

What you need to know before getting started

Introduction

This document has been designed to help your company understand and collect the relevant data required to comply under the packaging waste regulations. It has been designed for use in conjunction with one of our data collection templates.

Are you obligated?

Your company is obligated if it handles more than 50 tonnes of packaging and has a turnover of more than £2 million.

If you are part of a group of companies within the UK, which combines, meets the turnover and tonnage of the threshold, then you may be obligated.

Performing an activity on your handled packaging

In order to be obligated, your company must perform one or more of the following activities on the packaging handled: Raw material manufacturing, conversion, pack/filling, selling, and importing.



Identifying obligated packaging

Before attempting to complete the template you will first need to identify the packaging for which you are responsible. Is it obligated packaging?

- Contain, handle, protect, display, present
- Usually new packaging
- Biodegradable packaging
- Leased packaging
- Internal use

It is important to remember that you are only obligated on packaging on its first journey through the packaging chain, **unless** you are importing, as second hand imported packaging is obligated.

The list above is not fully comprehensive as there are many exceptions. If you are unsure what packaging counts towards your obligation contact our Data Insights Team (data.insights@valpak.co.uk) for a free consultation.

Direct imports /suppliers

Only include imports purchased directly from overseas suppliers. You will be classed as an importer if you are the first UK business to take legal title of the imported packaging when it enters the UK. Please note that packaging received from Northern Ireland is not classed as an import.

Ownership

Does your company have legal title of the packaging handled? For example, you do not have to include leased packaging **unless** you are the lessor such as CHEP pallets. Lessors are obligated under the regulations for the packaging which they lease.

Contract Packing / Third-party warehouses / Toll manufacturing

- The obligation lies with whoever owns the packaging at the time the activity takes place, e.g. packing/filling
- The ownership changes at the point of sale, therefore the company using contract packers/third-party warehouses/toll manufacturing always takes the selling obligation.
- It is considered good practice to cover Packaging Regulations responsibilities when arranging contracts with third parties.
- If the packaging is owned by a foreign company, the UK contractor may have to pick up the obligation.

Supply of goods & packaging

The most common type of supply is when your organisation transfers the ownership of packaging or packaged goods to a customer. Supply can also occur when packaging or packaged goods are lent, exchanged or given as a sample, a gift or a prize. When packaging is supplied to another site within the same company (the same legal entity) this is considered as 'internal supply', which currently carries no obligation. However if this packaging is subsequently supplied to another company it will become obligated.

All materials used for packaging purposes should be included:

- Paper (includes cardboard and cellulose)
- Glass
- Aluminium
- Steel (includes tin plate)
- Plastic (includes polystyrene, polythene, shrink wrap, foam)
- Wood (includes pallets and now fibreboard such as chipboard and MDF)

- Other (includes all other materials such as ceramics, cork, jute, rubber and hessian)

NB: If you are dealing with composites use the predominant material weight. When dealing with different materials within a single product such as a bottle of wine, you will need to consider each of the different packaging materials within that single product. E.g. you would need to consider the glass bottle, paper label and metal cap/cork.

What data sources can I use to work out how much packaging we have handled?

- Purchasing and sales reports
- Customer and supplier reports
- Invoices
- Production reports
- Inventory and stock reports
- Bill of materials

Packaging layers

- Primary packaging: first-level product packaging such as the bottle, can, jar, tube, etc., that contains the item sold.
- Secondary packaging: encloses the primary packaging, such as cardboard outer cases.
- Transit packaging: transport packaging such as pallets, shrink wrap, etc.

How to collect packaging weights

- In-house weighing
- Suppliers
- Internal specification records
- Ask other departments within the business

It should be noted that company's activities and packaging applications vary widely and as such no one method is considered to be suitable for all.

Data accuracy “As Accurate As Reasonably Possible”

The regulations state that your data return should be “as accurate as reasonably possible” with evidence that your level of accuracy has shown improvements from submissions in previous years. It is in your interest to provide data which is as accurate as reasonably possible; an over estimation of packaging flows could result in your business facing higher obligation costs, while under estimation could result in prosecution.

For further guidance and detailed information please contact the Valpak Data Insights Team on **01789 208 733** or email data.insights@valpak.co.uk