Packaging EPR data requirements and timings

July 2024

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Agenda

1. Introduction to Ecosurety
2. Packaging EPR overview
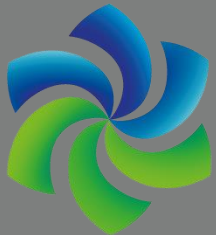3. Data collection and reporting requirements
4. Key changes
5. Q & A

Certified

B Corporation

This company meets the highest standards of social and environmental impact

Since April 2020

The first compliance scheme to be B Corp certified

We meet rigorous social and environmental standards for:

- Governance
- Workers
- Community
- Environment
- Customers

Best for the World 2022

Governance

Ranked in the top 5% worldwide in our group size for Governance since 2021

We've pledged to become net zero before 2030

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Background to Ecosurety

1000+ clients	67 employees	NPS score +57 classed as excellent	£92m turnover	1.2m tonne obligation

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A selection of our members

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Packaging EPR overview

The core principles of packaging EPR

Encourage a circular economy

Producers are more responsible for packaging waste to encourage:

- ✓ Less packaging
- ✓ Easily recyclable packaging
- ✓ Reusable packaging

A single point of compliance

100% of the packaging obligation sits with either the:

- ✓ Brand owner
- ✓ Importer
- ✓ Packer/filler
- ✓ Distributor
- ✓ Service provider
- ✓ Online marketplace

Full cost recovery

For packaging waste collected by Local Authorities from:
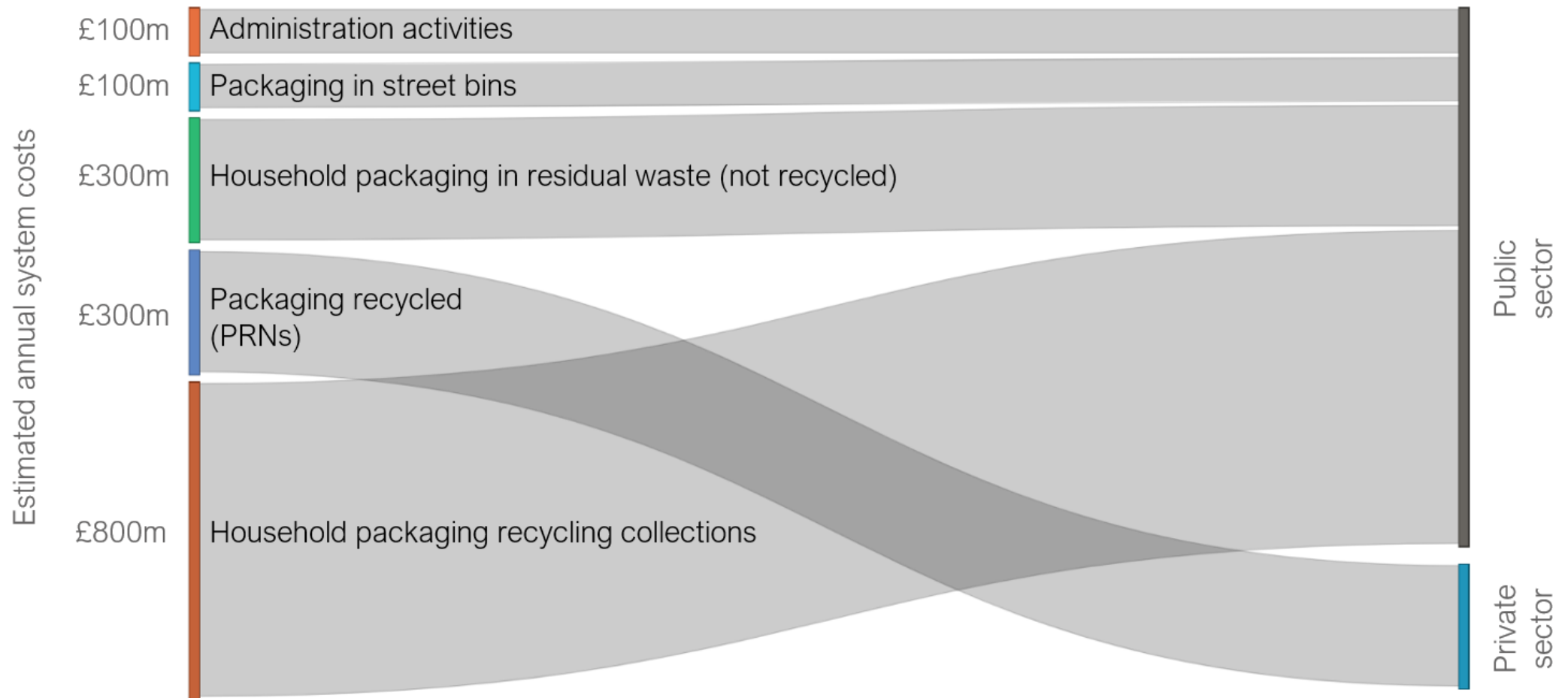
- ✓ Households
- ✓ Street bins

Eco-modulation of fees

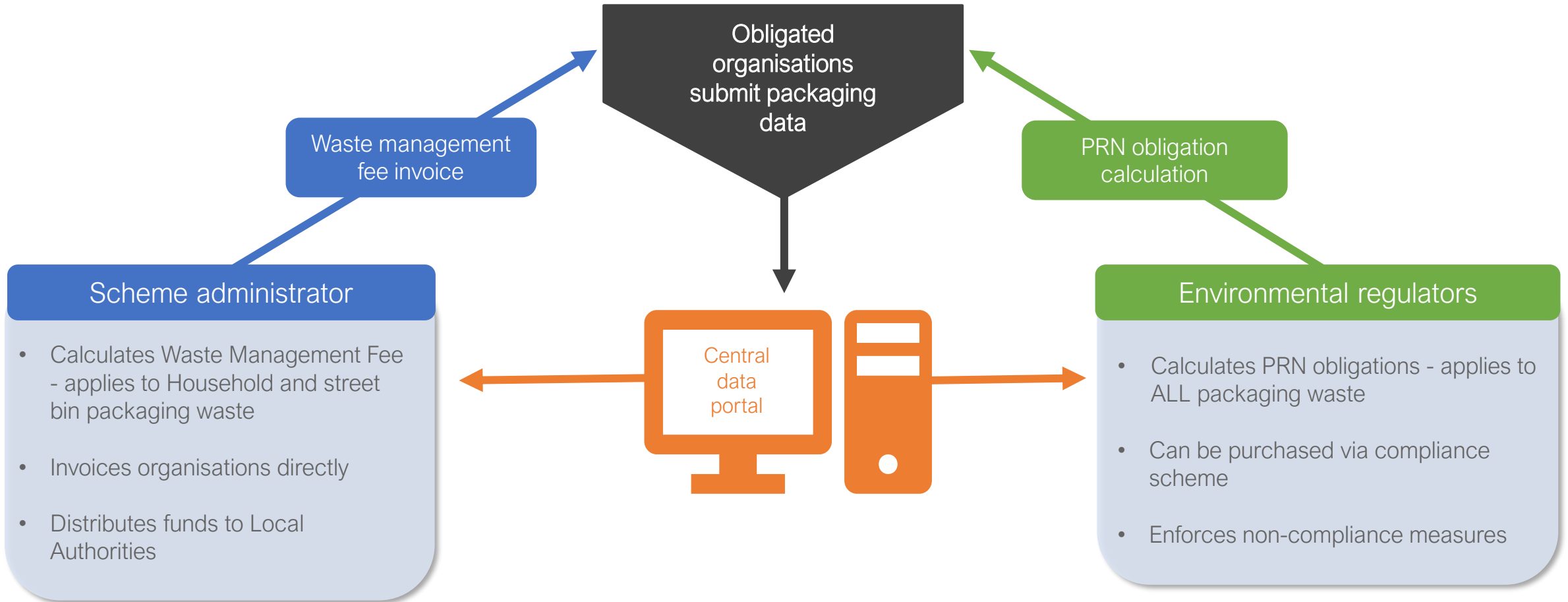Producer fee modulation on household packaging waste:

- ✓ Financially deter difficult to recyclable packaging
- ✓ Promote reusable packaging

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Packaging EPR system cost flows

Packaging EPR governance

Obligated organisations submit packaging data

Waste management fee invoice

PRN obligation calculation

Scheme administrator

- Calculates Waste Management Fee - applies to Household and street bin packaging waste

- Invoices organisations directly

- Distributes funds to Local Authorities

Central data portal

Environmental regulators

- Calculates PRN obligations - applies to ALL packaging waste

- Can be purchased via compliance scheme

- Enforces non-compliance measures

Drink containers in-scope of a live Deposit Return Scheme are not subject to PRNs or Waste Management Fees.

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Data collection and reporting requirements

Step 1: Check if you meet the main threshold

> £1 million annual turnover

+

> 25t packaging in previous year

+

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. Sells empty packaging

An organisation not meeting this criteria falls under the de minimis and has no reporting or financial obligations.

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Step 2: Identify if your organisation is small or large

Annual turnover

	£1m - £2m	> £2m
25 - 50 tonnes	Small organisation	Small organisation
> 50 tonnes	Small organisation	Large organisation

Annual packaging handled

Small organisations only have data reporting requirements whilst large organisations have data reporting requirements and financial obligations.

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Packaging EPR data requirements overview

From 1 January 2023 all obligated organisations must collect and report data on their packaging, including the:

New single point of compliance for EPR includes six activity categories.

1. Packaging activity
Your activity when handling or suppling the packaging

2. Packaging class
The functional role of the packaging

Includes primary, secondary, shipment and transit packaging.

A new data requirement used to determine waste management fees - includes household, non-household and street-binned.

3. Packaging type
The waste stream the packaging will likely end up as

4. Material & weight
Of each individual packaging component

New material categories and need to specify 'other' materials.

From 2025 requirement will increase with extended material data and recyclability assessment.

+

New requirement that applies if you sell, hire or loan out packaging, own an online marketplace or import packaging you discard.

5. Nation data
UK country packaging was sold, hired, loaned, gifted or discarded in

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There is another producer type 'Seller' that is used only in nation data reporting.

1. Packaging activity
Record the activity you performed for all packaging you handle or supply in these categories:

Reporting category	Brand owner	Packer/Filler	Importer	Distributor	New! Service provider	New! Online marketplace
Activity	Supplied under your brand	Packed or filled as unbranded packaging	Imported packaging to be sold in the UK	Supplied as empty packaging	Hired or loaned packaging	Non UK packaging sold via an online UK marketplace you own

Distributors who supply empty packaging must assume all packaging they supply is obligated, unless they can evidence that they supplied it to an obligated organisation.

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2. Packaging class
Record the function of the packaging you handle and supply in these categories:

Reporting category	Primary	Secondary	Shipment New!	Transit
Description	The individual container your products are sold to consumers in. Typically in direct contact with product and classed as a 'sales unit'.	Used to group multiple 'sales units' for selling or shipping. Sometimes used to display sales units in a shop.	Used for shipping single or multiple sales units directly to individual consumers, purchased online or mail order.	Used to group secondary packaging to protect them during transit.
Example	Steel tin and paper label reported as primary packaging	Cardboard box and plastic tape reported as secondary packaging	Plastic mailing bag reported as shipment packaging	Large cardboard boxes housing secondary packaging, plastic tape, pallet and shrink wrap reported as transit packaging

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	3. Packaging type Record the type of waste the packaging will likely end up as (multiple categories may be required)					New!
Reporting category	Household waste	Non-household waste	Packaging that commonly ends up in public bins	Drinks containers	Reusable packaging	Self-managed waste
Definition	Includes all primary and shipment packaging.	Includes all secondary and transit packaging.	Includes packaging that commonly ends up in street bins.	Includes drinks containers supplied in England, Wales or Northern Ireland.	Includes reusable items such as pallets.	Includes household waste collected via customer take-back and organisational waste collected internally or on site.
!	Evidence required to exclude primary and shipment packaging from household waste, if sold to a business user who discards it.	Evidence is required to report primary and shipment packaging as non-household.	For example packaging for takeaway food, on-the-go drinks and tobacco products	Includes bottles and cans made from PET, glass, steel or aluminium from 50ml to 3L.	Should only be reported the first time they are used, but first submission includes all reusable packaging already in use.	Can include other brands' packaging waste. Can be used to offset fees under certain conditions.

Drinks containers in scope of the Scottish Deposit Return system (DRS) are not captured in packaging EPR reporting.

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From 2025 the material reporting requirements are expected to be more far more detailed to include recyclability data.

4. Materials and weights
Record the kg of the packaging material you handle or supply in these categories:

Aluminium	New! Fibre-based composites	Glass	Paper or cardboard	Plastic	Steel	Wood	'Other'

New! 'Other' materials must be individually reported and could include:
bio-degradable plastics, cork, cotton, flax-based products, bamboo, rubber, silicone.

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Nation data applies to all household and non-household packaging.

5. Nation data

New!

Record where in the UK your packaging has been sold, hired, loaned, gifted or discarded if you:

- Supply filled or empty packaging directly to consumers in UK
- Supply empty packaging to UK organisations not obligated under EPR
- Hire or loan out reusable packaging
- Own an online marketplace where other organisations sell empty packaging and packaged goods to UK consumers
- Import packaging to UK that you discard without selling or exporting it

Data required	Activity supplied under	Nation sold, hired, loaned, gifted or discarded in	Packaging material & weight (kg)	Packaging class	Packaging type
Reporting category	Seller Importer Distributor Online marketplace Service provider	England Wales Scotland Northern Ireland	Plastic Wood Aluminium Steel Glass Paper/Card Fibre composite Other (specify)	Primary Secondary Shipment Transit	Total Household

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Data reporting frequency

Data reporting under the 2007 regulations will now continue until 2024, alongside new EPR data reporting

	2023												2024												2025											
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
2007 packaging waste regulations (Annual reporting)				2022 data												2023 data																				
EPR large org (Bi-annual reporting)								○		2023 H1 data						2023 H2 data					2024 H1 data							2024 H2 data						2025 H1 data		
EPR small org (Annual reporting)													○															2024 data								
EPR nation data (Annual reporting)																																				2024 data
Plastic Packaging Tax	●			●			●			●			●			●			●			●			●			●			●			●		
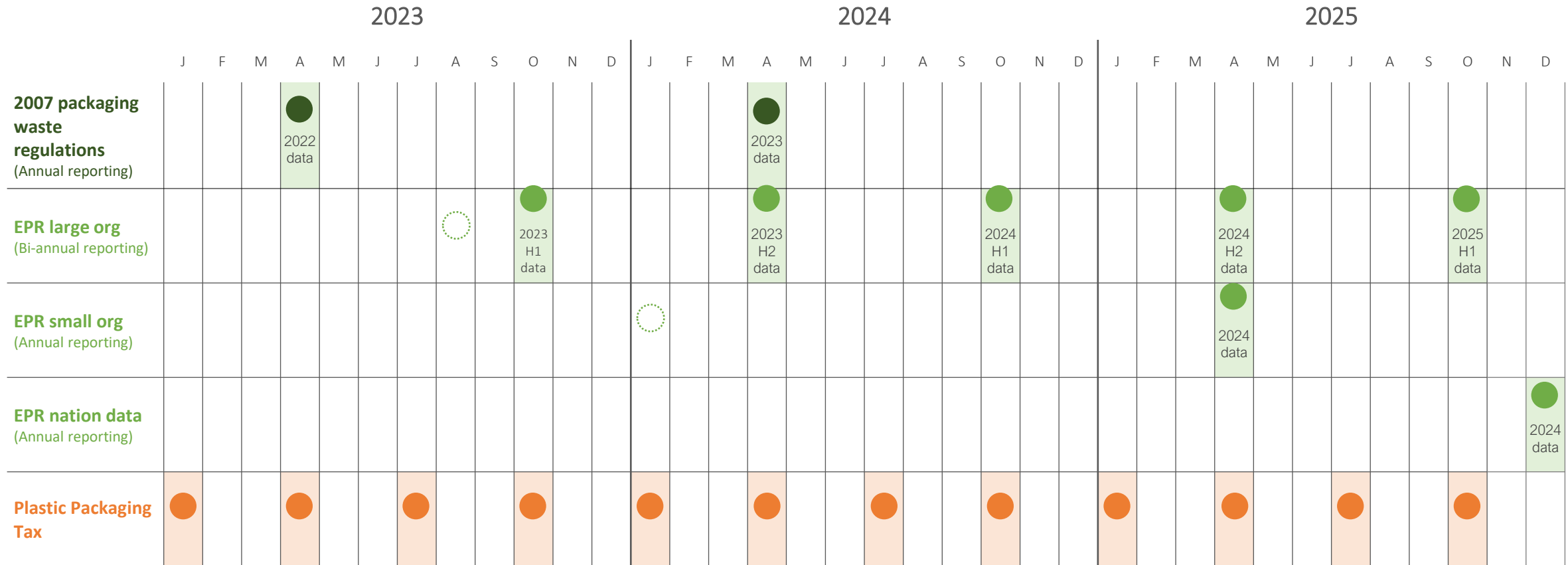
○ Registration opens   ● Data reporting deadline

Data reporting is by activity type

Individual data tables are used for Brand owner, Packer/filler, Distributor, Service Provider and Importer

Material	Household (kg)		Non-household (kg)				Commonly ends up in public bins (kg)	Household drink containers			Non-household drink containers			Re-usable packaging (kg)	
	Primary	Shipment	Primary	Secondary	Shipment	Tertiary		Weight (kg)	Quantity (units)	Av. Weight (kg)	Weight (kg)	Quantity (units)	Av. Weight (kg)	Primary	Non-primary
Plastic															
Wood															
Aluminium															
Steel															
Glass															
Paper / Card															
Fibre Composite															
Other (specify below):															
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Brand owner

A breakdown of self-managed waste data is reported in another table

Even if some secondary packaging ends up as household waste, it is reported under non-household as it can only pick up a PRN obligation

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Reporting self-managed waste

The breakdown of self-managed waste must include the country of origin and where it was transferred to in the UK for recycling

Material	Self-managed consumer waste (kg)															
	From England				From Scotland				From Wales				From Northern Ireland			
	To England	To Scotland	To Wales	To Northern Ireland	To England	To Scotland	To Wales	To Northern Ireland	To England	To Scotland	To Wales	To Northern Ireland	To England	To Scotland	To Wales	To Northern Ireland
Plastic																
Wood																
Aluminium																
Steel																
Glass																
Paper / Card																
Fibre Composite																
Other (specify below):																
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Only HH packaging waste that less than 25% UK local authorities collect for recycling can be offset against EPR fees. Evidence of recycling must be submitted

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Reporting nation data

Seller - Total Packaging

	England				Scotland				Wales				Northern Ireland			
	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit
Plastic																
Wood																
Aluminium																
Steel																
Glass																
Paper / Card																
Fibre Composite																
Other (specify)																

> Individual data tables are used for Seller, Importer, Distributor, Service Provider and Online Marketplace

Seller - Household Only

	England				Scotland				Wales				Northern Ireland			
	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit	Primary	Secondary	Shipment	Transit
Plastic																
Wood																
Aluminium																
Steel																
Glass																
Paper / Card																
Fibre Composite																
Other (specify)																

> Household only packaging must also be reported along with the total amount

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This data reporting form is draft and illustrative only - final format is to be confirmed!

Changes to reporting

Definition of household packaging

Test 1

The packaging is supplied directly to a business or public institution that removes the packaging. The packaging may be removed because they are the end-user, or they are removing it before supplying it on to the end-user.

Test 2

It is packaging for a product that is designed only for use by a business or public institution, AND the packaging for that product is not reasonably likely to be disposed of in a household or public bin.

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Drinks containers

1. Drinks containers in scope of the Scottish DRS no longer exempt from EPR reporting

2. Glass, PET, steel & aluminium containers reported under drinks container reporting category.

   Only ancillary components to glass containers reported under primary packaging.

3. "… any PET, glass, steel or aluminium container… not 'conceived, designed or marketed' to be refilled/reused".

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Brand-owner obligations

✓ Group filled and multi-branded packaging
   "first supply once filled"

✓ Definition of brand-owner
   "relating to the product not the packaging"

Additional reporting obligations for 2024 data

Importers

- Unfilled packaging discarded after import, unless brand-owner responsible
- Overseas owned branded packaging, packed by UK third party

Packer fillers

- Branded packaging on behalf of a small organisation
- The brand does not relate to the product
- The brand is owned by a non-UK company

Distributors

Must report all empty packaging other than:

- Sold to a large organisation that pack/fills it
- Sold to a large organisation that brands it

Any questions?

Thank you

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