



## Are you obligated under EPR? It's time to get ready.

### What is EPR?

Extended Producer Responsibility (EPR) is one of the four ongoing areas of reform in the UK that hopes to incentivise producers to design packaging that is easy to recycle by ensuring that they pay the full net costs of managing the packaging they place onto the UK market.

### Who will be affected and how?

There is change as to who is affected and how information is reported under the new EPR regulations. It will apply to any UK organisation that places over 25 tonnes of packaging onto the UK the market, has a turnover of over £1 million and that supplies products in any of the below "packaging activities"

- products supplied under your brand name
- packaging packed or filled as unbranded
- packaging imported
- packaging supplied as empty
- packaging hired or loaned
- packaging supplied through your online market place

| Waste Cost and Recycling Obligations |                | Turnover      |                |                 |
|--------------------------------------|----------------|---------------|----------------|-----------------|
|                                      |                | < £1m         | £1m - £2m      | > £2m           |
| Packaging Tonnage                    | < 25 tonnes    | No Obligation | No Obligation  | No Obligation   |
|                                      | 25 - 50 tonnes | No Obligation | Reporting Only | Reporting Only  |
|                                      | > 50 tonnes    | No Obligation | Reporting Only | Full Obligation |

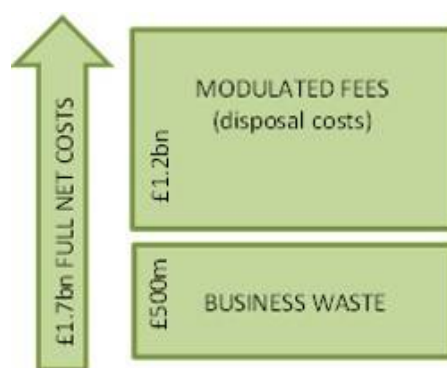
↓ Small Producer
 ↓ Large Producer

## New costs for businesses

The new EPR system has two main costs; the current PRN system, which covers the cost of recycling, and the new element called “Modulated Fees”.

The modulated fees are designed to cover the net costs of the Local Authority’s Road side collections of household waste. Currently these costs are covered in council tax. The costs are based on waste material type, the harder the material to recycle, the higher fee it will incur.

The PRN system is expected to generate roughly £500 million a year and the modulated fees are expected to generate another £1.2 billion on top of that.



## When and what do you need to start reporting on?

EPR data needs to start being recorded from January 2023, and will be reported every 6 months. The first submission will be October 2023 for the period January 2023 – June 2023. The government is developing a new portal called MMPS, Manging My Packaging Service where your company will be able to register from the 1<sup>st</sup> July 2023. If you are in doubt as to whether or not you need to register there is an “Obligation checker” on the gov.uk website where you can enter your company information to find out.

## What data needs to be recorded?

There will be 4 parts to the cost-based data that you need to collect about the packaging you place onto the UK market.

1. Packaging Activity – how the packaging has been put on the market (see above)
2. Packaging Material and Weight
3. Packaging Type – primary, secondary, shipment, tertiary
4. Waste type – how is it going to be discarded?

### Packaging Material:

- paper
- steel
- glass
- plastic
- aluminium
- wood
- fibre-based composites
- “other”

### Packaging Type:

- Primary
- Secondary
- Shipment
- Tertiary

### Waste Type:

- household waste (Primary and shipment packaging treated as HHW unless proven otherwise)
- non-household waste (outer and transit packaging)
- street bin waste
- re-useable
- self-managed
- drinks containers

## Nation of sale data

In addition to the afore mentioned reporting, UK organisations that put packing into the marketplace may also be liable to report where the packaging is going. This is reporting data only – no fees are attached to nation data reporting. If your organisation does any of the following, they will need to submit nation data:

| Nation of Sale Obligation |             | Turnover      |               |
|---------------------------|-------------|---------------|---------------|
|                           |             | < £1m         | > £1m         |
| Packaging Tonnage         | < 25 tonnes | No Obligation | No Obligation |
|                           | > 25 tonnes | No Obligation | Obligated     |

- Supply filled or empty packaging directly to consumers in the UK
- Supply empty packaging to UK organisations that are not legally obligated under the regulations
- Hire or loan out reusable packaging
- Own an online marketplace where other organisations sell their empty packaging and packaged goods to UK consumers.
- Import packaging to the UK that you discard without selling or exporting it.

For more information, please visit the [gov.uk](https://www.gov.uk) website or speak to your waste packaging Compliance Scheme.