

# [Detailed guide: Packaging waste: apply to be an accredited reprocessor or exporter](#)

*Updated:* Added link to the Environment Agency 2018 monitoring plan.

Accredited reproducers or exporters recycle or recover packaging waste discarded by UK businesses and households. They generate electronic packaging recovery notes (ePRNs) and electronic packaging export recovery notes (ePERNs), also known as evidence notes.

Packaging producers, or packaging producer compliance schemes (PCs) on behalf of their members, obtain ePRNs and ePERNs to meet their recycling and recovery targets. The notes are evidence they've met their recycling and recovery obligation.

## **Check if you can apply for accreditation**

You must have a UK presence with a UK address for receiving your business communication.

You must:

- recover or recycle UK sourced packaging waste
- export UK sourced packaging waste for recovery or recycling

When you reprocess the waste into a new product or material it must be of beneficial use and need no further processing, except where the [end of waste test](#) is met.

See the [processes you can get accreditation for](#).

## **Application dates**

The accreditation year is from 1 January until 31 December. You must submit your application by 30 September for your accreditation to start on the following 1 January (subject to approval).

You may apply any time during the year but it may take up to 12 weeks to determine your application. Your accreditation start date may be later than 1 January but will always end on 31 December.

You cannot issue evidence notes on any packaging waste you received or exported before your accreditation start date.

## Charges for accreditation application

UK reprocessors must apply and pay a fee for each site. Exporters must apply and pay one fee for the company. The fee includes all the waste materials included in an application.

The amount you pay depends on the weight of ePRNs and ePERNs you plan to issue for the UK packaging waste you recycle or export for recycling in the compliance year. The annual fee is:

- £505 if you plan to issue 400 tonnes or less of ePRNs or ePERNs – you'll be classed as a small accredited reprocessor or exporter
- £2,616 if you plan to issue more than 400 tonnes of ePRNs or ePERNs – you'll be classed as a large reprocessor or exporter

You must total up the weight of all the materials you will issue ePRNs or ePERNs on to determine if you're a small or large reprocessor or exporter. For example, if you're an exporter and you issue 200 tonnes of paper ePERNs and 201 tonnes of plastic ePERNs, you're a large reprocessor or exporter.

If you pay the lower charge but you then issue ePRNs or ePERNs for more than 400 tonnes during the compliance year, you'll have to pay the balance of £2,111 within 28 days of issuing the ePRN or ePERN for the 401st tonne of packaging waste. If you do not pay the additional fee any additional evidence you issue may be made void and your accreditation may be cancelled.

Exporters can apply with no overseas reprocessing sites and add them once accredited. For each batch of extra overseas sites you add you must pay £85 for the first overseas reprocessor and £35 for each additional site.

## Apply for accreditation

Apply online using the [National Packaging Waste Database \(NPWD\)](#).

Reprocessors must submit an application for each site. Each reprocessing site is accredited separately. An accreditation can cover multiple materials.

Exporters can submit an application with none, one or multiple overseas reprocessing sites. Sites can be added after accreditation with the appropriate payment.

### Step 1

If you do not already have a login, request a user name and password from the [environmental regulator](#) of the UK country your main place of business is based.

### Step 2

Log in to NPWD and specify the type of accreditation you're applying for, reprocessor or exporter. You can submit multiple applications. Complete the online form. You do not have to complete it in one session, you can save and

reopen to fully complete another time.

### **Step 3**

Upload supporting documents. Reprocessors need to upload a business plan, sampling and inspection plan and details of the recovery and recycling processes used. Exporters need to upload a business plan, sampling and inspection plan and evidence that the site to which the waste is being exported meets the same environmental standards as those in the EU. This is known as '[broadly equivalent](#)', see the [guidance on what information to provide](#) in your documents.

### **Step 4**

Pay the correct accreditation fee to the appropriate [environmental regulator](#).

## **Payments**

You can pay via BACS transfer, credit card over the phone or post a cheque. Contact your environmental regulator for payment details.

### **Bank transfer (for example BACS/CHAPS) – England**

To transfer your fee use these details:

- company name: Environment Agency
- bank: RBS/Natwest, London Corporate Service Centre, CPB Services, 2nd floor, 280 Bishopsgate, London EC2M 4RB
- sort code: 60-70-80
- account number: 10014411
- account name: EA RECEIPTS
- reference: PR/PK/REP/ (reprocessor) or PR/PK/EXP/ (exporter) plus an identifier, such as your company name or NPWD code

## **Contact the UK environmental regulators**

### **England – the Environment Agency**

Email: [packaging@environment-agency.gov.uk](mailto:packaging@environment-agency.gov.uk)

Telephone 03708 506 506\*

### **Northern Ireland – Northern Ireland Environment Agency**

Email: [packaging@daera-ni.gov.uk](mailto:packaging@daera-ni.gov.uk)

Telephone: 028 9056 9338\*

### **Scotland – Scottish Environment Protection Agency**

Email: [producer.responsibility@sepa.org.uk](mailto:producer.responsibility@sepa.org.uk)

Telephone: 01786 457700\*

## Wales – Natural Resources Wales

Email: [packaging@naturalresourceswales.gov.uk](mailto:packaging@naturalresourceswales.gov.uk)

Telephone: 0300 065 3096\*

\*[Find information on call charges](#)

## Information you must provide

Check that the material you reprocess or export for reprocessing is UK sourced packaging waste. This will be verified during an audit. See the [packaging definition](#) guidance.

### Reprocessors

You must provide and keep details and proof of:

- the packaging waste being UK sourced
- your capability of reprocessing it by the end of the following calendar year
- the type of business it comes from
- the type and the weight of the specific material you're applying for accreditation to reprocess
- the reprocessing method being as efficient as possible and the [end-product](#) having a beneficial use
- how you'll keep your records to allow for a full audit, including to where you supplied the end product
- your compliance with a [national or site specific protocol](#) (agreed set percentages) if applicable
- your compliance with an [Agency Agreed Industry Grade \(AAIG\)](#) if applicable

### Exporters

You can export from more than one site but you must own the UK sourced packaging waste at the time you export it or have transferred ownership to the overseas site. It must go to the overseas reprocessing site you name in your application, or to the [Organisation for Economic Co-operation and Development \(OECD\)](#) or [European Union \(EU\)](#) country listed in your application. It must be exported for reprocessing overseas and not for disposal.

If you're brokering the waste or acting as a dealer you must be [registered as a waste broker or dealer](#). You may only register as an exporter if you're the last owner of the waste in the UK.

You cannot issue evidence against the shipment until we've approved the overseas reprocessing site. You must provide and keep details and proof of:

- the packaging waste being UK sourced

- the type of business it comes from
- the weight you export such as by load or container
- where you'll export from
- who owns the material at time of export
- nature of the material such as type and form
- who you're exporting it to
- the end product having a beneficial use and [meeting the end of waste test](#)
- how you intend to keep your records
- compliance with a [national or site specific protocol](#) if applicable
- compliance with an [AAIG](#) if applicable

You need to provide access to export documentation to prove that the material reached or has been accepted by the overseas reprocessing site. For example, a valid contract or completed Annex VII form.

If exporting outside of the EU or [OECD](#) countries you must:

- meet '[broadly equivalent](#)' standards
- keep to the [Waste Shipments Regulation](#)

## **Documentation for more than one accreditation**

If you're a reprocessor and have applied for accreditation for more than one site, you must:

- keep all documents and records for each site separate
- record on NPWD if you transfer packaging waste between sites

You can have a single business plan but you must have a section for each site and state for each:

- your collecting and sorting arrangements
- how you'll develop your business to deal with more waste
- what type of materials you reprocess

If you're an exporter and have applied for accreditation for more than one material, you can have one business plan. The plan must have a section on each material stating the expected ePERN revenue and the category of investment.

## **Business plan**

Reprocessors and exporters must upload a business plan. It must include:

- measurable targets for the volume of packaging waste you'll reprocess or export for reprocessing
- an income forecast from issuing evidence notes
- how you'll reinvest this money and contribute to increasing amounts of UK [packaging waste recycling](#) – we may ask you to provide evidence of this

## Sampling and inspection plan

Reprocessors and exporters must upload a sampling and inspection plan. It needs to show that the packaging waste you're handling and [issuing evidence notes](#) on complies with the rules and is from the UK. It should include:

- what type of materials you reprocess or export, for example, shredded plastic polyethylene terephthalate (PET) bottles
- your checks with suppliers to make sure the waste you receive or export comes from the UK and is packaging
- how the samples you take to check how much waste packaging is in the loads you receive or export are representative of the loads
- your system for inspecting the waste you receive and determining the weight of packaging
- your system for determining the amount of non-target or non-packaging material that's within loads, this should be excluded from evidence notes
- details of any nationally agreed protocols for mixed loads and how you're complying with the specifications set out in the protocol
- details of any site specific protocols you've developed for mixed loads and details of the sampling regime to justify the amount of packaging waste in the loads
- details of any [AAIG](#) protocol used and compliance with the specifications in the AAIG

## Decision on application

Before a decision is made on your application, an officer from your environmental regulator may carry out an inspection of your business premises. They may also apply special conditions to your accreditation. The regulator will write to you with the decision.

### Refused accreditation

Your accreditation(s) may be refused. This could be for lack of information or failure to keep to the regulations, including [Transfrontier Shipment of Waste Regulations \(TFS\)](#).

There's no refund of your application fee.

If you're in England you may appeal to the Secretary of State against a refusal at:

Department for Environment, Food and Rural Affairs (Defra)

Nobel House

Area 2B

17 Smith Square

London

SW1P 3JR

In Northern Ireland you can appeal at:

Planning Appeals Commission

Park House

87–91 Great Victoria Street

Belfast

BT2 7AG

Find out who to apply to in [Scotland](#) and [Wales](#).

## Reapply for your accreditation

Every year you must:

- apply for accreditation on NPWD
- pay the fee

If there's been no change to your business, permit or the way you operate, you can renew your application. This means documents you uploaded in last year's application are carried forward into your new application. If there are changes, you'll need to make a new application and upload updated documents.

## Public register and disclosure

By law, we must put your details on a public register. This will include the name and address of your registered office or your main place of business for each site.

We may also make these details available:

- type of waste you reprocess or export
- reprocessing activity
- fee band
- name of the person given as your contact on the application
- business phone number and address
- NPWD registration number
- any quarterly returns and revenue returns you've failed to supply
- any suspensions or cancellations of your accreditation, or notices of intention to suspend or cancel the accreditation

If you think any information you provide about your business is confidential, contact your environmental regulator and explain why. Be aware that under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 your environmental regulator may have a legal duty to disclose information about you if asked.

## **Accreditation: how to comply**

### **Record information in NPWD**

You must record the actual weight (not rounded figures) of qualifying packaging waste received for reprocessing or exported for reprocessing in [NPWD](#).

Reprocessors should do this on a monthly basis and exporters for each consignment. This will help you with your reporting obligations. If you use protocols you'll need to do separate entries. NPWD tells you what to record and automatically populates your [quarterly returns](#).

You must keep supporting documentation on site for 4 years and make it available for inspection. If you're an exporter, when we audit you we may also need proof of:

- the overseas order
- whether the shipment has cleared customs in the receiving country
- its receipt by the site you've named

### **Issuing evidence**

You can only issue ePRNs or ePERNs on UK sourced packaging waste received for recovery, or exported for recovery, during an accreditation period.

You can only issue evidence on the tonnage of the material type you're accredited for. This can include material that's reasonably associated with that material, for example items that cannot be easily removed before the recovery process. This is known as target material and includes:

- labels glued to plastic or glass bottles
- labels, tape and staples attached to cardboard boxes
- plastic lids attached to plastic or glass bottles
- labels glued to plastic film
- other metals contained in drink cans

You must not issue evidence on:

- non-packaging waste
- non-target materials like items used to bind material for transport, examples include baling wire and strapping
- packaging offcuts like material from a packaging manufacture that was never turned into packaging
- end of waste loads that you will further process



You must never issue ePRNs or ePERNs twice for the same packaging waste. For example, you must not issue ePRNs or ePERNs on packaging waste you've received but passed on to another accredited site for reprocessing or export.

The supporting information demonstrating that ePRNs and ePERNs have only been issued on eligible packaging waste must be available for auditing. Examples include weighbridge tickets, duty of care transfer notes and invoices. Your suppliers may be checked.

## **Cancelling ePRNs or ePERNs**

You need to get agreement from the producer or compliance scheme to cancel an evidence note. Then you must contact the relevant environmental regulator and request, complete and return a cancellation form.

## **Invalid ePERNs**

If you issue ePERNs for exported packaging waste that's not reprocessed overseas by the approved reprocessor, it becomes invalid and must be cancelled.

If you exported other loads of eligible packaging waste that are reprocessed by approved reproducers but have not yet had ePERNs issued on them, you can use these to offset any previous loads not reprocessed. You must balance any tonnes of waste packaging not reprocessed with the amount of ePRNs issued and keep records.

## **Year-end carry over**

Evidence issued on packaging waste received by reproducers or exported by exporters in December can be:

- used to meet recovery and recycling obligations for the year it was received for reprocessing or export
- carried over and used to meet the recovery and recycling obligations of the following year

You must specify that the evidence has been issued in December.

## **Quarterly reports**

You must submit quarterly reports on NPWD. The deadlines are:

- 21 April for the January, February and March (quarter 1) report
- 21 July for the April, May and June (quarter 2) report
- 21 October for the July, August and September (quarter 3) report
- 28 February for the October, November and December (quarter 4) report

If you have not received or exported packaging waste for reprocessing during the quarter you must submit a nil return.

The Environment Agency publish [national reports](#) which show:

- the collated amount of packaging waste received by reprocessors or exported
- the collated amount of ePRNs or ePERNs issued
- accredited operators who have not yet submitted a quarterly return

## **Revenue reports**

You must invest revenue generated from evidence notes in ways that will increase and improve recycling of UK sourced packaging waste.

You need to complete and submit a revenue return on NPWD by 28 February following your accreditation year. Include:

- the income you received in the accredited year from issuing ePRNs or ePERNs
- how you reinvested this money to support improved recycling of UK sourced packaging, choose a category from the list in the revenue reports

## **Notice of wind-up or insolvency**

You must tell your environmental regulator as soon as you can if your business is being wound up, has become insolvent, or is going into receivership or administration.

## **Suspended or cancelled accreditation**

Your environmental regulator may suspend or cancel your accreditation if you:

- fail to meet any of the accreditation conditions in [Schedule 5 of the Packaging Regulations](#), or specific conditions for your site, this includes non-submission of quarterly reports, even if they're zero
- give false information, either in your application or to meet any conditions of your accreditation
- issue incorrect ePRNs or ePERNs
- no longer have a valid relevant environmental permit or exemption for the waste you handle
- stop being a reprocessor or exporter of packaging waste
- ask for a cancellation

This may also impact on subsequent applications for accreditation you make.

You'll receive a written suspension notice to confirm:

- the environmental regulator's decision
- the start date, and for a suspension how long it lasts for and the action you need to take to end it
- the reason
- your right to appeal

During a suspension you cannot issue any ePRNs or ePERNs. If the suspension is later lifted, you cannot then issue them retrospectively on the tonnage of packaging material received for reprocessing or exported for reprocessing

during the suspension period.

## Penalties for non-compliance

See the [Environment Agency monitoring plan](#) which sets out how they'll check businesses are complying each year.

If you break the conditions of your accreditation, the environmental regulator of the UK country where you carry out your business will investigate. If they find you are non-compliant, they have the power to:

- issue a warning letter
- formally caution you
- suspend or cancel your accreditation – this will prevent you issuing ePRNs and ePERNs evidence notes
- prosecute you

The most serious offences may also result in prosecution under other criminal law, for example, the Fraud Act.

## Packaging waste: recycling and recovery processes

### Recycling processes

To get accreditation you'll need to do one of the following:

- produce a material with the same properties and functions as the packaging waste material you processed; and that material must be used instead of a raw material from a natural source
- demonstrate that your process results in a beneficial output that does not need further reprocessing; find out how to [meet the end of waste test](#)

Your environmental regulator will test each recycling process submitted on its individual facts to ensure it meets these criteria.

If your process meets one of the standard recovery and recycling practices you're likely to have your accreditation approved.

### Standard recovery practices

The table shows the standard recovery and recycling practices and activities that can be accredited. Re-use cannot be considered for accreditation. You cannot issue ePRNs or ePERNs against the weight of production residues.

Packaging material	Accreditable process
Glass – re-melt (R5)	Glass cullet destined for re-melt that satisfies the requirements of <a href="#">Regulation (EU) No 1179/2012</a> including the requirement to have a quality management system and produce a statement of conformity Manufacture of glass containers, products or fibreglass

## Packaging material

## Accreditable process

Glass – other (R5)	<p>Fine glass material such as sand substitute (for example, in sandpaper and sandblasting) and fluxing agents (for example, moulds that metal is poured into or material used in welding)</p> <p>Aggregate (crushed glass) that meets the standards set out in the <a href="#">Quality Protocol for aggregates from inert wastes</a> or for Scotland in the SEPA guidance on production of <a href="#">recycled aggregates</a></p> <p>Decorative crushed glass</p>
Paper (R3)	<p>Manufacture of paper or board</p> <p>Animal bedding or packaging material</p>
Plastic (R3)	<p>Manufacture of plastic pellets</p> <p>Flake or shredded packaging plastic that meets all the standards set out in the <a href="#">Quality Protocol for non packaging plastics</a>. Although the protocol is aimed at expanding the recycling market for non-packing waste, the standards can be achieved with plastic packaging</p>
Wood (R3)	<p>Manufacture of wood board, for example, chipboard or orientated strand board (OSB)</p> <p>Decorative woodchip or utility chip (for example, used in riding arenas, fuel, temporary car parks)</p> <p>Animal bedding</p>
Metals (R4)	<p>Manufacture of metal (aluminium or steel ingots, sheets or coils) from packaging waste</p> <p>Scrap iron, steel and aluminium that satisfies the requirements of <a href="#">Regulation (EU) No.333/2011</a>, including the requirement to have a quality management system and produce a statement of conformity</p>
Organic recycling (R3)	<p>Organic compost from packaging waste that meets the standards set out in the <a href="#">Quality Protocol for composting</a></p> <p>Anaerobic digestate from packaging waste that meets the standards set out in the <a href="#">Quality Protocol for anaerobic digestate</a></p> <p>Biomethane from packaging waste that meets the standards set out in the <a href="#">Quality Protocol for biomethane</a></p>
Energy recovery (R1)	<p>Energy from packaging waste burnt in a municipal waste incinerator where the energy efficiency is 0.6 or above</p>

For R1 energy recovery the energy efficiency of 0.6 or above applies to installations permitted before 1 January 2009. For installations permitted after 31 December 2008 the energy efficiency is 0.65 or above. See the guidance on [how to get R1 recovery status](#).

You may apply for accreditation for other processes not listed above. These will be evaluated by your environmental regulator.

## Receiving mixed-waste packaging

You may apply for accreditation for mixed loads that contain packaging and non-packaging waste. But you must do one of the following:

- use accepted percentages for assessing the weight of packaging waste
- provide a sampling and inspection plan for your mixed-waste loads and include this in your accreditation application (if there are no percentages specified)

If accredited, you must record and keep all your sampling results. Your environmental regulator may also ask for samples of the waste to confirm your figures are accurate.

## Agreed national protocol percentages

For each mixed load you receive you must apply the stated percentage for each of the following materials. You cannot apply for a site specific percentage protocol or do continuous sampling. You may apply an [AAIG](#) for certain packaging wastes.

### Recovered paper

If you receive or export mixed paper, you must apply the national mixed paper protocol.

Following industry sampling trials, from 1 January 2017 the amount of claimable packaging waste in mixed paper (classified in [BS EN643](#) under codes 1.01 and 1.02) is 34.5%.

The 100% agreed set percentage for old kraft lined straw (KLS) or old corrugated containers (OCC) stops at the end of December 2016. You can use the [AAIG](#) for paper or you will need to sample to establish the packaging waste content.

Providing you demonstrate you're handling UK sourced packaging waste material which meets the standard specified in BS EN643, you will not have to provide evidence of sampling in your sampling and inspection plan. Instead you need to state that you used the national protocol and that you'll check that the packaging waste meets the specification. You'll need to keep records to demonstrate that the material's been received or exported under EN643.

### Plastic packaging

There are no nationally agreed protocols for plastic. You can get accreditation on flaking or shredding packaging plastic waste if your process meets all the standards set out in the [Quality Protocol for non packaging plastics](#) and the terms of your accreditation.

### Wood packaging

There are no nationally agreed protocols for wood. ePRNs and ePERNs cannot be issued against the weight of wood offcuts. Businesses working to the [Wood](#)

[Protocol developed by WRAP](#) must show how the identity, origin and quantity of any packaging within wood waste consignments is determined and recorded.

## Scrap steel

The percentages of packaging content in scrap steel are agreed by the [Cast Metals Federation](#). If you handle the grades of steel listed below, you can issue ePRNs or ePERNs for the percentages shown, providing you can prove that the load contains some packaging waste.

### Grades of scrap steel Percentage of packaging waste in the scrap steel

1 and 2 (mixed)	0.55
2	1.1
Fragmentised	4.7
4C	10.6
4E	5
8B	10.6

You must still keep to these percentages if you handle loads made up of 100% of:

- steel drums (such as 210 and 25 litre drums)
- baling wire
- banding and strapping

If you want to apply a percentage of packaging waste to other grades of scrap steel, you must justify the percentages by providing details of your sampling in your application.

## Scrap aluminium

You can use the percentage agreed with the [Aluminium Packaging Recycling Organisation \(ALUPRO\)](#) to report how much aluminium packaging waste is contained in the non-ferrous element extracted from incinerator bottom ash (IBA).

Aluminium ePRNs or ePERNs can be issued on 70% of the non-ferrous metal recovered from IBA.

If the mixed non-ferrous is further processed to separate the aluminium fraction, you can issue ePRNs and ePERNs on 87.5% of the separated aluminium fraction.

Some operators receive mixed non-ferrous metals from IBA, mix it with other metals and then process it through a fragmentation plant to produce the Zorba grade to export. In this case the fragmentation plant operator can issue ePRNs or ePERNs on 70% of the non-ferrous metals from IBA input to the fragmentation plant.

If you want to apply a percentage of packaging waste to other grades of scrap aluminium, you must justify the percentages by providing details of your

sampling within your application.

## **Baling Wire**

Baling wire and strapping around bales of packaging waste cannot be included in the weight that ePRNs and ePERNs are issued on. Following discussion with industry and to minimise the administrative burden of calculation, operators can apply a 0.15% weight deduction for baling wire prior to entering the weight onto NPWD.

## **Energy from waste: municipal**

You can issue recovery ePRNs on 19% of the municipal waste received at an accredited R1 energy from waste incinerator.

If you put other waste streams through the incinerator, and want to issue on their packaging content, you must propose a sampling method in your accreditation application for the packaging content of these waste streams.

The 19% protocol does not include the non-combustible elements of packaging waste within the municipal waste streams such as metals which can be separately claimed under the relevant protocols.

## **Energy from waste: clinical**

You can issue recovery ePRNs on 6% of the total weight of the clinical waste received at an accredited energy to waste facility.

## **Refuse Derived Fuel (RDF)**

There is currently no national protocol for this. You will need to agree a site specific protocol with the appropriate environmental regulator before you issue any evidence.

## **Agency Agreed Industry Grades (AAIGs)**

You can:

- use the AAIGs
- demonstrate your own site specific protocol through sampling
- do continuous sampling

You can use AAIGs for the following packaging waste types.

### **Aluminium cans**

You can issue evidence on 97.5% of packaging in consumer collected used aluminium packaging predominantly made up of used beverage cans mixed with relatively small volumes of aluminium foil and aerosols. Contamination, including steel cans, paper and plastic, must be minimised.

## **Steel cans**

You can issue evidence on 97.5% of baled grade 6E. This is classed as steel from food, drinks and domestic aerosol cans collected from the public, such as by can banks and door to door (kerbside) collection schemes. Cans should be free from excessive contamination by other materials. Bale size and density to be jointly agreed.

## **Paper**

You can issue evidence on 97.5% of a load of paper classified in [BS EN643](#) as codes 1.04.00, 1.05.00 and 1.05.01. You may also issue 70% on loads classified as 1.04.01 and 80% on 1.04.02. You must apply all other standards in BS EN643, such as moisture content. Where material is baled, a further deduction of 0.15% must be applied for baling wire.

Providing you demonstrate you're handling UK sourced packaging material which meets the standard specified in BS EN643 you will not have to provide evidence of sampling in your sampling and inspection plan. You just need to state in the plan that you used the AAIG and how you will check that the material meets the specification in BS EN643.

If you wish to deduct less than the standard 2.5% you must provide evidence in your sampling and inspection plan to support the claim and the material you're handling will not be classed as BS EN643.

## **Evidence for overseas reprocessors**

When you apply to be an accredited exporter you may need to submit broadly equivalent (BE) evidence. If you're audited you'll need to supply evidence that your materials have been received by an overseas reprocessor site. This is also a requirement of the [Transfrontier shipment of waste rules](#).

### **Broadly equivalent (BE) definition**

This means that the overseas recovery or recycling operation will be carried out in a way that achieves the level of environmental protection set out in the Waste Framework Directive.

Check when you need to submit BE evidence:

### **EU and OECD countries**

You do not need to provide us with specific evidence for each overseas reprocessor if you're exporting UK packaging waste to an EU or OECD country for recovery. The only exception is when exporting glass packaging. Here the environment regulator must have full site details to assess if the site is capable of remelt.

See the list of current member countries on the [OECD website](#).



## Non OECD countries

You need to provide us with specific evidence. This could be:

- a statement from the competent authority proving the overseas site receiving the packaging waste material is regulated and meets broadly equivalent standards
- a photocopy which must show the site's environmental licence or permit relating to that process plus translation
- a statement from the reprocessor that the site is regulated, and works to broadly equivalent environmental standards to those that apply in the EU along with:
  - details of the regulations the site works to
  - contact details for the competent environment regulator
  - a photocopy of a recent inspection report from the environmental regulator
  - details of any certificates the reprocessing site holds for environmental standards

See the list of [broadly equivalent evidence examples](#) for further information. You do not need specific evidence if you fulfil all 5 of these conditions below:

- the packaging waste is separated at source, or processed, to ensure it's exported for reprocessing within a shipment of similar material; for example, if the shipment contains steel drink cans and steel scrap and is not a general mix of different materials (such as paper and plastic), or a mixture of different grades of the same material (for example, different plastic polymers)
- there's a well-established international technical specification for the exported packaging waste material that your consignments meet
- the material needs only limited processing overseas before it is recovered, and the recovery process has losses that meet EU industry standards
- processing the waste material before recovery does not include hand-sorting that may cause significant harm to human health
- the material goes through a recognised form of recovery, and is unlikely to cause significant harm to the environment

You're only likely to meet these conditions for exports of metal packaging waste, including metal packaging waste within shipments of the right grades of scrap metal. When you apply for accreditation you must tell us that your process meets all of these conditions. You must keep documents to this effect.

## More information

See packaging waste legislation and regulations:

- [Producer Responsibility Obligations \(Packaging Waste\) Regulations 2007](#)
- [2010 amendment regulations](#)
- [2012 amendment regulations](#)

- [2016 amendment regulations](#)
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## [Detailed guide: Packaging waste: producer responsibilities](#)

*Updated:* Added a link to the Environment Agency 2018 monitoring plan.

If your business or organisation produces or uses packaging, or sells packaged goods, you may be classed as an obligated packaging producer. Obligated packaging producers must follow rules which help to:

- reduce the amount of packaging produced in the first place
- reduce how much packaging waste goes to landfill
- increase the amount of packaging waste that's recycled and recovered

These are in addition to [waste duty of care](#) rules all businesses must follow.

Every year an obligated packaging producer must:

- register as a packaging producer by 7 April
- meet their recovery and recycling obligation
- obtain evidence of compliance
- submit a certificate of compliance (CoC) by 31 January the following year

### **Check if you're an obligated packaging producer**

#### **Packaging definition**

'Packaging' is any material used to hold, protect, handle, deliver and present goods. This includes packaging for raw materials right through to finished goods to be sold or being sold. For example, pallets, boxes, bags, tape for wrapping, rolls, tubes and clothes hangers sold as part of the clothing item.

#### **What an obligated packaging producer is**

You're an 'obligated' packaging producer if you, or a [group](#) of companies you're part of handled 50 tonnes of packaging materials or packaging in the previous calendar year. And you have a turnover of more than £2 million a year (based on the last financial year's accounts).

If your business provides [licences](#) to other businesses such as franchises or pub leases, any packaging they handle may contribute towards the 50 tonne threshold for your business.

## What 'handling' means

Handling means you do all of the following:

- carry out one or more of the activities in the [activity list](#) or have these activities carried out on your behalf
- own the packaging on which the activities are carried out
- supply packaging or packaging materials at any stage in the chain or to the final user of the packaging

You're not handling packaging or packaging materials you use internally within your business.

## Activity list: description

The activities are:

- raw material manufacture – produce raw materials for packaging manufacture
- packaging conversion – convert raw materials into packaging
- packing/filling – put goods into packaging or put packaging around goods
- selling – supply packaged goods to the end user
- importing – import packaged goods or packaging materials from outside the UK; this includes raw materials that will become packaging, for example, plastic pellets used to make bottles
- service provider – a business that supplies packaging by hiring it out or lending it

## Check the tonnage you handle

When you work out if you handle 50 tonnes of packaging or more, do not include packaging or packing material you export or give to someone else to export. Export includes supplies sent to the Isle of Man, Channel Islands and Republic of Ireland. You must be able to demonstrate what packaging you've exported.

## When your business is part of a group

If you're a group you must add up the total amount of packaging handled and annual turnovers to see if you're an obligated packaging producer.

If you're a holding company and you have 2 or more subsidiaries that handle packaging, or both you the holding company and at least one subsidiary handle packaging, you're a group.

A holding company that does not handle packaging itself with only one subsidiary that does, is not a group.

## Licensors or pub chains

You can find an explanation of what a licensor and pub operating business is in the [Regulations](#).

The type of packaging relevant to your business includes:

- packaging or packaging materials with your trademark
- packaging or packaging materials around goods that carry your trademark
- packaging or packaging materials members must buy from the head organisation or a business specified by the head organisation

## Register as a packaging producer

By 7 April every year you must register or be registered with your environmental regulator.

You can either join a compliance scheme or register yourself in the [National Packaging Waste Database](#) (NPWD).

A compliance scheme will register you with the correct environmental regulator, obtain evidence of your compliance and submit the CoC each year.

If you register yourself you will be responsible for registering, getting evidence of compliance and submitting the CoC.

### Small packaging producer status

You're classed as a small producer if you have a turnover:

- between £2 million and £5 million
- of less than £2 million but you're part of a company group that has an obligation

See [step 1](#) to find out how to register as a small producer.

### Join a compliance scheme

Select an approved compliance scheme from the [public register](#). You'll need to pay a fee and follow the scheme's instructions.

Check the compliance scheme timescales and make sure you provide the correct information about your company and packaging handled.

### Register yourself

You need to register with the [environmental regulator](#) where your registered head office or main place of business is based.

To submit a registration you must be an 'approved person'. This is a:

- director or company secretary
- company partner
- sole trader

To get access to NPWD you need to complete and return an authorised signatory

form. Contact your [environmental regulator](#) to get a form. Once returned and accepted NPWD will issue a login.

Use the [delegation of approved/appropriate person form](#) if you want to delegate your function to another person. Sign the form and send it to your environmental regulator.

Log in and fill in the registration form in [NPWD](#).

If you've registered before, your information is copied into your new registration. You'll need to check it and make any necessary amendments.

## **Information you need to enter into NPWD**

### **Step 1: contact details and business information**

Provide your:

- registered office information and any main site address where your packaging activities happen or where you collate your packaging data
- Standard Industrial Classification ([SIC](#)) code
- turnover (last set of audited accounts)
- status – small producer, subsidiary, holding company or licensor

Small producers can register as a small producer in one of two ways. They can:

- use the allocation method – obligation based on turnover, the obligation is calculated by multiplying turnover in £ million to the nearest £10,000 by 30 tonnes
- register as a packaging producer – obligation based on weight of packaging handled in the previous year

Groups can register:

- as one group; the holding company can do this even if it's not a packaging producer
- individually by subsidiary
- as a combination of individual subsidiaries and the holding company

Subsidiary details you need to include are:

- company registration numbers
- contact details, including addresses
- [SIC](#) code
- turnovers
- main packaging activities of each subsidiary
- whether any subsidiary is a small producer

### **Step 2: packaging data**

You must describe:

- your main packaging activity, for example, sell packaged goods
- any secondary packaging activities, for example, import packaging
- how you worked out how much packaging you handled in the previous year

You must enter:

- the amount (in whole tonnes) of packaging you supply to the next stage in the packaging chain or sell to the end user
- any packaging you import and any packaging around goods you import
- materials you or another company exports for which you have auditable records

Do not include:

- packaging that's been used before unless its imported
- processed waste

### **Step 3: review your recovery and recycling obligation**

NPWD auto-generates your obligation from the data you entered into the tables. If you do not fill out the tables correctly you will have the wrong recovery and recycling target so you need to follow the instructions in NPWD carefully.

Small producers must review their obligation calculated on the turnover and main material handled entered.

Amend any data inconsistencies and then submit.

To find out how the producer obligation is calculated see [Schedule 2 of the Packaging Waste Regulations 2007](#).

The table shows the current UK government recycling targets in percentages:

<b>Material</b>	<b>2014 (%)</b>	<b>2015 (%)</b>	<b>2016 (%)</b>	<b>2017 (%)</b>
Aluminium	46	49	52	55
Glass*	75	76	77	77
Glass by remelt*	65	66	67	67
Steel	73	74	75	76
Paper/ board	69.5	69.5	69.5	69.5
Plastic**	42	47	49	51
Wood	22	22	22	22

\*new glass targets announced by Defra for 2014 to 2016

\*\*new plastic target announced by Defra for 2016 and 2017

### **Step 4: upload supporting information**

#### **Consumer information obligations**

If your main activity is selling packaged goods, you must give your customers

information about:

- return, collection and recovery systems they can use
- their role in reusing, recovering and recycling packaging and packaging waste
- what recovery and recycling symbols on packaging mean
- how to get copies of waste strategy guidance

You must upload an explanation on how you will achieve this.

## **Small producer**

You must upload proof of turnover or audited accounts if you chose the allocation method.

## **Packaging producer charges**

You cannot pay online. You must pay by cheque, BACS or credit or debit card.

The charges if you register yourself are:

- producer: £776
- small producer: £562

You can register a group as a small producer if the group of companies has a combined turnover under £5 million. Where the holding company itself is a small producer, but the whole group turnover is greater than £5 million, the holding company must register as a producer.

Group: £776 plus these subsidiary charges:

- £180 each for the first 4 subsidiaries
- £90 each for the next 5 to 20 subsidiaries
- £45 for any further subsidiaries
- no charge for a small producer subsidiary using the allocation method

## **Compliance scheme fee**

When you join a compliance scheme, it must pass on your registration fee to the appropriate regulator. The scheme's charges are:

- single company: £564
- small producer: £345

The scheme can register a group as a small producer if the group of companies has a combined turnover under £5 million. Where the holding company itself is a small producer, but the whole group turnover is greater than £5 million, the holding company must be registered as a producer.

Group: £564 plus these subsidiary charges:

- £180 each for the first 4 subsidiaries
- £90 each for the next 5 to 20 subsidiaries

- £45 for any further subsidiaries
- no charge for a small producer subsidiary using the allocation method

## **Late fees**

If you register with a compliance scheme after the registration deadline you'll have to pay an additional late fee of £110.

## **Resubmission fee**

If you need to update your information during the registration year there is no charge for making a minor change. If you need to correct your obligation or packaging handling data, for example following an inspection by your environmental regulator, the charge is £220 for each resubmission where there is a change to the obligation.

## **Northern Ireland**

There are different charges, contact the [Northern Ireland Environment Agency](#).

## **Business changes**

Tell your environmental regulator within 28 days if a change to your business means the information you supplied in your registration needs updating.

## **Cancel registration**

You need to immediately cancel your direct registration if you become a member of a producer compliance scheme or stop being a producer.

## **Financial difficulties**

Tell your environmental regulator immediately if your business has:

- a winding up order, or a resolution for voluntary wind-up
- entered insolvency, receivership or administration

## **Comply with your registration**

Once registered you must meet your obligations. If you joined a compliance scheme it takes on your legal responsibility to meet the recovery and recycling obligation and submit the certificate of compliance (CoC). You must give the scheme correct information and accurate data.

## **Obtain evidence**

You must get evidence of waste packaging recycling and recovery equivalent to the weight of your obligation from [accredited reprocessors and exporters](#). They (or yourself if you are accredited) can issue electronic packaging recovery notes (ePRNs) and electronic packaging export recovery notes (ePERNs) for the waste packaging they recycle or recover.



Small producers must obtain ePRNs for the main packaging material handled.

If you recover and recycle packaging waste your own business handled or supplied, you must still obtain an ePRN or ePERN from accredited reprocessors and exporters.

You cannot use NPWD to carry out financial transactions for evidence notes. It does record and track ePRN/ePERNs credited to your account, and shows the balance of your obligation for which you still need evidence.

## **Submit a certificate of compliance (CoC)**

NPWD generates CoC for directly registered producers. It will say whether your obligation has been met. Your authorised person must check it's correct, then log in to NPWD to sign it off and submit it.

The deadline for submission is 31 January immediately following the end of the calendar compliance year.

See the [Environment Agency monitoring plan](#) which sets out how they'll check businesses are complying each year.

## **Penalties**

If you fail to meet your legal obligations, or provide false or misleading information, you may face prosecution under criminal law. In England and Wales there are also civil penalties. These include:

- fixed penalty fines for minor offences
- higher fines for more serious offences
- an [enforcement undertaking](#): an offer, formally accepted by your environmental regulator that redresses the impact of your non-compliance – these apply to offences after 6 April 2010 in England and after 15 July 2010 in Wales

## **Public register and disclosure**

By law, your environmental regulator must put your details on a public register. This will include the name and address of your registered office or your main place of business for each site.

If you think any information you provide about your business is confidential, contact your environmental regulator and explain why. Be aware that under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 your environmental regulator may have a legal duty to disclose information about you if asked.

## **Contact your environmental regulator**

## **England**

Environment Agency

Producer Responsibility Regulatory Services

Quadrant 2

99 Parkway Avenue

Sheffield

S9 4WF

Telephone: 03708 506 506

Email: [packaging@environment-agency.gov.uk](mailto:packaging@environment-agency.gov.uk)

## **Scotland**

Scottish Environment Protection Agency (SEPA)

Producer Compliance and Waste Shipment Unit

Strathallan House

Castle Business Park

Stirling

FK9 4TZ

Telephone: 01786 457 700

Email: [producer.responsibility@sepa.org.uk](mailto:producer.responsibility@sepa.org.uk)

## **Northern Ireland**

Northern Ireland Environment Agency (NIEA)

Producer Responsibility Unit

Klondyke Building

Cromac Avenue

Gasworks Business Park

Lower Ormeau Road

Belfast

BT7 2JA

Telephone: 028 9056 9338

Email: [packaging@daera-ni.gov.uk](mailto:packaging@daera-ni.gov.uk)

## **Wales**

Natural Resources Wales

Producer Responsibility Unit

Rivers House

St Mellons Business Park

St Mellons

Cardiff

CF3 0EY

Telephone: 0300 065 3096

Email: [packaging@naturalresourceswales.gov.uk](mailto:packaging@naturalresourceswales.gov.uk)

## **Legislation and regulations**

The producer responsibility regime implements the [Packaging and Packaging Waste European Directive \(94/62/EC\)](#).

The [Producer Responsibility Obligations \(Packaging Waste\) Regulations 2007 \(as amended\)](#) and [2016 amendments](#) cover recycling and recovery, while the [Packaging \(Essential Requirements\) \(Amendment\) Regulations 2013](#) cover single market and design and manufacturing aspects.

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## **[Collection: Environmental permit](#)**

## [application form: standard permit, installations, mining waste or waste operation](#)

*Updated:* Added: You can apply online for most standard rules environmental permits.

Forms and guidance to help you apply for a standard permit.

You can apply online for most standard rules environmental permits.

[Apply for a standard rules environmental permit.](#)

Check if you need a [conservation risk assessment](#) before you submit your permit application.

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## [Detailed guide: Cattle passports: what to do if problems arise](#)

*Updated:* Updated CPP9 and Additional text under Problems with the post section

Cattle passports are important legal documents. You must ensure that the passport for each animal on your holding is in order.

### **If you make a mistake on a passport application**

If the British Cattle Movement Service (BCMS) can't issue a passport because you have made a mistake on your application form or not completed it fully, they will send you a letter asking you for the correct information.

If you realise that you have given wrong information by mistake on the application form, you should [contact BCMS](#) as soon as possible. If the passport has already arrived, return it to BCMS immediately with a letter clearly explaining your error. BCMS will send you a new passport based on the correct information.

## Problems with the post

When you apply for a passport, you should receive it within 14 days. If you don't, the passport will be treated as lost and you should [contact BCMS](#).

If BCMS have issued the passport and you haven't received it, they will carry out checks and may send you a replacement free of charge if you have informed them within 6 weeks.

If you do not inform BCMS within 6 weeks of the date the passport was produced, you will have to pay a fee of £20 per animal when you apply for the replacement passport.

You should also tell BCMS if you've sent in a passport for any reason and you've not received it back within 14 days.

## Late applications and refused passports

If your application doesn't arrive with the British Cattle Movement Service (BCMS) within 27 days of the calf's birth, BCMS will not issue a passport. Instead, you will get a notice of registration (CPP35) that registers your calf on the Cattle Tracing System (CTS).

Without a passport, the animal:

- must remain on your holding for its lifetime
- must not move alive from your holding, unless you [get a movement licence from BCMS](#) and move the animal direct to a BSE sampling site, knacker's yard or hunt kennel
- must not go into the human food chain under any circumstances
- may be used for milking or breeding purposes only (you must [apply for passports](#) for any calves the animal may have in the usual way)

## How to appeal against a passport refusal

If you've had a cattle passport refused because the application was late, you may appeal to BCMS.

You need to show there were exceptional circumstances that stopped you making the application in time (the rules on this are narrow and are strictly interpreted).

You must appeal in writing and send evidence to support your appeal. Each appeal is assessed on the basis of the individual facts.

Exceptional circumstances that stopped you making the application on time might include:

- events outside your control ('acts of God'); for example, major floods, regional or national power failures, or postal strikes
- personal circumstances including a death in the immediate family, your suffering from a sudden and serious illness, and possibly the theft of

- or damage to your farm records or computer
- unusual postal delay
- mistakes made by BCMS or a breakdown of CTS

These reasons aren't grounds for appeal:

- a mistake, oversight or misunderstanding by you or anyone acting for you
- being too busy with other farm work
- financial difficulties

You can send your appeal in writing to:

Appeals Section

BCMS

Curwen Road

Workington

CA14 2DD

## **Getting a passport after a late application**

BCMS may be able to issue the passport based on a DNA test, which proves that the animal is the offspring of the dam shown in the application.

As each case is considered individually, [contact BCMS](#) for more information on appeals and DNA testing.

## **If your cattle passport is lost, stolen or destroyed**

You must [tell BCMS](#) within 14 days of becoming aware that a passport has been lost, stolen or destroyed.

You must get a replacement before you can move the animal off your holding.

This includes passports lost in the post (you'll need proof of posting as evidence that this has happened).

## **How to get a replacement passport**

[Contact BCMS](#) with the passport number you need to replace – or you can do this on CTS Online. BCMS will send you a form to fill in – complete the form as soon as possible. BCMS will then trace a full movement history for the animal.

The [guidance notes to the form](#)

(PDF, 55.4KB, 2 pages)

which provide full details of the process

Your replacement passport will be in the latest single-page format.

BCMS can't issue a replacement passport if it can't trace a full movement history. If this happens, you'll be sent a notice of registration (CPP35) that places [restrictions on what you can do with the animal](#).

## **Fees for replacement passports**

Replacement passports for animals with a Certificate of Registration (COR) are free.

In all other cases, you must pay a fee of £20 per animal when you apply for the replacement passport.

You can pay by two methods:

- direct through your bank by BACS transfer using these details:
  - account name: GBS RE RPA (RC)
  - sort code: 60-70-80
  - account number 10018255
  - your CPH number (given at part 1 of the application form) as the payment reference
- by sending a cheque with your completed form:
  - make cheques payable to 'Rural Payments Agency'
  - write your CPH number on the back of the cheque

Euro bank details are available on [request from BCMS](#).

## **If you find the original passport**

[Tell BCMS](#) as soon as possible

## **Contact**

### **British Cattle Movement Service**

Curwen Road

Derwent Howe

Workington

Cumbria

CA14 2DD

Email

[bcms-enquiries@bcms.rpa.gsi.gov.uk](mailto:bcms-enquiries@bcms.rpa.gsi.gov.uk)

BCMS helpline

0345 050 1234

Helpline for cattle keepers in Wales

0345 050 3456

Normal BCMS helpline opening hours: Monday to Friday 8:30am to 5pm, closed weekends and bank holidays. All calls charged at local rate.

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## [Detailed guide: Get new or replacement official ear tags for cattle](#)

*Updated:* The approved list of suppliers of cattle ear tags has been updated.

You'll need a stock of official ear tags to use when calves are born on your holding, and if a tag is lost or the number can no longer be read you'll need to get a replacement.

You can only buy official ear tags from suppliers registered with the British Cattle Movement Service (BCMS).

- [List of suppliers and the official tags they supply](#)  
(PDF, 152KB, 8 pages)

### **Order a new batch of tags**

When you request a batch of official tags, the supplier will need to know your [herd mark](#) and [County Parish Holding \(CPH\) number](#). They will use this to get the run of individual unique animal numbers for your tags from BCMS's Ear Tag Allocation System database. The supplier will send the printed tags direct to you.

You should not apply for more ear tags than you will use in one year. Unused ear tags must be kept securely.

### **Get replacements for lost tags**

If you do need to [replace an illegible or lost tag](#), contact any supplier of approved tags to order a replacement.



Always use the correct applicator for the type of tag you are using and follow the manufacturer's instructions.

## **Give feedback about ear tags**

BCMS monitors, and may act on, feedback from cattle keepers about official ear tags. You can

[download a feedback form](#)

(PDF, 854KB, 2 pages)

or get one from your supplier.

[Welsh language version of this page](#)