

## EPR recyclability assessments: update and explanation

### Who must conduct a Recyclability Assessment?

From **1 January 2025**, liable producers who supply **household packaging** must assess the recyclability of that packaging and report the results of the assessment to regulators (Environment Agency, the Scottish Environment Protection Agency, Natural Resources Wales or the Northern Ireland Environment Agency, as appropriate).

These assessments must be submitted alongside 2025 packaging data, with a Red, Amber or Green rating for each element of the household packaging.

Recyclability assessments are conducted through a 5-step process, however when an item of packaging is classified as Red this is its final rating, and any remaining steps do not need to be calculated. Each main packaging item that will end up in household waste streams must have a recyclability assessment conducted on it.

**REMEMBER: You can also pay a packaging waste compliance company, such as Ecoveritas, to conduct a recyclability assessment on your packaging to take the hard work out of this for you.**

### The five stages of a Recyclability Assessment

1. Classification – essentially what is the main material for each element of packaging
2. Collection – what is the main route for recycling
3. Sortation – how easy is the material to sort at scale based on packaging specifications
4. Reprocessing – how easy is it to reprocess the material into high quality recycle materials, particularly focusing on contaminants
5. Application – other factors that may reduce recycle quality or cause secondary material loss

Government explanations and definitions can be found at [on the government website](#).

An example for a plant pot, black vs non- black, assessed under Rigid Plastics – Pots, Tubs and Trays

Stage of Recyclability Assessment	Black plastic pot	Non-black plastic pot
Classification	Green – as this is classed as a Pot	Green – as this is classed as a Pot
Collection	<p><b>Red</b> – since black plastic is not collected, this gains a rating of Red.</p> <p><b>Stop assessment as this is the final rating</b></p>	<p><b>Until March 31, 2026 – Red</b> as not widely accepted in kerbside collections</p> <p>From March 31, 2026 – Green as when Simpler Recycling comes into force, this will then meet the threshold of 75% of Local authorities in the UK collecting to receive a green rating</p> <p>(see below section on Simpler Recycling)</p>
Sortation	Not tested, but would be Red due to carbon black pigment	Green – packaging items must be at least 40mm in 2 dimensions
Reprocessing	Not tested	Green – Plant pots do not contain any listed contaminants
Application	Not tested	<b>Amber</b> – Polypropylene (PP) classified as Amber if containing any opaque colours excluding white. Therefore, only clear or white pots would be classed as green. We have raised this as a challenge to Defra.
<b>Final classification for Recyclability Assessment to be reported</b>	<b>Red</b>	<p><b>Before March 31, 2026 – Red</b></p> <p><b>After March 31, 2026 – Amber</b></p>

## Collection of Plant Pots under Simpler Recycling in England

In August 2024, the HTA gained clarity from Defra regarding non-black plastic plant pots, and their inclusion in household recycling collections under Simpler Recycling rules. This means that from 31<sup>st</sup> March 2026, all local authorities in England will be required to accept

the same core set of materials in kerbside collections, and any waste collections from businesses in England too.

Under the definitions, non-black plastic plant pots can be collected under Plastics – Rigids: Pots, Tubs and Trays. This includes PET and PP pots which are larger than 40x40mm and do not contain any pigment which prevents them from being near-infrared detectable (e.g. carbon black pigment) within the plastic recyclable waste stream.

Specific guidance on Rigid Plastics can be found [on the government website](#).

## How will a Recyclability Assessment affect costs?

From 2026 onwards, packaging producer fees will become modulated, meaning they will be adjusted, based on the recyclability assessment rating. **Packaging classified as Red will face a multiplication of fees** which will also increase year on year for the first 3 years.

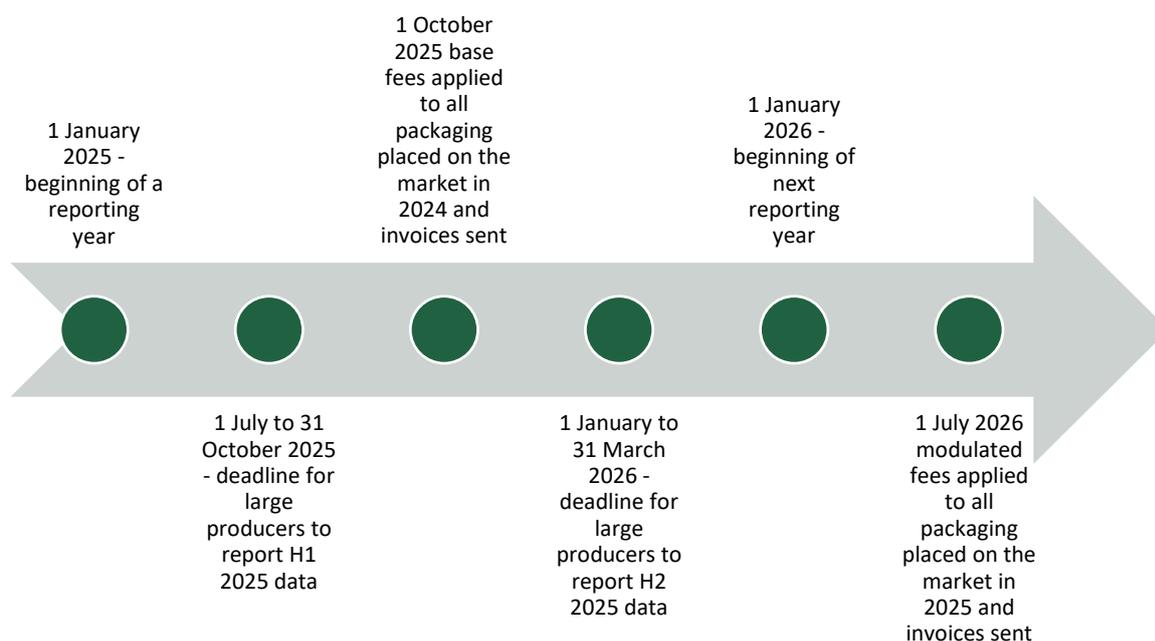
Assessment Year	Multiplication Factor for RED packaging
2026 to 2027	1.2
2027 to 2028	1.6
2028 to 2029	2.0

**Amber rated packaging will not be modulated** and will remain at the base fee cost. Base fees for 2025 (for 2024 packaging returns) are below, and fees for each year will be determined based on data submitted for the previous year (as this is also what fees are applied to). So, for data submitted in 2025, the modulated (adjusted) fees will be charged in 2026.

Material	Base Rate (in £ per tonne)
Aluminium	£266
Fibre-based composite	£461
Glass	£192
Paper and card	£196
Plastic	£423
Steel	£259
Wood	£280
Other	£259

**Packaging classed as Green will have a reduced fee** however the amount will not be determined until all Red and Amber packaging is calculated. The remaining cost of recycling all waste will be split between the Green rated packaging, however this will be **less than the base fee per tonne.**

## EPR dates, when do RAs need to be done and when do they apply to?



<p>2024 data – base fees will apply to 2024 data – invoiced in October 2025</p>	<p>2025 data – Recyclability Assessments calculated and submitted in two halves by large producers by 1 October 2025 and 31 March 2026 – fees will be modulated based on assessments – invoiced in July 2026</p>
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The above information can also be viewed [on the Government website](#), and in a [statement published on June 28, 2025](#).