

**The Packaging Waste (Data Reporting) (England) Regulations 2023 – Packaging Producer Pre-Audit Information**

Please complete and return to: [\*\*\*\*\*\*\*\*\*\*\*@environment-agency.gov.uk](mailto:***********@environment-agency.gov.uk)

1. **Extended Producer Responsibility for packaging – Information**

A Regulatory Position Statement (RPS) was published on 5th September 2023 and applies to the requirement for large producers and compliance schemes (as defined within the Data regulations) to submit the first and second data reports to the Environment Agency under regulation 17(2), 17(3)(a) and 20(1) of the regulations on or before 1 October 2023 and on or before 1 April 2024 respectively. It only applies to these 2 data reports.

The conditions of the RPS are that large producers and compliance schemes submit these two datasets on or before 31st May 2024.

Full details can be found at [Reporting packaging data under Extended Producer Responsibility (EPR): RPS 288 - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/reporting-packaging-data-under-extended-producer-responsibility-epr-rps-288/reporting-packaging-data-under-extended-producer-responsibility-epr-rps-288)

Further details/guidance on EPR for packaging can also be found at:

* [Extended producer responsibility for packaging: Technical interpretations and agreed positions](https://npwd.environment-agency.gov.uk/FileDownload.ashx?FileId=0cca40d5-56f7-4293-8807-2241c232dbf5)
* [Extended producer responsibility for packaging: report packaging data - GOV.UK (www.gov.uk)](https://www.gov.uk/government/collections/extended-producer-responsibility-for-packaging-report-packaging-data)
* [Extended Producer Responsibility (EPR) - January 2023 requirements presentation on YouTube](https://www.youtube.com/playlist?list=PL8GdyULfgggioEy6uVDW9JsCFJvY68Oki)
* [Household and Non-Household Packaging Guidance Webinar on YouTube](https://www.youtube.com/watch?v=1uGsPhSE6-0)
* [Nation of Sale Data Webinar - YouTube](https://www.youtube.com/watch?v=nMzR1g5v7O4)
* [Get the latest from Defra Collection and Packaging Reform (confirmsubscription.com)](https://confirmsubscription.com/h/t/EBFF97EEADC3DECE)
* [EPR Statutory Instrument SI Webinar - YouTube](https://www.youtube.com/watch?v=6xrMHr48PlQ)

2. Organisation, producer, registration, and support details

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| **Organisation details** | **Organisation name** |  |
| **Companies House number (if applicable)** |  |
| **Registered Office address (if applicable)** |  |
| **Audit site address (if different from above)** |  |
| **Management System** | **Quality or environmental management scheme (e.g., ISO14001)** |  |
| **Organisation representative details** | **Organisation representative name and position completing this information.** |  |
| **Organisation representative experience, training received.** |  |
| **Approved person/delegated authority, if different to above** |  |
| **Producer details** | **Individual organisation or Group of companies** |  |
| **Turnover (audited accounts as of 7th April 2023)** |  |
| **Packaging handled in previous calendar year (2022)** |  |
| **Large or small producer**  **(see below for guidance)** |  |
|  | **Large or small producer**  **(see below for guidance)** |  |
|  | | |
| **Registration details and support** | **Producer Compliance Scheme (PCS) or Direct Registrant** |  |
| **PCS name and representative (if applicable)** |  |
| **Date of most recent PCS visit (if any)** | **Attach copy of PCS visit report** |
| **Consultant name and consultancy name (if any)** |  |
| **Date of most recent consultant visit (if any)** | **Attach copy of consultant visit report** |
| **Licensor or Pub Operating Business** |  |

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| If providing a copy of the most recent PCS visit report and/  or consultant visit report– list the document(s) here: - |
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3. Organisation structure

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| Provide a summary of organisation structure; type (group, holding, subsidiary) and details of any other UK subsidiaries/sister companies/sites: - |
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| If providing a copy of the organisation structure – list the document(s) here: - |
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4. Business overview

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| Provide a summary of the following: - |
| 1. Organisation’s business activities e.g. manufacturer, importer, |
| 1. Products |
| 1. Activities at site selected for audit and any other UK sites included in obligation |
| 1. Markets the organisation is supplying to e.g., consumers, retailers, manufacturers, wholesalers, distributors and whether the customers are the ‘users’ or consumers of the product (and hence its packaging). |
| 1. Significant changes to business over recent years |

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| If providing additional documentation to support your summary – list document(s)here: - |
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5. Packaging Flow

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| Provide a summary of the following: - |
| 1. Where do you source your packaging/packaging products from? |
| 1. Is the packaging you handle filled/unfilled? |
| 1. Do you own the packaging? |
| 1. Who do you supply packaging/packaged goods to? |
| 1. Do you export? (evidence that the packaging is physically exported is required for this packaging to be excluded) |
| 1. Do you import any packaging that you are the end user of? |

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| If providing additional documentation to support your summary – list document(s)here: - |
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**Packaging Data**

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| If ready, please provide a copy of your data to support Sections 6-9 and completed DRAFT pEPR Data Tables - list the document(s) here: - |
|  |

**6.** **Packaging activity data**

The producer function describes the role of the producer when the packaging was supplied. The packaging activity describes how the producer supplied the packaging.

The EPR regulations introduce a single point of obligation, so only one business will be obligated for the recycling of any one piece of packaging. Complete the table: -

|  |  |  |
| --- | --- | --- |
| **Producer function** | **Packaging activity** | **Where applicable provide examples with a description** |
| **Brand owner\*** | Filled packaging supplied under own brand |  |
| **Pack/filler** | Place goods in packaging for which there is no brand owner |  |
| **Importer** | Importer of filled packaging (unbranded/brand owner not responsible) |  |
| **Distributor** | Empty packaging that you’ve manufactured or imported and supplied to an organisation that is not classed as a large organisation. |  |
| **Service Provider** | Supply reusable packaging to a user of that packaging where the supply is made by hiring out or lending the packaging |  |
| **Online marketplace operator\*\*** | Filled or unfilled packaging supplied to the UK market from outside the UK through an online marketplace you own |  |
| **Seller\*\*\*** | Filled packaging sold to the final user of the packaging – selling data will eventually be reported separately |  |

\*\*\* The seller function relates to ‘Nation of Sale’ reporting only. A producer may be a seller and one of the producer types for the same packaging You will need to submit your Nation data for the relevant calendar year when the main Statutory Instrument is laid - please refer to the following guidance: <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#check-if-you-need-to-report-nation-data>

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| Where relevant, provide a list of the brands owned\* by the organisation and details of the platform used as an online marketplace operator\*\*– list the document(s) here: - |
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**7. Packaging class data**

Use the packaging class data guidance in: - <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-class-data> to complete the table: -

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| --- | --- | --- |
| **Packaging class** | **Description** | **Where applicable provide examples with a description** |
| **Primary** | Packaging used to contain a single ‘sales unit’ to sell to customers. |  |
| **Secondary** | Packaging used for grouping several ‘sales units’ for selling or shipping purposes. Includes packaging used to display goods |  |
| **Shipment** | Packaging used to ship single or multiple sales units directly to consumers includes cardboard boxes, bubble wrap and mail bags. |  |
| **Tertiary/Transit** | Packaging is used to group secondary packaging units together to protect them while being transported or handled through the supply chain. |  |

**8. Packaging material data**

Use the packaging material data guidance in: - <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-material-and-weight-data> to complete the table: -

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| --- | --- |
| **Packaging material** | **Where applicable provide examples with a description** |
| **Plastic** |  |
| **Wood** |  |
| **Aluminium** |  |
| **Steel** |  |
| **Glass** |  |
| **Paper/Card** |  |
| **Fibre-Based Composite** |  |
| **Other e.g.**  **Glue, Hessian sacks,**  **Cloth, Corks, Wax**  **Bamboo, Silicone**  **Ceramic's** |  |

**9. Packaging type data**

**9.1 Household /Non-Household**

Household packaging is primary and shipment packaging that is not supplied directly to a business end user. Complete the table: -

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| --- | --- | --- |
| **Packaging type** | **Packaging class** | **Where applicable provide examples with a description** |
| **Household** | Primary |  |
| Shipment |  |
| **Non-Household\*\*\*\*** | Primary\*\*\*\* |  |
| Shipment\*\*\*\* |  |
| Secondary |  |
| Tertiary |  |

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| \*\*\*\*If providing evidence which demonstrates that this primary and/or shipment packaging has been supplied directly to a business end user - list the document(s) here: - |
|  |

**9.2 Public bin**

Public bin packaging is household (primary and shipment) packaging that commonly ends up in public bins which is listed here: -. <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-type-data>. Use the list to complete the table: -

|  |  |
| --- | --- |
| **Packaging material** | **Packaging items examples 60g crisp packets, take away straws** |
| **Plastic** |  |
| **Wood** |  |
| **Aluminium** |  |
| **Steel** |  |
| **Glass** |  |
| **Paper/Card** |  |
| **Fibre-Based Composite** |  |
| **Other e.g.**  **Glue, Hessian sacks,**  **Cloth, Corks, Wax**  **Bamboo, Silicone**  **Ceramic** |  |

**9.3 Drinks containers**

Drinks containers are household and non-household single-use bottles or cans holding over 50ml or under 3000ml made of polyethylene terephthalate (PET) plastic, aluminium, steel or glass supplied in the UK (excluding Scotland). All other bottles and cans are reported within the primary packaging reporting. Use the drinks containers guidance in here: - <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-type-data> to complete the table: -

|  |  |  |
| --- | --- | --- |
| **Packaging material** | **Household examples** | **Non-Household\*\*\*\*\* examples** |
| **PET Plastic** |  |  |
| **Aluminium** |  |  |
| **Steel** |  |  |
| **Glass** |  |  |

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| \*\*\*\*\*If providing evidence which demonstrates that these drinks containers have been supplied directly to a business end user - list the document(s) here: - |
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**9.4 Reusable**

Reusable packaging is packaging which has been designed to be used multiple times by being refilled or reused for the same purpose for which it was conceived. Unless imported, reusable packaging is only obligated the first time it is supplied. Use the guidance in here: - <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-type-data> to complete the table: -

|  |  |
| --- | --- |
| **Packaging material** | **Reusable packaging items examples tote boxes, bread trays** |
| **Plastic** |  |
| **Wood** |  |
| **Aluminium** |  |
| **Steel** |  |
| **Glass** |  |
| **Paper/Card** |  |
| **Fibre-Based Composite** |  |
| **Other e.g.**  **Glue, Hessian sacks,**  **Cloth, Corks, Wax, Bamboo, Silicone, Ceramic** |  |

**9.5 Self-managed**

There are two types of self-managed waste: -

* Consumer waste – such as waste collected through your own store take-back scheme
* Organisation waste – such as ‘backhauled’ waste

There are two types of self-managed consumer waste:

* Recovered packaging waste that is not commonly collected by local authorities (LAs)
* Reusable packaging waste

Use the self-managed waste guidance in here: - <https://www.gov.uk/guidance/how-to-collect-your-packaging-data-for-extended-producer-responsibility#packaging-type-data> to complete the table: -

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Packaging material** | **Self-managed consumer waste** | | **Self-managed organisation waste** | | |
| **Recovered not commonly collect by LAs examples** | **Reusable examples** | **Back hauled examples** | | **Private contractor examples** |
| **Plastic** |  |  |  | |  |
| **Wood** |  |  |  | |  |
| **Aluminium** |  |  |  | |  |
| **Steel** |  |  |  | |  |
| **Glass** |  |  |  | |  |
| **Paper/Card** |  |  |  |  | |
| **Fibre-Based Composite** |  |  |  |  | |
| **Other e.g. Glue, Hessian sacks, Cloth, Corks, Wax, Bamboo, Silicone, Ceramic** |  |  |  |  | |

**10. Data collection methodology**

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| Describe how packaging weights (kgs) have been identified, the systems used, and the record keeping that provides an audit trail. The description should include the following details: - |
| 1. Are you using an acknowledged methodology? |
| 1. Data used e.g., purchase records, supplier data, sales data – how this data was generated and for what period? |
| 1. How packaging specifications were identified e.g., in-house weighing, supplier data |
| 1. Method for determining imported packaging |
| 1. Method for determining exported packaging |
| 1. Details of any assumptions used, or estimates made (e.g. part year extrapolations etc) |
| 1. Details of any packaging not included in the assessment |
| 1. Any improvements to the system planned for future years data used, e.g., purchase records |
| 1. Description of records available providing an audit trail |
| Provide a copy of your written methodology and a copy of the calibration certificate(s) for the scale(s) used to establish packaging weights – list the document(s) here: - |
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**End of document**