



*UK Extended Producer Responsibility for Packaging Update for*



21 January 2026  
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# House Keeping



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Enter questions into the **Q&A box** at any time



Questions in the Q&A box will be addressed throughout and at the end of the webinar



A copy of the slides and recording will be circulated after the session

# Introductions



**Samantha Smith**  
**Policy & Public Affairs Manager**  
**HTA**

Sam joined the HTA in 2025, having previously served as Head of Heat & Biomass at the Renewable Energy Association. She began her career in Parliament working for MPs and brings 8 years' experience in policy and public affairs across agency and trade association roles



**Sandy Dhesi**  
**Commercial Manager**  
**Ecoveritas**

Over 20 years' experience in the industry, previously built up a data collection service for the UK's largest compliance scheme



**Lily Toyne**  
**Customer Success Manager**  
**Ecoveritas**

Over 7 years working in customer service with extensive experience in building and maintaining successful stakeholder relationships

# Agenda

12pm-1.15pm

This session will cover:

- A clear overview of Packaging EPR and the latest updates
- How the horticultural sector is affected
- An introduction to the new *Recyclability Assessment Methodology (RAM)*
- Practical steps to reduce your EPR compliance costs
- How Ecoveritas is supporting horticultural businesses with data, reporting and ongoing EPR obligations
- Q&A session



# Ecoveritas

A leading provider of outsourced environmental compliance services

## Environmental Compliance Reporting Made Easy

- To meet the complex challenges of managing environmental compliance reporting Ecoveritas offers a unique combination of consulting, data and software that helps companies around the globe take the next step in their sustainability journey.

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# Why Extended Producer Responsibility (EPR)

## The pre-existing UK Packaging Regulations were over 25 years old which meant:

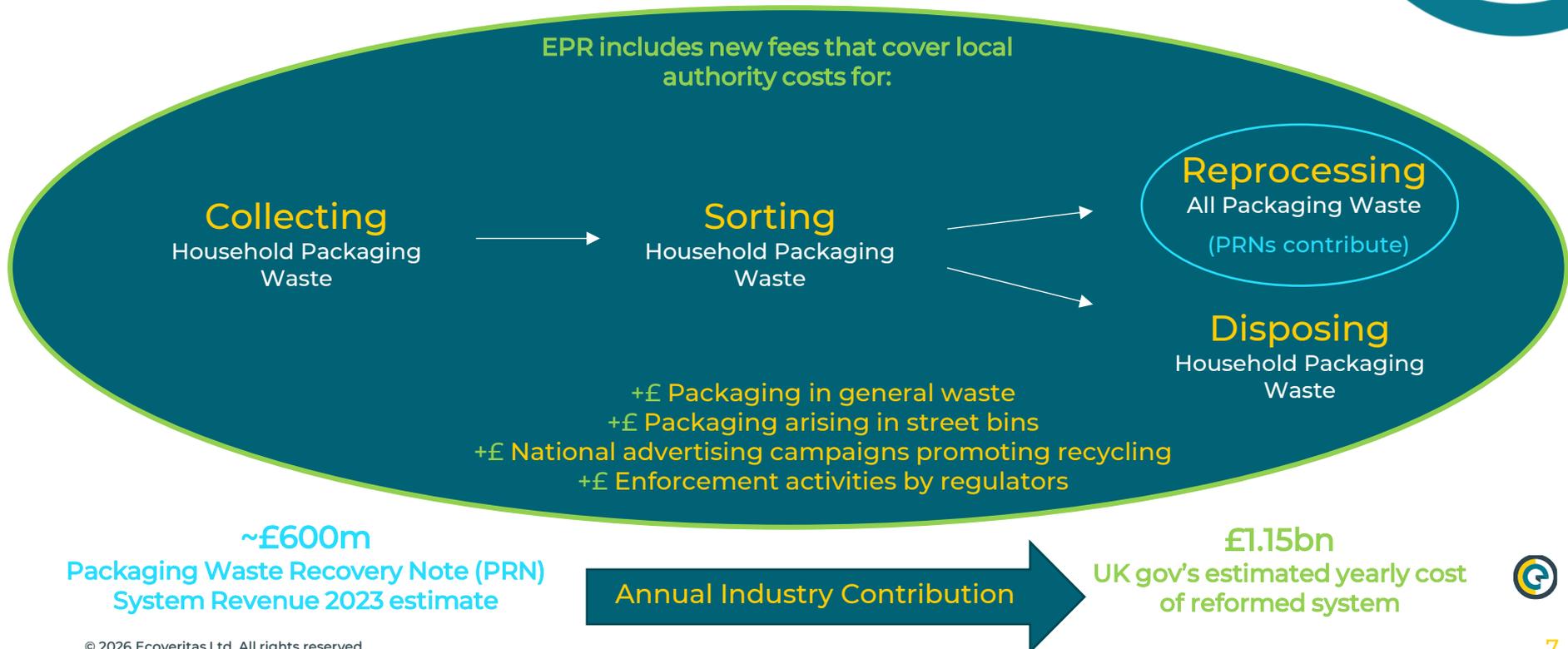
- Recycling rates had plateaued
- Household kerbside recycling was inconsistent
- Consumers were not clear what can and can't be recycled

## EPR will address these issues and follow the producer pays principle:

- As regulatory tool it requires producers to be substantially responsible for their post-consumer product
- This responsibility is fulfilled through financial payments
- The aim of EPR frameworks is to incentivise more sustainable product design, increase re-use and recycling and boost collection rates



# Extending Producers' Financial Responsibility



# Household Vs Non-Household Packaging



**Household (HH)**  
Subject to PRN and EPR fees



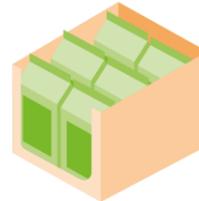
**Primary Packaging**



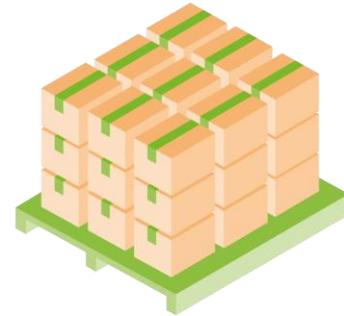
**Shipment Packaging**



**Non-Household (NHH)**  
Subject only to PRN fees



**Secondary Packaging**



**Tertiary Packaging**

# System Overview



Business (NHH):  
Commercial Collection

Household (HH):  
Local Authority (LA)  
Collection

Materials Facility/ First  
Points of  
Consolidation/ Waste  
Management

Reprocessor/Exporter



## Scheme Administrator (SA) (PackUK):

- Strategic & ops planning
- Calculate & collect producer disposal costs & fees (inc. modulated + litter)
- Make payments to LAs
- Manage & fund campaigns
- Data support & recyclability tool
- Prepare annual reports

## Compliance Schemes:

- Review data and submit onto RPD on your behalf
- Acquiring business PRNs/PERNs, Acquiring HH PRNs/PERNs
- Approval & competence test

## Producers:

- Enroll on to gov RPD portal
- Collect data
- Submit data to your Compliance Scheme or direct on RPD
- Procure PRNs to demonstrate obligations met
- Pay quarterly to SA (HH only)
- Self-managed to reduce obligation



# Understanding Your Obligations

## Two main types of obligation under EPR



### Waste Cost & Recycling:

- Obligation to report placed on the market data
- Meet recycling obligations (PRNs/PERNs)
- Pay disposal costs (EPR fees)



### Nation of Sale:

- Report where packaging is disposed, broken down by nation within the UK
- Reporting only (no fees)

Not all producer types will be obligated for both sets of obligations



# Who is Obligated

## Threshold criteria: Waste Cost & Recycling Obligation

Producer Thresholds		Turnover		
		<£1m	£1-£2m	>£2m
<b>Packaging Tonnage</b>	<25 tonnes	No obligation	No obligation	No obligation
This is the aggregated total from ALL packaging activities, including selling, as defined by the regulations	25-50 tonnes	No obligation	Small producer	Small producer
	>50 tonnes	No obligation	Small producer	Large producer



Your organisation does any of the following:

1. Supplies packaged goods to the UK market under your own brand
2. Places goods into packaging that's unbranded when it's supplied
3. Imports products in packaging
4. Owns an online marketplace
5. Hires or loans out reusable packaging
6. Supplies empty packaging
7. Pass Packaging to an end user (selling)

Our experience with the horticultural sector shows that a business with a turnover of £6 million or more results in a large producer obligation

*The above example is for guidance only, each business should assess their obligations independently*

# UK Packaging EPR

Threshold criteria: Nation of Sale obligation

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



Your organisation does any of the following:

1. Sells filled or empty packaging directly to end users
2. Sells empty packaging to UK organisations that are not legally obligated under the regulations
3. Hires or loans out reusable packaging
4. Owns an online marketplace
5. Imports packaging you discard

- This is a data reporting only obligation, where packaging must be broken down by the nation in the UK where it was disposed
- Supports the government in monitoring recycling performance and setting targets
- Ensures fair distribution of EPR fees across the nations
- You should have been collecting this data from 2024 onwards, Reporting will be before 1 April 2027 (2026 data)

# UK EPR for Packaging

## Obligated Producer Thresholds, Reporting & Fees

### EPR

Producer Type	Threshold	UK Packaging Regs	Bi-annual Reporting	Annual Reporting	Nation of Sale Report	EA Fee	CS Fee	PRN Fees	EPR Fees	Labelling (Date TBC)
Large Producer	£2m / 50t	X	✓	X	X	✓	✓	✓	✓	✓
Small Producer	£1m / 25t - £2m / 50t	X	X	✓	X	✓	X	X	X	✓
Seller	> £1m/25t	X	X	X	✓*	X	X	X	X	✓
De minimus	< £1m/25t	X	X	X	X	X	X	X	X	✓

#### Glossary

**EA** – Environment Agency

**CS** – Compliance Scheme

**PRN** - Packaging Recovery Note. Obligated producers must purchase PRNs to meet their recycling obligations. This remains in place under EPR and ensures that producers contribute financially to the recycling process itself

**EPR Fees** (additional modulated fees for packaging ending up in household and street bin). Obligated producers are responsible for the costs of collecting, sorting, and treating household packaging waste, covering the full net cost

\* No longer have a reporting deadline in 2025. Reports must still be kept on file & deadlines will resume in 2027 for 2026 data

Fees started in October 2025 (2024 data)

PRNs fees likely to continue to be invoiced quarterly (as they are currently by most compliance schemes)

EPR fees can be paid as one upfront payment or quarterly to spread payments

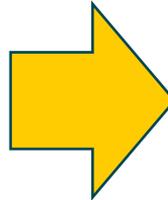
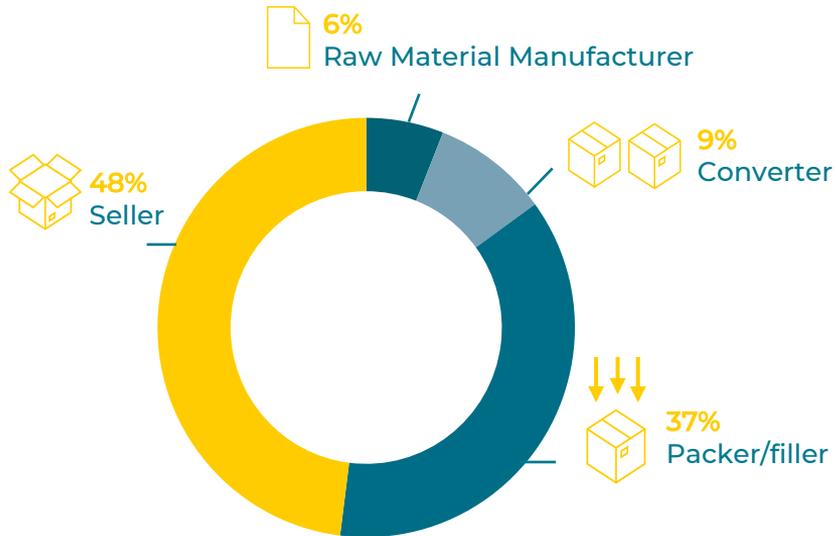
Scheme Administrator = [PACKUK](#)

EPR base fees for Year 1 can be found [here](#)

# Who is Obligated

## Single party responsibility

The costs were previously 'shared' between the packaging supply chain based on performed activity



Under new system, a single party will have responsibility to cover waste management costs

- Brand Owner
- Importer
- Online Marketplace
- Packer/Filler
- Distributor/Supplied as Empty
- Service Provider

# Who is Obligated

## Producer types



= Most Likely for Horticulture Sector

Producer Type	Description	Reporting Requirements
Brand Owner 	Supplies own-branded packaged goods to the UK market  A brand includes: a name, a trademark, any distinguishing mark	Report filled branded packaging and any unbranded packaging forming part of a branded layer  For products with dual-branding, the producer who makes the first supply is obligated
Packer/Filler 	Fills packaging where no obligated brand owner exists	Report: unbranded packaging added and branded packaging filled for non-obligated producers  Include unbranded packaging owned by you at the time of adding e.g. providing unbranded packaging to a third-party warehouse
Importer 	Directly imports filled packaging into the UK	Report: filled packaging for which there is no obligated UK brand owner: imported filled unbranded packaging, imported filled non-UK branded packaging Also report packaging where the UK brand owner is not responsible for the import (e.g. you import Walkers crisps without their involvement)  Don't forget packaging you discard after importing from around raw materials, empty packaging, finished goods/components
Service Provider	Hires or lends reusable packaging	Report any reusable packaging, the first time that packaging is supplied  Please note: if you are using leased packaging e.g. CHEP pallets/metal stillages owned by your supplier, this is not required to be declared anywhere on the data form
Distributor	Manufactures or imports empty packaging and supplies it on where a large producer does not ultimately use it	Defra releases a list of producers to help with determining customers under the large producer threshold. <a href="#">Find large producer list here</a>
Online Marketplace	Operates an internet-based sales platform, which facilitates the supply of goods to UK-based consumers by non-UK businesses through the platform	Report filled and unfilled packaging supplied by non-UK businesses, including unfilled packaging supplied to a UK business which is not a large producer via the online marketplace  Please note: owning a website or app that sells goods from UK organisations only does not fall under the online marketplace category

# Brand Owner Examples



# Labels & Carrier Bags

- Logistical labels
  - Branding added to aid distribution = responsibility of the Packer/Filler
  - Branding added that does not assist in distribution = responsibility of the Brand Owner (Brand Owner must know their brand is on the label)
- Labels are considered packaging where they perform a packaging function
- Obligated labels
  - Handle with care
  - Buy one get one free sticker
  - Label with description/picture of product and/or company name
- Non-Obligated labels
  - Barcode only
  - Hazchem label only
  - Pharmacy labels
- Carrier Bags & Durable Bags
  - Carrier bags must be reported as shipment packaging (not primary or secondary)
  - Durable bags (woven PP, canvas, jute, heavy-duty nylon) are product, not packaging



# Recyclability Assessment Methodology (RAM)

## What is RAM?

- Directs how **large producers** must assess the recyclability of their **household packaging**
- Enables producers to grade their packaging as either **Red**, **Amber** or **Green** based on factors like collection, sorting and reprocessing capabilities



**Red** packaging is challenging to recycle at scale due to problematic materials or designs

**Amber** packaging is recyclable but needs either specialist infrastructure or may be reprocessed with some reduction in quality or efficiency

**Green** packaging is widely recyclable

## Why is RAM important?

- From HY1 2025 all household packaging placed on the UK market must be assessed using RAM
- RAM classifications will directly impact fees, with non-recyclable packaging components incurring higher costs



# Recyclability Assessment Methodology (RAM)

- PackUK proposes applying penalties to red-rated packaging under EPR as follows:
  - **Year 2 (FY2026/27):** 20% surcharge on the EPR base fee
  - **Year 3 (FY2027/28):** 60% surcharge
  - **Year 4 (FY2028/29):** 100% surcharge
- All revenue from red-rated penalties will be used to apply a uniform fee reduction to green-rated packaging
- The green-rate discount will be calculated only after the total amount of reported red-rated packaging is known

Year 2 illustrative fees, with RAM modulation

Material	June 2025 base fees	Green fee (in £/tonne)	Amber fee (in £/tonne)	Red fee (in £/tonne)
Aluminium	266	245	270	325
Fibre-based composite	461	475	525	630
Glass	192	185	205	245
Paper and card	196	190	210	250
Plastic (Rigid)	423	415	455	545
*Plastic (Flexible)	423	415	455	545
Steel	259	260	290	345
Wood	280	410	450	540
Other	259	205	225	270
		* This sub-category does not impact Y2 costs but is included to differentiate for future years		

Agencies' Position Statement (July 2025): confirmed no enforcement action would be taken against producers who did not submit recyclability data for HY1 2025 by 1 Oct 2025

If you opted out of HY1 2025 Reporting:

- HY1 2025 can be submitted alongside HY2
- HY2 2025 recyclability data will be pro-rated to cover the full 2025 year
- Agencies expect full reporting from H2 2025 onward

A dedicated RAM session was run by Ecoveritas last year. If you would like more information on RAM please get in touch. Detailed fee information can be found [here](#)



# Data Requirements for 2026 EPR Reporting (2025 calendar year data)



Producer Type	Packaging Layer	Packaging Material by Weight (kg)	Packaging Type	Self-Managed Waste	RAM
Brand Owner	Primary	Aluminium	Household (primary + shipment)	Self-Managed - 'consumer waste' you collect in store	Recyclability of Household Packaging only
Packer/Fillers	Secondary	Glass	Non-Household (secondary & transit)	Self-Managed - 'organisational waste' collected for recycling from your own sites	
Importer	Shipment	Paper / Card	Public Bin		
Distributor	Transit/Tertiary	Fibre Composite	Drinks Container (England, NI, Wales only)		
Service Provider		Plastic (Rigid/Flexible)	Reusable (first time it's supplied)		
Online Marketplace		Steel			
	Wood				
	Other (by type)				

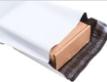
Small producers only report drinks of the above

Data must be 'as accurate as reasonably possible' and retained for 7 years



# UK Packaging EPR

## Packaging layer

Packaging Layer	Definition	Example	
Primary	Primary packaging is the individual container that you store goods in to sell to consumers. This is called a 'sales unit'	If you sell peas in steel tins with paper labels, the primary packaging is 'steel tin' and 'paper label'	
Secondary	Secondary packaging is for grouping several 'sales units' for selling or shipping purposes. Organisations may use secondary packaging to display goods in shops	If you place one or more tins of peas into a cardboard box, then sell the box to a retailer or ship it to the consumer, the secondary packaging is 'cardboard box'	
Shipment	Shipment packaging is a type of secondary packaging for shipping single or multiple sales units to consumers. This includes cardboard boxes and mailing bags	For example, if you place a mobile phone in a cardboard box and then place the box into a mail bag before shipping it, the shipment packaging is 'mail bag'. The primary packaging is 'cardboard box'	
Tertiary	Tertiary or Transit packaging is used to group secondary packaging units together to protect them while being transported or handled. Transit packaging does not include road, rail, ship and air containers	For example, if secondary packaging units are placed into larger cardboard boxes that are sealed with parcel tape and put onto wooden pallets to be transported, the transit packaging is 'cardboard box', 'parcel tape' and 'wooden pallet'	

You only need to submit information about reusable packaging, such as pallets, the first time they are used



# 2026 Obligation Year Reporting Deadlines & Agency Registration Fees

## Large Producer Deadlines

- EPR HY1 2025 January to June data – **Deadline of 1 October 2025**
- EPR HY2 2025 July to December data – **Deadline of 1 April 2026**

## Small Producer Deadline

- FY 2025 January to December data – **Deadline of 1 April 2026**

Please note that your Compliance Scheme deadlines are likely to be 4-6 weeks earlier

Nation of Sale reports must still be kept on file & deadlines will resume in 2027 for 2026 data



Agency Fees from 1 Jan 2026 (including any resubmissions and late registrations that relate to previous years):

Charge Type	2026 Charge
Large Producer registering directly	£2,842
Large Producer using compliance scheme	£1,803
Small Producer registering directly	£1,303
Small producer using compliance scheme	£696
Resubmission Charge registering directly	£807
Resubmission Charge using compliance scheme	£512
Late registration charge	£386

# EPR Payments

## Small Producers

Agency registration fees are payable via your compliance scheme or when submitting data on RPD if registering directly

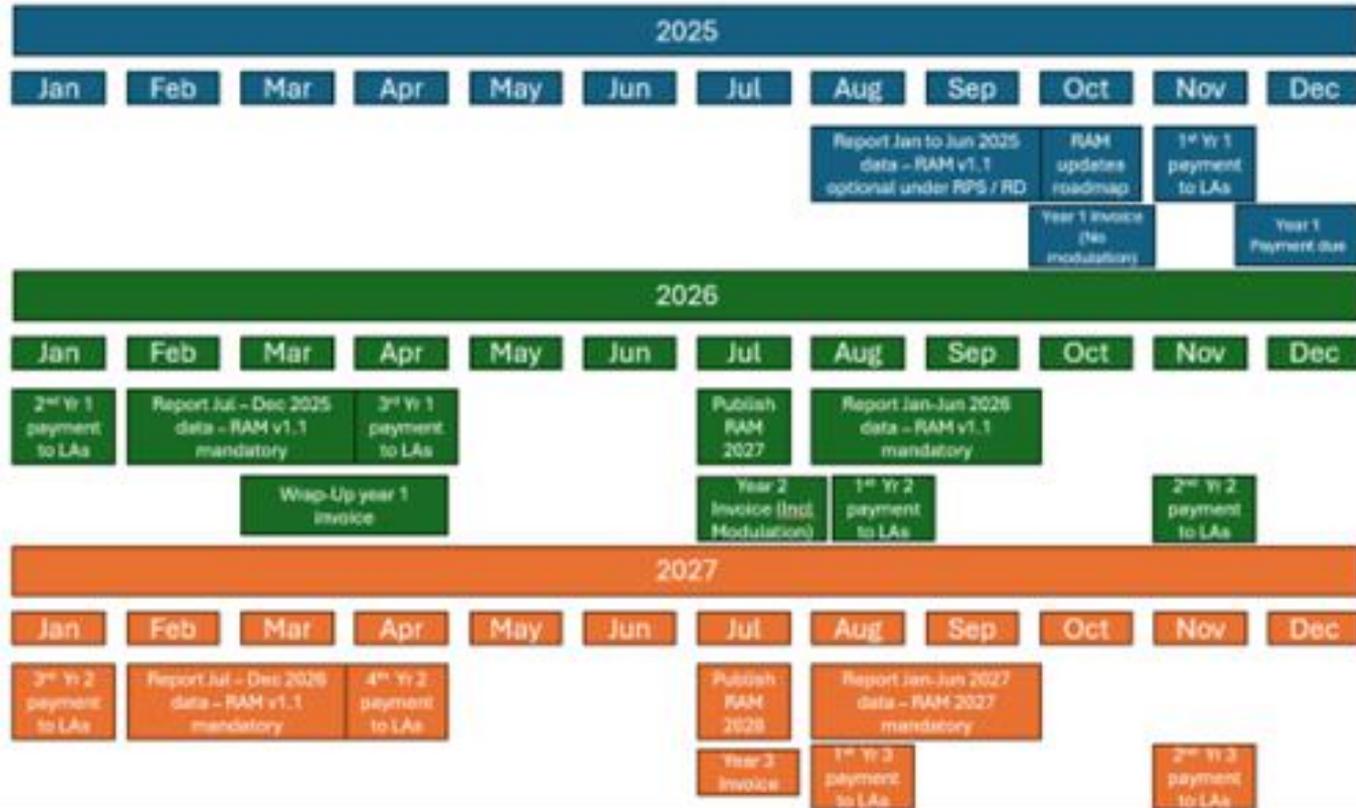
## Large Producers

- PRN fees and Agency registration fees are invoiced via your compliance scheme (typically quarterly). Direct registrants pay the Agency fee when submitting data and are responsible for purchasing PRNs and uploading evidence to RPD
- Obligated producers received their first EPR Notice of Liability in October 2025 for the 2025–26 assessment year, based on 2024 packaging data. Fees may change following the February end-of-year recalculation
- Invoices are issued through RPD, with notifications sent to primary contacts and approved users
- Payment is due within 50 days or via a four instalment plan (direct debit or standing order only) on:
  - 20 November 2025
  - 1 January 2026
  - 1 April 2026
  - 1 July 2026

**Late payments incur penalties of 20% of unpaid EPR fees, 5% of UK turnover or 2% of group turnover (whichever applies)**



# Defra's Proposed EPR Compliance Timeline





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Ecoveritas Support



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# Practical Steps To Help Reduce Your Compliance Bill

## 5 Immediate Steps:

1. **Check your packaging data accuracy:** Small discrepancies create large cost errors under EPR
2. **Model your 2025–26 exposure:** Use both PRN and EPR fees to understand the material-by-material impact
3. **Identify high-cost packaging hotspots:** Material swaps, format changes, and lightweighting can create huge savings
4. **Plan for fee modulation:** In 2026, modulation will further increase costs for hard-to-recycle packaging
5. **Bring finance, sustainability, procurement and packaging teams together early:** EPR is cross-functional by nature

## Success Highlight

Ecoveritas recently helped a client reduce their 2025 EPR fees from **£1.4m** to under **£200k**.



# Helping the Horticultural Industry Manage Packaging EPR compliance

## EPR Reporting Made Easy

Our purpose-built software tool (my.ecoveritas) helps companies to cost effectively manage their EPR data and reporting requirements inhouse with ease.

## Comply With Confidence

my.ecoveritas allows you to comply with complex legislation without the need for in depth knowledge of the regulations & rules.



Acknowledged  
Methodology



Easy to Use,  
Step by Step Process



Secure Data Storage &  
Full Audit Trail



Access to  
Packaging Weights Data



Guidance &  
Support

# Getting Started with my.ecoveritas



**Horticulture free account**

*Includes online obligation checker, quote & purchase, EPR guidance tools*

[View site here](#)

**Horticulture online EPR tool for Small & Large Organisations**

*Includes Business Profile, Data Upload, Factor mapping, Form generation*

**RAM & Nation of Sale**

*RAM & Nation of Sale reports are calculated outside the tool once your EPR submissions are complete*

**Speak to An Expert**

*Book a free one-hour session with the Ecoveritas team*

*We will help you to understand your obligations and next steps*



Any Questions?



PASSION LED US HERE



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# Thank You

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**Let's meet up!**

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Don't forget to follow us



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