

YOUR TOOLKIT TO
**EXTENDED PRODUCER
RESPONSIBILITY (EPR)
FOR PACKAGING**

WASTEPACK





OVERVIEW OF EPR



EPR regulations, or Extended Producer Responsibility, is government legislation that aims to make producers responsible for the entire lifecycle of the packaging around their products.

Under the UK packaging EPR scheme, producers must report data on the packaging they supply, and pay fees that offset the costs of collecting, sorting, and recycling packaging at end of life.

The regulations also aim to encourage the use of more sustainable and recyclable packaging by placing higher LA Waste Disposal fees on packaging that is more difficult to recycle.

*At Wastepack, we help producers like you comply with EPR legislation - from data collation to reporting and meeting financial obligations. Join **over 1,500 producers simplifying compliance** with Wastepack.*



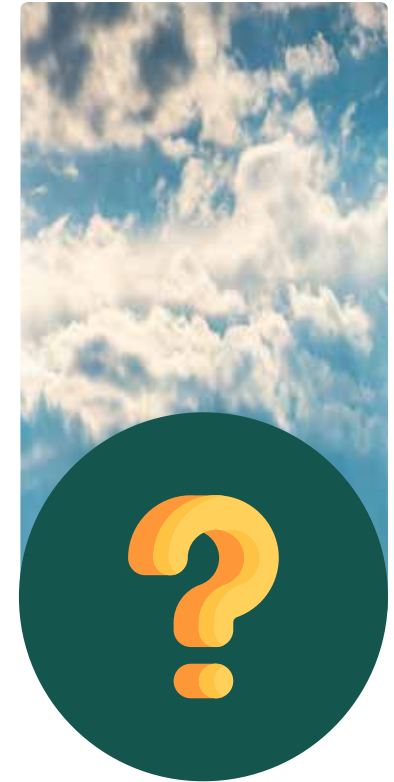
INPUT FOR EPR DATA AND REPORTING



EPR reporting should not fall in its entirety to a single staff member. From setting a procurement policy to tracking exports, many colleagues may have an input in managing the packaging inputs, data gathering and reporting across the business.

	DEPARTMENT	ROLES	POSSIBLE EPR DATA CONTRIBUTIONS
Operations & Supply Chain	Packaging Engineering	Packaging Engineering	Designs packaging formats, selects materials, maintains specs including weights and recyclability
	Procurement / Purchasing	Buyer, Procurement Specialist	Sources packaging, requests supplier data sheets and certifications
	Supply Chain Management	Supply Chain Analyst, Logistics Coordinator	Tracks packaging volumes, material flows, and supports data aggregation
Product & Design	Product Development	Product Manager, R&D Lead	Oversees packaging format decisions during product design
	Design / Creative	Packaging Designer, Graphic Designer	Selects substrates and liaises with printers; may influence recyclability and material choices
	Quality Assurance	QA/QC Lead	Verifies packaging against specifications; may weigh samples and confirm compliance
Sustainability & Compliance	Sustainability / ESG	Sustainability Manager, Environmental Analyst	Tracks recyclability, aligns packaging data with reporting frameworks (e.g. EPR, GHG)
	Regulatory Affairs	Compliance Officer, Regulatory Specialist	Ensures packaging formats and data meet legal requirements; interprets legislation
	Health, Safety & Environment (HSE)	HSE Coordinator	May contribute to environmental impact assessments of packaging materials
Data & Reporting	Business Intelligence / Reporting	Data Analyst, Reporting Specialist	Aggregates packaging data for dashboards and external submissions
	Finance / Costing	Cost Accountant, Finance Analyst	Tracks packaging costs and may assist in calculating packaging weight per unit
Legal / Contracts	Supplier Management / Vendor Relations	Supplier Account Manager	Requests and verifies packaging specs and recyclability data from suppliers
	Legal / Contracts	Legal Counsel, Contracts Manager	Ensures supplier agreements include packaging data obligations

BRIEFING INFORMATION FOR COLLEAGUES



Once you have identified who must play a role in your organisation’s packaging requirements and EPR reporting, the following briefing note is a good start to explain what the requirements are:

Who is Affected?

Any business that supplies/imports packaging or packaged goods in the UK (brand owners, packers/fillers, importers, distributors, online marketplaces, service providers) and where the turnover exceeds £25m and supplies more than 25 tonnes of packaging.

1. A **Large Producer** has an annual turnover exceeding £2m per annum and *supplies more than 50 tonnes of packaging per year.
2. A **Small Producer** has an annual turnover between £1m - £2m and *supplies between 25-50 tonnes of packaging per year.

Producers must **register, report, and pay fees** for the packaging they place on the market, ensuring recycling and disposal costs are covered.

**In this context, “supply” refers to situations where an organisation either provides packaging itself or delivers goods that come packaged around the products. Charities are exempt.*

Under EPR, key thresholds determine whether an obligated producer is classified as a Small Producer (SP) or a Large Producer (LP).

- **Small Producers (SPs)** are subject to annual data reporting requirements.
- **Large Producers (LPs)** must meet biannual reporting obligations and annual financing responsibilities. These financing requirements include Recycling Obligations, and - where household packaging is involved - Local Authority (LA) Waste Disposal Fee obligations as well.

The table shows the thresholds which relate to the annual turnover, and the packaging tonnage supplied or imported in a calendar year by the business.

	TURNOVER		
	Under £1m	£1m - £2m	More than £2m
PACKAGING TONNAGE SUPPLIED OR IMPORTED IN AGGREGATE IN A CALENDAR YEAR	Under 25 Tonnes	No Obligation	No Obligation
	25 - 50 Tonnes	No Obligation	Small Producer
	More than 50 Tonnes	No Obligation	Small Producer
			Large Producer

STRATEGIES TO SIMPLIFY YOUR EPR DATA GATHERING

Depending on how many different products and packaging components you supply, it may be sensible to select items to gather packaging data on based on highest volumes of sales and extrapolate to remaining stock items.

Pick a sensible percentage of overall packaging to sample (e.g. 5%, 10% etc.).

You can start with a small sample and build your internal data base of packaging data over time.

Supplier Data

- Request **packaging specifications and weights** directly from manufacturers or suppliers.
- Often available in technical sheets or product specifications.
- Reduces internal workload but requires validation to ensure accuracy.

Bill of Materials (BOM) or ERP System Data

- Extract packaging weight information from **internal systems** (ERP, BOM, or product databases).
- Ensures consistency across reporting periods.
- Requires systems to be kept up to date with supplier changes.

Direct Weighing

- **Weigh packaging components individually** (e.g., bottles, caps, labels, boxes, pallets).
- Use calibrated scales to ensure accuracy.
- Best for businesses with manageable product ranges or when precision is critical.

Sampling & Averaging

- Weigh a **representative sample** of packaging items (e.g., 10 units per SKU).
- Calculate an **average weight** and apply it across all units sold.
- Useful for high-volume packaging where weighing every item is impractical.

Transport / Tertiary Packaging Recording Options

(pallets, shrink wrap, trays)

- **Per consignment method** weigh packaging used per shipment.
- **Per pallet type method** record standard weights for each pallet type.
- **Per unit method** assign packaging weight per product unit.
- **Hybrid method** combines approaches depending on warehouse operations.



KEY COMPLIANCE NOTES

1. Your data must be “as accurate as reasonably possible”.
2. Your chosen method must be consistent and auditable.
3. Regulators may request evidence of how weights were determined.
4. Methodologies should be updated when packaging materials or suppliers change.

Best Practice Tip: Combine **supplier data** with **sampling checks** to balance efficiency and accuracy. Document your chosen method clearly in case of regulator monitoring visit.

Record-Keeping & Evidence

- Keep data and evidence for **7 years** after each reporting period.
- **Evidence required:**
 - Weight of packaging supplied (by material).
 - Proof packaging weights used to calculate reports.
 - Proof of packaging exported outside the UK.
 - Documentation of mergers, acquisitions, or transfers of brands/businesses.



Need support with your EPR compliance?

The Wastepack Scheme Membership covers a range of essential services from data reporting and obligation management, including access to important resources for optimised compliance.

Find out more by contacting our team on 01279 620000 or email sales@wastepack.co.uk



Ready to Simplify Compliance?

Contact our expert team today to learn more...

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