

Regulatory changes for reproprocessors and exporters of UK packaging waste

Agenda





- Overview of Regulatory changes
- Registration and accreditation (key differences)
- Reporting requirements
- Breaches and Offences
- Fees and charges
- Digital: NPWD to EPR transition and timeline

Extended Producer Responsibility for packaging (pEPR) - Context

Extended Producer Responsibility for Packaging is a project within the UK Government's wider Collection and Packaging Reforms (CPR), which also includes Simpler Recycling, Deposit Return Scheme for Drinks Containers, and Digital Waste Tracking.

CPR is a first and crucial step in driving the transition towards a circular economy – a manifesto commitment set by the UK Government in 2024.

The overall environmental objectives of pEPR are to drive:

- the use of environmentally sustainable packaging; 
- the prevention of packaging becoming waste; 
- an increase in the reuse of packaging, and in the quantity and quality of packaging materials recycled; 
- and a reduction in the packaging material placed on the market 

The new Regulations include a series of changes affecting reprocessors and exporters of UK packaging waste, which we will be covering in more detail during this webinar. These changes will be key in driving the environmental objectives of pEPR, through better data collection and monitoring, promotion of UK recycling, and efforts to prevent fraud.



Changes to be aware of under the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024:

The key regulatory requirements will remain the same, though there are some changes

- Registration – mandatory for all operators
- Accreditation – remains a voluntary activity (linked to the issuing of PRN/PERNs)
 - This also now contains new "tonnage" bands for quantities recycled
- New reporting requirements
- Introduction of the “Fit & proper person” test
- New charges
- For PERNs – these must be issued on receipt at the overseas reprocessing site, rather than at point of export (effective from 2026)
- Overseas reprocessing sites will be published on the public register



Registration & accreditation

Registration

- Mandatory for all reprocessors and exporters of packaging waste
- Apply by Wednesday 1 October 2025, or within 28 days of starting to recycle or export packaging waste
- Conditions of registration
- Quarterly reporting obligations
- Annual subsistence charge by Tuesday 30 September each year

Accreditation

- Voluntary – but necessary to issue PRNs/ PERNs
- No deadline to apply – but for accreditation to be determined by Thursday 1 January 2026, apply by Tuesday 30 September 2025
- Conditions of accreditation
- Monthly reporting obligations
- Reapply each year

Information for applications



Registration

- Must be operational at the time of application
- Apply & pay for each material, at each site if you're a reprocessor
- Provide site/ permitting information
- Provide sampling and inspection plan
- Exporters provide details of overseas reprocessing sites
- 12 week determination period

Accreditation

- Must be registered before accreditation can be determined
- Must be habitually resident in the UK with either the registered office or principal place of business in the UK
- Apply & pay for each material, at each site if you're a reprocessor
- Provide business plan, and answer additional questions to supplement your sampling and inspection plan
- Exporters apply for overseas reprocessing sites to be approved
- Must be submitted by approved person or delegated authority
- Fit & proper person requirement
- 12 week determination period

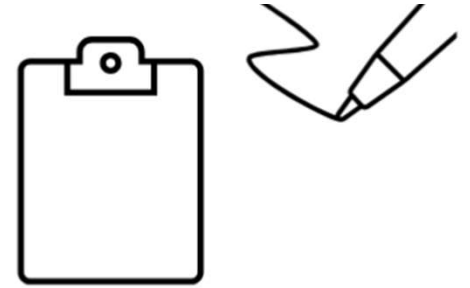
Key changes

Registration & accreditation

- **Approved person (or delegated authority)**
 - Submitting application(s) for accreditation
 - Submitting quarterly, monthly & annual reports
- **Public register of overseas reprocessing sites**
 - Requirement in pEPR for these to be published

Accreditation only

- **Fit and proper person**
 - Applies to accreditation only
 - Something that regulators consider as part of your overall application, and throughout accreditation
 - Joint regulator guidance will be published soon
- **Exporter point of issue**
 - Under 2007 regulations PERNs can be issued once the packaging waste clears customs. From 2026 onwards PERNs can be issued once the packaging waste has been received by the approved overseas reprocessing site



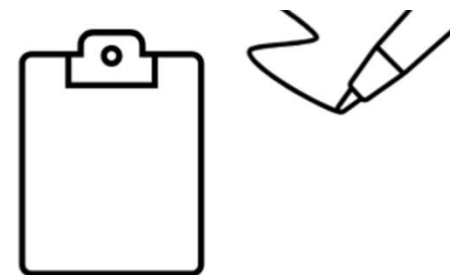
Reporting requirements

Registered only – quarterly reporting with an annual report *starting in April for Q1*

Accredited – monthly reporting with an annual report *starting in February for January data*

Schedule 8 Part 2

- The weight of packaging waste received for recycling/ export
- Details about who and where the packaging waste came from
- The weight of packaging waste recycled/ exported
- The weight of unrecycled packaging sent elsewhere (e.g. to another facility)
- The final UK destination of all unrecycled packaging waste.
- Exporters only – the weight of packaging waste which hasn't been exported, was refused by the recipient, stopped during export or repatriated.



Reporting requirements

Conditions of accreditation

Reprocessors must report monthly:

- The tonnage of packaging waste for which PRNs were issued in that month;
- The average price per tonne of packaging waste received in that month;
- The total revenue from PRN sales in that month.

Exporters must report monthly:

- The tonnage of packaging waste for which PERNs were issued in that month;
- The average price per tonne of packaging waste received in that month;
- The total revenue from PERN sales in that month.

Breaches and offences

- Non-compliance with regulatory requirements, including conditions of registration and accreditation, may be subject to criminal proceedings or civil sanctions
- We may also consider cancellation of a registration or accreditation
- We may also suspend an accreditation until such time as non-compliance is addressed
- We have a range of civil sanctions available to use which rely on the civil standard of proof:
 - Fixed Monetary Penalty (£1000)
 - Variable Monetary Penalty
 - Compliance Notice
 - Enforcement Undertaking (offered not imposed)
- Enforcement and sanctions policy consultation
 - search on .gov.uk for: 'Applying Environment Act 2021 civil sanctions'



Charges

Journey	Charge	Applicable when
Apply for registration	£2921	Registering a material for the first time
Maintain registration	£1324	Maintaining an existing registration (payable annually by 30 September, from 2026)
Apply for accreditation - up to 500 tonnes	£500	Applying for accreditation (annual)
Apply for accreditation - up to 5,000 tonnes	£2000	
Apply for accreditation - up to 10,000 tonnes	£3000	
Apply for accreditation - over 10,000 tonnes	£3631	
Approval of overseas site included in an accreditation (per site)	£216	Applying for accreditation, or seeking approval of additional overseas sites in-year
Approval of changes to a Sampling & Inspection plan or Business Plan	£428	Requesting regulator approval of changes to a previously-submitted Sampling & Inspection plan or Business plan



Charges associated with upgrading an accreditation

Upgrades	Charge
Upgrade accreditation from 500 to 5000 tonnes	£1600
Upgrade accreditation from 500 to 10,000 tonnes	£2600
Upgrade accreditation from 500 to 10,000+ tonnes	£3231
Upgrade accreditation from 5,000 to 10,000 tonnes	£1100
Upgrade accreditation from 10,000 to 10,000+ tonnes	£1731
Upgrade accreditation from 10,000 to 10,000+ tonnes	£731

*This table follows the formula specified in the regulations: taking the New tonnage band, subtracting from the initial charge paid, and adding +£100.



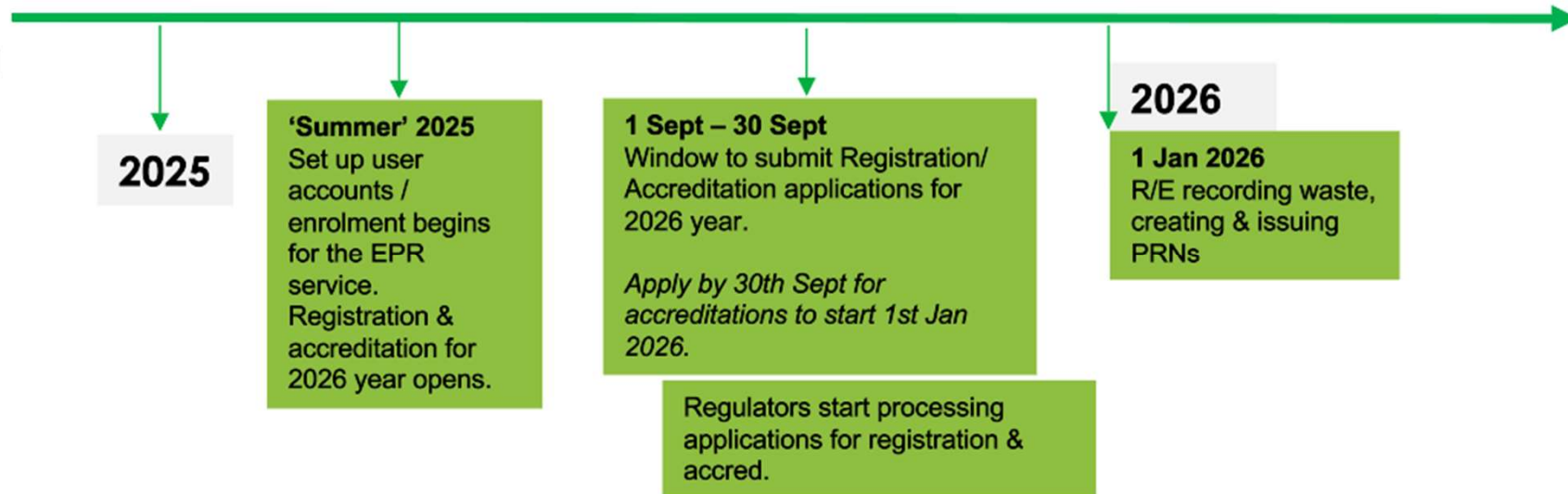
Digital transition - NPWD to EPR Service

- Defra are currently building a new government 'EPR for packaging' service, to support implementation of the 2024 Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations.
- The EPR for packaging digital service will eventually replace the existing digital service for the 2007 Regulations, the National Packaging Waste Database (NPWD), for the issuing and management of PRNs/PERNs and recycling obligations.
- Since the changes made by the 2024 Regulations affect producers and schemes before they affect reprocessor and exporters, producers and compliance schemes have already transitioned to the new service and are already using EPR. During 2025, Defra have built functionality to pass PRN/PERN data between the two systems, before reprocessors and exporters move to the EPR digital service.

NPWD



EPR for Packaging Service



Getting ready for registration and accreditation this summer

Three steps to help you get ready:

- 1.) Think about who your orgs users should be (Approved persons, PRN signatories, or super-users.)
- 2.) Check you have the relevant supporting paperwork ready (site permits, waste exemptions and CBD licences, documentary evidence of standards on overseas reprocessing sites etc.)
- 3.) For **Exporters** – Consider which overseas reprocessing sites you will want to register, and which you will seek to have 'approved' so that you can issue PERNs for the waste you export to them.

