



Department  
for Environment  
Food & Rural Affairs

# Nation Data Sales Webinar

## Collections and Packaging Reforms



Department of  
Agriculture, Environment  
and Rural Affairs  
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Nation of Sale Data Webinar

Unlisted

# What is Nation Data

There are two main sets of obligation under EPR:

1. Waste Cost and Recycling Obligations
    - Report information about packaging supplied in the UK
    - Meet recycling obligations
    - Pay disposal costs for LA collected packaging waste
  2. **Nation data reporting obligation**
    - **This is information about which country in the UK (England, Scotland, Wales or Northern Ireland) your packaging has been sold, hired, loaned, gifted or discarded in**
    - **This data is necessary to allow each UK nation to set and track nation-level recycling targets**
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## Who should report this data?

Producer Type	Waste Cost and Recycling Obligations	Nation of Sale Reporting Obligations
Brand Owner	Yes	No
Packer/Filler	Yes	No
Importer	Yes	Yes
Service Provider	Yes	Yes
Distributor	Yes	Yes
Online Marketplace	Yes	Yes
Seller	No	Yes

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## Who should report this data?

- **Sellers** - You supply filled or empty packaging directly to consumers or businesses where the intention is that they will be the final user of the packaging before it becomes waste
- **Distributors** - You supply empty packaging to UK organisations that are not “large producers”
- **Service Providers** - You hire or loan out reusable packaging
- **Online Marketplaces** - You own an online marketplace where other organisations sell their empty packaging and packaged goods to UK consumers
- **Importers** – You import packaging to the UK that you discard without selling or exporting it (if you sell it, then you would be obligated as a Seller, if you export it, then you / that packaging is not obligated)

## Reporting the data

### **Data required:**

- the weight, to the nearest kilogramme, of obligated packaging that is supplied in each nation of the UK

### **Estimates for secondary and tertiary packaging**

- In the first three years of the scheme, sellers and importers who supply secondary and tertiary packaging may use estimates to help with the gathering of nation data
- This is not permitted however, if you are supplying to a person or business who uses that packaging

## Reporting deadlines

### **Reporting deadlines:**

- Reports will be made annually, reporting 12 months of data
- The first report will be of data from January – December 2023 and this should be reported by the deadline of 1 December 2024
- The second report will be of data from January – December 2023 and this should be reported by the deadline of 1 April 2025
- And this will then continue annually

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- In 2023, a supermarket sells products in primary packaging to consumers in Scotland and Wales
  - The supermarket is therefore a Seller with regards to that packaging (they may also be another type of producer regarding the same packaging but for a different obligation)
  - The supermarket must collect data on the weight in kilogrammes of the obligated packaging that is distributed in both Wales and Scotland
  - They must then report that data in the following year, by 1 December 2024 (this is a transitional deadline for the first year, following years will be 1 April)

- In 2024, a manufacturer, X Ltd, sells products in secondary packaging to a supermarket
- The supermarket discards that packaging after placing the products on the shelf
- X Ltd is therefore a Seller with regards to that secondary packaging (they may also be another type of producer regarding the same packaging but for a different obligation)
- In the first three years of the scheme, Sellers and Importers may use estimates for secondary and tertiary packaging\* (\*with regards to the nation data obligation)
- X Ltd therefore works with the supermarket to estimate how much of the obligated packaging was distributed to Wales, Scotland, England and Northern Ireland by that supermarket



- A business, A Ltd, imports packaged goods into the UK
- For some of the goods they take off the tertiary/transit packaging around the goods and put this packaging in the bin
- They also supply some goods onwards to a wholesaler, without removing any packaging
- The wholesaler removes the tertiary and secondary packaging when they receive the goods
- A Ltd is therefore an Importer with regards to the packaging they put in the bin and an Importer with regards to the tertiary and secondary packaging they supplied to the wholesaler.
- They must then report the obligated packaging by the relevant deadline

## **Nation Data Reporting**

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- Packaging data for EPR must be reported via a digital system in development
  - Nation data is a separate reporting obligation, and as such must be reported separately from the data used to calculate disposal fees and PRN obligations
  - Where a producer is obligated under both reporting obligations, they will need to report the data in two separate files
  
  - Data will be submitted via a flat file format based on pre-defined codes
  - These codes will be set out in a published data specification
  - A separate data specification will be made available for Nation of Sale data later in 2023
  - The functionality to submit Nation of Sale data will be made available in 2024, well ahead of the December 2024 deadline
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- As with other reporting obligations, data must be reported broken down by a series of dimensions:
  - Packaging Type (Primary, Secondary, Shipment or Transit / Tertiary)
  - Material Type (Plastic, Wood, Aluminium, Steel, Glass, Paper/Card, Fibre-Composite, Other)
  - Activity supplied under (i.e. Seller, Importer, Distributor, Online Marketplace or Service Provider)
  - Nation Supplied to (England, Scotland, Wales, Northern Ireland)
  - Either Household or Total
  
- Packaging weight must be supplied in kilograms

- This shows an example output of a flat file could look, both as a visualisation and as the turn to codes
  - After validation, the codes are checked. Incorrect codes (or invalid codes) will be rejected
- Note: All codes and data are dummies for demonstrative purposes*

#### File Visualisation:

Producer ID	Producer Type	Waste Type	Waste Sub-Type	Material Type	Material Sub-Type	To Nation	Quantity (kg)
R1234	Seller	Household	Primary Packaging	Steel		England	400126
R1234	Seller	Household	Shipment Packaging	Paper_Card		England	395991
R1234	Seller	Household	Primary Packaging	Steel		Scotland	132018
R1234	Seller	Household	Shipment Packaging	Paper_Card		Scotland	34887
R1234	Seller	Total	Primary Packaging	Steel		England	611990
R1234	Seller	Total	Primary Packaging	Steel		Scotland	222134
R1234	Seller	Total	Primary Packaging	Steel		Wales	35953
R1234	Seller	Total	Primary Packaging	Steel		Northern Ireland	84124
R1234	Seller	Total	Shipment Packaging	Paper_Card		England	752487
R1234	Seller	Total	Shipment Packaging	Paper_Card		Scotland	40496
R1234	Seller	Total	Shipment Packaging	Paper_Card		Wales	15812
R1234	Seller	Total	Shipment Packaging	Paper_Card		Northern Ireland	63071
R1234	Importer	Total	Timber Packaging	Wood		England	141005
R1234	Importer	Total	Timber Packaging	Wood		Scotland	288980
R1234	Importer	Total	Timber Packaging	Wood		Wales	145293
R1234	Importer	Total	Timber Packaging	Wood		Northern Ireland	80672
R0478	Seller	Total	Primary Packaging	Other	Ceramic	Scotland	429083
R0478	Seller	Total	Primary Packaging	Other	Ceramic	Wales	187780
R0478	Seller	Total	Secondary Packaging	Paper_Card		Scotland	51261
R0478	Seller	Total	Secondary Packaging	Paper_Card		Wales	30873

#### Translated to codes :

Producer ID	Producer Type	Waste Type	Waste Sub-Type	Material Type	Material Sub-Type	To Nation	Quantity (kg)
R1234	SA	WH	P1	ST		EN	400126
R1234	SA	WH	P2	PC		EN	395991
R1234	SA	WH	P1	ST		SC	132018
R1234	SA	WH	P2	PC		SC	34887
R1234	SA	TD	P1	ST		EN	611990
R1234	SA	TD	P1	ST		SC	222134
R1234	SA	TD	P1	ST		WS	35953
R1234	SA	TD	P1	ST		NI	84024
R1234	SA	TD	P2	PC		EN	752487
R1234	SA	TD	P2	PC		SC	40496
R1234	SA	TD	P2	PC		WS	15812
R1234	SA	TD	P2	PC		NI	63071
R1234	IA	TD	IN	WD		EN	141005
R1234	IA	TD	IN	WD		SC	288980
R1234	IA	TD	IN	WD		WS	145293
R1234	IA	TD	IN	WD		NI	80672
R0478	SA	TD	P1	OT	Ceramic	SC	429083
R0478	SA	TD	P1	OT	Ceramic	WS	187780
R0478	SA	TD	P3	PC		SC	51261
R0478	SA	TD	P3	PC		WS	30873

Q & A

**Q: We mostly sell products through retailers but have small online sales direct to consumers. Is the nation data we need to report just for the online sales?**

A: For goods sold through retailers, nation data obligation only applies to any packaging that is taken off the product by the retailer before they supply to their consumers. This is likely to be tertiary and secondary packaging

**Q: Is the nation reporting only for retailers, or is it for anyone who's customer removes and disposes of the packaging?**

- **For example will Tesco report on primary and transit packaging or will they only report primary and then their suppliers export on the transit that Tesco remove?**
- **If the latter, how should the supplier report the nation data if they supply to Tesco's warehouse in England but then England distributes to various locations/nations where they'll remove and dispose of the packaging?**

A: Nation data reporting is not only for retailers. It is any packaging sold to a person or business who is the final user of that packaging. For B2B this is likely to mainly tertiary or secondary packaging. In the scenario described, the supplier would need to work with Tesco to understand where in the UK the obligated packaging ends up being supplied



**Q: If packaging is sold to consumers how can we determine where it is disposed? It may be sold in England to someone who travels to Scotland or Wales and disposes of it there. How would we have sight of that?**

**Unless nation data can be classified based upon where the customer - not consumer - is based there is no way nation data can be accurately supplied**

A: The nation data is based on where the packaged product is supplied to the consumer. So if the customer bought the product in England but disposes of it in Wales, you would report England

**Q: Is the nation of sale obligation for >£1m only for ecommerce sales or all turnover?**

**A: All turnover**

**Q: Is the national of sale relevant to business HQ or regional depot?**

A: It is the nation the packaging is in at the point of supply. So for example, if goods are held in England and then distributed to Wales and Scotland before being sold to consumers, then it is those nations which should be reported

**Q: Most of our product is sold B2B how does nation of sale work?**

A: For B2B it is any packaging that the business it is being sold to will remove. So for example, plastic film around goods or cardboard boxes containing multiple goods that is removed before shelf stacking

**Q: If as a business we are not obligated under EPR (as now not classed as a packaging producer), do we still have an obligation to report nation of sale as we have a turnover over £1mil and handle more than 25 tonnes?**

A: Yes, the nation reporting obligation applies to both “small” and “large” producers. The threshold to be classified as a small producer is if you have £1 million turnover and have handled more than 25 tonnes

**Q: Please clarify whether nation of sale data includes packaging weights for branded goods or just volumes of items sold. We have the volumes and packaging weights for goods sold under our brand but do not have access to packaging weights for other brands**

A: You should report all obligated packaging. For a seller, this could be both their own-brand products but also other brands

**Q: For nation reporting, should you report only if you sell for example 25tonnes of branded/imported packaging, or is it 25 tonnes of any packaging sold that results in an obligation to report? And can you be obligated on only nation reporting if you only sell and are over 25t and £1m**

A: When considering the de-minimis thresholds, you should look at all packaging handled with regards to all obligations, except for any exempt packaging (for example, exported packaging).

**Thank you**