

EPR

Extended Producer Responsibility



Update:

Extended Producer Responsibility (EPR) came into effect on 1st January 2023. There will now be phased implementations of a different scheme until 2027



What is EPR?

Extended Producer Responsibility (EPR) is a regulatory tool that requires producers of packaging to be responsible for their post-consumer product

What is changing?

The previous scheme put requirements on various sections of the supply chain to be accountable for the packaging supplied to consumers. With the new scheme, the brand owner is responsible for 100% of these costs.

The reasons for these changes are to encourage a circular economy, to have a single point of compliance, to fund full recovery costs for the packaging waste, and to financially deter difficult to recycle packaging and promote reusable packaging.



Packaging Data:

Initially within this new scheme there will be 2 separate charging routes, one for PRNs (packaging waste recycling note), which cover recycling/reprocessing costs, and one for waste management fees, which cover anything which is likely to be collected by Local Authorities (kerbside), known as household waste.

Businesses should first see if they need to report data by going to:

[Check if you need to report packaging data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

If required, the guidance on preparation and collection of data can be found:

[Packaging waste: prepare for extended producer responsibility - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[How to collect your packaging data for extended producer responsibility - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

For large organisations, the reporting will be 6 monthly with the first reporting period being January to June 2023. Submission for this should be made between July and October 2023.

Small organisations will need to collate the data for 2023 and submit this between January and April 2024.

Nation data:

A new requirement of the EPR regulations is the requirement to report nation data, which covers the packaging sold into each of the UK nations. This is applicable to anyone supplying an end user, provided they meet the reporting thresholds. It is not based on the brands being sold. For example, retailers selling multiple brands would have to report what they are selling by nation.

If a distributor falls into the reporting threshold this would be their responsibility. At the moment we believe any data that is not captured by the distributor (due to not meeting the threshold) would become the responsibility of the brand owner, however, we are still waiting for clarification on this.

Household and Non-Household Packaging

Household packaging is all primary and shipment packaging.

Non-Household packaging is secondary and tertiary packaging. Where, products are sold directly to an end consumer that is a business or you can provide evidence that a distributor removes all the packaging before selling then you are also able to class primary and shipment packing as Non-Household.



From 2025 Eco Modulation will also affect fees to be paid.

Eco Modulation is based on the ease of recyclability of the materials.

Although fees are not yet in place, it is understood that harder to recycle materials will attract higher fees.



Labelling indicating the recyclability on the majority of packaging will become mandatory.

These are based on the current OPRL style labels which you will start seeing on our own packaging as the packaging is redesigned.



Recyclability labels will become mandatory on other types of packaging such as films and flexible packaging.

Financial Obligations:

At the moment only large organisations under the scheme will incur any financial obligations so it is important to check where you may fall into the scheme. Small organisations only have data reporting requirements currently.

Unfortunately the costs are yet to be published so no modelling on this can yet be done.