



New registration and data reporting requirements under packaging EPR

16 May 2024

Collection and Packaging Reforms

Today's webinar will be hosted by:

Jim Bligh– Corporate Affairs & Packaging Director, FDF

Peter Collins– Head of Digital, Collection & Packaging Reforms, DEFRA

Natalie Aldridge– Digital Team Lead, DEFRA

Mark Simmons- Deputy Service Owner, Report Packaging Data, DEFRA

Joanna Carew– Head of Communications & Engagement, Resources and Waste, DEFRA

The FDF is a powerful voice for the UK's vibrant, resilient and diverse food and drink manufacturing industry.

For over 100 years, we have successfully contributed to policy making and legislative development, championing our members' views – large and small – on the critical issues of the day.

With more than 1,000 members – from the most recognisable global brands to the most innovative start-ups – we represent the largest manufacturing sector in the country.

Services the FDF provides on packaging:

- Access to expert teams in London, Edinburgh and Cardiff, providing insight, intelligence and counsel on the fast-moving developments in packaging, policy and regulation
- Opportunities to engage with senior officials, ministers and other stakeholders to shape the debate on the future of packaging
- Support with understanding what the packaging reforms mean for your business
- Chance to feed into the development of a Producer Responsibility Organisation to support the roll-out of an efficient and effective EPR scheme
- Frequent peer-to-peer networking, events, committees and more

Packaging & Corporate Affairs

Jim Bligh – Director of Corporate Affairs & Packaging – Jim.Bligh@fdf.org.uk

David Bellamy – Head of Packaging – David.Bellamy@fdf.org.uk

Harry Cobbold – Public Affairs Manager – Harry.Cobbold@fdf.org.uk

Membership

Claire Conquest – Head of Membership – member.enquiries@fdf.org.uk

Agenda Items

- Overview of CPR Reform
- The need for timely and accurate data
- Who is affected?
- How to register your business on the RPD portal
- What data to collect and how to format it
- The role of Compliance Schemes



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Overview of the CPR reforms

The Collection and Packaging Reforms (CPR)

What are The Collection and Packaging Reforms?



- The Extended Producer Responsibility scheme for packaging (EPR)
- The Deposit Return Scheme for drinks containers (DRS)
- Simpler Recycling
- Digital Waste Tracking



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The need for timely and accurate data

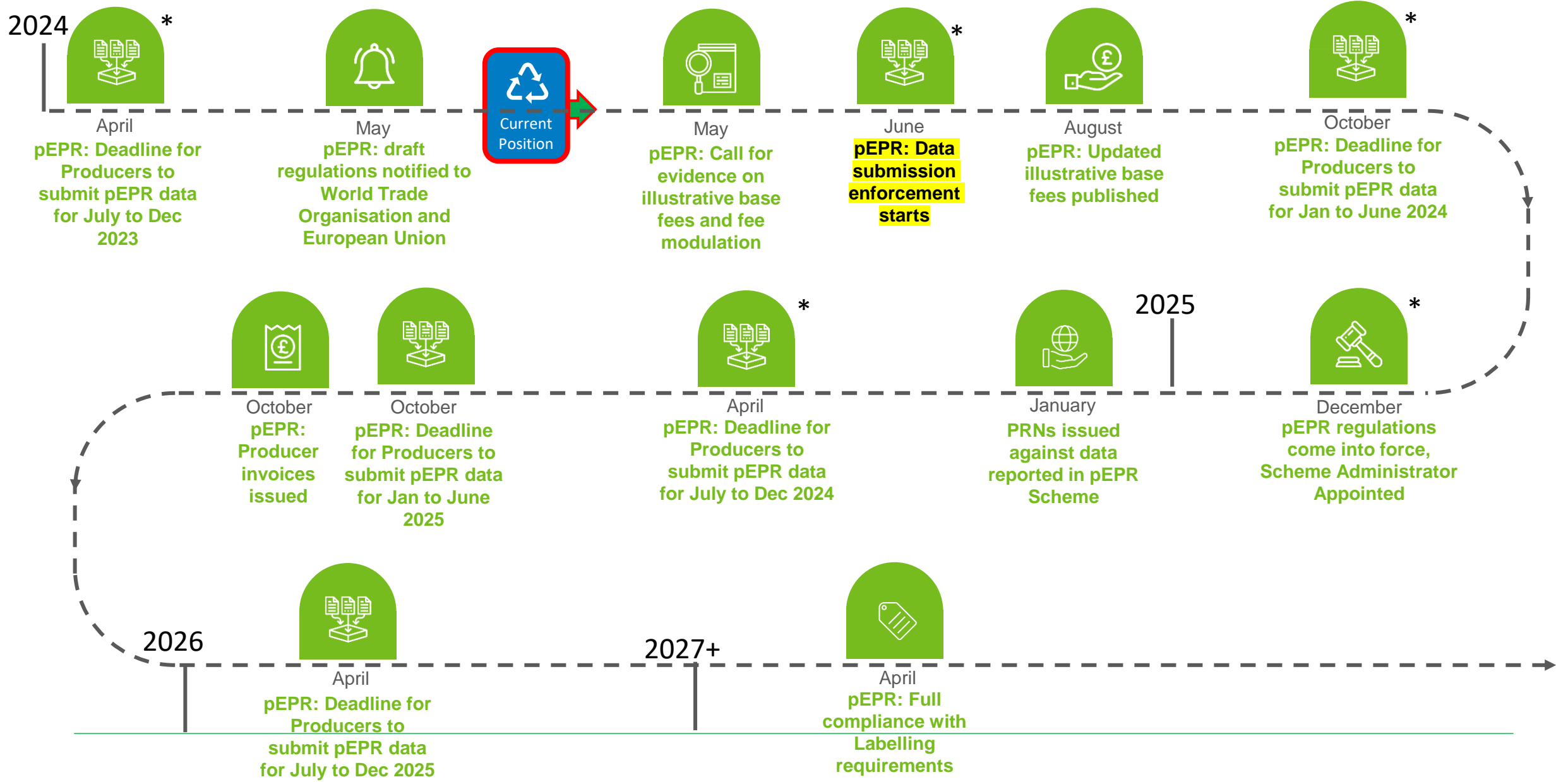
Report your data

Please remember to submit your organisation details and EPR packaging data on time.

If your organisation needs to report data under the new Extended Producer Responsibility for packaging (EPR) scheme, the deadline for submitting your 2023 data was 1 April 2024. Where applicable, no enforcement action will be taken on late submission if your 2023 EPR data is submitted by 31 May 2024.

Packaging Producers pEPR Timeline

May 2024 – Dates shown are subject to change





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Who is affected?

Producer groups – de minimis thresholds

Not all businesses need to report data – there is a threshold, determined by placed on the market tonnages and business turnover, which aligns with RPD current and future functionality

Waste Cost and Recycling Obligations		Turnover		
		< £1m	£1m - £2m	> £2m
Packaging Tonnage	< 25 tonnes	No Obligation	No Obligation	No Obligation
	25 - 50 tonnes	No Obligation	Report Data for 2024 via RPD in 2025	Report Data for 2024 via RPD in 2025
	> 50 tonnes	No Obligation	Report Data for 2024 via RPD in 2025	Report Data for 2023 via RPD now

Report Packaging Data – report your 2023 packaging data

Producer nation	Jan to June (report by Oct 1 2023)	July to Dec (Report by April 1 2024)
England	1 March - 30 June	1 July - 31 December
Northern Ireland	1 March - 30 June	1 July - 31 December
Scotland	1 March - 30 June	1 July - 31 December
Wales	Not required	17 July to 31 December

- The EPR regulations vary slightly in each nation, so the reporting schedules vary slightly between nations. We request that organisations in all four nations of the UK report the full data set from 1 January – 31 December if they are able to do so.
 - Large organisations in England, Scotland and Northern Ireland should submit packaging data by:
 - 1 October 2023 to report for January to June 2023
 - 1 April 2024 to report for July to December 2023
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Report Packaging Data – report your 2023 packaging data

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Scotland	1 March - 30 June	1 July - 31 December
Wales	Not required	17 July to 31 December

- In 2023, obligated producers in Wales do not have to report data from January to June, but may choose to report that data if they wish.
 - Small producers do not need to report packaging data this year or enrol on RPD. Small Producers will submit one set of data – from January to December.
 - **This report is in addition to the normal report that was due into NPWD by 7th April**
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How to enrol your business on the Report Packaging Data service

Report Packaging Data – What do producers need to do?

- Large producers must report their packaging data to the regulator by creating an account on the new Report Packaging Data (RPD) online service via Gov.uk and enrolling as a producer.
 - You can use your account to:
 - tell us your organisation details
 - report packaging data
 - tell us if you're working with a compliance scheme
 - If you need help enrolling with RPD or have a question about it, you can contact the service helpdesk.
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Report Packaging Data – Report Organisation Details

- After you have enrolled on RPD, you will need to submit your organisation details, including:
 - address
 - packaging activities
 - the people who'll be verifying and submitting your data
- You may also need to report additional details for your organisations, such as brand information or partner information.
- You should submit your organisation details in a CSV file. There is guidance on Gov.uk to help you do this, including how to structure your CSV file, or downloadable templates:

<https://www.gov.uk/government/publications/organisation-details-how-to-create-your-file-for-extended-producer-responsibility-epr-for-packaging>



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How to collect and report your packaging data

Report Packaging Data – Report 2023 PoM data

- Your packaging data submission must include the following information:
 - packaging activity – this is how you supplied the packaging
 - packaging type – for example, if the packaging is household or non-household
 - packaging class - whether the packaging is primary, secondary, shipment or tertiary
 - packaging material and weight
 - For a detailed description of the different types of data you need to submit, please see guidance on [Gov.uk](https://www.gov.uk)
 - You should include all the required packaging data in a single CSV file. You'll be able to upload this file to the report packaging data (RPD) service.
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Report Packaging Data – Packaging Type

- Large organisations will also need to report the type of packaging you supply or import, and whether your packaging is any of the following:
 - Household (classed as either primary or shipment packaging)
 - Non-household (classed as either secondary or tertiary packaging)
 - Commonly ends up in public bins – you do not also need to report this as household.
 - Is a drinks container (Scotland **excluded**)
 - Is reusable
 - Becomes self-managed waste, classed as either of the following:
 - Consumer waste
 - Organisation waste
 - We encourage you to visit the Gov.uk guidance to understand the different rules around how to report your packaging data: <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility>
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Report Packaging Data – Packaging Activities

When you report your packaging data, you will need to tell us what your organisation's role was when you supplied packaging to the UK:

- **Supplied under your brand**– Organisations who either put goods into packaging, or have goods put into packaging, and place those goods on the UK market under their brand name.
- **Packed or filled** – If you pack or fill unbranded packaging that you own, you should report it in this category. This could be for goods you packaged for your own organisation or for another organisation.
- **Imported** – Organisations who import some filled or unfilled packaging, that you have gone on to supply or discard in UK.

Report Packaging Data – Packaging Activities

- **Hired or loaned** – Organisations who hire out or loan out reusable packaging. You only need to report this packaging the first time it's supplied.
- **Supplied as empty** – Organisations who manufacture or import empty packaging, which is then supplied to an organisation that is not classed as a large organisation (2023 only). Please see Gov.uk guidance for changes to reporting in 2024.
- **Online marketplace** – Under EPR for packaging, you're classed as owning an online marketplace if you operate a website or app that allows non-UK businesses to sell their goods into the UK.

It is possible for a single business/organisation to be more than one producer type

Report Packaging Data – What is packaging class?

Packaging is; products made of any materials which are used for the containment, protection, handling, delivery and presentation of goods from the producer to the user or the consumer. This includes anything that is intended to be filled at the point of sale.

There are different classes of packaging; Primary, Secondary, Shipment and Tertiary.

- **Primary** – primary packaging is the packaging that is in direct contact with the product; it constitutes a sales unit to the final user or consumer at point of purchase
 - **Secondary** – secondary packaging is used to group several individual 'sales units' for selling or shipping purposes
 - **Shipment** – shipment packaging is a type of secondary packaging for shipping single or multiple 'sales units' which have been purchased online or by mail order to consumers
 - **Tertiary** – tertiary or transit packaging is used to group secondary packaging units together to facilitate their transport and to protect them while being transported or handled
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Packaging Class Examples – Primary Packaging

- **Primary** – primary packaging is the packaging that is in direct contact with the product; it constitutes a sales unit to sell to customers
- **Example:** a steel can containing beans = beans, steel can and a paper label
- ✓ The primary packaging would be the steel can with a paper label



Packaging Class Examples – Secondary Packaging

- **Secondary** – secondary packaging is used to group several individual 'sales units' for selling or shipping purposes
- **Example:** 24 tins of beans in a cardboard box = beans, 24 cans, a paper label on each can, all placed in a cardboard box
- ✓ The secondary packaging would be the cardboard box



Packaging Class Examples – Shipment Packaging

- **Shipment** - Shipment packaging is any packaging added to primary packaging for shipping single or multiple sales units to businesses or consumers.
- **Example:** a mobile phone packaged in a cardboard box and then placed into a mail bag before shipping
- ✓ The shipment packaging would be the mail bag



Packaging Class Examples – Tertiary or Transit Packaging

- **Tertiary** – tertiary or transit packaging is used to group secondary packaging units together to facilitate their transport and to protect them while being transported or handled
- **Example:** if secondary packaging units are placed into larger cardboard boxes, that are sealed with parcel tape and put onto wooden pallets to be transported
- ✓ The tertiary packaging would be 'cardboard box', 'parcel tape' and 'wooden pallet'



Report Packaging Data – Packaging Materials

- After you've categorised your data into the relevant packaging activities, you must report the weight of the individual materials.
 - The packaging material weight should be given in kilograms (kg).
 - You should report your data in the following categories:
 - Aluminium
 - Fibre-based composite
 - Glass
 - Paper or cardboard
 - Plastic
 - Steel
 - Wood
 - 'Other'
 - Composite packaging is made up of 2 or more layers of different materials, that cannot be separated by hand.
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How to report your packaging data on RPD

How to report your packaging data on RPD

- If you are a large organisation, to upload your packaging data into the Report Packaging Data online service, you must have already created an account and enrolled as a producer.
 - You should submit your packaging data in a CSV file. There is guidance on Gov.uk to help you do this. If you need help creating a packaging data CSV, you can use the 'generate a packaging data file' tool to:
 - generate a valid packaging data file
 - check how your file should be structured before creating one yourself
 - You can also use the example packaging data file to see how you should structure your data submission.
 - Please see the online guidance to access these materials:
<https://www.gov.uk/government/publications/packaging-data-how-to-create-your-file-for-extended-producer-responsibility>
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Report Packaging Data – Example output file

A1 organisation_id

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
organisation	subsidiary_ic	organisation	submission_	packaging_a	packaging_t	packaging_c	packaging_r	packaging_r	from_countr	to_country	packaging_r	packaging_material_units		
100001		L	2023-P3		CW	O1	PL		EN		2000			
100001		L	2023-P3		CW	O1	PL		WS		1500			
100001		L	2023-P3		CW	O1	PL		SC		1800			
100001		L	2023-P3		CW	O1	PL		NI		50			
100001		L	2023-P3		CW	O1	PL		EN	SC	2000			
100001		L	2023-P3		CW	O1	PL		WS	SC	1500			
100001		L	2023-P3		CW	O1	PL		NI	SC	50			
100001		L	2023-P3		OW	O2	PL		EN		400000			
100001		L	2023-P3		OW	O2	PL		WS		30000			
100001		L	2023-P3		OW	O2	PL		SC		35000			
100001		L	2023-P3		OW	O2	PL		NI		10000			
100001		L	2023-P3		OW	O2	WD		EN		40000			
100001		L	2023-P3		OW	O2	WD		WS		3000			
100001		L	2023-P3		OW	O2	WD		SC		3500			
100001		L	2023-P3		OW	O2	WD		NI		1000			
100001		L	2023-P3		OW	O2	PC		EN		16000			
100001		L	2023-P3		OW	O2	PC		WS		1200			
100001		L	2023-P3		OW	O2	PC		SC		1400			
100001		L	2023-P3		OW	O2	PC		NI		400			

Report Packaging Data – access IT support

- It is important that you act now to submit your packaging data before the May 31st deadline.
 - If you need help submitting your packaging data or interacting with the RPD service, you can contact the Defra service helpdesk for support with the following activities:
 - Creating an account
 - Delegating access to your account
 - Creating and uploading your CSV file for your packaging and organisation details
 - File validation
 - Aligning with a compliance scheme
 - Telephone: 0300 060 0002
 - Email: EPRCustomerService@defra.gov.uk
 - You can access guidance on how to report your packaging data on Gov.uk, as well as templates and examples to help you construct your data file. Bite Size Learning Videos are available on the Defra YouTube channel and provide step by step guides to help you create an account for your organisation and report your packaging data.
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Report Packaging Data – access compliance support

- It is important that you act now to submit your packaging data before the May 31st deadline.
 - For questions on compliance, please contact your relevant environmental regulator:
 - For England, Environment Agency. Email: *packagingproducers@environment-agency.gov.uk*
 - For Wales, Natural Resources Wales. Email: *packaging@naturalresourceswales.gov.uk*
 - For Northern Ireland, Northern Ireland Environment Agency. Email: *packaging@daera-ni.gov.uk*
 - For Scotland, Scottish Environment Protection Agency. Email: *producer.responsibility@sepa.org.uk*
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Aligning with a compliance scheme

Aligning with a compliance scheme

- If your organisation needs help to meet your obligations under EPR for packaging, you can join a compliance scheme. There is no requirement to join a compliance scheme if you don't want to.
 - Compliance schemes can:
 - pay your registration fees
 - get PRNs or PERNs to meet your recycling obligations
 - report your packaging data
 - If you choose to work with a compliance scheme, you should make sure they appear on the [compliance scheme public register](#).
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Aligning with a compliance scheme

- If you join a compliance scheme, you will need to align with them digitally on the Report Packaging Service
 - You will still need to create an account for your own organisation on RPD
 - Add your compliance scheme to your RPD account
 - You will then provide your organisation details and packaging data to your compliance scheme, who will provide your data to us via RPD. You will not need to upload your data to RPD.
 - A compliance scheme cannot make your waste management payments.
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What you must do now:

Please report your packaging data by 31st May

Questions

