

A complete guide from Swiftpak

Preparing your business for the EPR packaging regulations

Swiftpak 



Introduction to EPR

The implementation of Extended Producer Responsibility (EPR) marks a significant shift from the existing Producer Responsibility Packaging Regulations. This new approach places greater accountability on businesses for the 'Full Net Cost' of packaging at its end-of-life stage.

Under this new EPR system, not only are the obligations changing, but the amount, frequency, and level of detail required for reporting on packaging data are also being amended. Consequently, businesses will find themselves dealing with a more intricate and potentially costlier process.

1. Changes to Obligated Producers

The newest iterations of EPR steer away from the 'shared' obligations between manufacturers, convertors, packers/fillers, sellers, and end users. Instead, EPR identifies obligations based on the specific packaging activities your business performs.

This shift has a direct impact on your business as you are now required to determine which specific activity or activities your business falls under. It is likely that your business may be responsible for more than one activity, adding complexity to the assessment.



Supplied under your brand (SO)

If your business packages and sells products with your brand's label, it is highly likely that you fall under the obligation of EPR for the "supplied under your brand" activity.



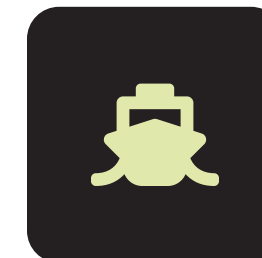
Packed or filled (PF)

If your business places goods or products into unbranded packaging provided by a supplier, you are held accountable under the "packed or filled as unbranded" activity.



Imported or first UK owner (IM)

If your business imports products from overseas, including primary, secondary, or any transportation packaging, you are responsible for the "imported" packaging activity.



Supplied as empty (SE)

If your business manufactures or imports empty packaging and then supplies it to an organisation that is not a large producer, you have EPR obligations for the "supplied as empty" activity.



Supplied through an online marketplace (OM)

If you own and operate a website that enables non-UK businesses to sell products to UK consumers, you are responsible for the packaging waste supplied through that "online marketplace".



Hired or loaned/Service provider (HL)

Businesses engaged in hiring or loaning out reusable packaging, such as wooden pallets or containers, must maintain records and report under the "hired or loaned (service provider)" activity.

2. Does my business fall under EPR regulations?

The implementation of new lower threshold tests will result in a broader inclusion of companies under the EPR scheme.

If your business has a turnover that is below £1 million or supplies less than 25 tonnes of obligated packaging, you are not required to register under EPR. However, it is essential to monitor your packaging usage regularly and conduct an annual review to ensure continued compliance with the regulations.

For those with a turnover of over £1 million and supplies over 25 tonnes of obligated packaging, you will fall into one of two categories:

	£1m - £2m	> 2m
> 50 Tonnes	Small Producer	Large Producer
25 - 50 Tonnes	Small Producer	Small Producer

Large Producer

If your business is classified as a large producer, you are required to thoroughly assess all the packaging you supply and take on the full responsibility for compliance. This involves reporting data twice a year and making payments towards packaging recycling (PRNs). Additionally, if you supply household packaging, you will also be liable to pay Disposal/Modulated Fees.

Small Producer

As a small producer, your business is still obligated to assess and report the packaging you supply. However, your responsibility is limited to reporting data only once a year. Small producers have no requirement to pay waste disposal fees or purchase Packaging Recovery Notes (PRNs), regardless of whether they supply household packaging.

WEBINAR

Extended Producer Responsibility (EPR)



Emma Wilkinson
Regulatory Affairs Leader

EPR Webinar

Swiftpak x Beyondly

Looking for expert advice on EPR? Then tune in to our webinar. Here, alongside a renowned expert from Beyondly, Emma Wilkinson, we discuss valuable insights to provide you with a deeper understanding of the subject.

[View webinar](#)

3. Packaging type data

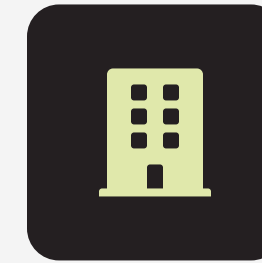
As part of the EPR system, companies will be obligated to disclose the expected end-of-life waste category for the packaging they produce. This crucial information will determine the extent of additional disposal/modulated fees that you may be required to pay, in addition to the existing Packaging Recycling Note (PRN) system.

For **Small Producers**, you are not required to break down your data into the other packaging types. All you must report on are the following:

- Your total packaging weight, excluding drinks containers
- Drinks Containers – (as mentioned previously)



If your business is considered a **Large Producer**, you need to break down your data into the following packaging types:



Non-Household Waste

This category encompasses all Outer and Transit packaging that will be discarded by the businesses you supply. It includes packaging materials that are not intended for household use and are typically utilised in commercial or industrial settings.



Household Waste

By default, all Point-of-Sale and Shipment packaging will be classified as household packaging, unless you can provide evidence that it has been supplied to a business that will manage its disposal.



Commonly Ends Up In Public Bins

Often referred to as ‘on-the-go’ packaging, this category includes packaging related to food, beverages, and tobacco products, primarily in smaller sizes that are commonly discarded in public bins.



Drinks Containers

For drinks containers, additional reporting is required, specifying the weight and quantity of units supplied, categorised by material. This includes packaging for beverages like bottles and cans.



Reusable Packaging

This relates to packaging specifically designed, boxed, or intended to be used multiple times for the same purpose. While the obligation applies only to the initial use of the packaging in the UK market, you must also include this weight in your standard household or non-household packaging data the first time it is supplied.



Self-Managed Organisation Waste

This refers to packaging waste that your business has collected and managed itself on its own sites, rather than through a standard external waste collection service or local authority.

4. Packaging class data

Each packaging item must be clearly identified based on its role. There are four packaging classes that items can be categorised into:



POS (Primary packaging)

The first packaging point of contact with the sales item.



Outer (Secondary packaging)

The packaging that groups a number of sales items.



Shipment (New)

Packaging used to ship goods to consumers, typically tertiary packaging, including online, mail order, or store delivery.



Transit (Tertiary Packaging)

The packaging that supports the transportation and handling of a collective of outer packages.





5. Packaging materials and weight data

Once you have categorised your data into the respective packaging activities, the next step is to report the weight of each packaging material. The weight should be expressed in kilograms (kg).

Types of material

You are required to classify your data according to the following material types:

- Aluminium
- Fibre-based composite
- Glass
- Paper or cardboard
- Plastic
- Steel
- Wood
- 'Other' For materials not falling into the above categories.

For example: bamboo, ceramic, copper, cork, hemp, rubber,

6. Does my business need to report nation data?

Nation data refers to information regarding the specific nation within the UK where packaging is supplied and where it is ultimately discarded.

If your business falls under the EPR regulations for packaging, you are required to submit nation data if any of the following activities are part of your operations:

- Supplying filled or empty packaging directly to UK customers, where these customers are the end users of the packaging.
- Supplying empty packaging to UK organisations that are either not legally obligated or are considered small organisations.
- Engaging in the hiring or loaning out of reusable packaging.
- Owning an online marketplace where organisations outside the UK sell their empty packaging and packaged goods to UK consumers.
- Importing packaged goods into the UK for your own use and subsequently discarding the packaging.

The nation data you provide should indicate the specific locations within the UK where you have supplied packaging to individuals or businesses who later discarded it.

For more information on this topic, please visit the official [GOV website](#).

The RAG Rating System

EPR uses the Recyclability Assessment Methodology (RAM) to determine the fees producers pay. This system uses a Red/Amber/Green (RAG) rating to reward sustainable design and penalise hard-to-recycle materials.

Who must report RAM data?

Currently, only Large Producers are required to collect and report RAM assessment data. Small producers are not required to submit this recyclability information.

What is the scope of the assessment?

The assessment does not apply to all packaging. It is mandatory only for:

- Household packaging (Primary and Shipment).
- Public bin packaging (Packaging commonly discarded in street bins).
- Glass drinks containers (Household and non-household).

Note: Non-household packaging (B2B transit) and drinks containers made of PET, aluminium, or steel that are part of a Deposit Return Scheme (DRS) are currently exempt from RAM reporting.

The 5 stages of assessment

1

Classification

Identifying the predominant material (e.g. plastic, paper, glass).

2

Collection

Assessing if the material is widely collected at the kerbside by at least 75% of UK Local Authorities.

3

Sortation

Evaluating if current infrastructure can effectively identify and separate the item (e.g. NIR detection for plastics).

4

Reprocessing

Determining if the material can be successfully turned back into high-quality recyclate without excessive contamination.

5

Application

Checking if there is a viable end-market where the recycled material can replace virgin resources.





Financial impact: The “Bonus & Malus” System

The RAG rating directly dictates a “multiplier” applied to your base fee:

Rating	Definition and criteria	Free impact
Green	Widely recyclable in current UK infrastructure: Meets all 5 stages of the RAM and has high recovery rates (e.g., clear PET bottles, mono-material cardboard).	Green-rated materials receive a discount.
Amber	Transitional: Packaging made of material with existing collection, sortation, or reprocessing challenges.	Amber acts as the baseline for all fee calculations.
Red	Hard-to-recycle: Packaging with specific design specifications that make it difficult to recycle at scale.	Red-rated materials will receive a premium surcharge.

A cheat sheet to EPR codes

To help you prepare, here's a brief overview of the codes you'll need for EPR reporting.

Packaging Activity

Codes	Name	Description
SO	Supplied under your brand	Packaging for products supplied to the UK market under a brand name you own.
PF	Packed or filled as unbranded	Unbranded packaging into which you have placed goods for your own or another organisation.
IM	Imported	Packaged goods where you are the first UK owner, subsequently supplied or discarded in the UK.
SE	Supplied as empty	Empty packaging manufactured or imported and supplied to a non-large UK organisation.
HL	Hired or loaned	Reusable packaging (e.g., pallets or containers) that you hire or loan out to other organisations.
OM	Supplied through an online marketplace that you own	Filled or unfilled packaging supplied to the UK market from outside the UK through an online marketplace you own

Packaging Type

Codes	Name	Description
OW	Self-managed organisation waste	Packaging waste that your business has collected and managed itself on its own sites.
PB	Commonly ends up in public bins	Packaging that commonly ends up in public bins.
RU	Reusable packaging	Packaging designed for multiple uses. Report on its first use in the UK, including it in relevant household/non-household data.
HDC	Household drinks containers	Packaging that fits the definition of household packaging but is also classed as single-use drinks containers.
NDC	Non-household drinks containers	Packaging that fits the definition of non-household packaging but is also classed as single-use drinks containers.
SP	Small organisation packaging - all	The combined total of all your packaging, excluding drinks containers.
HH	Household packaging	All primary and shipment packaging, unless you have evidence it is managed by a business at end-of-life.
NH	Non-household packaging	All secondary and tertiary packaging is non-household. Some primary or shipment packaging may be non-household, where you have evidence that this is the case.
CW	Self-managed consumer waste	Packaging waste recovered from consumers.

Packaging Class

Codes	Name	Description
P1	Primary packaging	Packaging used to contain a single 'sales unit' to sell to customers.
P2	Secondary packaging	Packaging used to group several sales units together.
P3	Shipment packaging	Tertiary packaging added to items supplied to a consumer via online, mail order, or shop delivery.
P4	Tertiary packaging	Used to group secondary packaging units together while being transported or handled.
P5	Non-primary reusable packaging	The combined total of secondary, shipment, and tertiary reusable packaging in its first UK use.
P6	Online marketplace total	The combined total of all packaging supplied through an online marketplace that you own.
O1	Self-managed consumer waste - all	Total packaging reported under the packaging type CW (self-managed consumer waste).
O2	Organisation waste - origin	Packaging waste you have collected yourself in each country of the UK.
B1	Public bin	Packaging reported under the packaging type PB (commonly ends up in public bins).

Packaging Material

Codes	Name	Description
AL	Aluminium	
FC	Fibre composite	
GL	Glass	
PC	Paper or card	
PL	Plastic	
ST	Steel	
WD	Wood	
OT	Other	Any other material that is not listed here. You must also give the material subtype. <ul style="list-style-type: none"> ● Bamboo ● Ceramic ● Copper ● Cork ● Hemp ● Rubber ● Silicone

UK Country Codes

Codes	Name	Description
EN	England	
NI	Northern Ireland	
SC	Scotland	
WS	Wales	

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Further EPR Resources

Official EPR updates from GOV.UK

Information regarding EPR is constantly being updated. For the latest changes, please refer to the official GOV website.

[See GOV.UK Updates](#)

Online EPR obligation checker

Check if your business needs to report packaging data under extended producer responsibility (EPR) for packaging.

[EPR obligation checker](#)

Swiftpak EPR blog

Explore all there is to know about Extended Producer Responsibility.

[Read the blog](#)

Swiftpak x Beyondly EPR webinar

Gain valuable insight on EPR from the expert Emma Wilkinson

[View webinar](#)