

# PACKAGING EXTENDED PRODUCER RESPONSIBILITY (EPR) TECHNICAL GUIDANCE EXECUTIVE SUMMARY

FEBRUARY 2024 | VERSION 1

*This guidance is true at the time of publication  
but could be subject to change.*

This document aims to provide a high-level overview of the upcoming reforms to the packaging compliance system, which is covered in detail in the accompanying Technical Guidance document and point to where in that document further detail on specific matters covered here can be found.

The UK packaging sector has been subject to producer responsibility regulations since 1997. These regulations have required ‘producers’ of packaging, from raw material manufacturers through to retailers of packaged products, to collect data on the amount and composition of packaging they handle annually, report this data to the environmental regulator, and finance the recycling of an equivalent amount of that packaging at end of life, whilst trying to reach targets set annually by government. Over the 26 years this system has so far operated, recycling rates in the UK have dramatically increased.

However, these recycling rates have plateaued in recent years, and stakeholders recognise that more needs to be done to improve the circularity of the UK’s packaging sector, and reduce its contribution to the UK’s carbon footprint. As a result, since 2018 the UK has been embarking on a programme of reforms to the UK’s packaging compliance system, both to improve its overall performance and to modernise the compliance system (see section *Motive for the reform*). This will be achieved by moving to a system of Extended Producer Responsibility (EPR).

In 2023 we saw the first phase of the reforms become law (see section *2024 is a transition year*), when new data gathering requirements were introduced for new types of producers (see section *EPR new producer categories*), and those producers with over £2m annual turnover and more than 50 tonnes of packaging (large producers – see section *Producer thresholds*) supplied in any of the new producer categories obligated to report this data. The data to be collected and reported is more wide ranging, and detailed than has historically been the case, and for the first time has to be done in bi-annual ‘in-year’ reporting, in October and the following April.

Producers are not only required to report the weight and material of the packaging they have placed on the market, as well as the producer category they are obligated for this packaging within, they are also required to report: whether packaging is primary, secondary, tertiary or shipment/e-commerce (see section *Packaging Definition*); whether it is likely to arise as waste in households, or street bins; whether it is in scope of a future deposit return scheme; and flag whether packaging is reusable (see section *Data producers have to report*). Large producers are also required to capture data on their own packaging waste that they generate throughout the course of their business operations.

Due to the fact that the reforms are being phased in, whilst the historic packaging waste compliance system is being out, producers continue to be obligated under the historic system for 2023/24 compliance in addition to their new obligations under EPR. This means that for large producers obligated under both the new and historic systems will be obligated to make 3 data reports for their 2023 packaging placed on the market.

There are new EPR fees (see section *Financial obligations*), which will see large producers of packaging considered likely to arise within the household waste stream pay for the operation of local authority waste collection services, packaging waste arising in street bins, and national communication campaigns around waste reduction which are due to come into effect from October 2025, based on packaging placed on the market in 2024. Producers will be obligated to pay these fees to a new central body, in addition to continuing to be obligated to fund the recycling of packaging waste – achieved through procuring packaging waste recovery notes.

EPR will also see new labelling requirements introduced (see section *Introduction of a Scheme Administrator and mandatory labelling*) for some packaging but that is dependent on the roll out of the reforms across the next year, and how well various aspects of the reforms perform (see section *Current timeline for packaging EPR implementation*). As the reforms are being phased there are already changes which Defra have informed industry they are expecting to make to producer obligations (see section *Future expected changes*). If the reforms and potential costs are daunting then there is assistance either in reducing the financial implications of EPR (see section *Mitigating the expected increases in packaging compliance costs*) or for meeting the new challenging data reporting requirements (see section *Producer Compliance Schemes*).

There are a number of intricacies of the new requirements which will have specific effects on members of the print industry. In the accompanying guidance document we have attempted to not only provide in-depth guidance on the regulatory requirements, but also tackle specific areas of concerns for members of the print industry (see section *FAQs*). There are also links provided to other resources that are available to producers (see section *Official guidance pages*).

*The guidance document covers Motive for the reform, 2024 is a transition year, Packaging definition, EPR new producer categories, Producer thresholds, Producer Responsibilities, Registration, Small producer obligations, Large producer obligations, Financial obligations, Data producers have to report, Potential cost impacts, Mitigating the expected increases in packaging compliance costs, Introduction of a Scheme Administrator and mandatory labelling, Current timeline for packaging EPR implementation, Future expected changes, Producer Compliance Schemes, FAQs, and Official guidance pages.*

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If you have any questions email the EPR helpdesk at [eprhelp@bpif.org.uk](mailto:eprhelp@bpif.org.uk)



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