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Preparing for Packaging EPR Data Reporting

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New Business Manager

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Confidential – for Food & Drink Federation members only



UK's Largest Packaging Compliance Scheme

Assisting 2,000+ businesses to comply across 36 countries



Most

business within Defra's EPR consultation

50

Million SKUs logged in our packaging database

22

years on Defra's Advisory Committee



What are the Collection & Packaging Reforms



EPR Reform UK wide

Producers pays new fees to cover local authority packaging waste management costs



Simpler Recycling England only

Standards what packaging waste must be collected for recycling



Deposit & Return Schemes UK wide

Drinks containers. Deposit redeemable upon return, incentivising recycling



Plastic Packaging Tax UK wide

£217.85/tonne tax on produced/imported packaging with under 30% recycled content

Packaging Reform Timeline

2025

Simpler Recycling (Businesses) England only, from April 2025

EPR fees from October 2025, based on packaging supplied in 2024

2026

Simpler Recycling (Households) England only, from April 2026

Eco-Modulation from July 2026, based on packaging supplied in 2025

2027

Mandatory Labelling



from April 2027, only for primary packaging
Label size requirement threshold = 80cm²

DRS UK wide, from October 2027

EPR Reforms: Who is affected?

Responsibility for reporting & paying fees under EPR falls on a single business for each piece of packaging



£1m turnover & 25t packaging = Data reporting requirements

£2m turnover & 50t packaging = Fee payment requirements

EPR: Fees & Cost of Compliance

Fixed cost: ~£2bn/yr

Variable cost

New EPR fees cover the net costs of

Collecting

HH Packaging Waste



Sorting

HH Packaging Waste

- +£ Packaging in residual waste
- +£ Packaging in street bins (date TBC)
- +£ National communications on recycling
- +£ System Administration

Packaging Recycling Note system to continue to fund

Reprocessing

Both HH + Business Packaging Waste



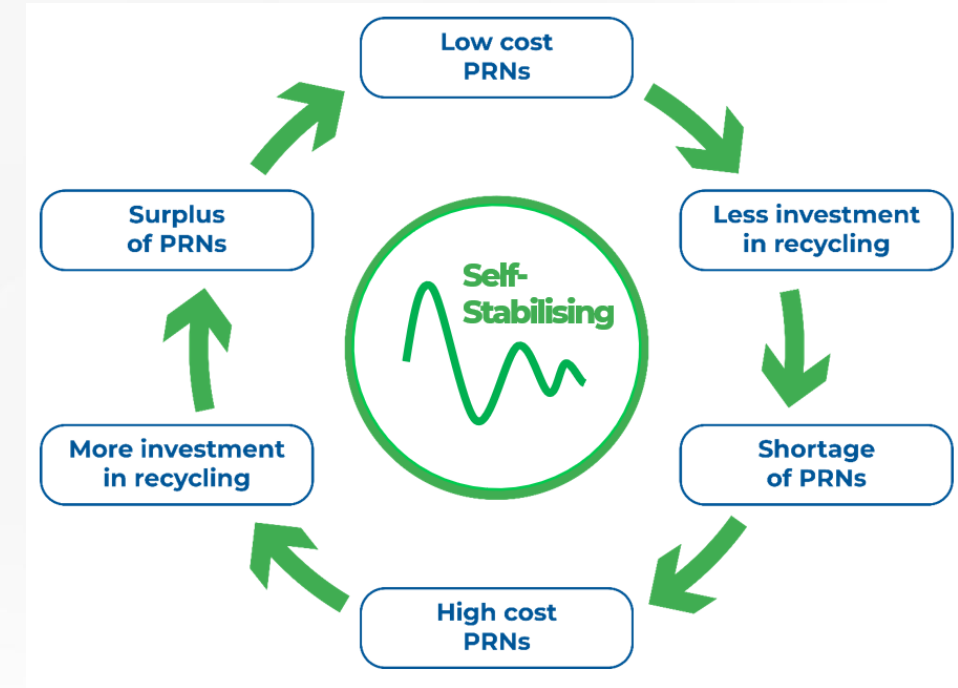
Disposing

HH Packaging Waste

Explainer: Packaging Recycling Notes (PRNs)

Amid the introduction of EPR fees, the PRN system is being maintained for the foreseeable future.

- Each obligated packaging producer has a tonnage of packaging which it must fund the recycling of
- Producers can only show the regulators they've funded recycling through possessing PRNs
- PRNs are certificates that confirm certain UK packaging waste has been recycled or exported for recycling overseas
- Can only be sold by recyclers & exporters accredited to do so
- Can only be purchased by producers & compliance schemes



- **With 100s of operators and 1000s of producers selling & buying PRNs, they are price-variable market commodities**

Explainer: EPR ‘Disposal’ fees

Defra published initial estimates of EPR Base Fees on August 15th

- Fees intended to cover the costs currently incurred by local authorities of managing household packaging waste
- **Payable from October 2025 in addition to PRN fees** by EPR producers of household packaging
- EPR fees to be invoiced by and be payable directly to the government-led EPR administrator
- **These are initial estimates!!** Defra have advised businesses not to use them to forecast EPR costs
- **Updated estimates expected in the coming weeks**, as well as in early 2025

Per tonne rates per material	Low estimate	Mid estimate	High estimate
Aluminium	£245	£495	£655
Fibre- Composite	£410	£525	£655
Paper/Board	£185	£260	£350
Glass	£130	£260	£330
Plastic	£355	£515	£610
Steel	£170	£295	£420
Wood	£225	£265	£330
Other	£225	£265	£330

- **Actual fee for each material to be confirmed around July 2025**

EPR Data Reporting



Ascending Complexity

- **Move from annual to bi-annual reporting**
- **New packaging declaration categories**
- **New reporting process via RPD portal**
- **Small producer & 'Sales by nation' reporting**

**Maximum
Data Points
to capture:**

119
Old System

vs.

520
EPR System

EPR Data Reporting

Base Material Aluminium, Glass, Paper/Card, **Fibre-Composite**, Plastic, Steel, Wood or Other (specify)

Packaging Type Primary, Secondary, Transit/Tertiary or **E-commerce/Shipment**

Waste Type

- **Likely waste stream: Household or Non-Household**
Evidence will need to be acquired for Non-HH primary and shipment packaging
- **Street Bin Packaging**
Takeaway food & drink packaging, confectionary and savoury snack packaging, ready-to-eat food, beverage cartons & pouches, smoking packaging (size limits applicable)
- **Drinks containers**
All single use containers, 50ml-3L, supplied into UK
PET, Glass, Steel and Aluminium
- **Reusable packaging**
- **Packaging waste that is self-managed for EPR fee offsetting**

Remember - data reporting is in Kg, PRN and EPR fees will be charged per tonne!

EPR Data Reporting: Non-Household Packaging

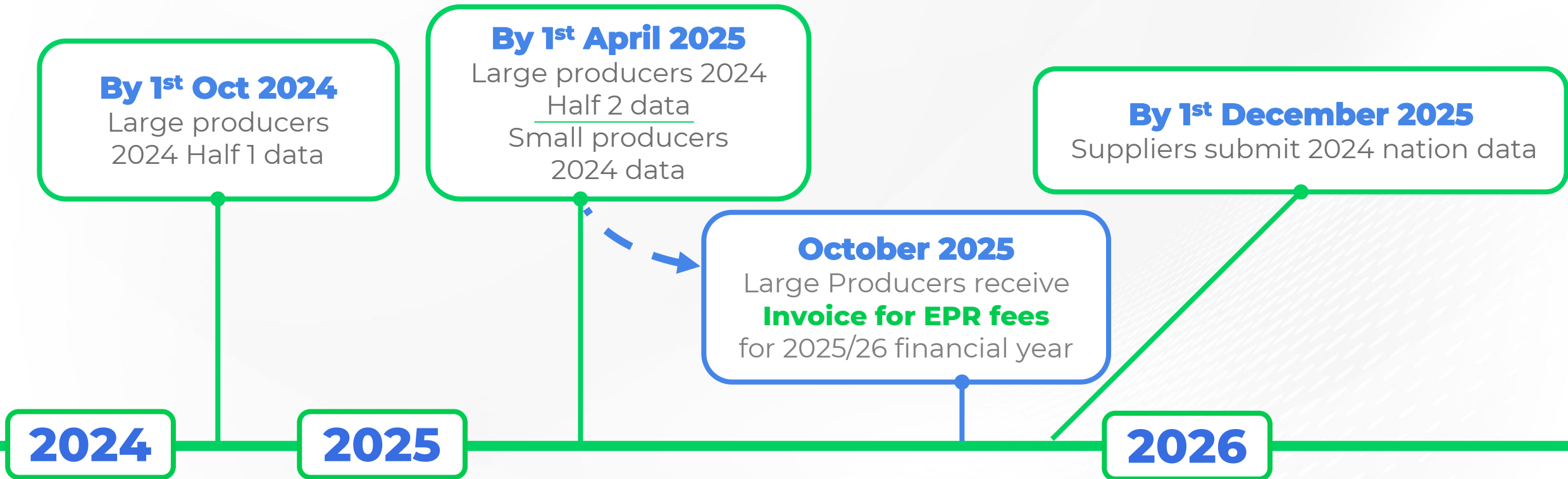
Defra has expanded the grounds upon which primary and shipment packaging can be declared as ‘non-household’:

- **If the producer directly supplies the business that is the end user**
- **Nature of the product/packaging** shows its clearly intended for B2B use only
- **Nature of the supply** is such that consumers cannot ordinarily access the item
- **Legal restrictions** mean the item can't be used without training/qualifications

If you can't provide evidence, packaging must be declared as HH



EPR Reporting & Fee Timeline: 2024 into 2025



Your compliance scheme will have an earlier reporting deadline than the statutory deadline!!

Eco-Modulation

UK Government

Packaging shortlisted for higher fees

- 1 Plastics containing carbon black

- 2 PVC inc. non-PVC packaging with PVC components

- 3 Some polystyrene HIPS, expanded & extruded

- 4 Some plastic films e.g. multi-material

- 5 Compostable and degradable plastics

- 6 Non-polyolefin foamed plastics e.g. non-PP, non-PE

- 7 High wet strength paper and card

- 8 Some coated papers e.g. waxed, greaseproof

- 9 Paper and card with too much* foil embossing

- 10 Some fibre-based composites e.g. PVC lined

- 11 Glass with attached ceramics

- 12 Some packaging in the 'wood' and 'other' category e.g. cork, ceramics, textiles

- 13 Paper and card with double-sided lamination


* To be defined

EPR fees will be subject to eco-modulation from July 2026

Difficult to recycle packaging will incur eco-modulation penalties

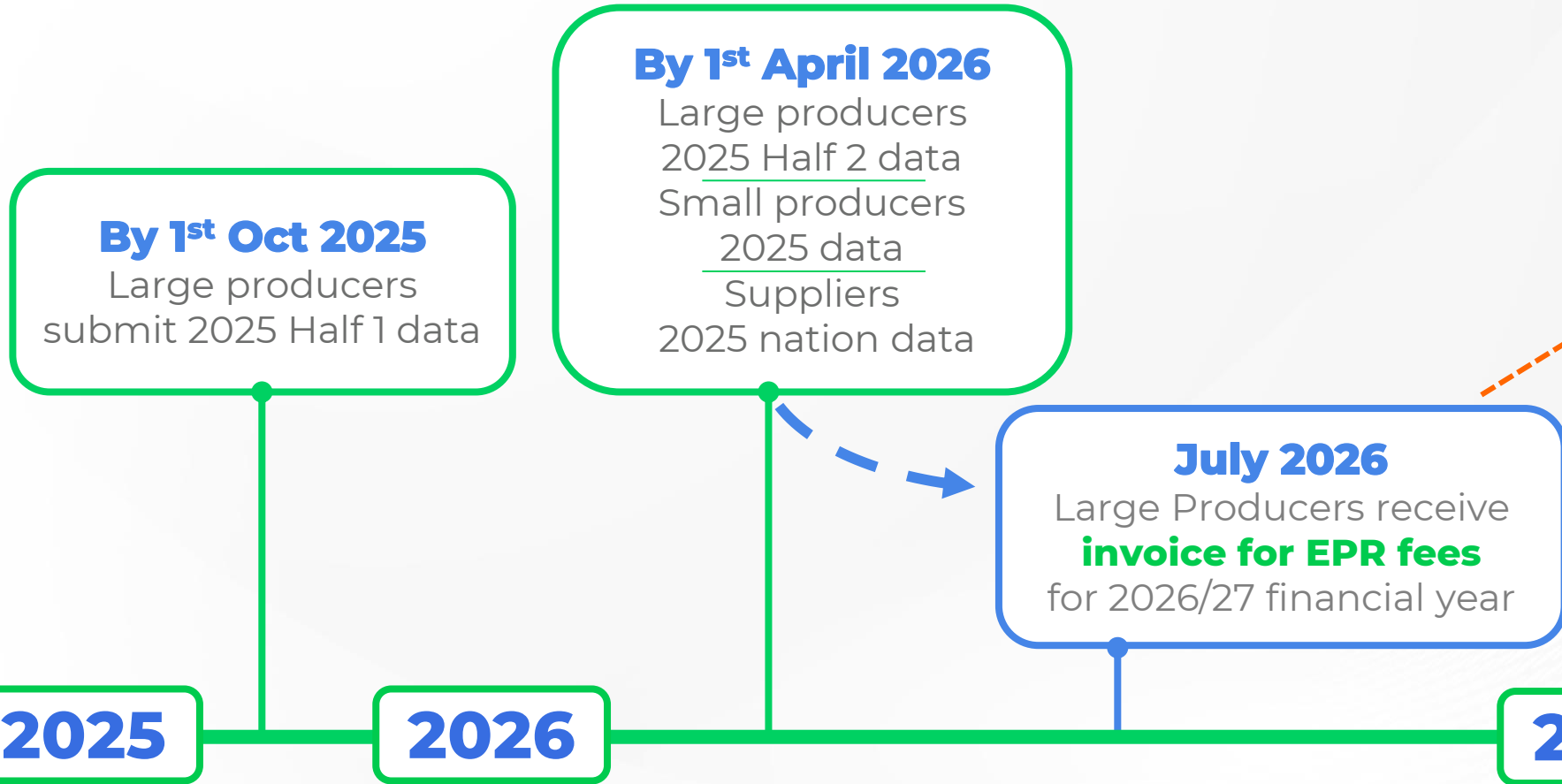
Modulation to require more granular reporting



Provisional list from November 2023
Defra hoping to announce an 18-item list in late 2024

Producers paying penalties to subsidise EPR fees paid by producers of non-penalised packaging

EPR Reporting & Fee Timeline: 2025 into 2026



First EPR invoices subject to eco-modulation



Your compliance scheme will have an earlier reporting deadline than the statutory deadline!!

EPR: Compliance To-Do List

Enrol for reporting through Report Packaging Data portal

- Pass your compliance scheme your info to link your account to them

Ensure you've a packaging data collection strategy

- Can you contact suppliers and get information from them?

Categorise packaging data for new EPR requirements:

- Supply route (household/non-household)
- Component-level compatibility with UK kerbside recycling

What are we awaiting from Government?

- **Passage of EPR fee legislation into law – Autumn 2024**
- **Actual EPR fee rates & how producers pay them – July 2025**
- **Specifics on eco-modulation – November/December 2024**



Valpak Data Insights

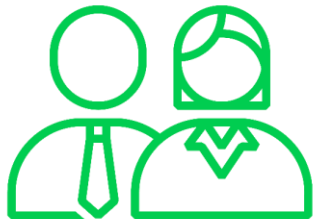
Assisted **over 500 companies** since 2004, including **7 of UK's 10 largest grocery retailers currently**

Supports International Compliance services across **36 countries**



30%

time savings



120+ staff

dedicated to going beyond compliance



Regulatory Reporting

- Gather & Manage
- Calculate Obligations
- Undertake compliance reporting



Cost modelling & analysis

- Forecast EPR costs
- Identify easy wins
- Develop mitigation strategies



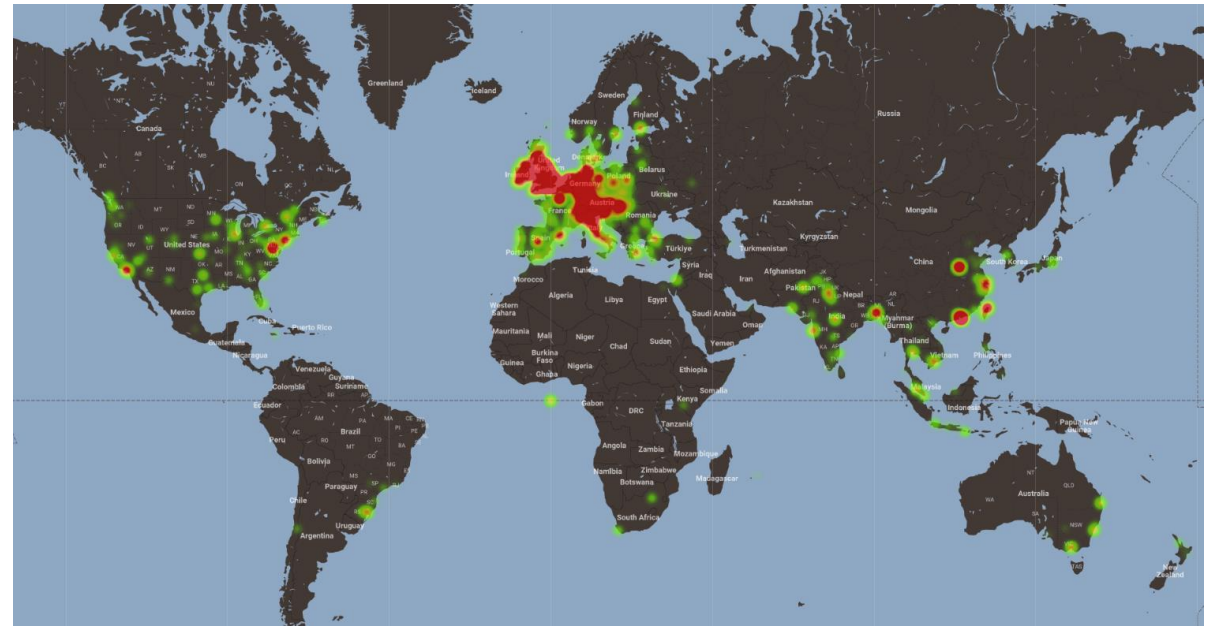
Sustainability Target Tracking

- SKU-level data
- Track buying team performance
- Bespoke reporting

Valpak Data Insights

Assisted **over 500 companies** since 2004, including **7 of UK's 10 largest grocery retailers currently**

Supports International Compliance services across **36 countries**



100,000

Supplier Data Hub Users



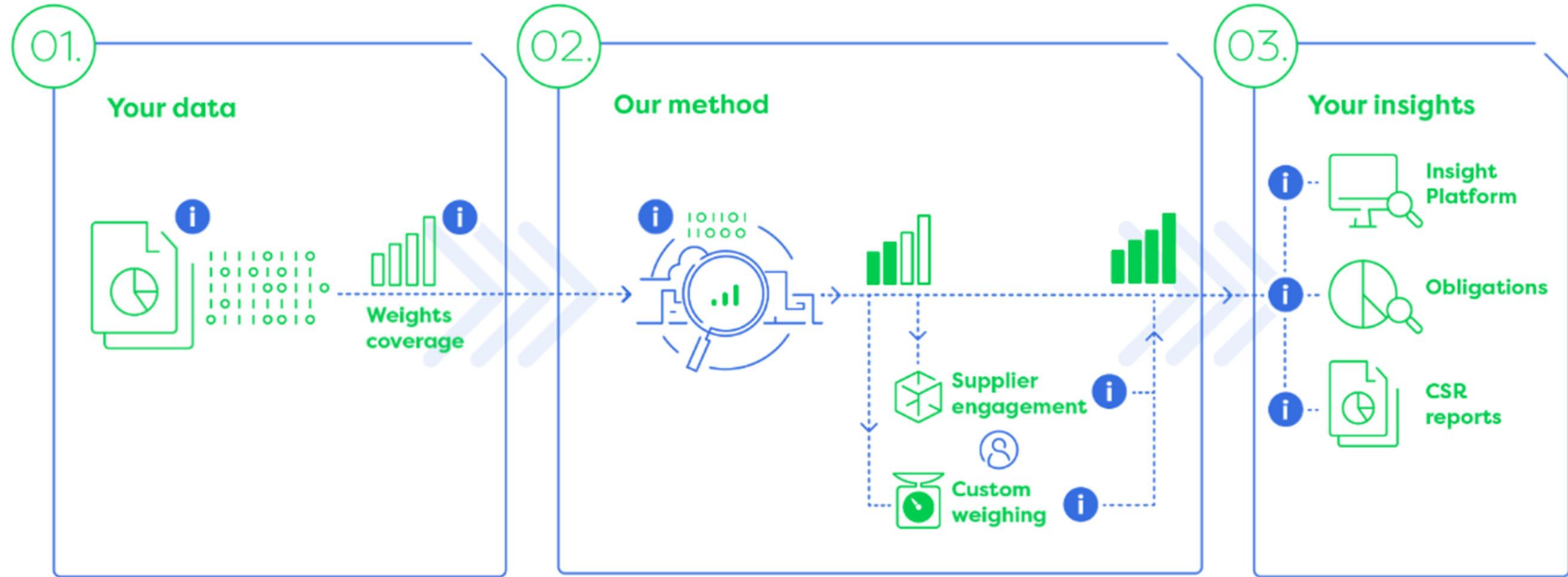
3,500,000

New packaging data entries in 2023

TESCO

“Tesco highly recommend the Insight Platform for anyone looking to get significantly increased value from their packaging data and is delighted to have supported Valpak in its development.”

Our Data Management Process



We utilise sophisticated data tools and compliance expertise to manage EPR requirements and beyond

Insights Platform

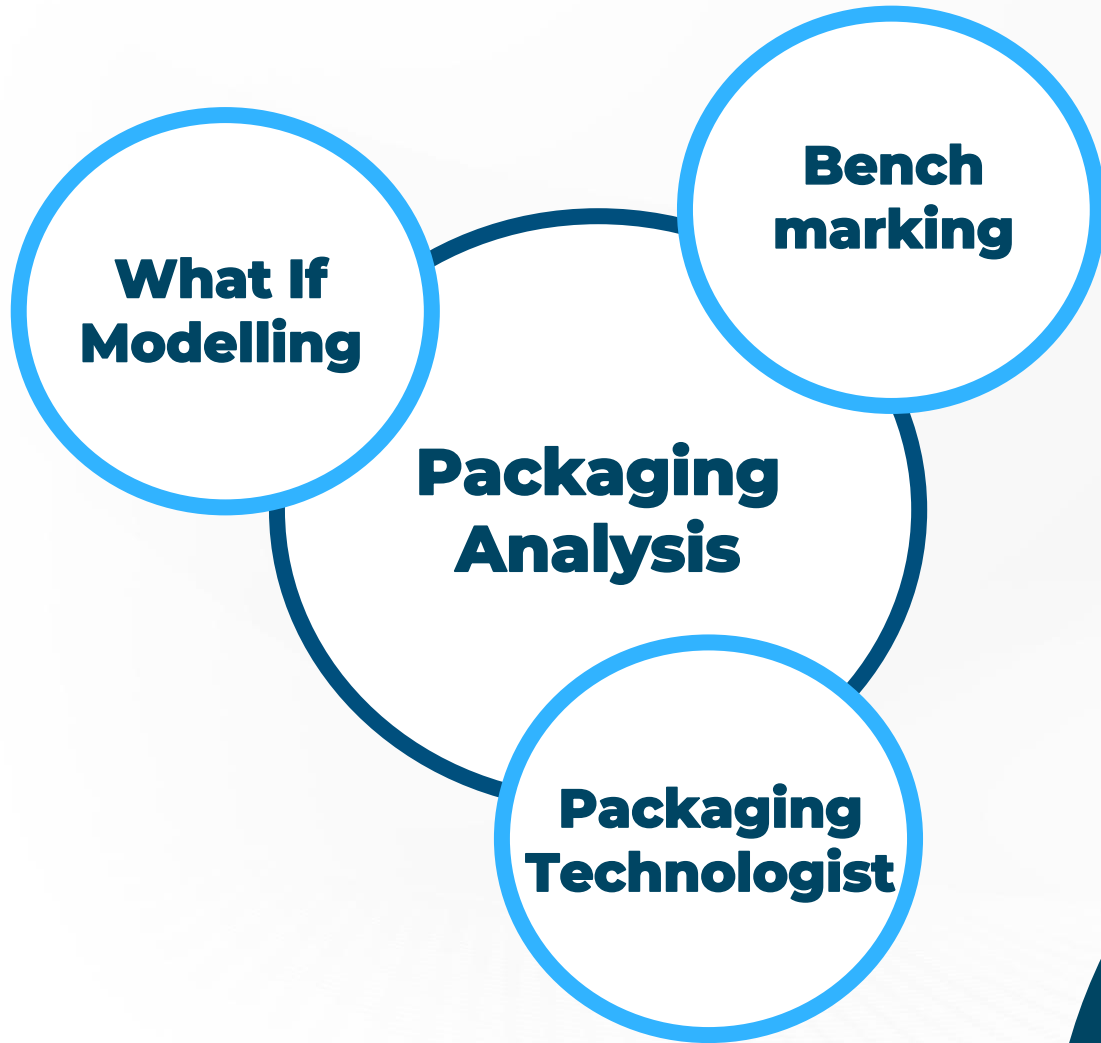
Customisable **online reporting tool** offering data transparency at SKU level.

- ❖ Granular data visibility
- ❖ EPR and Plastic Tax cost modelling
- ❖ Supplier assessment tools
- ❖ Sustainability target tracking

[Valpak Insight Platform - YouTube](#)



Packaging Analysis



Providing detailed analysis to help our members make data-backed, cost-saving packaging decisions

- Identify optimal target packaging
- Develop improvement strategies
- Model impacts

Cooking oil

Original total cost

£1,626k

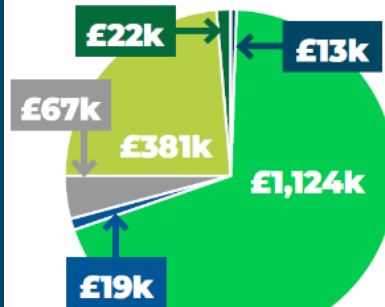
Best in class total

£1,284k

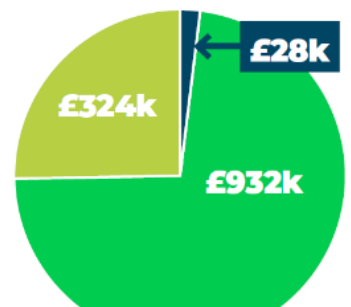
Potential saving

£342k

Original product cost material breakdown

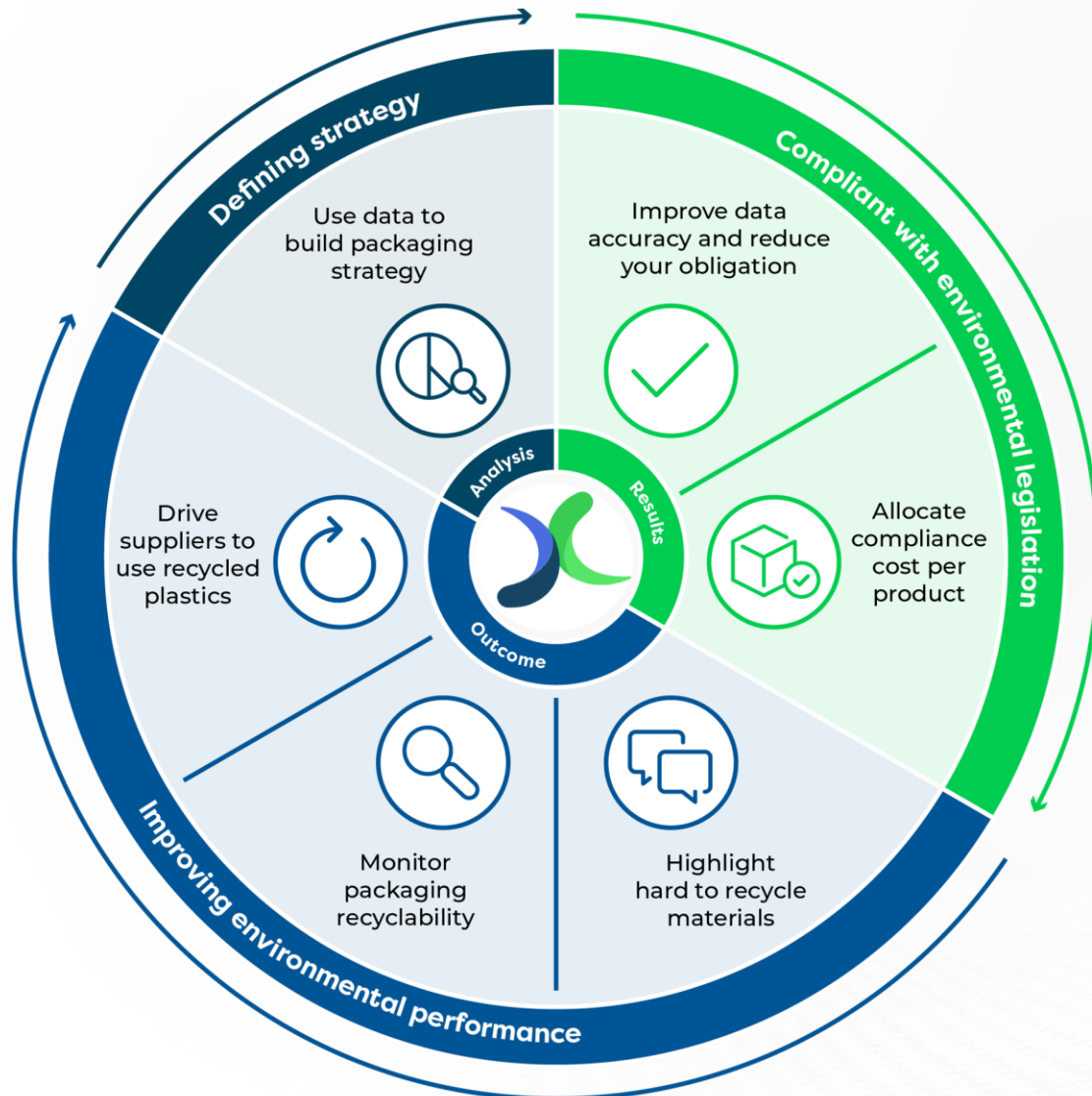


Best in class cost material breakdown



- Paper
- Green plastic
- Amber plastic
- Red plastic
- Glass
- Steel

Analysis in Practice



Benchmark grocery product packaging against best in class to explore innovative solutions

Material switching offers significant cost saving but other factors must be considered

Adopting **best-in-class designs in current materials could reduce EPR costs* by:**

26-48%
Wet Ingredients

78%
Dry Ingredients

*depending on unit size & material based on 2020 EPR estimates



Thank you

Questions?

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