

Q4 Newsletter

The Circular | ERP UK | December 2025



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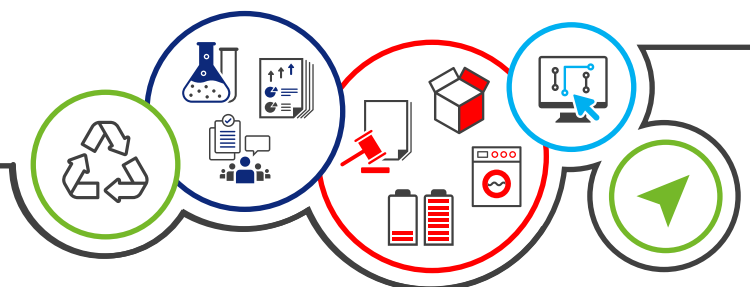
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03 | Message from our Managing Director

As we approach the end of 2025, I'm taking a moment to reflect on a year that's been transformative for Extended Producer Responsibility in the UK. It's been a privilege to support businesses navigating increasingly complex environmental regulations whilst championing the circular economy principles that underpin everything we do.

What we've achieved in 2025

This year, ERP UK has been actively supporting companies as they navigate the often-complex landscape of Extended Producer Responsibility (EPR). From packaging EPR to WEEE compliance, battery takeback schemes to the evolving RAM requirements, we've worked alongside businesses of all sizes to simplify their compliance obligations and turn regulatory challenges into strategic opportunities.

Engaging with industry

A big part of what we do is sharing our knowledge and giving insights about what's to come regarding regulations.

ERP UK representatives have attended meetings, conferences and events across the country – meeting producers, local authorities, government and other stakeholders with the aim of ensuring that EPR compliance

systems work effectively for businesses whilst delivering meaningful environmental outcomes. We have also been at the forefront of commentary on Extended Producer Responsibility in the UK - I have appeared in national media talking about everything from packaging EPR's impact on small producers (in a BBC interview), to getting ahead with RAM in The Grocer.

In the Q2 newsletter, I also thanked many of our packaging members for their very swift turnaround of support for the Packaging Scheme Forum's Expression of Interest to Defra to operate a Producer Responsibility Organisation (PRO), delivering delegated functions of the Scheme Administrator (PackUK). I also advised that we had been asked to prepare a full proposal.

I'm pleased to confirm that, after a significant collaborative effort between schemes throughout the Autumn, and with a very encouraging level of support from producers and other stakeholders essential to effective delivery of government's policy objectives in this area, the proposal was duly submitted. This is in the name of a new not-for-profit entity - PackPRO – of which ERP UK Ltd is a subscriber. We look forward to evaluation and feedback from Defra in Q1 2026.

These activities continue to affirm our profile as an industry thought leader, ensuring that the businesses we support benefit from our deep regulatory expertise and forward-looking insights.

Championing circular economy principles

We've doubled down on our commitments to circular principles throughout 2025, publicising and taking part in initiatives that demonstrate what's possible when businesses, communities and compliance schemes work together.

The Great Cable Challenge encouraged households and businesses across the UK to clear out their "drawers of doom" and recycle unused cables containing valuable copper and other materials. It's a simple concept that delivers real results, diverting recoverable materials from waste streams.

Our battery takeback competition in Welsh schools continues to flourish, proving that education and action go hand-in-hand. The programme has diverted tonnes of batteries from landfill since 2012, and more importantly, it's creating lasting behavioural change. When children understand why recycling matters, they become advocates at home and challenge family habits.





04 | Message from our Managing Director (cont.)

Today's students are tomorrow's decision-makers, making this investment in environmental education crucial for building the circular economy infrastructure we need.

A milestone worth celebrating

October 14th 2025 marked [International E-Waste Day](#), and we were proud to share a significant milestone: over the past 20 years, ERP has collected and responsibly treated more than [5 million tonnes of electronic waste](#) across multiple European countries.

That's equivalent to 500 Eiffel Towers or 625,000 elephants in weight. More importantly, it represents over 5.15 million tonnes of avoided carbon emissions and the recovery of valuable materials including 2 million tonnes of ferrous metals, 275,000 tonnes of plastic, 92 tonnes of silver and 20 tonnes of gold.

These numbers demonstrate what's achievable when producer responsibility schemes operate effectively, turning waste streams into resource streams and keeping valuable materials in productive use.

Season's greetings

2026 looks to be another year busy with changes and consultations in UK producer responsibility. For now, thanks to you for working with ERP UK in 2025 and we look forward to doing so again in 2026.

Instead of sending out Christmas cards to our customers and partners, ERP UK has made a donations to WasteAid who work with communities and policy makers in lower and middle-income countries to implement waste management and recycling programmes. Please visit their [website](#) to find out more. Wishing you a safe and enjoyable festive season.

John Redmayne
Managing Director, ERP UK



An Expert in EPR for Textiles

Extended Producer Responsibility (EPR) for Textiles is coming to the UK.

Anticipated new legislation will place fashion brands and retailers at the heart of the circular economy, empowering businesses like yours to turn environmental challenges into a competitive advantage by rethinking waste, closing loops, and shaping a more sustainable textile future.

You do textiles, we do EPR – so let our experts guide you and support your business.

Contact us today:

Tel: +44 (0)20 3142 6452

E-mail: uk@erp-recycling.org





05 | Member news



Data Rounds - WEEE & Battery

January is a busy month for reporting – all battery members and WEEE members must submit the below placed on the market data by 15th January 2026.

- Q4 2025 Battery
- Q4 2025 B2C EEE
- 2025 B2B EEE

The Compliance Team have a short window to process over 500 declarations in January, so please submit your data as early as possible!



If you need any help with your data, please contact your Account Manager.

Data Round – HY2 2025 EPR Packaging

Large Producers for EPR Packaging must report their HY2 2025 declarations via our Circul8 portal by the end of February.

This will be the first declaration where the Recyclability Assessment Methodology (RAM) reporting is mandatory for all Large Producers reporting household

packaging data.

We are keen to support our members with submitting data that is as accurate as possible – so as well as ongoing support from your Account Manager and the wider Compliance Team, we will be hosting an online webinar for EPR packaging data reporting. To register for the webinar, please click [here](#).

EPR Packaging – PackUK invoices for Household Waste Disposal Costs

October saw the first invoices to producers of household packaging for the brand-new Household Packaging Waste Disposal [HPWD] costs.

Invoices were due to be paid by the start of December, so if you have not yet made payment, please do so as a matter of urgency. Your invoices can be accessed through your Report Packaging Data (RPD) online account.

Late payments may result in a variable monetary penalty of (whichever is greater):

- 20% of your unpaid disposal and administration fees; or
- 5% of your UK turnover if registered as single organisation / 2% of your UK group turnover if registered as a group.

Reporting Periods	Reporting Deadlines
Q1: 1st January to 31st March	Tuesday 15th April 2025
Q2: 1st April to 30th June	Tuesday 15th July 2025
Q3: 1st July to 30th September	Wednesday 15th October 2025
Q4: 1st October to 31st December	Thursday 15th January 2026
2025 B2B EEE: 1st Jan to 31st December	Thursday 15th January 2026





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Data Round – Small Producer Annual 2025 EPR Packaging

Small Producers for 2026 will need to submit their Annual 2025 declarations via our Circul8 portal by the end of February.

Make sure you also completed your annual confirmation of registration details through Circul8.

ERP UK will then ensure Small Producers are registered for 2026 by the legal deadline (1st April 2026).

Here's a reminder of what determines if you are obligated and your producer size (Small or Large).

Please refer to our [Small Producer \(pEPR\)](#) service for a combined compliance and data service package.

Packaging PRN Market Update for Q4 2025

Our latest update on the PRN market was emailed to our packaging members ahead of Q4 invoicing.

If any packaging members have not received our recent market update, or would like to discuss PRNs in more detail, please contact your Compliance Account Manager, or email: ukcompliance@erp-recycling.org.

Producer Thresholds		Turnover		
		<£1million	>£1m - £2m	>£2million
Packaging Tonnage	<25 tonnes	No obligation	No obligation	No obligation
The total from ALL packaging activities, including selling	25-50 tonnes	No obligation	Small Producer	Small Producer
	>50 tonnes	No obligation	Small Producer	Large Producer

Packaging PRN Market Update for Q4 2025

Our latest update on the PRN market was emailed to our packaging members ahead of Q4 invoicing. If any packaging members have not received our recent market update, or would like to discuss PRNs in more detail, please contact your Compliance Account Manager, or email ukcompliance@erp-recycling.org.

Member events for 2026

We have planned face-to-face workshops and online webinars to take place throughout the year, so please take a look at our website [here](#).

These member events are a way of

providing information, updates and answers to any questions raised to help understand your obligations and be compliant.





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Starting them early: ERP UK gets pupils excited about circularity through the School Recycling Programme

ERP UK's long-running Welsh Schools Takeback initiative results in thousands of tonnes of used batteries being collected each year, with the 2025 scheme preventing 132,000 batteries ending up in landfill in just 8 months.

It's been nearly 14 years since ERP UK launched the Wales Schools Takeback initiative, and it's inspiring to see how this straightforward programme, encouraging pupils across the country to engage in battery recycling, has captured the imagination of young people nationwide.

From small beginnings, the campaign has grown to be widespread across South Wales and into Mid Wales up to Ceredigion, playing a key role in promoting engagement with a low-waste, sustainable future. The 2025 iteration has posted some of the most impressive results to date,

with 12,000 schoolchildren collecting more than 3.3 tonnes of used batteries in just eight months, removing 132,000 batteries from potential landfill.

It's an astonishing amount, serving as clear proof the next generation isn't putting off today, what it cannot afford to tomorrow. What makes these school-based recycling initiatives so effective is that they are as much educational as they are helpful.

Crucially, through a practical and positive exercise like this, beyond the 'who can collect the most' incentive, students learn how battery recycling can conserve resources, save energy and reduce the need for new raw materials.

It's building-in desirable habits and routine to help establish and maintain a low-carbon, minimum waste future enthusiastically, helping youngsters view battery takeback as a service and responsibility, rather than a tedious, obligatory chore. Through a mix of evolving incentivisation, accessible

participation, measurable outcomes and effective partnerships with Wales' CLAIRE group of councils (working together with ERP UK through Resource Efficiency Wales), the initiative grows from strength-to-strength each year.

And it doesn't stop there. Looking ahead to 2026, ERP UK is limbering up for what it hopes to be the biggest year for Wales Schools Takeback yet, reaching out to headteachers, sustainability coordinators and school administrators to inspire scholastic engagement to address environmental challenges in meaningful ways.

Next year will be about hammering home the vital role schools play in the recycling ecosystem, not just from nurturing lasting behavioural change, but also directly collecting significant quantities of batteries (and small electricals) that might otherwise end up in landfill. Yet ERP UK will also demonstrate how the impact goes further. Beyond increasing an awareness of doing the right thing, we're proving that this type of activation is also influencing the development of the pupils themselves, opening up future opportunities around careers and civic engagement.

Ultimately, what the Wales Schools Takeback initiative demonstrates is that compliance expertise can be leveraged beyond its upfront purpose to also create community benefit and simultaneously strengthen the every-growing national, and global, circular economy infrastructure.

Why not take a closer look into the initiative and see how it relates to our wider takeback services [here](#).





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RAM Roadmap: Charting a clear course to compliance: understanding PackUK's RAM roadmap 2025-2030

With the Recycling Assessment Methodology (RAM) evolving at a rapid rate, ERP UK explores what the next five years look like.

In October 2025, PackUK published its highly anticipated RAM roadmap, charting a course for 2025-2030 with key milestones codified for large producers to add to their regulatory diaries. There are plenty of positives to take away as it will help to increase RAM alignment with UK and international policy, creates tighter language and definitions, and strengthens the regulation to reduce loopholes.

However, the roadmap also highlights a significant degree of transformation to existing models. So, if you're responsible for packaging compliance, this is something you'll want to pay



close attention to as it contains details that call for immediate action.

Fundamentally, the roadmap is an essential document which will help to seamlessly navigate the complexities of packaging Extended Producer Responsibility (pEPR), demystifying RAM v1.1, enabling affected organisations to create a clear strategy for compliance.

Whilst PackUK makes it clear that the timings contained within the roadmap are subject to change, the current version offers a pretty good indicator of the direction the regulation is going in, and any upcoming enhancement and changes.

From the very outset, it's important to understand the structure of the roadmap, as it's only through knowing that it operates on two levels that readers will know what they need to do. This can be delimited as recurring annual activities and specific 'intensive' reviews on

particular years.

Activity is already underway, with take-back scheme guidance under review and evidence requirements for RAM rating changes being assessed. But that's only the beginning. The next five years will bring significant transformation, and it's encouraging that producers now have a clearer sense of what to expect in terms of both annual obligations and intermittent requirements.

Thankfully, regulatory tightening is being introduced in a gradual and piecemeal way, so organisations can plan in a phased fashion. However, it's something they should be thinking about now, rather than putting it off until later. For example, whilst next year will see focus turned to establishing packaging definitions and language clarity, things quickly start to ramp up with a Deposit Return Scheme (DRS) potentially operational by 2028 and a review of the recyclability of bioplastics and compostables in 2029. For these reasons, it's worth carefully studying the roadmap today.

Needless to say, here at ERP UK we have been closely scrutinising the RAM roadmap and incorporating our learnings into the advice and consultancy we're providing to our members around pEPR and RAM v.1.1.

If you want to find out more, why not take a look at our comprehensive deep dive into the roadmap? This article will help you to plan your compliance journey and remain fully compliant up to 2030.





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Consultation launched on extending CE mark recognition for Ecodesign

Currently, manufacturers of Energy Related Products that carry the European Union's CE Mark can sell them in Great Britain (GB) without needing to also apply a UK Conformity Assessment (UKCA) mark, as long as the products comply with GB's ecodesign standards.

This arrangement helps to reduce costs for manufacturers by removing the need for two separate conformity assessment processes to sell the same goods in both the EU and GB.

However, a significant change is underway in the EU. On 18 July 2024, the EU enacted a new framework for setting ecodesign standards, known as the Ecodesign for Sustainable Products Regulation (ESPR). This new regulation is set to replace the previous Ecodesign Directive (2009/125/EC). The first EU ecodesign regulations to be created



under the new ESPR framework are expected to come into force from mid-2027.

Considering this change, a consultation has been launched to propose an amendment to the UK's Ecodesign for Energy Related Products Regulations 2010. The proposal seeks to extend the current CE marking recognition mechanism so that it also applies to new measures made under the EU's ESPR.

Amending the regulations to continue this recognition for products would future-proof the existing policy. This would provide businesses with long-term certainty that the streamlined process can continue.

The responses gathered from this consultation will inform the government's decision on whether to develop a Statutory Instrument to officially amend the 2010 Ecodesign Regulations. The consultation is now accessible for responses and closes on 20th January 2026. The consultation can be accessed [here](#)

2026 EPR Compliance: Why preparation today is non-negotiable

Whilst transition to Extended Producer Responsibility for packaging (pEPR) dominated much of 2025, producers who assume the hard work is now done are risking costly surprises. So, now is not the time to rest on one's laurels.

In fact, the new year will bring a fresh wave of wider EPR compliance challenges and opportunities directly affecting companies' regulatory and operational requirements. Here are three of the most significant:

Eco-modulated fees arrive: The most notable change will be the introduction of eco-modulated packaging fees, with the first invoices expected in the second half of 2026. Compliance costs will now be determined by the recyclability of packaging under the Recyclability Assessment Methodology (RAM). Packaging classified as 'Green' will benefit from reduced fees, funded by the additional charges levied on problematic packaging. This means 'Red'-rated materials (any packaging not assessed under RAM) will face escalating penalties, starting out as 1.2x the base fee in 2026/27, rising to 2.0x the base fee in 2028/29. Meanwhile, sustainable alternatives could reduce costs by up to 50%.

Nation of Sale reporting: Nation of Sale reporting (whether a product is sold in England, Scotland, Wales or Northern Ireland) is a delayed part of EPR for packaging data reporting. However, although the deadline for reporting falls in April 2027 – it applies





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to sales destination for 2026 – so setting up and maintaining accurate data collection for this now is important.

New WEEE requirements: Beyond packaging, 2026 introduces fresh regulatory responsibilities. For example, vape producers must fund collection and recycling costs to meet new targets. Online Marketplaces (OMPs) are now classified as producers for non-UK sellers on their platforms, and they must register for WEEE compliance.

Of course, this small snapshot only scratches the surface of what's coming down the tracks. Why not read our full rundown [here](#).

Act now

Packaging producers should conduct a full packaging audit now, assess all materials under RAM to avoid defaulting to Red classification, and strengthen data collection systems for Nation of Sale reporting requirements.

As with all things EPR, planning is key to minimising the burden. Contact ERP UK for expert guidance on how to navigate 2026's intensifying compliance landscape, turning compliance obligations into potential competitive edge, while protecting your business from avoidable costs.

Fraud alert: Fake EPR invoices targeting UK producers

Recently, PackUK, the administrator for the UK's packaging Extended Producer Responsibility (pEPR) scheme, issued an urgent fraud warning after counterfeit payment demands began circulating to producers across the country. Here's

what you need to know:

The scam

Businesses are receiving sophisticated emails designed to mimic official Notices of Liability (NoLs) for their packaging obligations. These fraudulent messages may direct recipients to fake government websites or payment portals, which attempt to divert genuine compliance payments into the hands of criminals.

The scam is particularly dangerous because it exploits the complexity of the pEPR regulations and the fact that many businesses are still navigating their obligations for the first time. Fraudsters are taking advantage of this uncertainty to create convincing correspondence that appears legitimate.

The financial risk is clear, but the compliance implications are equally serious. A producer who pays a fraudulent invoice believing they have settled their legal obligations will still be liable for non-compliance penalties – in addition to the money lost to the scam.

With penalty rates of the greater of up to 20% of unpaid fees or 5% of UK turnover (2% for individuals), the consequences of falling victim to this fraud extend far beyond the initial loss.

How to protect your business

PackUK is urging all producers to exercise extreme caution when receiving any correspondence about pEPR obligations. Before taking any action:

- **Verify the source:** Carefully check the sender's email address for inconsistencies or unusual domains.
- **Do not click links:** Fraudulent emails may contain links to convincing but fake portals designed to harvest payment details.
- **Use official channels:** Log in directly to the Government's 'Manage your packaging data' portal to check your liability status and make payments securely. Or, go straight to PackUK's official Report Packaging Data (RPD) accounts.

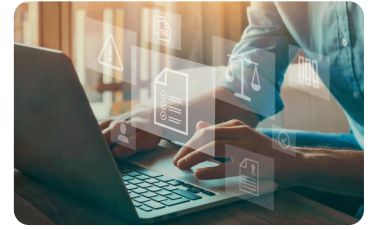
PackUK added that it will never send producers a payment link via email and warned that scammers may also attempt to make contact via telephone or letter.

Report suspicious activity

Any suspected fraudulent correspondence should be reported immediately to help authorities track and combat this criminal activity. Producers who are uncertain about the legitimacy of any communication regarding their EPR obligations should contact their compliance scheme directly for verification. You can contact the EPR support desk by emailing epcustomerservice@defra.gov.uk.

Vigilance is the first line of defence. Taking a few precious moments to verify correspondence could save your business from both significant financial loss and compliance penalties.





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WEEE Compliance

WEEE update – Environment Agency stats update

Volumes of EEE placed on the market (POM)

According to data published by the Environment Agency on 1st December 2025, the volume of EEE placed on the UK market (POM) in Q3 2025 de-

creased by approximately 3,330 tonnes compared to Q3 2024.

There were decreases across various categories in Q3 2025 compared with Q3 2024; Large Household Appliances (Category 1) decreased significantly by 9% (nearly 13,000 tonnes), IT and Telecomms Equipment decreased by 14% (over 2,100 tonnes), Toys, Leisure and Sports decreased by 21% (over 3,500

	Category	Q2 2025 UK B2C EEE placed on the UK Market (tonnes)	Variance (Q2 2025 vs Q2 2024)	% Variance
1	Large Household Appliances	129,003	12,891	-9%
2	Small Household Appliances	54,487	1,680	3%
3	IT and Telecomms Equipment	13,748	-2,161	-14%
4	Consumer Equipment	7,336	-409	-5%
5	Lighting Equipment	19,070	3,907	26%
6	Electrical and Electronic Tools	18,432	1,960	12%
7	Toys Leisure and Sports	13,691	-3,566	-21%
8	Medical Devices	688	-11	-2%
9	Monitor and Control Instruments	6,597	1,392	27%
10	Automatic Dispensers	105	35	50%
11	Display Equipment	18,388	-1,624	-8%
12	Cooling Appliances	59,596	2,363	4%
13	Gas Discharge Lamps/ LED	1,003	-93	-9%
14	Photovoltaic Panels	41,302	5,662	16%
15	Vapes & E-cigarettes	427	427	0%
	Total	383,873	-3,329	-1%



An Expert in

WEEE Compliance

Our WEEE compliance scheme simplifies environmental compliance for companies making or importing electrical and electronic equipment.

Our solution takes care of all your legal obligations from registration and reporting to collection and recycling.

Contact us today:

+44 (0)20 3142 6452

or

visit our [WEEE webpage](#) for more information.





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tonnes) and Display Equipment, by 8% (over 1,600 tonnes).

But there were increases too; Cooling Appliances Containing Refrigerants increased by 4% (over 2,300 tonnes), Photovoltaic Panels increased by 16% (over 5,600 tonnes), and the total Small Mixed WEEE categories 2-10 increased by 3% (over 10,000 tonnes).

Volumes of WEEE collected

As the table below demonstrates, the overall collected tonnage in Q3 2025 increased to that collected in Q3 2024.

WEEE collection volumes in Q3 2025 showed a 5% increase when compared to the same period last year (nearly 7,000 tonnes). Some categories demonstrated growth, particularly Large Household Appliances (Category 1) which saw an increase of 8% (over 3,100 tonnes), Cooling Appliances Containing Refrigerants (Category 12) grew by 6% (over 2,400 tonnes), and Categories 2-10 Small Mixed WEEE collections grew by 4% (nearly 1,460 tonnes). Photovoltaic Panels (Category 14), saw a huge 393% increase, by 374 tonnes.

The following streams showed a decline in collection volumes; Display Equipment (Category 11) decreased by 1% (144 tonnes) and Gas Discharge Lamps (Category 13) decreased by 20% (217 tonnes).

Outlook for the compliance year

Looking back at Q3 progress over the past decade we know that a stream which has not achieved 75% of its

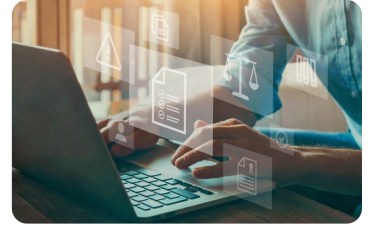
Category	Q3 2025 UK B2C WEEE Collected (tonnes)	Variance (Q3 2025 vs Q3 2024) (tonnes)	Variance (%)
Large Household Appliances	43,732	3,102	8%
Cooling Appliances	40,622	2,409	6%
Display Equipment	11,947	-144	-1%
Cats 2-10 Small Mixed WEEE	38,181	1,459	4%
Gas Discharge Lamps & LED Light Sources	848	-217	-20%
Photovoltaic Panels	469	374	393%
Vapes & E-cigarettes	0	0	0%
TOTAL	135,802	6,983	5%

Category	Q1-Q3 2025 UK B2C WEEE Collected (tonnes)	2025 DEFRA targets	Progress to targets (%)
Large Household Appliances	130,588	172,384	76%
Cooling Appliances	108,707	141,068	77%
Display Equipment	35,111	51,631	68%
Cats 2-10 Small Mixed WEEE	108,348	147,617	73%
Gas Discharge Lamps & LED Light Sources	2,482	4,066	61%
Photovoltaic Panels	943	519	182%
Vapes & E-cigarettes	0	0	0%
TOTAL	386,179	517,285	75%

target by this point is unlikely to achieve its collection target. When looking at the collection volumes against the collec-

tion targets for Q3 2025 specifically, it is evident that Large Household Appliances (Category 1), Cooling Appliances





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Containing Refrigerants (Category 12) and Photovoltaic Panels (Category 14) are on track after quarters 1,2 and 3, however, Display Equipment (Category 11), Categories 2-10 Small Mixed WEEE and Gas Discharge Lamps & LED Light Sources (Category 13) have still got some catching up to do.

Battery update –

Environment Agency stats update

Volumes of Portable Batteries placed on the market (POM)

According to data published by the Environment Agency on 1st December 2025, the volume of portable batteries placed on the UK market in Q3 2025 increased by 1,090 tonnes (11%) compared to Q3 2024.

Volumes of waste portable batteries collected

The Q3 2025 collection data shows an overall decrease from this time last year (Q3 2024). There was a 16% decrease overall (-801 tonnes), with a notable decrease in 'Lead acid' (-47%), by over 1,600 tonnes, whilst there was significant increases in 'Ni-Cd' (125%) and 'Other' waste portable batteries being collected (43%), by over 640 tonnes.

	Portable Batteries Placed On The Market		
	Q3 2024 (tonnes)	Q3 2025 (tonnes)	Variance (%)
Lead Acid	374	419	12%
NiCd	35	25	-30%
Others	9,710	10,766	11%
TOTAL	10,120	11,210	11%

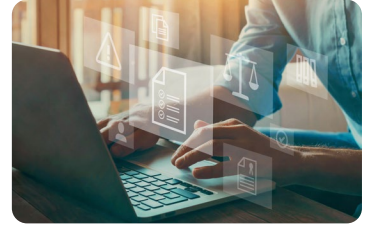
	Waste Portable Batteries Collected		
	Q3 2024 (tonnes)	Q3 2025 (tonnes)	Variance (%)
Lead Acid	3,427	1,822	-47%
NiCd	129	291	125%
Others	1,486	2,128	43%
TOTAL	5,043	4,241	-16%

The Q3 2025 collection data shows that there were more 'Other' waste portable batteries collected than 'Lead Acid', only the second time this has happened and both times over the last two quarters.

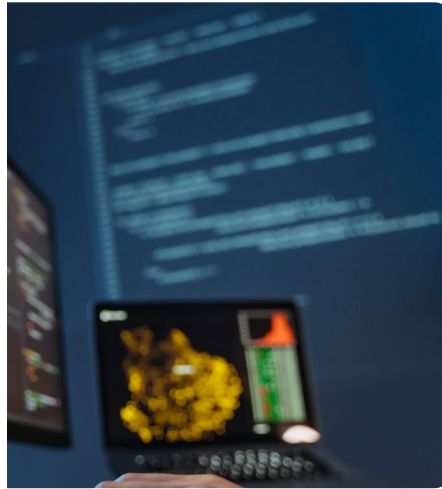
Outlook for the compliance year

Based on Q3 2025 data, the UK collection rate for 2025 is 37.05%, which is 82.33% progress towards to the 2025 target (45%).





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Data Services

Extended Producer Responsibility

Data Services Account Managers are working towards the next pEPR submissions and will be contacting customers for their Half 2 2025 data. This will include data for the period 1st July– 31st December 2025.

Please contact your account manager as soon as possible if there have been any changes to your business structure or activities that could alter your data and submissions.

If you have any questions about Extended Producer Responsibility or your next packaging submissions, please reach out to your account manager directly or the Data Services team at:

ukdataservices@erp-recycling.org

For the latest guidance on EPR please read [here](#)

Nation of sale

The Environment Agency has now confirmed Nation of Sale data collection and reporting timelines. During The EPR conference held in London on the 12th of November, it was confirmed that data collection will begin from 1st January 2026 for the 2026 calendar year, with the first report due 1st April 2027.

Who needs to report Nation of Sale data?

Both small and large producers who are classed as; Sellers, Distributors, Service Providers, Online Marketplaces or Importers.

Why do I need to report Nation of Sale data?

Nation of Sale data is necessary to allow each UK nation to set and track nation-level recycling targets.

Producers have a legal requirement to report and collect nation of sale data, following the removal of the regulatory position statement (RPS) 330 on the 31st December 2026.

When do I need to collect and report?

Data collection activities should begin from 1st January 2026, in accordance with the Packaging Regulations for the period 1 January to 31 December 2026

Data must be reported to the Environment Agency on or before 1 April 2027, therefore we are requesting members submit their full year Nation of Sale data along with their H2 2026 packaging declarations in February 2027.

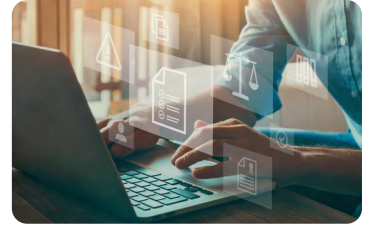
Should you have any questions about Nation of Sale reporting, or your next submissions, please contact your Account Manager or the Data Services team at:

ukdataservices@erp-recycling.org

Plastic Packaging Tax

With the new year brings the new rate for UK Plastic Packaging Tax (PPT). The government has announced that the rate of PPT will increase in line with the Consumer Price Index (CPI). The rate will increase from £223.69 per tonne to £228.82 per tonne from 1st April 2026 and will apply to plastic packaging containing less than 30% recycled plastic that is manufactured in and imported into the UK.





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PPT is reported quarterly, and businesses should also carry out their own due diligence checks in respect of Plastic Packaging Tax if you either manufacture plastic packaging components or import plastic packaging components.

If you have any questions about PPT, and how it will affect your company, please contact your EPR Account Manager or the Data Services team at ukdataservices@erp-recycling.org

For the latest HMRC guidance on the tax please read [here](#)

PPT Mass Balancing of Chemically Recycled Plastic

The government has now confirmed that a mass balance approach for chemically recycled plastic for the purposes of PPT will be accepted, and it intends to implement this change from April 2027. From the same date,

pre-consumer waste will no longer be accepted as a source of recycled plastic for the purposes of PPT.

Provision for these changes will be legislated for in Finance Bill 2025-26.

Mechanical Recycling and Mandatory Certification

As announced in the 2025 Budget, the government will also be launching a consultation in early 2026 to seek views on the potential introduction of mandatory certification for businesses claiming relief from PPT on the basis that their plastic packaging contains at least 30% mechanically recycled plastic, following compliance concerns raised by businesses.

This consultation will explore the risks and issues with the verification of mechanically recycled plastic and invite views on the whether to introduce

mandatory certification and the potential impacts on businesses.

PPT Due diligence checks

LIABLE businesses should carry out due diligence checks to establish the integrity of the suppliers and customers in your supply chain.

You should carry out these checks at least every 12 months. If you become aware of any changes within the 12 months, you must decide if more due diligence checks are required.

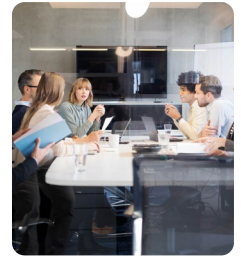
It is recommended that due diligence checks include (but not limited to) weighing and weight verification checks, which should be carried out to verify the weight data held on record and used to form part of the tax returns. Full details of HMRC's guidelines can be found [here](#)

For any of your UK Suppliers, it is recommended that you ensure that your suppliers are paying PPT where it is due, with the idea of 'secondary liability' being available in PPT legislation that can follow your supply chain. Please read [here](#)

Please speak to your Data Services Account Manager to see how ERP UK can help.

We would like to wish you all a very Merry Christmas and a successful year ahead.





16 | Featured article:

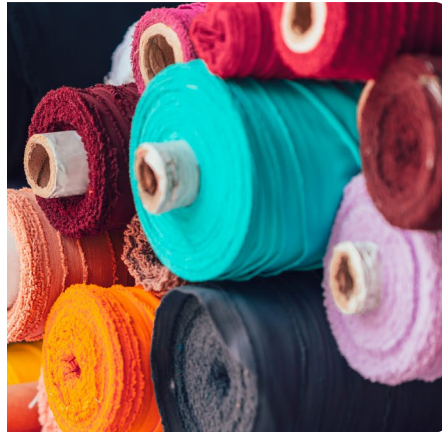


Textiles tEPR: What's on the horizon?

The clothing industry faces a fundamental shift in how it manages textile waste. With 88% of textile waste in Europe[3] currently ending up in landfill or incineration, Extended Producer Responsibility for textiles (tEPR) is set to change the game.

The EU's revised Waste Framework Directive made tEPR mandatory across all member states from October 2025, with fully functional schemes required by April 2028. For UK clothing producers selling into EU markets - whether manufacturers, importers, retailers or online sellers – compliance requirements are edging closer.

While the UK charts its own course outside the EU, mandatory tEPR programme is highly likely. A Circular Economy Growth Strategy expected early in 2026 will likely set the timetable for UK tEPR policy implementation. Industry



experts project a framework will be in place within the next five years. The question for UK clothing businesses is whether they'll be ready when it does.

Benefits of planning ahead

Delaying preparation creates compressed implementation timelines, higher costs and a reactive scramble when regulations arrive. Early movers gain significant advantages. Under the EU's tEPR, producers will pay fees based on product volume and environmental impact. These fees then fund the collection, sorting, reuse and recycling of textile waste. UK tEPR is expected to be run in a similar way. Fee structures will likely include modulated charges, incentivising environmentally preferable products with lower costs.

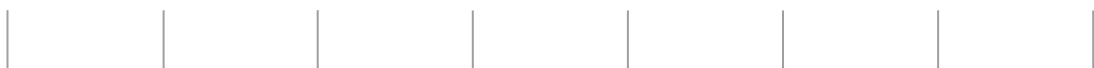
Forward-thinking businesses are already developing the capabilities tEPR will require detailed product data systems, reverse logistics, digital tracking and circular design principles. These same capabilities unlock new business

models in rental, resale, repair and remanufacturing. Early preparation delivers operational advantages too: improved inventory management, reduced waste, enhanced customer loyalty through take-back programmes, and cost savings from circular design that simultaneously appeal to increasingly conscious consumers.

ERP UK has tEPR sewn up

As a leading expert in environmental compliance and EPR solutions, ERP UK brings unmatched experience across multiple waste streams - WEEE, batteries and packaging. This multi-stream expertise positions us uniquely to support clothing producers preparing for tEPR. We provide expert guidance on evolving UK and EU tEPR legislation, international insights from our position within the global Landbell Group, bespoke support tailored to your business size and complexity, data-driven solutions to simplify compliance obligations and strategic partnership to help you get ahead of the curve. Our approach is straightforward: we simplify complex environmental regulations so you can focus on your business whilst making a positive impact on sustainability.

The businesses that thrive under tEPR will be those that prepare today. Don't wait for the rush. Reduce costs, unlock opportunities and position your business as a leader in the circular economy. [Contact our team](#) to discuss how we can support your tEPR readiness journey.





17 | Meet a new team member: Cayla Balfour



analyse and manage a range of customer datasets. My role is varied and includes tasks such as key account matching, auditing, supplier data loading and supporting account managers within the data services team.

Q How long have you been with ERP UK?

A Since November this year

Tell us about your experience before joining the ERP team?

A Before joining ERP UK, I spent several months travelling across Southeast Asia and a year working in Australia, both of which were incredibly rewarding experiences. Prior to that, I completed a degree in Natural Sciences at Lancaster University, which gave me a deep understanding of how our world works and the role we can all play in protecting it – something I'm extremely passionate about.

Q What does a typical day look like for you?

A As a database administrator, I

Q What motivates you in your role?

A I am motivated by the opportunity to apply the skills I developed at university and in previous roles to support both the data services team and the wider organisation. I was particularly drawn to ERP UK because of its strong focus on sustainability and positive environmental impact.

Q What do you enjoy doing outside work?

A I enjoy running and recently completed a half marathon, which was challenging but very rewarding. I also enjoy baking, particularly during the Christmas holidays when we have family and friends over.

Q Your favourite music band(s)?

A I don't really have a particular favourite band, but I mostly enjoy listening to pop music.

Q Favourite holiday destinations?

A My favourite holiday destination is Sydney, Australia. I love how much there is to do, and while it feels similar to the UK, the weather is definitely better!



Register for our 2025
weekly and monthly

Workshops & Webinars

Including:

Extended Producer Responsibility
Packaging Regulations

Receive the latest insight,
guidance, and key updates
relating to
Packaging Regulations

To avoid disappointment,
book your virtual seat at the
EPR discussion table
and let ERP UK steer you
through the new
Packaging Compliance

visit our
**Workshop & Webinar
webpage**

to register and find out
more information.





18 | Events & workshop diary



Events

ACI Battery Recycling Europe |

Date: 4th & 5th March 2026 |

Venue: London UK

Description:

Battery Recycling Europe 2026 is the leading conference for professionals driving the future of sustainable battery lifecycle management. This March, industry leaders from across the value chain—recyclers, manufacturers, collection operators, and policymakers—will come together to tackle urgent challenges and showcase breakthrough solutions shaping the sector. John Redmayne (Managing Director) will be attending and speaking at the event.

Event details [here](#)

National E-Waste & Critical Minerals Conference 2026 |

Date: 11 March 2026 | **Venue:** Cavendish Conference Centre, London

Description:

Formerly the WEEE Conference, the event has been rebranded with a new

name and identity to reflect its expanded focus on both electronic waste and critical materials. Join ERP UK at the National E-Waste & Critical Minerals Conference as we explore the future of electronic waste management. This essential industry gathering brings together leaders, policymakers and innovators to discuss the latest breakthroughs in recovery, reuse and recycling of waste electrical and electronic equipment.

Event details [here](#)

2025 Workshops and Webinars

Our workshops provide detailed training for our members about the Regulations and how to apply them in your business.

January 2026

EEE Scoping, Categorisation, Data Collection and Data Reporting |

Date: 7th January 2026 |

Time: 11am – 12.30 pm | **Venue:** Online

Battery Scoping, Categorisation, Data Collection and Data Reporting |

Date: 7th January 2026 | **Time:** 1.30pm – 2.30pm | **Venue:** Online

Please e-mail us if you are interested: uk@erp-recycling.org

Visit our webinars & workshops webpage to register and book your seat today - click [here](#)





19 | ERP's EPR glossary

AATF Approved Authorised Treatment Facility (for WEEE)	EA Environment Agency (see also SEPA, NRW and NIEA)	PERN Packaging Waste Export Recovery Note
ABE Approved Battery Exporter	EEA European Environment Agency	PP Polypropylene
ABTO Approved Battery Treatment Operator	EFW Energy from Waste	PPT Plastic Packaging Tax
AE Accredited Exporter (for Packaging)	ELV End of Life Vehicles	PRN Packaging Waste Recovery Note
AR Accredited Reprocessor (for Packaging)	EMS Environmental Management System	PRO Producer Responsibility Organisation
ATF Authorised Treatment Facility (for WEEE)	EPR Extended Producer Responsibility	PS Polystyrene
BFR Brominated Flame Retardants	ESA Environmental Services Association	PVC Polyvinyl chloride
CA site Civic Amenity (see also HWRC)	HDPE High Density Polyethylene	RCV Refuse Collection Vehicle
CIO Consumer Information Obligation (for Packaging)	HWRC Household Waste Recycling Centre	ROHS Restriction Of Hazardous Substances (in EEE)
CIWM Chartered Institution of Wastes Management	LA Local Authority	SEPA Scottish Environment Protection Agency
CSR Corporate Social Responsibility	LARAC Local Authority Recycling Advisory Committee	WAC Waste Acceptance Criteria
DCF Designated Collection Facility (for WEEE)	MRF Materials Recovery Facility	WBA Waste Batteries and Accumulators
DEFRA Department for Environment, Food and Rural Affairs	MSW Municipal Solid Waste	WCA Waste Collection Authority
DRS Deposit Return Scheme	NIEA Northern Ireland Environment Agency	WDA Waste Disposal Authority
DOENI Department for the Environment Northern Ireland	NPWD National Packaging Waste Database (Batteries & Packaging)	WEEE Waste Electrical and Electronic Equipment
DTS Distributor Takeback Scheme (for WEEE)	NRW Natural Resources Wales	WFD Waste Framework Directive
	ODS Ozone Depleting Substance	WRAP Waste and Resources Action Programme
	PCB Polychlorinated Biphenyl	
	PCB Printed Circuit Board	

WBA Regulations means The Waste Batteries and Accumulators Regulations 2009 (SI 2009/890);

WEEE Regulations means the Waste Electrical and Electronic Equipment Regulations 2013 (SI 2013/3113); and

Packaging Regulations means The Producer Responsibility Obligations (Packaging Waste) Regulations 2017 (SI 2007/871)





20 | Get in touch

Please get in touch – we'd love to hear from you!

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For Data Services:

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Email: ukdataservices@erp-recycling.org

For International Compliance:

Contact: Rupert Foxall, EU Services Manager Call: +44 (0) 7825 119437

Email: rupert.foxall@erp-recycling.org

Our services

WEEE Compliance:

Simplifying the recycling of waste electrical and electronic equipment

Visit our webpage [here](#)

Batteries Compliance:

Simplifying the recycling of portable batteries

Visit our webpage [here](#)

Packaging Compliance:

Simplifying the recycling of packaging

Visit our webpage [here](#)

Data Services:

Simplifying your data and submissions

Visit our webpage [here](#)

Small Producer (pEPR)

ERP UK is an expert in Extended Producer Responsibility

Visit our webpage [here](#)

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