATION: Share information on EPR reporting requirements with your suppliers. Request suppliers provide all required packaging data prior to supply and, if relevant, a declaration that their packaging materials comply with the 'green' rating as per the current RAM.



PROCUREMENT CONTROL: BUILDING AN EPR-READY PROCESS



PROCUREMENT PROCESS: Include the EPR reporting and RAM rating requirements in the Request for Proposal (RFP). Specify that prior to an order being placed, all packaging material and weight data, and only 'green' rated packaging/ packaging materials will be considered.



COMPLIANCE MONITORING: Conduct regular audits of the supplied packaging materials (e.g., supplier declarations, design specifications; production certificates; applicable standards conformance certification, etc) to ensure ongoing compliance with data requirements for EPR and RAM 'green' ratings.



TRAINING & AWARENESS: Ensure staff are trained on EPR data requirements, current RAM ratings and the importance of adhering to the 'green' rating criteria. Educate suppliers about EPR, RAM and your procurement requirements.



REPORTING & DOCUMENTATION: Keep records of all EPR weight data, RAM assessments, and supplier declarations for auditing purposes. Conduct an annual review of the procurement procedure to ensure it remains aligned with the latest EPR and RAM guidelines.





RAM OVERVIEW





What is RAM?

RAM stands for Recyclability Assessment Methodology. It's a framework to assess how recyclable packaging is against four factors: **collection**, **sortation**, **reprocessing** & **application**.



Why is RAM important?

Starting in 2026, **Large Producers** LA Waste Disposal Fees will be modulated based on how recyclable the packaging is. This is based on data reported for 2025 and its 'RAG' rating.



What do you need to do?

If you're a Large Producer, you must use the RAM to assess your 'household' packaging and report the 'RAG' rating in your upcoming submissions.



What packaging need to be assessed?

In scope 'household' packaging components need to be assessed under RAM. This includes any 'household' primary or shipment packaging, as well as street binned waste and glass household drinks containers.



View the latest RAM details here: https://www.gov.uk/guidance/recycling-assessment-methodology-how-to-assess-your-packaging-waste

RAM OVERVIEW





What is a 'RAG' Rating & how will this impact LA Waste Disposal Fees?

In scope 'household' packaging components will receive different ratings - **Red**, **Amber** or **Green**. This rating will be reportable in your submission and will impact the LA Waste Management fee charged in the **2026 compliance year** with Green being the lowest fee, and Red the highest.

How does RAM work?

RAM checks each household packaging component based on:

- Collection Is it widely collected for recycling?
- <u>Sortation</u> Can it be sorted easily?
- Reprocessing Can it be reprocessed without disrupting recycling processes
- Application can it be used to make new products, contributing to circular economy



Struggling with RAM?

We can help! Find out more about our data services.
Email: sales@wastepack.co.uk

RAM OVERVIEW

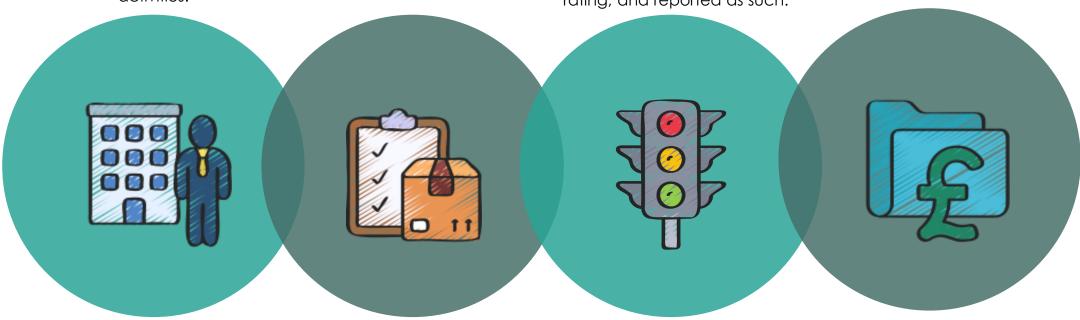


OBLIGATED LARGE PRODUCER

Business supplies and/or imports packaging under EPR packaging activities.

RAM RATING

Packaging component assigned 'Red', 'Amber' or 'Green' (RAG) rating, and reported as such.



PACKAGING TYPE & ASSESSMENTS

Producer supplies/imports

'Household' packaging therefore
the components are be assessed
and reported against RAM criteria.

IMPACT ON LA WASTE MANAGEMENT FEE

PackUK to assign material base fees, and invoice producers according to RAM Red, Amber, Green ratings. With Red being higher charges, and green lower.



BEST PRACTICE TIPS

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Ensure EPR data awareness across the company and put a process in place to ensure relevant packaging information is gathered at the procurement stages.

2

Data must be as 'accurate as reasonably possible' and you must report to the nearest kilogram for each activity/material.

3

Always report branded packaging under the brand owner (this overrides all other categories). For unbranded packaging, classify based on your role – importer, filler, distributor, lender/renter (service provider) etc.

4

Ensure you have correctly categorised your 'household' and 'non-household' data split. This can impact your LA Disposal Fees.



BEST PRACTICE TIPS



Begin with the simplest items to assess and consider the Pareto Principle. For example, if 20% of packaging represents 80% of sales gather weights for the 20% and extrapolate relevant information.



Submission must comprise of packaging supplied/imported in the relevant period, i.e. January to June for Half Year 1 (H1) or July to December for Half Year 2 (H2) for LPs.



Sample weighing is always recommended, along with photographic evidence. Focus on your most commonly supplied/imported packaging as a starting point.



Reporting is on packaging supplied and imported - exports are exempt and are not reported.



WASTEPACK EPR TOOLKIT



Download our EPR Tool Kit PDF – <u>here</u>



Download our Procurement Guide for EPR – <u>here</u>



Feeling overwhelmed? Let us lighten the load. Discover our EPR services today, contact sales@wastepack.co.uk.





ANY QUESTIONS?

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THANKS FOR JOINING US

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