

Packaging data: what to collect for extended producer responsibility

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A guide to collecting data about your packaging. This is for UK organisations affected by extended producer responsibility (EPR) for packaging.

As a large or small organisation affected by EPR for packaging, you must collect and report data about the packaging you supply within or to the UK market.

Find out if you're affected by EPR for packaging rules.

The data you report will be used to calculate your recycling obligations and any waste disposal fees.

Data you must collect and report

The data you must collect and report depends on whether you're considered a large or small organisation (also referred to as large and small 'producers' under EPR). Check if you're considered a large or small producer.

It also depends on whether the packaging is supplied by an organisation that's established in the UK.

You must keep your data and the evidence for your data for at least 7 years.

Large producers

You must report:

- packaging activity data - for example, supplying under your brand, packing or filling, or importing
- packaging type data - for example, if the packaging is household or non-household
- packaging class data - whether the packaging is primary, secondary, shipment or tertiary
- packaging material and weight data

You may also need to report nation data. This is information about which nation in the UK packaging is supplied in and which nation in the UK packaging is discarded in.

Recyclability information

You must also collect information about the recyclability of some packaging. Find out about the recyclability assessment methodology (RAM).

Read PackUK's statement on recyclability assessment. This links to regulatory position statements from each of the four regulators. Check the statement from your regulator to understand how this affects your data submission.

Small producers

You must report:

- packaging activity data
- packaging class data
- packaging material and weight data

Only use these codes in your reporting:

- SP (small organisation packaging - all)
- HDC (household drinks containers)

You must record all of your drinks containers as 'household drinks containers'.

You do not need to split plastic into 'rigid' and 'flexible' packaging material - you just need to report it as 'plastic'.

All the differences are explained in more detail in the relevant sections of this guidance.

A separate guide summarises what you must do as a small producer.

What 'established in the UK' means

An organisation is established in the UK if the registered office, head office or principal place of business is in the UK.

An organisation can also be 'established in the UK' if it just has a branch or postal address in the UK. This can be:

- a PO box
- an office
- a warehouse
- domestic premises that are used for business

This is true even if the registered office, head office or principal place of business is outside the UK.

Reporting deadlines

Large producers must report their:

- January to June packaging data by 1 October of the same year
- July to December packaging data by 1 April the following year

Small producers must report their January to December packaging data by 1 April the following year.

Large and small producers must also report nation of sale data for packaging supplied to the end user. This data must be reported by 1 April the following year.

Read more guidance about reporting dates and deadlines for large and small producers, and what to do if you miss a reporting deadline.

Collecting and reporting nation of sale and self-managed organisation waste data

The environmental regulators have issued Regulatory position statements (RPS)(Regulatory statement in Wales) about when you should collect and report data on:

- nation of sale
- self-managed organisation waste

Find out how the RPS or Regulatory statement affects your data submission in:

- England
- Scotland
- Wales
- Northern Ireland

Report packaging activity data

You must report how you place packaging onto the UK market. This is called 'packaging activity'. Your organisation may be involved in more than one packaging activity. Split your packaging data into the following activities:

- supplied under your brand
- packed or filled
- imported (or as 'first UK owner')
- supplied as empty (for example, if you're a distributor)
- hired or loaned (service provider)
- supplied through an online marketplace that you own

'Supplied under your brand' packaging

This includes any packaged goods supplied under a brand that you own. A brand includes any of the following:

- a name

- a trademark
- any distinguishing mark

This applies to all filled packaging, where one or more of the pieces of packaging displays the brand you own.

For example, you may supply a ready meal inside an unbranded plastic tray with film, with a branded cardboard sleeve. In this instance, the plastic tray and film should be included as part of the data you report in the 'supplied under your brand' category.

Primary, secondary, shipment and tertiary packaging can all be classed as 'supplied under your brand' packaging.

If you pay another organisation to carry out part of the supply chain for you, you should still report any packaging that's supplied under your own brand. This is the case even if you paid or licensed another organisation to:

- produce goods that you've gone on to supply under your brand
- pack goods that you've gone on to supply under your brand
- supply your branded goods to the UK market
- import your branded goods for you

If another organisation uses your brand under a licence agreement, you are responsible for the branded packaging they supply in the UK. However, if the packaging is imported and you were not responsible for the import, the other organisation should report it as 'imported' packaging.

For packaging with more than one brand

Sometimes packaging around a sales unit displays more than one brand. The organisation that must collect data depends on who made the first supply of the filled packaging:

- If one of the brand owners made the first supply of the filled packaging, that brand owner is the producer and must report the packaging.
- If none of the brand owners made the first supply, the brand owner whose brand occupies the largest area on the external surface of the packaging is the producer. They are responsible for all of that packaging, including any parts contained within or forming part of it, whether or not those parts are branded.

If a sales unit contains packaged items with another organisation's brand, you should only collect data for the packaging you've added to the sales unit that has your brand on it, and any other unbranded packaging. However, if there are imported products inside, you may have to report them as 'imported' - see the guidance on imported products later on in this page.

For example, if you supply food hampers bearing your brand, you only need to collect data for the hamper and other packaging you add (such as straw, tags, ribbons or bows). You do not need to collect data about any items contained within (such as wine, biscuits or cakes) if they display another organisation's brand, unless you've imported that packaging.

There are detailed illustrations and examples in the 'agreed positions and technical interpretations' guidance, produced by the environmental regulators. It is currently stored on the National Packaging Waste Database.

Packaging that has already been supplied by another producer

Once packaging has been supplied by the first producer, no other person (except a seller) becomes a producer in relation to that packaging by making a further supply of it. This means you do not need to report packaging that another producer has already supplied.

If you add a new component to packaging after it has been supplied by the first producer, for example a new label, you are only responsible for reporting the new component. The original packaging remains the responsibility of the first producer.

'Packed or filled' packaging

Report any unbranded packaging you pack or fill.

You should report branded packaging that you've packed or filled if all the following are true:

- there's only a packaging manufacturer's brand on the packaging
- the brand does not relate to the product inside
- you do not own the brand on the packaging

For example, if you pack and fill Jiffy bags with a product, you'd report the Jiffy bags.

You should also report branded packaging that you've packed or filled if either of the following are true:

- the brand on the packaging belongs to an organisation that is not established in the UK
- the brand on the packaging belongs to a UK organisation that is not a large organisation

'Imported' packaging

You must report filled or unfilled packaging that you have imported and gone on to supply or discard in the UK if:

- it's unbranded after it's imported
- it's branded but the brand owner is not established in the UK
- it's branded, but the brand owner is not responsible for the import
- you supply to an organisation in the UK that is not classed as a large organisation under EPR for packaging
- you import it into the UK, filled or unfilled, and discard without supplying within the UK or exporting

You do not need to report filled packaging as 'imported' if it's:

- branded, and you've imported it on behalf of a brand owner that is established in the UK and is a large organisation
- unbranded, and you go on to supply it to a large organisation that applies its brand to them before supplying them on

The large organisation must report these as 'supplied under your own brand'.

If you do not know whether an organisation counts as a 'large organisation', check the list of large producers who have submitted data to the environmental regulators. The list will be regularly

updated. You should also check with the organisation.

There are detailed illustrations and examples about importing in the 'agreed positions and technical interpretations' guidance, produced by the environmental regulators. It is currently stored on the National Packaging Waste Database.

Importing packaging: secondary and tertiary packaging

If you import filled packaging, you do not have to report secondary and tertiary packaging if all the following are true:

- it's branded
- you're not the brand owner
- the brand owner is a large organisation, established in the UK
- the brand owner is responsible for the import

See the section 'Packaging class data' on this page for more information about primary, secondary, tertiary and shipment packaging.

Packaging that's packed or filled by UK third parties

You'll also have to report if your organisation sells products to end users where the following are true:

- the brand owner is an overseas business that is not established in the UK
- a UK third party packs or fills a product into the brand's packaging before it comes to you - they may also manufacture the product
- the overseas brand owner owns the packaging while it's being filled and before you purchase it

You are 'first UK owner' of these packaged products. Report this packaging under the 'imported' packaging activity.

For example, a French company purchases bottle packaging from a UK supplier. They have the packaging sent to a UK company. The French company sends over shampoo in bulk to the same UK company, who put it in the packaging and send the packaged shampoo to the French company's UK customer, a supermarket. This supermarket is 'first UK owner' - they are responsible for the packaging.

'Supplied through an online marketplace that you own' packaging

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.

If you own an online marketplace, you should report any filled or unfilled packaging supplied by non-UK businesses through the marketplace in this category. You should only report packaging supplied to the UK market from abroad.

You must also send a description of the methodology you've used to collect your data to the relevant environmental regulator by 1 April following the calendar year you're reporting on.

Find out how to create and submit your methodology.

If your organisation owns a website that supplies goods from UK organisations only, this is not classed as an online marketplace.

‘Hired or loaned’ packaging

If you hire out or loan out reusable packaging as a service provider, you must report it in this category. You only need to report this packaging the first time it is supplied. You do not need to report packaging you hire or borrow from a service provider.

‘Supplied as empty’ packaging

Distributors who manufacture or import unfilled (branded or unbranded) packaging must report it as ‘supplied as empty’ unless you sell the packaging to a:

- large UK producer who fills or packs it
- large UK brand owner - who fills it to form part of a branded sales unit

You can check if the organisation you’re selling to is on the list of large producers who have submitted data to the environmental regulators.

Report packaging type data

Large producers need to report whether the packaging:

- is household or non-household
- commonly ends up in public bins
- is a household or non-household drinks container
- is reusable
- becomes self-managed waste

Small producers need to report:

- the total weight of waste packaging, excluding drinks containers
- the weight and number of household drinks containers only

Household and non-household packaging

There is separate guidance on how to assess household and non-household packaging.

Packaging that commonly ends up in public bins

You must collect and report data about the material and weight of the following household packaging items that commonly ends up in public bins:

- packaging provided to consumers with take-away food or drink, including wraps, boxes, cups, cup-holders, bags and paper
- packaging on confectionery, where the confectionery weighs less than 230g, including chewing gum packaging and chocolate wrappers
- packaging on cigarettes, cigars, tobacco, e-cigarettes and vaping refills
- packaging around straws - for example, a paper or cellophane wrapper
- crisp packets or packaging on other savoury snacks, where the crisps or snacks weigh less than 60g

- packaging on single portions of food which can be consumed immediately without further preparation, including sausage rolls, sushi, sandwiches, biscuits and individual cakes
- cartons holding 850ml or less of drink, whose contents can be consumed immediately without dilution
- pouches containing less than 600ml of drink, whose contents can be consumed immediately without dilution

You only need to report this data in this category. You should not report it as household packaging as well.

The list of items that commonly end up in public bins is reviewed regularly and may change at the end of the reporting year.

There are detailed illustrations and examples in the 'agreed positions and technical interpretations' guidance, produced by the environmental regulators. It is currently stored on the National Packaging Waste Database.

Drinks containers

Drinks containers include single-use bottles or cans for drinks. They should be made wholly or mainly of any of the following materials:

- polyethylene terephthalate (PET) plastic
- glass
- steel
- aluminium

Drinks containers should hold 150ml to 3l of liquid. This includes containers that are 150ml to 3l and supplied in multipacks.

Takeaway cups do not count as drinks containers.

Reporting lids, labels and other parts

If the drinks container has other parts made of different material, like a lid or a label (also known as 'ancillaries'), report these:

- separately, as primary household packaging for glass drinks containers
- as part of the total weight of the container for steel, aluminium and PET drinks containers - report the container as whatever material makes up most of the weight

How large organisations should report drinks containers data

You must split your drinks containers data into 2 categories:

- household drinks containers
- non-household drinks containers

There is separate guidance on how to assess household and non-household packaging .

How small producers must report drinks containers data

You must record all of your drinks containers as 'household drinks containers'.

Reusable packaging

You must report reusable packaging the first time it is supplied. Report it twice:

1. Under the relevant packaging activity (for example, 'packed or filled' or 'hired or loaned') with the appropriate packaging type and class.
2. As reusable packaging, split into:
 - reusable packaging that is primary packaging
 - reusable packaging that is non-primary packaging

See the examples at the end of this guidance for how this works in practice.

Self-managed packaging waste

Large organisations report self-managed waste as either:

- consumer waste - such as waste you collect through a front of store take-back scheme to offset your household packaging
- organisation waste - such as 'backhauled' waste

The environmental regulators have issued a statement on nation of sale data and data about self-managed organisation waste. Find out more about how this may affect your data submission.

For the self-managed waste you report, you need to tell us about any waste that's collected in one UK nation and sent to another for recycling. For consumer waste you must only report data for waste that has been recycled.

You need to specify which nation the packaging was collected in and which it was sent to. This must be broken down by weight and material type.

For example, if you collect packaging waste in a grocery store in Scotland but move it to a distribution centre in England before it is sent for recycling, you will need to collect this data.

Self-managed consumer waste

Self-managed consumer waste you report may be used to offset packaging you've reported as household packaging. This will reduce your waste disposal fee.

You will need to report the total weight, broken down by material type. You must have evidence that it has been recycled. The evidence must come from an accredited reprocessor or exporter.

You must have evidence that the waste was recycled in the reporting period, not just sent for recycling.

If you submitted self-managed consumer waste data for the period January to June 2025 before 1 January 2026, you must resubmit it by 1 April 2026. This is because the evidence requirements changed on 1 January 2026. There is no fee for this resubmission. If you have not yet submitted your January to June 2025 data, you do not need to resubmit - just ensure your submission meets the new evidence requirements.

There are 3 different types of self-managed consumer waste:

- recovered packaging waste that is not commonly collected by local authorities
- reusable packaging waste that's been reused at least once
- closed-loop packaging waste

Add these together when you report your self-managed consumer waste.

Recovered packaging waste that is not commonly collected by local authorities

You will need to report data about any packaging waste that you've collected from consumers through a self-managed recycling scheme.

Examples of these schemes include:

- plastic bag collection points in supermarkets
- schemes that allow people to return empty crisp packets for recycling

This only applies to packaging waste that is not commonly collected by local authorities.

If you recover waste from consumers that is commonly collected by local authorities, you should report this as 'self-managed organisation waste'.

Items that are commonly collected by local authorities for recycling

The items that are commonly collected in all UK countries for recycling are:

- aerosols
- bottles and jars
- brown envelopes
- cardboard sleeves
- cereal boxes
- corrugated cardboard
- detergent and household cleaner bottles
- drinks bottles
- drinks cans
- egg boxes
- foil trays
- food pots and tubs
- food tins
- fruit and vegetable punnets
- margarine tubs
- milk bottles
- toilet roll tubes
- toiletries and shampoo bottles
- plastic trays
- window envelopes
- yoghurt pots

In England, local authorities also commonly collect for recycling:

- foil
- shredded paper

In Northern Ireland, local authorities also commonly collect for recycling:

- Tetra Pak and liquid food and drink cartons

In Scotland and Wales, local authorities also commonly collect for recycling:

- foil
- lids from glass jars
- shredded paper
- Tetra Pak and liquid food and drink cartons

Reusable packaging waste

This is waste from packaging which:

- has been designed to be re-used and refilled multiple times
- is now no longer being used as packaging - it has become waste
- has been recovered from customers

For example, this could include glass milk bottles that are no longer usable that you have sent for recycling.

Closed-loop packaging waste

Closed-loop packaging waste is food grade plastic household packaging that you supplied, collected back from consumers, and sent for recycling into food grade plastic.

There are specific requirements for reporting closed-loop packaging waste, including an additional registration charge. Find out about closed-loop recycling requirements.

How offsetting works

The self-managed consumer waste that you report may be used to offset packaging you've reported as household packaging. This will reduce your waste disposal fee.

You can only offset your household packaging if the material you have collected as part of your self-managed consumer waste is the same packaging material as the household packaging you've reported.

For example, if you have collected plastic carrier bags for recycling, as part of a front of store take-back scheme, you can offset this against any plastic packaging you've reported in the household packaging category. However, if you have not reported any plastic packaging, there will be no offset applied.

Self-managed organisation waste

You will also need to collect data about all of the packaging waste that you have collected yourself on-site.

This could include 'backhauling' or where you've arranged for packaging waste to be removed by a private contractor.

This can include:

- your own branded packaging waste
- other brands' packaging waste
- packaging waste you've received from another organisation for 'backhauling'
- unbranded packaging waste
- packaging waste you've recovered from consumers that is commonly collected by local authorities

For example, you may remove tertiary or secondary packaging from products before displaying them to customers. After removing this packaging, you arrange for it to be collected from your site by a private contractor and sent for recycling. In this instance, you should collect this data and record it in this category.

The environmental regulators have issued a statement on nation of sale data and data about self-managed organisation waste. Find out more about how this may affect your data submission.

Report packaging class data

Packaging class describes the purpose of the packaging and is split into four categories.

Primary packaging

Primary packaging is what's used to contain a single 'sales unit' to sell to customers. For a sales unit that's made up of lots of items, such as a multipack, the primary packaging includes all of the packaging on the items.

For example, if you sell peas in steel tins with paper labels, the primary packaging is 'steel tin' and 'paper label'.

For a multipack of crisps in plastic bags, the primary packaging is the 'plastic bags' around the crisps and the larger 'plastic bag' around the crisp packets.

Secondary packaging

Secondary packaging is for grouping several 'sales units' for selling or transport purposes. Organisations may also use secondary packaging to display goods in shops.

For example, if you place tins of peas onto a cardboard tray and place the tray onto a supermarket shelf, the secondary packaging is 'cardboard tray'.

Shipment packaging

Shipment packaging is tertiary packaging on items that are supplied or intended to be supplied to a consumer. This includes packaging on goods sold online, by mail order, or delivered to the purchaser from a shop or collection point. Shipment packaging can include cardboard boxes, bubble wrap and mail bags.

For example, if you sell a mobile phone directly to a purchaser online, in a cardboard box and then place the box into a mail bag before posting it, the primary packaging is the cardboard box and the mail bag is shipment packaging.

Tertiary packaging

Tertiary or transit packaging is used for handling and transporting sales units or secondary packaging, for example to prevent damage during transport.

Tertiary packaging does not include road, rail, ship and air containers.

For example, if secondary packaging units are placed into larger cardboard boxes that are sealed with plastic parcel tape and put onto wooden pallets to be transported, the tertiary packaging is 'cardboard box', 'plastic tape' and 'wooden pallet'.

Report packaging material and weight data

Small and large producers must report the weight in kilograms (kg) of the individual materials for each packaging activity you carry out.

Types of material

You should report data for the following materials:

- aluminium
- fibre-based composite
- glass
- paper or cardboard
- plastic
- steel
- wood
- 'other'

Report each one separately.

The definition of fibre-based composite changed on 1 January 2026. To be classified as fibre-based composite, the plastic content of the packaging must be greater than 5% by mass. If it is 5% or less, classify it as 'paper or cardboard'. You can resubmit your data for January to June 2025 to align with this change, but you will have to pay the resubmission fee.

'Plastic' subtypes

As a large producer you must split plastic into 'rigid' and 'flexible' subtypes for:

- household packaging
- packaging that commonly ends up in public bins

You must report the weight of each subtype separately.

'Other' subtypes

'Other' includes any materials you use that are not listed here. For example, other materials could include:

- bamboo

- ceramic
- copper
- cork
- hemp
- rubber
- silicone

These are reported as subtypes of 'other'.

You must report each material subtype separately. You must give the weight of each material subtype.

Composite and multi-material packaging

Composite packaging is individual packaging components made up of more than one material.

For this sort of packaging, you should report the:

- full weight of the packaging
- main material (the material that weighs the most)

For example, a crisp packet contains plastic and foil. The main material is plastic, so you should report this as plastic.

You should class a material as 'fibre-based composite' if both of the following are true:

- the packaging component contains paperboard or paper fibres with one or more plastic layers, forming a single unit that cannot be separated by hand
- the plastic layers are more than 5% of the packaging material by mass

It may also have layers of other materials.

If the plastic layers are 5% or less of the packaging material by mass, classify the packaging as 'paper or cardboard'.

Multi-material packaging is made from components of different materials. For example, a yoghurt pot with a cardboard sleeve and a foil lid.

For this sort of packaging, you should record the weights of the different materials separately.

Record recyclability data

From 1 January 2025, producers who supply household packaging must assess the recyclability of that packaging. The rating affects the disposal fee that will be charged for that packaging. This is sometimes called 'fee modulation'.

Large producers must report their first batch of RAM data by 1 October 2025. This will cover 1 January to 30 June 2025.

Small producers do not have to report RAM data.

Find out more by reading:

- an overview of the RAM that explains the process
- how to assess and rate individual materials - use this to find red, amber or green ratings for your packaging materials
- definitions and background - this explains the stages of recyclability and some technical terms

Recyclability assessment data: June 2025 regulatory position statement

The environmental regulators have issued a statement on collecting and reporting data under the RAM.

This only applies to Recyclability Assessment Methodology (RAM) data collection and reporting. It does not apply to any other data you must collect and report for EPR for packaging.

Read PackUK's statement on recyclability assessment. This links to regulatory position statements from each of the four regulators. Check the statement from your regulator to understand how this affects your data submission.

Plastic and paper bags supplied in England

The Environment Agency has issued a regulatory position statement about collecting and submitting 2025 plastic and paper bag data supplied in England. Check the statement to understand how this affects your data submission.

The first mandatory report is for 2026 data, due by 1 April 2027.

Report nation data

Nation data is information about which nation in the UK packaging is supplied in and which nation in the UK packaging is discarded in.

The environmental regulators have issued a statement on collecting and reporting nation of sale and self-managed organisation waste data supplied in 2024 and 2025. Find out more about how this may affect your data submission.

If your organisation must act under EPR for packaging, you must submit nation data if you also do any of the following:

- supply filled or empty packaging to customers in the UK, where they are the end user of the packaging
- supply empty packaging to UK organisations that are either not legally obligated, or are classed as a small producer
- hire or loan out reusable packaging
- own an online marketplace through which organisations based outside the UK sell their empty packaging and packaged goods to UK consumers
- import packaged goods into the UK for your own use and discard the packaging

Nation data should show where in the UK you've supplied packaging to a person or business who's gone on to discard it.

Supplying packaging includes:

- selling
- hiring
- loaning
- gifting
- providing in exchange for something other than money
- providing because of a statutory duty

This also includes packaging that you've imported and then discarded.

How to report your data

Report your data by submitting a file using the 'report packaging data' service.

Find out how to create your EPR for packaging data file.

How parent companies should report data

If you have registered for EPR for packaging as a parent company, you must submit data for each of the subsidiaries within your group registration separately.

You do not need to include data for any of your subsidiaries that have registered independently.

Find out how EPR for packaging affects parent companies, groups and subsidiaries.

There are detailed illustrations and examples in the 'agreed positions and technical interpretations' guidance, produced by the environmental regulators. It is currently stored on the National Packaging Waste Database.

How your data will be used

Your data is used to work out your waste disposal fee and your recycling obligations.

The scheme administrator will use some of your data to calculate your waste disposal fee. To calculate this fee, they will look at your:

- household packaging data
- packaging that commonly ends up in public bins data
- glass household drinks containers data

If you do not register or report

From 1 January 2026, if the scheme administrator (PackUK) believes that you have obligations under EPR for packaging and have not registered or have not reported, they will send you a notice of liability. You will have to demonstrate that you are not liable.

They can do this for up to 4 years after the end of the year in which you're considered to be a producer. This extends to 10 years if your non-compliance prevented them from calculating your fees earlier.

The environmental regulators can also request information from organisations connected to you,

which can be used as evidence for your obligations.

If you are found liable, the scheme administrator (PackUK) will send you an invoice for your waste disposal fees. You'll be charged interest on missed and late payments.

Examples of how to collect and report data

These examples show how you should collect and report your packaging data. They do not show how to report nation data.

Example 1: Imported supermarket groceries

A UK wholesaler imports broccoli from France. It sells the broccoli to a supermarket in the UK. The supermarket then sells the broccoli to consumers under its brand name. The supermarket was responsible for the import of the broccoli and makes this clear on the label.

When the broccoli arrives in the UK, it's already wrapped in plastic film with a paper label, which has the supermarket's brand on it. It is stored in a wooden crate.

The wholesaler takes the broccoli out and sends the crate back to France, where it is used again. The wholesaler packs the broccoli into unbranded reusable plastic trays (such as IFCO trays). They put the plastic trays onto hired wooden pallets and secure them with unbranded shrink wrap. They send the pallets to a supermarket.

The supermarket removes the shrink wrap and the pallets. They put the plastic trays onto the shelves for customers to access them. The supermarket sends the reusable plastic trays back to the wholesaler when they are empty. The supermarket recycles the shrink wrap and sends the pallets back to the hiring company.

After a consumer has bought broccoli, they remove the plastic film and label and put it into their bin.

Who needs to collect and report data?

- the wholesaler
- the supermarket
- the hiring company

Packaging material they should collect and report

- shrink wrap
- reusable plastic trays
- plastic film protecting the broccoli
- labels
- pallets

The wooden crates that the broccoli was shipped in do not need to be reported. This is because they were sent to another country to be reused.

Data the wholesaler should collect and report

The wholesaler needs to report the shrink wrap and the reusable plastic boxes.

They should record the following information for the shrink wrap:

- packaging activity: packed or filled as unbranded
- packaging type: non-household
- packaging class: tertiary packaging
- packaging material: plastic
- weight: kg

They only need to report the reusable plastic boxes the first time they are used. They should record the following 2 data entries for the plastic boxes.

First data entry:

- packaging activity: packed or filled as unbranded
- packaging type: non-household
- packaging class: secondary packaging
- packaging material: plastic
- weight: kg

Second data entry:

- packaging activity: packed or filled as unbranded
- packaging type: reusable
- packaging class: non-primary packaging
- packaging material: plastic
- weight: kg

Data the supermarket should collect and report

The supermarket needs to report the plastic film protecting the broccoli and the labels that have the supermarket's brand on them.

They should record the following data for the plastic film:

- packaging activity: supplied under your brand
- packaging type: household
- packaging class: primary packaging
- packaging material: plastic
- packaging subtype (for large organisations only): flexible
- weight: kg

They should record the following data for the labels:

- packaging activity: supplied under your brand
- packaging type: household
- packaging class: primary packaging
- packaging material: paper
- weight: kg

Data the hiring company should collect and report

The hiring company needs to report the wooden pallets. They only need to do this the first time they hire them out. They should record the following 2 data entries for the wooden pallets.

First data entry:

- packaging activity: hired or loaned
- packaging type: non-household
- packaging class: tertiary packaging
- packaging material: wood
- weight: kg

Second data entry:

- packaging activity: hired or loaned
- packaging type: reusable
- packaging class: non-primary packaging
- packaging material: wood
- weight: kg

Example 2: Heat pumps made abroad

An engineering organisation makes heat pumps for people's homes. They sell them to trade outlets and heat pump installers. The pumps are made in Ireland by the engineering organisation and are shipped to the UK.

After they are made in Ireland, the pumps are put into cardboard boxes that show the engineering organisation's brand. The boxes are put into a container and shipped to the UK distribution centre of the engineering organisation.

For the pumps that are sent to installers, the engineering organisation places each pump on a wooden pallet. They also place other parts onto the pallet, such as pipes, lubricants and other components. These parts are in unbranded plastic wrap. They secure the pallet with shrink wrap and send it to the installer.

The installer removes all the packaging and recycles it. The installer does not send any of the packaging back to the engineering organisation.

For the pumps that are sent to trade outlets, the pumps are placed onto pallets owned by the engineering organisation, with 6 on each one. The pallets are secured with shrink wrap and sent to trade outlets.

The trade outlet removes the shrink wrap and recycles it. They send the pallets back to the engineering organisation. They put the heat pumps onto their shelves.

They sell the heat pumps in their cardboard boxes. Some go directly to consumers, and some to heat pump installers.

The installers and consumers remove the cardboard boxes and recycle them.

Who needs to collect and report data?

The engineering organisation is the only one who needs to report data, in this instance.

Who does not need to collect and report data?

The trade outlets and the heat pump installers do not need to report.

Data the engineering organisation should collect and report

The engineering organisation needs to collect data about the following packaging materials:

- cardboard boxes
- pallets
- shrink wrap
- plastic wrap

They should collect the following data for the cardboard boxes:

- packaging activity: supplied under your brand
- packaging type: household
- packaging class: primary packaging
- packaging material: paper or cardboard
- weight: kg

They only need to report the returned pallets the first time they are used. They should collect the following 2 data entries about the pallets sent to trade outlets.

First data entry:

- packaging activity: packed or filled as unbranded
- packaging type: non-household
- packaging class: tertiary packaging
- packaging material: wood
- weight: kg

Second data entry:

- packaging activity: packed or filled as unbranded
- packaging type: reusable
- packaging class: non-primary packaging
- packaging material: wood
- weight: kg

For the pallets sent to installers (that are recycled), they should collect the following data:

- packaging activity: packed or filled as unbranded
- packaging type: non-household
- packaging class: tertiary packaging
- packaging material: wood
- weight: kg

They should collect the following data for the shrink wrap:

- packaging activity: packed or filled as unbranded
- packaging type: non-household
- packaging class: tertiary packaging
- packaging material and weight: plastic

They should collect the following data for the plastic wrap:

- packaging activity: packed or filled as unbranded
- packaging type: household
- packaging class: primary packaging
- packaging material: plastic
- packaging subtype (for large organisations only): flexible
- weight: kg

If you need to see the rules for data from 2023

This guidance covers data collected from 2024 onwards. You can check an archived copy of this guide to see the rules for data from 2023.

Contact the regulators if you need to report your data from 2023 but have not yet done so.

Get help and give feedback

If you have any questions, contact your regulator or the EPR customer service team.

Environment Agency Email: packagingproducers@environment-agency.gov.uk

Natural Resources Wales Email: packaging@naturalresourceswales.gov.uk

Scottish Environment Protection Agency Email: producer.responsibility@sepa.org.uk

Northern Ireland Environment Agency Email: packaging@daera-ni.gov.uk

Defra EPR customer service Telephone: 0300 060 0002 (Monday to Friday, 8am to 4:30pm) Email: EPRCustomerService@defra.gov.uk

Defra is looking for waste and packaging professionals to join a user panel to help improve our services. Find out more information and how to take part in resources and waste research sessions.

<https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility>