



STAKEHOLDER BRIEFING

Extended Producer Responsibility (EPR)

May 2026



Introduction to UK environmental horticulture and landscaping

The Horticultural Trades Association (HTA) represents around 1400 UK businesses, including growers, retailers, suppliers, garden designers, and landscapers who collectively deliver the gardens, green spaces, and green infrastructure that delivers for the economy, environment, climate change adaptation, flood resilience and our health and wellbeing.

Each year, the environmental horticulture sector delivers £38bn to GDP and supports 722,000 jobs.

Business operating costs increases have mounted in recent years and months. These include additional cost and paperwork associated with EU trade, higher employment costs, increased business rates, and higher fuel and energy costs, exacerbated by the ongoing conflict in the Middle East. In addition, regulatory taxes like EPR are adding significant cost, complexity and time for businesses to navigate.

While we support the aim of reducing certain types of packaging, businesses are effectively being taxed three times – plastic packaging tax, EPR, Packaging Recovery Notes - to achieve the same goal. EPR is extremely complex and represents one of the largest regulatory costs for businesses, costing around £1.6 billion in 2025.

Extended Producer Responsibility (EPR)

Introduced in 2024, EPR requires obligated businesses or “producers” to collect and report packaging data. Large producers - those handling more than 50 tonnes of packaging per year – must also pay EPR fees to cover their packaging from when it is placed onto the market, through to the end of its life.

Key asks for Policy Makers:

- 1. Postpone the introduction of modulated fees for EPR until 2027.**
This will not undermine the purpose of EPR, but it will reduce cost variation and give businesses certainty over those costs, which would remain comparable to 2025.
- 2. Ensure that non-black polypropylene plant pots are classed as ‘green’ under the Recycling Assessment Methodology (RAM).**
Businesses using fully recyclable pots should not be penalised because of the government’s definition of polypropylene, which currently classes plant pots amber.
- 3. Ensure that Simpler Recycling is being adhered to across England.**
This mandates the collection of non-black plastic plant pots in household kerbside recycling.
- 4. Scrap the PRN system.**
It is merely adding cost to packaging without driving improvements in recycling rates.
- 5. DEFRA and PackUK should engage with industry to establish what is working well and what could be improved under EPR.**



It only applies to household waste and covers the local authority costs of collecting and sorting packaging waste, either to be reprocessed or disposed of.

EPR is extremely complex, costing some of our member businesses hundreds of thousands of pounds every year. An element of EPR known as ‘Seller Obligation’ is also pushing many HTA member businesses into the ‘large producer’ category, attracting higher fees and more frequent reporting requirements. Seller Obligation applies to any filled packaging sold to a final user. For example, if a business sells items with another company’s brand, they do not include that in their EPR submission but do have to record it in their overall ‘Nation of Sale’ data reporting. As a result, many garden centres and nurseries are seeing seller tonnage alone push them into the large category, meaning they must submit biannual reports and pay the relevant levies and registration fees.

PackUK, the scheme administrator, is also making slow and limited progress in delivering on EPR’s aims, which seek to improve the collection and recycling of packaging waste.

Simpler Recycling

In 2018, the horticulture industry moved towards polypropylene taupe and other non-black recyclable pots to ensure they would be detectable by Near Infrared Sensors in waste management facilities. However, despite the introduction of Simpler Recycling, which came into effect for households on 31 March 2026 and mandates the collection of various materials, including non-black plastic plant pots from kerbside, more than 45% of Local Authorities in England are not collecting them. Many cite a lack of an end-market or suitable processing capability as the main barriers. There also seems to be confusion about garden versus plastic waste streams. Most plant pots are polypropylene and fall under the plastic waste, rather than garden, waste stream.

The plastic waste stream falls under Schedule 1, Part 4 of the Separation of Waste (England) Regulations 2024 which includes:

- **PET Bottles, Pots, Tubs, Trays, and Tubes:** Polyethylene terephthalate items.
- **PP Bottles, Pots, Tubs, Trays, and Tubes:** Polypropylene items.
- **HDPE & LDPE Bottles, Pots, Tubs, Trays, and Tubes:** High-density polyethylene and low-density polyethylene items.

It is frustrating for member businesses paying high EPR fees to be told that their recyclable materials cannot be processed. Further, modulated fees are due to be introduced this year under the Government’s Recycling Assessment Methodology (RAM), significantly increasing the costs of some packaging materials.

Packaging Recovery Notes

In addition, under EPR, obligated member businesses must also purchase Packaging Recovery Notes (PRNs) to prove that every tonne of packaging waste has been recovered and reprocessed. PRNs operate on an open market and are therefore subject to price fluctuation depending on supply and demand. However, costs have increased significantly, particularly around the time when businesses receive EPR invoices.

For example, in September 2025, the PRN price for plastics ranged between £170-£440. In October 2025 – when businesses received their EPR invoices – the prices were £315-£405. They reached £425 in November before falling



back slightly in December. However, in February 2025, the prices were only £62-80. The price of wood, by comparison, never exceeded £10 and steel never increased beyond £21.50.

This volatile market makes it incredibly difficult for businesses to accurately predict their packaging costs, and with the majority of our members operating in extremely low-margin environments, it is increasingly to absorb those costs.

The PRN system adds further costs for businesses by increasing packaging costs but has failed to drive improvements in recycling rates. Given the fees associated with EPR, and additional burden that places on business, we do not believe that PRNs are necessary. The fees collected under EPR should be used by local authorities to improve recycling infrastructure and capability in their local area so having PRNs, EPR and Plastic Packaging Tax feels like duplication at a time when costs are the highest they have ever been for business. Consolidation of these taxes, as well as improvements to EPR are needed. Government should delay the introduction of modulated fees until 2027 and use that time to engage with industry to establish how EPR can be approved, making it viable for business while still achieving its overall policy goals.