

EPR reforms

UK reforming previous 'Packaging Waste Regulations' to 'Extended producer responsibility packaging waste regulations'

Enhances obligations for producers:

- **EPR fees:** apply to 'household packaging', cover net municipal waste collection costs
- **PRNs continue:** apply to ALL packaging, contribute to reprocessing
- **New single point of compliance:** responsibility previously shared across supply chains, now primarily falls on brand owners and/or importers
- **Bi-annual reporting:** submissions previously annual and less detailed
- **Lower threshold at which businesses become obligated:** £1m annual turnover and 25 tonnes packaging, simplified responsibilities for 'small producers'
- **Nation of supply reporting:** producers to report which nation of the UK packaging placed on market

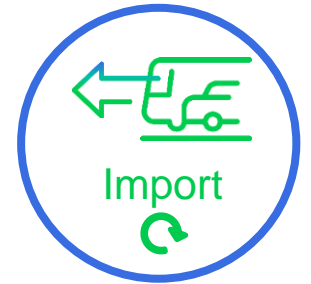
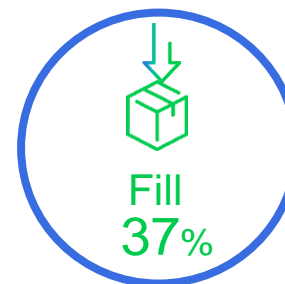
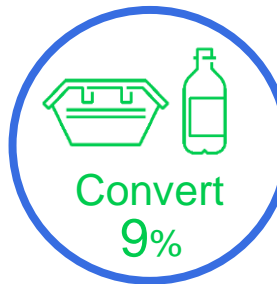
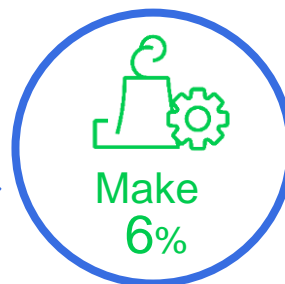
Implications of EPR Delay

2007 Regulations remain in operation for 2024

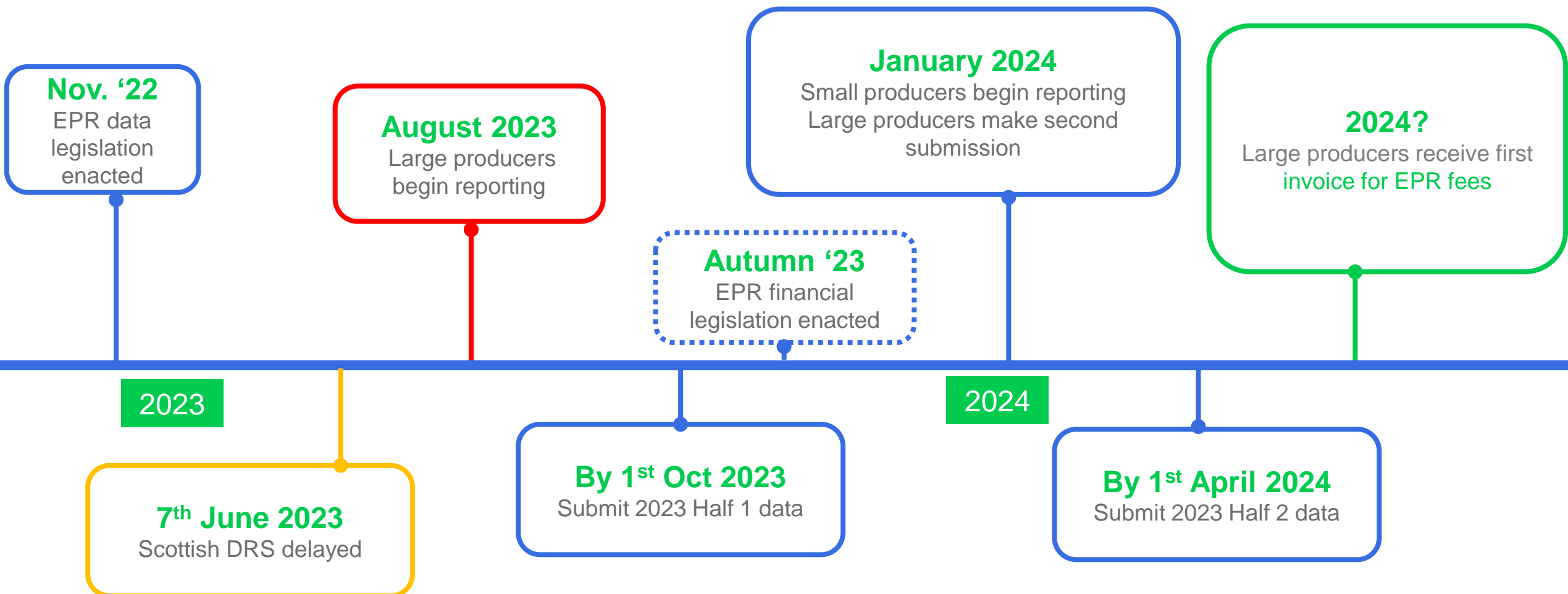
- Declare 2023 packaging data in Q1 2024 the same as years previous
- PRN recycling obligations for 2024 will be derived from these reports
- PRN targets for 2024 same as 2023, apart from glass (remelt), wood, and general

Paper	Plastic	Aluminium	Steel	Glass	Wood	Gen. Recycling
83	61	69	87	82 75% RM	42	80

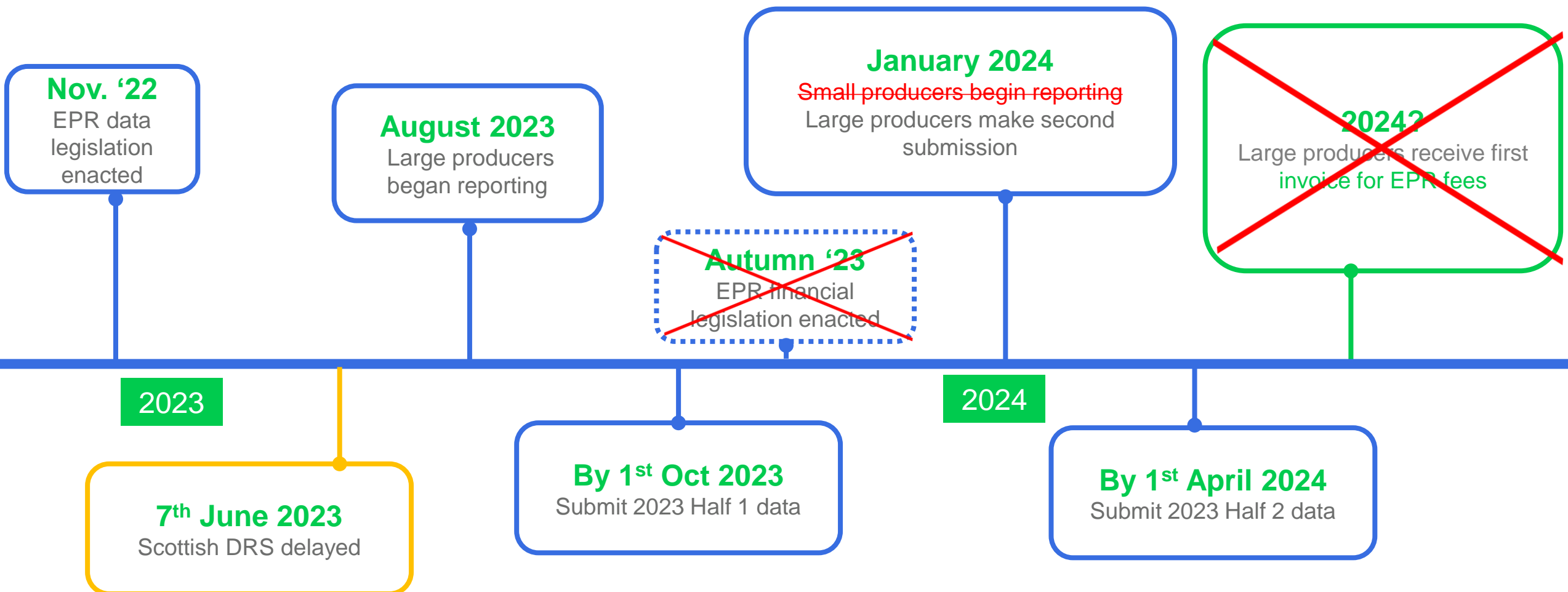
2007 regs feature
Shared Producer
Responsibility
(SPR)



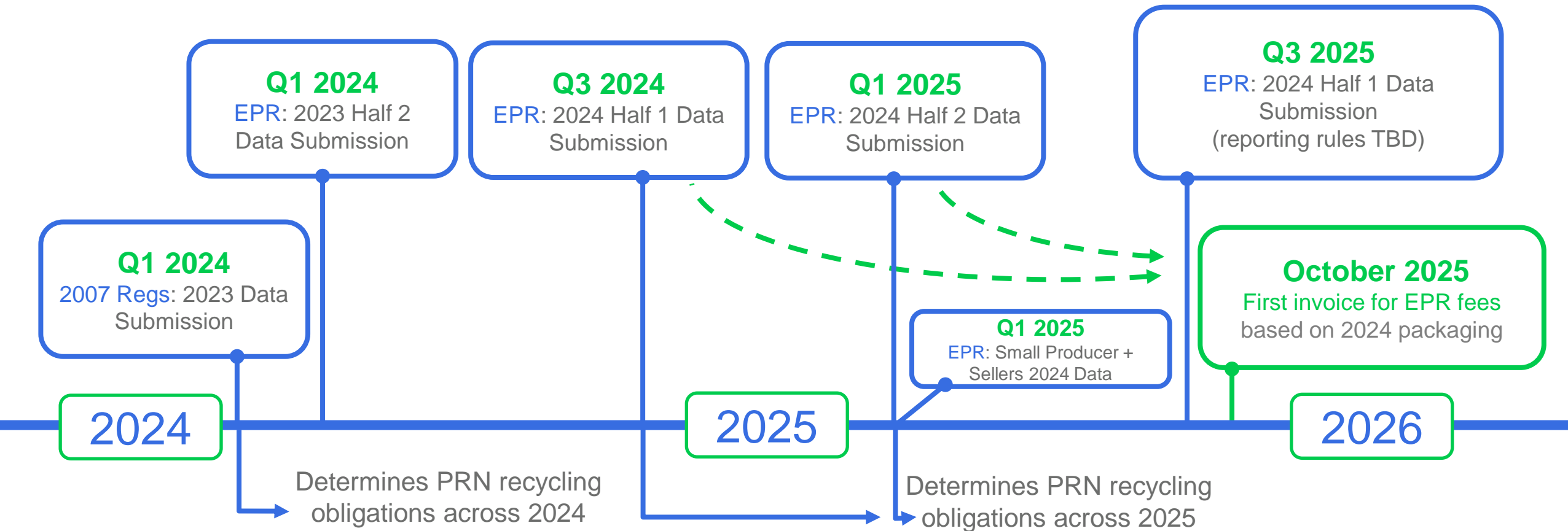
Summer 2023 expectations



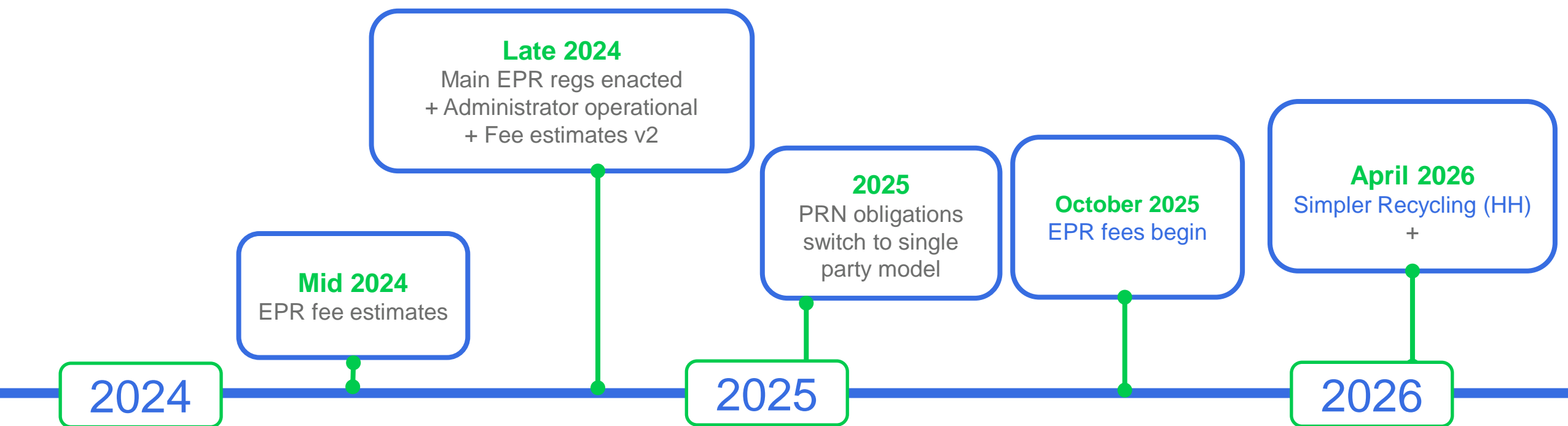
Summer 2023 what happened



Q1 2024 Expectations



Q1 2024 Expectations



Non-Household Packaging – placed on the market in 2023

Packaging that is likely to not arise within household kerbside waste

Primary & e-commerce shipment packaging can only be reported as non-household when supplied directly by producer to business end user & this supply can be evidenced by the producer:

Nature of the product

Packaging exempt where the product is clearly B2B (e.g. chemicals/ingredients)

Supply model

Details of business practices detailing that customers are end-users

Customer declarations

That the customer is the end user of the packaging and will not dispose of it via household kerbside bins

B2B primary packaging should be reported as household where multi-step supply chains exist

Non-Household Packaging – placed on the market in 2024

Packaging that is likely to not arise within household kerbside waste

Primary & e-commerce shipment packaging can only be reported as non-household when supplied directly by producer to business/public institution end user & this supply can be evidenced by the producer:

Nature of the product / Supply model / Customer declarations

Any packaging supplied to a business or public institution who is the end user

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The product within the packaging is designed for use in such settings and so the packaging is not reasonably likely to arise as waste in household waste streams

Non-Household Packaging – placed on the market in 2024

Packaging that is likely to not arise within household kerbside waste

Primary & e-commerce shipment packaging can only be reported as non-household when supplied directly by producer to business/public institution end user & this supply can be evidenced by the producer:

Nature of the product / Supply model / Customer declarations

Any packaging *supplied to a business or public institution* who is the end user

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The *product* within the packaging is *designed for use* in such settings so the *packaging is not reasonably likely* to arise as waste in household waste streams

Other Expected Obligation Alterations will apply to packaging POM in 2024

Scenario	2023 Position	2024 Position
Empty packaging filled by a contract packer on behalf of a small producer (or smaller business)	Unclear	Pack/filler
Empty packaging carrying manufacturer's brand sold to another business e.g. Jiffy bags	Manufacturer (as brand owner)	Packer/Filler
Foreign brand owner gets branded packaging manufactured and filled in UK by toll manufacturer/contract packer	Not obligated	First UK owner of the packaged goods (as importer)
Packaging manufactured/imported and supplied to a wholesaler who supplies packaging on to small producer to make use of	Not obligated	Packaging manufacturer/importer

Thank You

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