

Explainer: Extended Producer Responsibility (EPR)



What is EPR? EPR is a new UK Government requirement on businesses to take responsibility for the cost of managing the packaging waste they produce. It aims to encourage sustainable packaging choices, improve recycling rates, and reduce waste. Under EPR, obligated producers must report packaging data, pay fees based on the recyclability of their materials, and contribute to local authority recycling and waste management costs. The scheme officially began in January 2025, with obligated producers due to be invoiced from October 2025.

Who does this affect? Even if not directly obligated, EPR is likely to affect all businesses that handle packaging, through data sharing to support compliance between suppliers and customers on producer thresholds, packaging activity, type, class, material, weight and recyclability. In addition, Defra expects approx. 85% of EPR fees to be passed down supply chains to consumers.

Who is directly obligated? This is defined by thresholds, determined by the tonnage of packaging supplied to the UK market, and business turnover. The below table shows when an organisation is obligated as a small producer, a large producer, or not obligated at all.

Producer Thresholds		Turnover		
		≤£1m	>£1m-£2m	>£2m
Packaging Tonnage This is the aggregated total from ALL packaging activities, including selling, as defined by the Data Regulations	<25 tonnes	No obligation	No obligation	No obligation
	25-50 tonnes	No obligation	Small producer	Small producer
	>50 tonnes	No obligation	Small producer	Large producer

Large Producers have been required from 2023 to register with environmental regulators and record and report certain packaging data every six months (1 October for half one data for the calendar year and the following 1 April for half two). This data includes: the packaging activity, for example whether the

producer supplied the packaging empty or as packaged goods under their own brand. The packaging type (for example, whether the packaging is classed as household or non-household), the packaging class (whether the packaging is primary, secondary, shipment or tertiary) and the packaging material and weight must also be reported. From October 2025, large producers must report the recyclability of their packaging based on the recyclability assessment methodology and pay EPR fees on packaging data reported as 'household'.

Small producers must register on the online Report Packaging Data service and submit packaging data annually. The first deadline was 1 April 2025 to report 2024 data (and then yearly). Small producers must report data on packaging activity (for example whether the producer supplied the packaging empty or as packaged goods under their own brand), packaging class (whether the packaging is primary, secondary, shipment or tertiary) and the packaging material and weight. Small producers are not required to pay EPR fees.

Further information can be found on gov.uk. This includes information on [determining your obligation](#) and [specific data reporting requirements](#). Find details on registering for EPR [here](#). Regulators have produced an agreed positions and technical interpretations document which may be helpful, [find it here](#). EPR is complex and CPI recommends all obligated producers speak to a compliance scheme to understand specific obligations.

Note: Producers that fail to register or report packaging data by the deadlines commit an offence and may face enforcement action by the regulators.

Revised: April 2025