



Department  
for Environment  
Food & Rural Affairs

# Household and non-Household Packaging

## Extended Producer Responsibility

Webinar – 2 February 2023



Department of  
Agriculture, Environment  
and Rural Affairs

[www.dae.gov.uk](http://www.dae.gov.uk)



Scottish Government  
Riaghaltas na h-Alba  
[gov.scot](http://gov.scot)



Llywodraeth Cymru  
Welsh Government



0:02 / 19:06



# Household/non-Household packaging

- Producers should only report their packaging once in their reporting
- Packaging has been split into packaging waste type
- Producers will need to determine what their packaging is classed as and report

Waste type	Disposal cost	Recycling obligation (PRN costs)
Household packaging	YES	YES
Binned Packaging	YES	YES
Non Household packaging	NO	YES
Drinks containers (excl. glass) in E,W,NI	NO	YES
HH Drinks containers glass (E,W,NI)	YES	YES
NHH Drinks containers glass (E,W,NI)	NO	YES
Drinks containers Scotland	NO	NO



0:44 / 19:06



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# Household and non-Household Packaging

Applies to Primary and Shipment packaging only

**Default position;** all Primary and Shipment packaging is classed household packaging

**Except** where the primary and shipment packaging is supplied to a business who is the final user of that packaging and this can be evidenced

- Primary and Shipment packaging passing from a producer through multiple supply chain steps will **always** be classed as household packaging irrespective of where the packaging waste arises
- In some instances, packaging that is recorded as household may not end up in the household waste stream
- Defining household packaging is based on the supply chain, not whether the waste arises in the household



1:39 / 19:06



# Binned waste and DRS containers

## Binned Waste

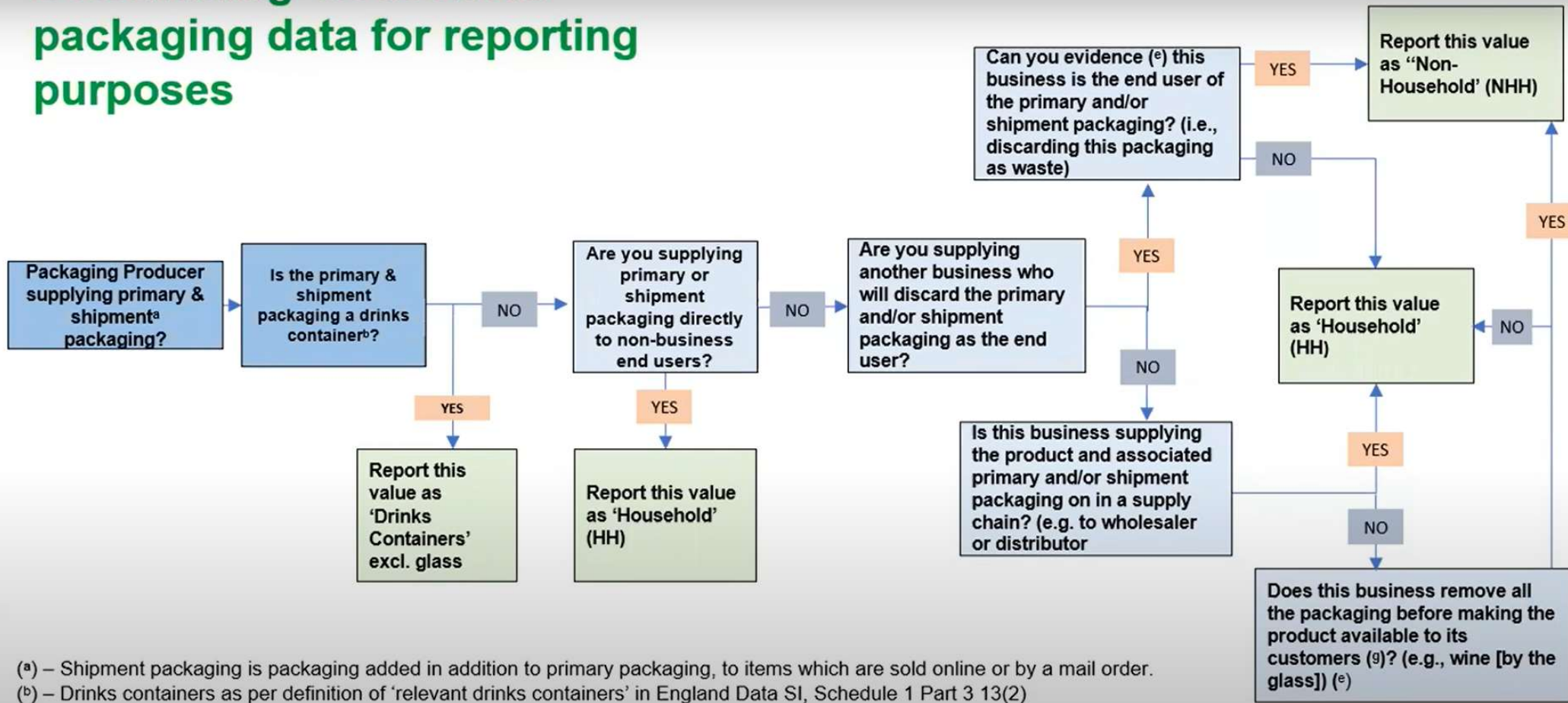
- Packaging waste commonly collected from public bins
  - Subcategory of household waste and reported separately
  - List is provided within Data SI and the gov.uk guidance ([link](#))

## Deposit Return Scheme (DRS) containers (England, Wales and Northern Ireland)

- These must be reported separately as part of EPR producer reporting and are subject to recycling obligations (PRN/PERN), not disposal costs
- Glass drink containers are included in drink container reporting but are subject to full EPR costs (PRN and disposal costs)
- Any DRS drink containers (incl. glass) supplied in Scotland are excluded from EPR reporting



# Determining 'household' packaging data for reporting purposes



(a) – Shipment packaging is packaging added in addition to primary packaging, to items which are sold online or by a mail order.

(b) – Drinks containers as per definition of 'relevant drinks containers' in England Data SI, Schedule 1 Part 3 13(2)

(e) – See further guidance on evidencing the end user position

(g) – If business supplies product in both its entirety and in part e.g. supplies wine both by the bottle and by the glass, the answer will be yes i.e. all packaging reported as Household.


\* Once Household packaging has been identified, this should be further classified on a binned packaging list (Data SIs, Schedule 1 Part 17 (2)) and these are reported separately.

### Example 1- UK canned food manufacturer Company A

Company A imports raw ingredients and branded multipack wraps. They purchased non-branded cans, secondary card boxes, tertiary packaging and shipment packaging (for internet sales) from a UK supplier (Supplier A) and branded primary labels from a UK supplier (Supplier B). A Primary unit is a multipack of 4.



## Household (HH) v non-Household (NHH): UK Canned Food Manufacturer

	WHOLESALE	SUPERMARKETS	ONLINE	RESTAURANTS	EXPORTS
HH	 Branded multipack wrap  Branded labels  Non-Branded cans	 Branded multipack wrap  Branded labels  Non-Branded cans	 Branded multipack wrap  Branded labels  Non-Branded cans  Shipping box		N/A
NHH	 Tertiary Shrink & Pallets  Secondary boxes	 Secondary boxes  Tertiary Shrink & Pallets		 Branded multipack wrap*  Branded labels*  Non-Branded cans*  Secondary boxes  Tertiary Shrink & Pallets	

\*IF EVIDENCED

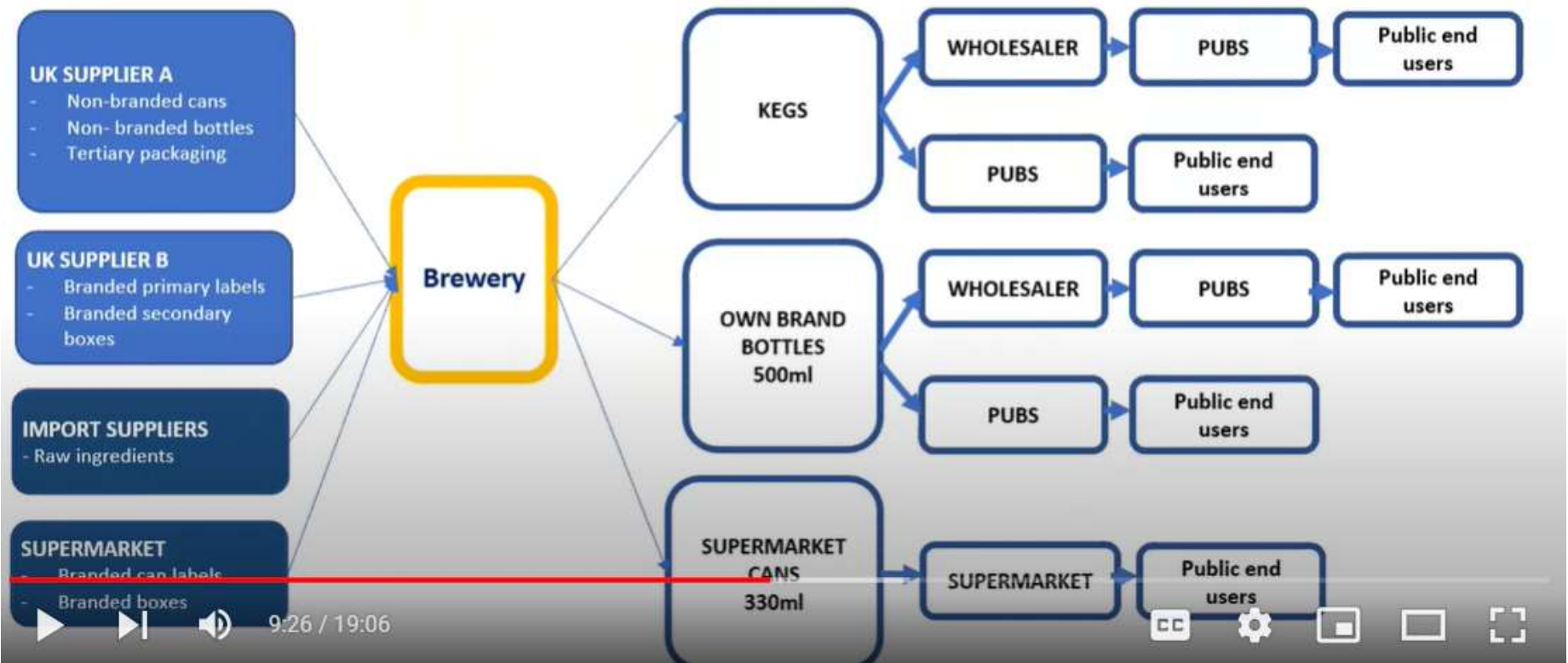
**Example: Not household** when sold direct to final business user (e.g. factories, restaurants, cafes etc), packaging will likely be removed before product sold to consumer. Producer will need evidence from the business that they do not supply any of that packaging to another business or consumer.



8:30 / 19:06

## Example 2- Brewery

Brewery produces own brand beer kegs, bottles and a supermarket branded canned beer. Brewery imports raw ingredients. They purchased non-branded cans and bottles, tertiary packaging from a UK supplier (Supplier A) and brewery branded primary labels and secondary boxes from a UK supplier (Supplier B). Supermarket provides labels and boxes for Brewery to apply/fill on their behalf.





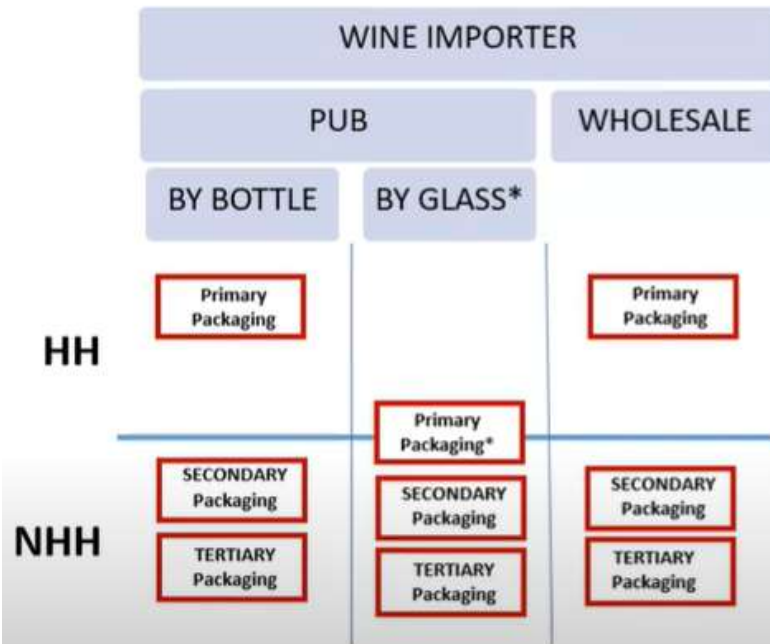
## Household (HH) v non-Household (NHH): Brewery



Example: Not household if producer can evidence to regulator that contents is removed from packaging and disposed of by their business customer before it is sold to the user to consumer – e.g. Keg sold direct to a pub and all beer is dispensed and keg becomes waste at the pub

## Household (HH) v non- Household (NHH)

### IMPORTED WINE



### ONLINE MARKET PLACES

Reporting total packaging and household packaging



\* **Household:** if business sells both packaged and unpackaged product to the consumer – e.g. wine by the glass and wine by the bottle

**Non-Household:** sold exclusively by the glass and this is evidenced then NHH

\* Requires evidence that business is used user packaging

# Evidence – Principle Requirement

- Starting point / default position:
  - all primary and shipment packaging is household
  - all primary and shipment packaging which passes from producer through multiple supply chain steps will always be classed as household packaging
- Onus is on producers to provide, when requested by the regulator, a reasoned and robust assessment, with supporting evidence, which has led to the conclusion that the primary and shipment packaging has been classified as non household



12:37 / 19:06



## Evidence – specialist goods for business use only

- Where the nature and type of product is such that the direct customer of the producer will only ever be the end user of the product.
- Examples could include; Bespoke products such as industrial chemicals and/or equipment for manufacturing process
- Evidence could include:
  - bespoke product specifications
  - Invoices with product detail (with VAT numbers to evidence business accounts)
  - customer contracts



13:47 / 19:06



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# Evidence – business model

Situations where the producer and its customers have a direct contractual arrangement for the supply of products (not the packaging), i.e. the producer supplies the product as part of a service/maintenance arrangement.

Examples could include

- Machine parts
- Soap replenishment
- Replacement lighting components

Evidence could include:

- service contracts
- stock replenishment reports



14:25 / 19:06



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Menu



# Evidence – customer confirmations

- In addition to the evidence listed you may use customer confirmations as a source of evidence. A customer confirmation should demonstrate that your direct business customer is the end user of the primary and shipment packaging.
- You should also use customer confirmations if you aren't able to provide any of the evidence listed
- Evidence could include:
  - supply contracts
  - written customer confirmations (making it clear that the customer you supplied the packaging to is the end user)
- Evidence should be kept for at least 7 years



15:21 / 19:06



# Offsetting Household Packaging

A producer that carries out collections of primary and shipment packaging materials returned by household consumer (e.g through front of store takeback or post back) for recycling, can report this weight of materials to be offset against their household costs obligations, if;

- They are materials which are **NOT** commonly collected by local authorities

*A reference list of materials LAs collect to assist producers identify relevant packaging materials is available [here \(NPWD\)](#)*

- The producer has reported materials in household packaging in the same material category as the collected material eg. reported household plastic packaging and collected plastic packaging
- The producer has evidence that the recycled material has been recycled
  - Waste transfer note from a permitted site
  - Waste contract

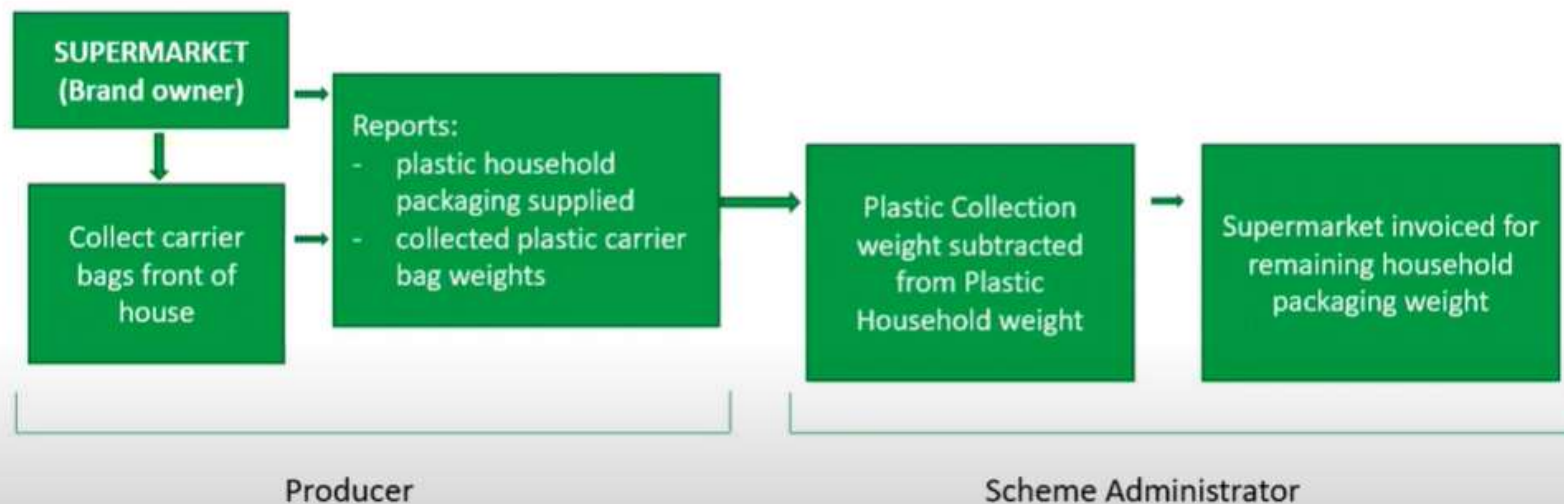


16:25 / 19:06



# Offsetting Household Packaging

Producer can only offset if they have arranged the collection of the materials they are offsetting



- Producer to check if collected material is on the commonly collected list for the nation they are registered, if not then can be reported for offsetting
- Producer should have evidence of collected materials e.g. contract in place, waste transfer notes



18:02 / 19:06





# Available Guidance

The gov.uk guidance on data reporting provides information on these areas, these will be supplemented with additional detail shortly

This guidance is available at:

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

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18:46 / 19:06

