Expression Of Interest – Proposal for the role of the Producer Responsibility Organisation (PRO)

Return completed EOI forms to packaging@defra.gov.uk by **10 June 2025**, candidate guidance can be found at the end of this form.

Candidate information

Organisation name and details Please provide organisation name and registered address, only non-for-profit body corporates, as defined in the candidate guidance in this form will be considered eligible.	This application is being made by Valpak Limited on behalf of a to be formed not for profit body, in line with the eligibility criteria, which states in Paragraph 1 of 'Candidate Guidance/Eligibility and Selection' on this form: *"Candidates will need to demonstrate that they currently meet this requirement through providing details of their company registration, their articles of association and a copy of their members' agreement. Alternatively, if the proposed company has not yet been formed, the candidate must provide a clear commitment from its proposed members that they will form a not-for-profit body corporate before the proposed date for the submission of formal applications in autumn 2025".* We can confirm that we already have the commitment for this not-for-profit body corporate from proposed Founder Members. Evidence of this commitment can be provided to DEFRA on request. Valpak has an extensive track record in previously operating as a not for distribution body, which is akin to a not-for-profit body. We also currently operate Valpak WEEE Retail Services Limited, which is run on a not-for-profit basis. REDACTED
Primary contact name and details Please provide a contact name, job title, email address and phone number	REDACTED
Organisations endorsing these proposals Please list organisations endorsing your proposals for the PRO, provide a named contact for each organisation alongside their job title and email address	REDACTED
Organisations consulted on these proposals Please list organisations consulted in developing these proposals including the date, and (briefly) the manner / forum of this engagement	REDACTED

Functions of the PRO

For each function listed below, please indicate which, if any, of the listed sub-functions the PRO should take on each year and provide a brief high-level summary of benefits of the PRO taking on these sub-functions. Where PackUk should retain a sub-function, add this to the "PackUK to retain" list.

Sub-functions not delegable to a PRO are listed under "PackUK to retain", this includes all sovereign sub functions which can only be carried out by public bodies. Candidates must also indicate what other activities beyond those functions delegated by PackUK they intend to undertake independently if appointed as the PRO.

Further information on how to complete this section can be found in the candidate guidance at the end of this form.

Function	Sub functions	Sub functions taken on by PRO	What value does the PRO add?
Calculation of producer fees Reg 60,61, 62,63,64,65, 66 & 75	• Run producer fee calculator using local authority (LA) disposal costs, RPD packaging data, public information costs, impairments and (from 2026/27) modulation criteria to determine individual producer fees • Review calculation results • User feedback (Producers, LAs) • Quality assurance • Commissioning fees calculator audit • Model / calculator development • Develop public information strategy and plan activity • Estimate public information costs for year ahead *PackUK to retain* • Sign off outputs and changes to model **[Sovereign]** • Data & model / calculator ownership **[Sovereign]** • Set administration fees **[Sovereign]**	*PRO Year 1 (26/27)* **Run producer fee calculator -** Operate calculator using PackUK methodology and data inputs (LA costs, RPD data, impairments, public info costs). **Review calculation results -** Internal QA and reconciliation with PackUK outputs. **User feedback (Producers, LAs) -** Establish feedback channels (e.g. surveys, forums). **Quality assurance -** Implement QA protocols and audit trails. **Commissioning fees calculator audit -** (assumed PackUK-led in Year 1). **Model / calculator development -** (assumed PackUK retains control in Year 1). **Develop public information strategy and plan activity -** Support PackUK in strategy development. **Estimate public information costs for year ahead -** Provide input to PackUK estimates. *PRO Year 2 (27/28)* **Run producer fee calculator -** Incorporate modulation criteria as they come into effect. **Review calculation results** - Enhanced review with stakeholder feedback loops. **User feedback (Producers, LAs) -** Integrate feedback into calculator refinements. **Quality assurance -** Expand QA to include third-party validation. **Commissioning fees calculator audit -** Commission independent audit of methodology and outputs.	The PRO adds value to PackUK by operationalising and enhancing the delivery of key sub-functions involved in the calculation of producer fees. These include running the fee calculator, reviewing the methodology, inputs and outputs, benchmarking the results, engaging stakeholders, assuring quality and consistency, estimating public information costs, and supporting model development. By taking on these responsibilities, the PRO enables PackUK to focus on strategic oversight while ensuring that the fee-setting process is transparent, responsive, and grounded in real-world data. The PRO acts as a bridge between PackUK and producers, facilitating feedback loops that improve the accuracy and fairness of fee allocations. Although the PRO is expected to remain under government approval and reporting to PackUK, it is likely to have a degree of operational independence. This has the potential to relieve it of at least some of the administrative and procedural constraints which might be experienced in delivering these services from within government. In addition to the core technical responsibilities associated with fee calculation, the PRO can add significant value through its broader capabilities in quality assurance, stakeholder engagement, and communications. By embedding robust quality assurance processes, commissioning independent

		Model / calculator development - Begin collaborative development with PackUK. **Develop public information strategy and plan activity** – Select delivery partner or partners. Co-develop and pilot campaigns. **Estimate public information costs for year ahead -** Jointly model costs with PackUK. *PRO Year 3 (28/29)* **Run producer fee calculator** - Refine with updated modulation and performance data. **Review calculation results** - Continuous improvement and benchmarking. **User feedback (Producers, LAs) -** Formalise feedback into annual review cycle. **Quality assurance** - Embed QA into governance framework. **Commissioning fees calculator audit -** Annual audit cycle established. **Model / calculator development -** Take on full development responsibility (if delegated). **Develop public information strategy and plan activity -** Lead strategy and delivery of national campaigns. **Estimate public information costs for year ahead -** Independently estimate and validate costs.	audits, and facilitating transparent feedback loops, the PRO can ensure that the fee-setting process is not only accurate but also trusted by all parties. Furthermore, the PRO's role in developing and supporting public information strategies - particularly in collaboration with expert partners - ensures that communications are clear, consistent, and aligned with policy objectives. These complementary functions help to build confidence in the system, support compliance, and ultimately contribute to the environmental and economic effectiveness of the EPR framework. **What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?** Valpak is well placed to deliver this value and would propose leveraging the considerable expertise of WRAP throughout. Our experience producing the government's PackFlow reports (for Defra but with the full collaboration of the regulators and environmental agencies across the four nations / devolved administrations) gives us deep insight into packaging flows and cost drivers. Our recent work with the Local Government Association (LGA) on kerbside collection cost modelling demonstrates our ability to handle complex data and translate it into actionable, policy-relevant outputs. We also have a strong track record in stakeholder engagement across the waste and recycling value chain and quality assurance, ensuring that fee calculations are robust, auditable, and trusted by industry. Through this partnership model, the PRO strengthens PackUK's capacity,

			improves system accountability, and ensures that producer fees are calculated in a way that is both technically sound and widely supported.

Valpak has a long-standing track record of delivering robust quality assurance frameworks through its compliance scheme operations, including independent audits, validation processes, and ISO-certified continuous improvement systems. Our leadership within packaging, WEEE and batteries compliance, as well as initiatives such as the National Cup Recycling Scheme and our operation of recycle-more.co.uk demonstrate our ability to develop and support effective, audience-specific communications in collaboration with brands and public bodies. Leveraging the expertise of other organizations, including other compliance schemes, producers and their representative organizations to ensure processes installed are robust will also be explored. |
| **Producer fee modulation**

Reg 7, 25 & 64

Schedule 7 Paragraph 8. | • Consulting with producers and regulators to develop additional packaging sub-categories

• Publishing additional packaging sub-categories for the coming year

• Reviewing / recommending degree of modulation for packaging sub-categories

• Publication of fee modulation criteria/policy statement

• User feedback (Producers, MFs, Reprocessors, LAs, DGs, and other including environment orgs)

• Monitoring impact of incentives on amount/type of packaging placed on the market & feeding impact evaluation into modulation reviews | *PRO Year 1 (26/27)*
Consulting with producers and regulators to develop additional packaging sub-categories - Support PackUK-led consultation.
Publishing additional packaging sub-categories for the coming year - (PackUK-led).
Reviewing / recommending degree of modulation for packaging sub-categories - (Advisory role only).
Publication of fee modulation criteria / policy statement - (PackUK-led).
User feedback (Producers, MFs, Reprocessors, LAs, DGs, NGOs) - Establish feedback channels. | **What value does the PRO add?**
The PRO adds significant value to PackUK by supporting the design, delivery, and refinement of the producer fee modulation system. This includes leading consultations with producers, recyclers and regulators to define and evolve packaging and material sub-categories, reviewing and recommending appropriate degrees of modulation, and monitoring how incentives influence the types and volumes of packaging placed on the market. The PRO also plays a key role in commissioning independent audits and peer reviews to ensure the |

	- Assessing the regulatory barriers to medical products using more sustainable packaging - Quality assurance - Commissioning audit & peer reviews - Model development	**Monitoring impact of incentives on packaging placed on the market -** Begin baseline data collection. **Assessing regulatory barriers to sustainable medical packaging -** Commission scoping study. **Quality assurance -** QA of stakeholder engagement and data inputs. **Commissioning audit & peer reviews -** (PackUK-led). **Model development -** (PackUK retains control).	credibility and transparency of the modulation framework. These functions are resource-intensive and require a deep understanding of both the technical modelling and the stakeholder landscape. The PRO enables PackUK to maintain strategic oversight while ensuring that the modulation system is grounded in robust evidence, informed by industry realities, and capable of evolving in response to market behaviour. A critical part of this is the ability to understand and model material flows, without which it is impossible to quantify the financial impact of modulation decisions on total system revenues or individual producer obligations.
	PackUK to retain - Sign off outputs and changes to modulation amount **[Sovereign]** - Data & model ownership **[Sovereign]** - Determining additional data reporting categories in coming reporting year **[Sovereign]** - Determining how modulation applies to medical packaging subject to regulation preventing the use of more sustainable packaging **[Sovereign]**	***PRO Year 2 (27/28)*** **Consulting with producers and regulators to develop additional packaging sub-categories -** Joint consultation and analysis. **Publishing additional packaging sub-categories for the coming year** - Co-publish with PackUK. **Reviewing / recommending degree of modulation for packaging sub-categories -** Provide evidence-based recommendations. **Publication of fee modulation criteria/policy statement -** Contribute to policy development. **User feedback (Producers, MFs, Reprocessors, LAs, DGs, NGOs) -** Integrate feedback into modulation reviews. **Monitoring impact of incentives on packaging placed on the market -** Analyse trends and behavioural shifts. **Assessing regulatory barriers to sustainable medical packaging -** Engage with MHRA and industry. **Quality assurance -** QA of modelling assumptions and outputs. **Commissioning audit & peer reviews -** Commission independent peer review of modulation model. **Model development -** Begin collaborative development.	**What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?** Valpak is particularly well placed to deliver value and would again draw on the expertise of WRAP in a partnership approach. Our extensive engagement and practical experience with producers, waste collectors and sorters, reprocessors, other compliance schemes and regulators gives us a strong foundation for leading meaningful consultation on packaging sub-categories. We would also seek input from other organizations, including compliance schemes, producers and their representative organizations that have similar experience to ensure a robustness in modulation and packaging reporting approaches taken forward. Valpak regularly conduct independent audits and peer reviews for our members and reprocessor partners,

		PRO Year 3 (28/29) **Consulting with producers and regulators to develop additional packaging sub-categories -** Lead consultation and category development. **Publishing additional packaging sub-categories for the coming year -** Lead publication process. **Reviewing / recommending degree of modulation for packaging sub-categories -** Lead review and recommendation process. **Publication of fee modulation criteria/policy statement -** Co-author or lead publication. **User feedback (Producers, MFs, Reprocessors, LAs, DGs, NGOs) -** Formalise into annual review cycle. **Monitoring impact of incentives on packaging placed on the market -** Feed impact evaluation into modulation design. **Assessing regulatory barriers to sustainable medical packaging -** Recommend regulatory or policy changes. **Quality assurance -** Embed QA into governance and audit cycle. **Commissioning audit & peer reviews -** Annual audit and review cycle. **Model development -** Lead model refinement and scenario testing.	and we have a proven track record in advising on modulation criteria through our consultancy work. Further, as the authors of the government's PackFlow reports, we have a detailed understanding of packaging material flows across the UK market, which is essential for modelling the revenue implications of modulation. Our recent work with the LGA on kerbside cost modelling, and our strategic working relationship with WRAP on these matters, further demonstrates our ability to assess the downstream impact of policy incentives and feed that insight into system design. In short, Valpak brings the technical expertise, stakeholder reach, and proven analytical capability needed to help PackUK deliver a modulation system that is credible, data-driven, and aligned with the goals of EPR. While our recent work with the Local Government Association is a strong example of our capabilities, it builds on a much broader track record. Valpak Consulting has delivered a wide range of foundational projects for government and industry in recent years - including the DRSflow baseline modelling for Defra in 2023, the PackFlow2025 report and 'hybrid' EPR governance model proposal which helped shape early pEPR thinking, and the PackFlowEPR report for Valpak members to provide an early indication of what modulation may entail. These projects demonstrate our long-standing role in developing the evidence base and strategic frameworks that underpin the UK's transition to a more circular packaging system.

			Further, our recent work for British Glass, to assess the comparative carbon impact of the UK's recycling reforms, further demonstrates our ability to deliver sector-specific, evidence-based insights. This project required detailed modelling of material flows and policy scenarios, skills that are directly transferable to the assessment and/or development of robust modulation criteria and recycling assessment methodologies under pEPR.
			Valpak's broader experience across related producer responsibility systems further reinforces our capability to support the development of a robust, evidence-based modulation framework. Our analysis of the Digital Deposit Return Scheme (DDRS) trial in Brecon provided valuable insights into how financial incentives influence consumer behaviour and return rates, directly relevant to understanding the behavioural impacts of fee modulation. Through our leadership of the PackFlow programme, we have demonstrated our ability to engage a wide range of stakeholders and model complex material flows. Our delivery of the Distributor Takeback Scheme (DTS) for WEEE on behalf of Defra showcases our ability to facilitate payments between producers and local authorities while maintaining strong governance and accountability— experience that is directly applicable to the financial and operational coordination required under EPR.
			Additionally, Valpak has historical experience in proposing detailed producer fee modulation systems via Defra's WEEE compliance fee

			methodology consultation process, where we have developed detailed modelling and impact assessments of performance-based adjustments which have been subject to the rigour of Defra assessment procedures. This experience, whilst not directly concerning the packaging system, has provided us a notable degree of insight of the necessary governance and process assurances Defra have historically desired when appointing external parties to administer producer responsibility mechanisms on their behalf.
Recycling Assessment Methodology (RAM) Schedule 7, Paragraph 7	• Running RAM expert advisory committee • RAM & guidance publication • User feedback (Producers, MFs, Reprocessors, LAs and DGs) • RAM methodology development *PackUK to retain* • Sign off changes to methodology **[Sovereign]** • Methodology ownership **[Sovereign]**	*PRO Year 1 (26/27)* **Running RAM expert advisory committee -** Support PackUK in convening and facilitating committee meetings. **RAM & guidance publication -** (PackUK-led). **User feedback (Producers, MFs, Reprocessors, LAs, DGs) -** Establish structured feedback mechanisms. **RAM methodology development -** (PackUK retains ownership). *PRO Year 2 (27/28)* **Running RAM expert advisory committee -** Co-chair and coordinate committee operations. **RAM & guidance publication -** Co-develop and support publication process. **User feedback (Producers, MFs, Reprocessors, LAs, DGs) -** Integrate feedback into RAM updates. **RAM methodology development -** Contribute to model refinement and testing. *PRO Year 3 (28/29)*	**What value does the PRO add?** The PRO adds value to PackUK by supporting the delivery and evolution of the Recycling Assessment Methodology (RAM) in a way that is collaborative, evidence-based, and responsive to stakeholder needs. While PackUK retains sovereign control over the RAM model and its outputs, the PRO plays a critical role in facilitating the expert advisory committee, coordinating user feedback, monitoring market and technology developments, proposing enhancements, supporting the publication of guidance, and contributing to the ongoing development of the methodology. By managing the day-to-day operations of the RAM advisory process, the PRO ensures that a wide range of perspectives—from producers and material facilities to reprocessors, local authorities, and devolved governments—are consistently represented and heard. The PRO also helps translate technical updates into accessible guidance, supports the integration of real-world feedback into

| | | | **Running RAM expert advisory committee** - Lead committee operations, reporting to PackUK.
 RAM & guidance publication - Draft and publish guidance (subject to PackUK sign-off).
 User feedback (Producers, MFs, Reprocessors, LAs, DGs) - Formalise feedback into annual review and update cycle.
 RAM methodology development - Lead technical development (with PackUK approval). | model refinements, and ensures that the RAM remains aligned with both policy objectives and operational realities.

 What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?
 Valpak is particularly well placed to deliver this value. We have extensive experience in convening and managing multi-stakeholder technical groups, including our leadership of the Distributor Takeback Scheme (DTS) for WEEE, our delivery of the government's material-specific PackFlow reports, and our regular member forums that bring together producers, reprocessors, and local authorities. These platforms have given us a strong track record in facilitating balanced, informed dialogue and translating stakeholder input into practical system improvements.

 Our relationships across the packaging and recycling value chain mean we can ensure that RAM development is grounded in operational insight and supported by those who will use and be affected by it. We also have a strong history of publishing technical guidance and managing feedback loops—ensuring that updates to the RAM are not only technically robust but also clearly communicated and widely supported. We will also explore leveraging the expertise of WRAP, material sector representatives, reprocessors, producers & their representatives, as well as other compliance schemes to ensure robustness and practicality to any approaches proposed and taken forward. |

			This builds on our broader experience delivering foundational modelling work for the UK's packaging reforms, including the DRSflow baseline for Defra and the PackFlow2025 report, which helped shape early thinking on EPR and modulation design. While we fully respect PackUK's ownership of the RAM model, we are well equipped to support its development and delivery in a way that enhances transparency, builds trust, and ensures the methodology remains fit for purpose as the system evolves.
Local Authority (LA) cost modelling Reg 69, 70, 71, 72, & 73	• Running Efficiency & Effectiveness expert advisory committee • Additional data collection (e.g. cost and waste data, including through surveying LAs and commissioning research, for instance compositional studies) • Waste disposal cost / expected LA waste income data checks and preparation • Running model to determine efficient disposal cost for each material for each LA • Review model outputs • User feedback (LA's, LA bodies, & DGs) • Monitoring impact of financial incentives on LA performance & feeding impact evaluation into LA cost model reviews • Quality assurance • Commissioning audit & peer reviews • Model development *PackUK to retain* • Sign off outputs and changes to model **[Sovereign]** • Data & Model ownership **[Sovereign]**	*PRO Year 1 (26/27)* **Running Efficiency & Effectiveness expert advisory committee -** Support PackUK in convening and facilitating. **Additional data collection (e.g. cost and waste data, surveys, compositional studies) -** Assist with. survey design and data gathering. **Waste disposal cost / expected LA waste income data checks and preparation -** Support data validation and reconciliation. **Running model to determine efficient disposal cost for each material for each LA -** (PackUK-led). **Review model outputs - Provide technical review and commentary** **User feedback (LAs, LA bodies, DGs) -** Establish structured feedback mechanisms. **Monitoring impact of financial incentives on LA performance -** Begin baseline data analysis. **Quality assurance -** QA of data inputs and assumptions. **Commissioning audit & peer reviews -** (PackUK-led).	**What value does the PRO add?** The PRO adds value to PackUK by supporting the delivery, refinement, and transparency of the LA cost modelling process—an essential component of the EPR system. While PackUK retains ownership of the model and final sign-off, the PRO plays a key role in operationalising the process: convening expert advisory groups, coordinating data collection, validating inputs, running the model, and managing stakeholder feedback. This support ensures that the model remains grounded in real-world data and reflects the operational realities faced by local authorities and their service providers. The PRO also helps monitor how financial incentives influence LA performance and feeds this insight into model reviews - ensuring the system remains responsive and fair. In addition, we would expect the PRO to carry out best practice reviews and modelling to determine benchmarks for packaging collection and sorting performance and cost. By commissioning benchmarking,

		Model development - (PackUK retains control).	audits and peer reviews, the PRO further enhances the credibility and accountability of the modelling process, while freeing up PackUK to focus on strategic oversight.
		PRO Year 2 (27/28) **Running Efficiency & Effectiveness expert advisory committee -** Co-chair and coordinate committee operations. **Additional data collection (e.g. cost and waste data, surveys, compositional studies) -** Lead targeted data collection and commission studies. **Waste disposal cost / expected LA waste income data checks and preparation -** Lead data preparation and QA. **Running model to determine efficient disposal cost for each material for each LA -** Co-run and validate model outputs. **Review model outputs -** Lead review and stakeholder validation. **User feedback (LAs, LA bodies, DGs) -** Integrate feedback into model updates. **Monitoring impact of financial incentives on LA performance -** Evaluate trends and behavioural shifts. **Quality assurance -** QA of modelling process and outputs. **Commissioning audit & peer reviews -** Commission independent peer review. **Model development -** Contribute to model refinement.	**What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?** Valpak is uniquely positioned to deliver this value and would leverage the considerable expertise of WRAP in the area of local authority activity and cost modelling, and would be open to exploring how best to leverage the knowledge of other experienced parties to ensure a world-leading system design prevails. Our recent work with the LGA on modelling the cost and value of kerbside collections under EPR demonstrates our deep understanding of local authority and their waste contractor's operations, cost structures, and the data challenges involved. That project required us to gather and analyse detailed waste and financial data from councils across England, assess the impact of policy changes such as the Deposit Return Scheme, and model the financial implications for local authorities under different scenarios.
		PRO Year 3 (28/29) **Running Efficiency & Effectiveness expert advisory committee -** Lead committee operations, reporting to PackUK. **Additional data collection (e.g. cost and waste data, surveys, compositional studies) -** Maintain and expand data collection programme.	We also have extensive experience running expert stakeholder groups, including for the Distributor Takeback Scheme (DTS) and the PackFlow programme (working with Defra and WRAP). These platforms have given us a strong track record in facilitating balanced, evidence-led discussions and translating stakeholder input into practical, policy-relevant outputs.

| | | **Waste disposal cost / expected LA waste income data checks and preparation -** Embed into annual modelling cycle. **Running model to determine efficient disposal cost for each material for each LA -** Lead model operation (subject to PackUK oversight). **Review model outputs -** Formalise review into annual reporting cycle. **User feedback (LAs, LA bodies, DGs) -** Formalise into annual review and update cycle. **Monitoring impact of financial incentives on LA performance -** Feed impact evaluation into model refinement. **Quality assurance -** Embed QA into governance and audit cycle. **Commissioning audit & peer reviews -** Annual audit and review cycle. **Model development -** Lead technical development (with PackUK approval). | Our delivery of the Distributor Takeback Scheme (DTS) on behalf of Defra further demonstrates our ability to manage national schemes involving financial flows to local authorities, while maintaining robust governance and audit processes.

Valpak's experience in assessing the impact of financial incentives is further demonstrated through our analysis of the Digital Deposit Return Scheme (DDRS) trial in Brecon, which provided valuable insights into how incentive structures influence consumer behaviour and local authority operations. This work is directly relevant to understanding how financial mechanisms can drive performance improvements in LA waste management under EPR.

In addition, Valpak brings extensive experience in data collection, validation, and analysis through our Valpak Data Insights (VDI) platform and our long-standing delivery of the PackFlow programme. These tools and methodologies enable us to gather high-quality data from local authorities, producers, and the waste management and recycling industries, identify inconsistencies, and generate actionable insights to inform cost modelling and system design. Our track record of collaboration with LA operations is further supported by our role as a WEEE compliance scheme operator, where we have maintained long-term partnerships with local authorities—including over 15 years of continuous contract delivery with the North East Procurement Organisation (NEPO) and Lancashire County |

			Council. These relationships have given us a practical appreciation of the operational challenges faced by councils and the importance of designing systems that are both fair and functional. With our technical expertise, sector insight, and collaborative approach, Valpak would bring the capability and credibility needed to support PackUK in delivering a cost modelling framework that is robust, trusted, and aligned with the goals of EPR.
Administrating payments Reg 67, 68, 74, 76, 78, 79, 80, 81, 82, & 83 **[non-Sovereign sub-functions contracted to FSS until 28/01/2028]**	• Sending producer notice of liability / notice of recalculation (invoicing) • LA assessment notice, grant letter, remittance notice (notice of LA payment) • Payments and disbursements ***PackUK to retain*** • Late payments enforcement & debt recovery **[Sovereign]**	**[Not available to PRO before 28/29]** ***PRO Year 3 (28/29)*** **PRO requirements in year 3 may be:** - Operate payment systems to distribute funds to local authorities and other recipients. - Validate payment data and ensure alignment with approved cost models. - Manage payment schedules and reconciliation processes. - Provide reporting and transparency on payment flows. - Handle queries and disputes related to payments. - Maintain audit trails and support financial oversight. - Coordinate with PackUK on compliance and assurance requirements.	**What value does the PRO add?** In Year 3, the PRO adds value to PackUK by operationalising the administration of payments in a way that is efficient, transparent, and accountable. While PackUK retains responsibility for this function in the early years, delegating it to the PRO in Year 3 allows for a more integrated and responsive system - particularly as the financial flows between producers, local authorities, and other stakeholders become more complex. The PRO can manage the day-to-day operation of payment systems, validate data against approved cost models, and ensure that funds are distributed accurately and on time. It also plays a key role in maintaining audit trails, managing reconciliation processes, and handling queries or disputes - ensuring that the system remains trusted and compliant. By taking on these responsibilities, the PRO enables PackUK to focus on strategic oversight while ensuring that the financial engine of the EPR system runs smoothly and transparently.

			What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?
			Valpak is well positioned to deliver this value. We already manage complex financial flows through our operational producer compliance schemes for packaging, WEEE and portable batteries in addition to the national Distributor Takeback Scheme (DTS) for WEEE. Valpak's long-standing role in delivering the DTS on behalf of Defra demonstrates our capability to operate a not-for-profit model that distributes funds to local authorities and Waste Disposal Authorities. This includes managing ring-fenced finances, maintaining separate governance structures, and ensuring full auditability - key competencies that directly align with the requirements of administering payments under the pEPR scheme.
			Our long-standing relationships with both producers and local authorities also mean we understand the sensitivities and expectations around payments - particularly the need for clarity, consistency, and responsiveness. Combined with our technical expertise and experience in data validation and cost modelling, we are well equipped to ensure that payment administration is not only accurate but also aligned with the broader goals of EPR. We will also explore leveraging the expertise of existing organisations, such compliance schemes, that have a range of sector-specific experience that is likely to help ensure the development of an efficient, effective fee payment & dispersal system.

Communications & Public Information			
Communications & Public Information Reg 63 & 75 Schedule 7. Paragraph 3, 4, 5, & 6	• Develop public information strategy and plan activity • Estimate public information costs for year ahead • Producing communications and public info campaigns to producers, packaging, manufacturers, scheme operators, relevant authorities and waste management companies, and other persons. • Guidance etc. to producers & local authorities *PackUK to retain* • Sign off public information strategy & costs **[Sovereign]**	*PRO Year 1 (26/27)* **Develop public information strategy and plan activity -** Support PackUK in co-developing national strategy and planning. **Estimate public information costs for year ahead -** Provide input to PackUK estimates. **Produce communications and public info campaigns -** (PackUK-led). **Provide guidance and information to producers and local authorities -** Support PackUK in producing guidance. *PRO Year 2 (27/28)* **Develop public information strategy and plan activity -** Co-lead strategy refinement and pilot campaigns. **Estimate public information costs for year ahead -** Jointly model and validate cost assumptions. **Produce communications and public info campaigns -** Co-develop and deliver targeted campaigns. **Provide guidance and information to producers and local authorities -** Co-author and distribute updated guidance. *PRO Year 3 (28/29)* **Develop public information strategy and plan activity -** Lead strategy development and delivery. **Estimate public information costs for year ahead -** Independently estimate and justify costs. **Produce communications and public info campaigns -** Lead campaign development and delivery. **Provide guidance and information to producers and local authorities -** Lead guidance development and stakeholder engagement**.**	**What value does the PRO add?** The PRO adds value to PackUK by supporting the design, delivery, and refinement of public information and communications activities that are essential to the success of the EPR system. These responsibilities include developing a national public information strategy, estimating associated costs, producing targeted campaigns, and providing clear, accessible guidance to producers, local authorities, and other stakeholders. In the early years, the PRO can support PackUK by co-developing strategy and messaging, helping to ensure that communications are informed by real-world operational insight and stakeholder needs. As the system matures, the PRO can take on a more active delivery role - developing and managing campaigns, refining messaging based on feedback, and ensuring that communications are consistent, timely, and aligned with policy objectives. It is expected that the PRO will, under appropriate governance arrangements, select and work with skilled communications partners across the devolved nations to deliver high-quality, audience-specific campaigns, including subject to agreement, WRAP. This ensures that public information activities are not only professionally executed but also strategically aligned with the goals of the EPR system. Importantly, many obligated businesses - particularly large brands and retailers - are already highly effective communicators with their customers. The PRO can help harness this existing

capability to amplify public messaging and drive behavioural change at scale.

The PRO also plays a key role in ensuring that public information activities are cost-effective and evidence-based. By monitoring the impact of campaigns and gathering feedback from producers, local authorities, and the public, the PRO helps ensure that communications remain relevant and effective over time.

What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?

Valpak, proposing to also work closely with WRAP, who are experts in this field in the UK, is exceptionally well placed to deliver this value. In addition to WRAP's experience. Valpak have a long-standing track record of engaging with a wide range of stakeholders through our member forums, consultancy work, and our leadership of initiatives such as the Distributor Takeback Scheme (DTS) and PackFlow. These platforms have given us deep experience in translating complex regulatory requirements into clear, actionable guidance for producers and local authorities.

Whilst we have strong in-house capability in campaign planning and stakeholder communications, we understand the importance of tailoring messages to different audiences across the packaging and recycling value chain, and the need to leverage the expertise of others to most effectively achieve this. We have long standing relationships with other established and successful material specific communication campaigns, such as

			Metal Matters and pledge-4-plastics, and would seek to engage further with these organisations to benefit from their experience and expertise and look for opportunities to incorporate their valuable work into a national campaign. We would also explore leveraging the expertise of other communications experts, including the devolved governments and their nominated comms providers, producers and their representative organisations, as well as NGOs.
			Our work with the LGA and other public bodies has further strengthened our ability to communicate effectively with local authorities and to understand the public-facing dimensions of EPR.
			Valpak operates www.recycle-more.co.uk (to address the consumer information obligation of our retail members, from the outset of the packaging regulations), which provides us with a basic level of insight into public engagement with recycling information. While this offers a useful foundation, we are committed to working with expert communications partners to ensure that all public information campaigns are professionally developed, audience-specific, and evidence-based. This includes engaging with other compliance schemes that have similar experience.
			Crucially, Valpak benefits from exceptionally broad industry engagement and representation. Our 28-year experience working with our stakeholders spans all sectors of the packaging supply chain, and we are trusted by producers, retailers, and

reprocessors alike. This gives us a unique ability to coordinate messaging, align interests, and work collaboratively with communications partners to deliver campaigns that are credible, inclusive, and impactful.

Our experience running the DTS also highlights our ability to deliver public-facing communications and coordinate with a wide range of stakeholders, including retailers, local authorities, and government bodies.

Our leadership of the National Cup Recycling Scheme further demonstrates our ability to co-create effective public messaging with major brands. Through this initiative, we've developed brand-aligned strategies that resonate with consumers and drive behavioural change - experience that will contribute toward delivering impactful, audience-specific campaigns under the EPR system.

We work collaboratively with WRAP and organisations across the devolved administrations on public information delivery. This includes reciprocal data sharing between WRAP's Recycle Now platform and our Recycle More website - where WRAP provides kerbside collection information and Valpak supplies national bring bank location data, ensuring that consumers have access to the most comprehensive and up-to-date recycling guidance. We recognise that communications must be tailored to local contexts to be effective. For example, in Wales this means working closely with the Welsh Government and WLGA to ensure that messaging supports national environmental goals and resonates with

			local communities, and would commit to replicate this collaboration in other nations, and regions within nations where beneficial.
Local Authority (LA) performance Reg 72 & 74	• • Developing LA Effectiveness Assessment Methodology • Assessing LA Effectiveness • LA Improvement Action Plan (IAP) process *PackUK to retain* • Decision to impose 20% reduction on LA payments **[Sovereign]**	*PRO Year 1 (26/27)* **Developing LA Effectiveness Assessment Methodology -** Support PackUK in scoping and stakeholder engagement. **Assessing LA Effectiveness -** (PackUK-led or pilot only). **LA Improvement Action Plan (IAP) process -** (Not yet implemented). *PRO Year 2 (27/28)* **Developing LA Effectiveness Assessment Methodology -** Co-develop methodology and pilot with selected Las. **Assessing LA Effectiveness -** Support initial assessments and data validation. **LA Improvement Action Plan (IAP) process -** Support development of IAP framework and criteria. *PRO Year 3 (28/29)* **Developing LA Effectiveness Assessment Methodology -** Refine and embed methodology into annual performance cycle. **Assessing LA Effectiveness -** Lead assessment process and reporting. **LA Improvement Action Plan (IAP) process -** Lead IAP coordination, monitoring, and stakeholder engagement.	**What value does the PRO add?** The PRO adds value to PackUK by supporting the development and implementation of a fair, evidence-based framework for assessing and benchmarking local authority performance under EPR. This includes helping to design the LA Effectiveness Assessment Methodology, supporting the assessment process itself, and coordinating the development and monitoring of Improvement Action Plans (IAPs) where needed. In the early stages, the PRO can assist PackUK in scoping the methodology and engaging with stakeholders to ensure that performance metrics are realistic, proportionate, and aligned with policy goals. As the system matures, the PRO can take on a more active role in running assessments, analysing performance data, and working with local authorities to co-develop improvement plans that are constructive and achievable. The PRO also plays a key role in ensuring that performance assessments are not just a compliance tool, but a realistic mechanism for continuous improvement. By monitoring the impact of financial incentives on local authority behaviour and feeding this insight into the review process, the PRO helps ensure that the system remains dynamic, fair, and responsive to real-world conditions.

			What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?
			Valpak, continuing to work closely with WRAP, would bring a unique combination of technical expertise, data capability, and trusted relationships with local authorities. Valpak's recent work with the LGA on modelling the cost and value of kerbside collections under EPR demonstrates our ability to engage constructively with councils, gather and interpret complex operational data, and translate that into meaningful insights for policy and system design.
			We understand the diversity of local authority contexts and the importance of tailoring performance frameworks to reflect different operational models, geographies, and resource constraints and are open to exploring working with expert organisation from the devolved nations to best ensure approaches are contextualised but consistent across the UK. Local authorities operate under varying political, financial, and logistical pressures, with differences in housing stock, rurality, contractor arrangements, and public engagement levels all influencing service delivery. In particular, we would look to involve and learn from experiences in Wales, which is widely acknowledged as a leader in this area.
			Designing fair and effective performance assessments requires a deep appreciation of these variables and a flexible, collaborative approach. Our experience running collaborative initiatives like PackFlow, the Distributor Takeback Scheme (DTS), and local authority WEEE contracts has given us direct insight into these challenges. For

			example, through our long-standing partnerships with councils across the UK, we've worked with authorities managing everything from densely populated urban boroughs to remote rural districts. Our member forums and data-sharing platforms have enabled us to bring these diverse voices together, identify shared challenges, and co-develop practical, evidence-led solutions. This experience positions us well to support a performance framework that is not only robust and transparent but also grounded in the operational realities of local government. Valpak operates under an ISO-certified quality management system (ISO9001), which embeds continuous improvement into our organisational processes—ensuring that performance monitoring, stakeholder feedback (in this case, from local authorities and their operational partners), and corrective actions are systematically reviewed and acted upon to drive better outcomes over time. If appointed to operate the PRO, Valpak would bring a balanced, collaborative approach to LA performance assessments, taking into account the specific circumstances and priorities across the devolved nations — one that supports accountability while also enabling local authorities to succeed within the EPR framework.

Appeals & complaints	*PackUK to retain*	*Not applicable*	*Not applicable*
Reg 77, 105, 106, 107 & 108 Schedule 7 Paragraph 10	• Disposal costs and admin cost appeals • LA appeals • Complaints		
Other Schedule 7 Paragraph 9, 11, 12, 13 & 14	• Review of lists of commonly binned or littered items, commonly recycled items • Publication of lists of commonly binned or littered items, commonly recycled items • Strategy and operational plan development • Annual report publication *PackUK to retain* • Strategy and operational plan publication • Publication of accounts	*PRO Year 1 (26/27)* **Review of lists of commonly binned or littered items, and commonly recycled items -** Support PackUK in initial review and stakeholder input. **Publication of lists of commonly binned or littered items, and commonly recycled items -** (PackUK-led). **Strategy and operational plan development -** Contribute to overarching strategy and delivery planning. **Annual report publication -** (PackUK-led). *PRO Year 2 (27/28)* **Review of lists of commonly binned or littered items, and commonly recycled items -** Co-lead review process and evidence gathering. **Publication of lists of commonly binned or littered items, and commonly recycled items -** Co-author and support publication. **Strategy and operational plan development -** Co-develop operational plans aligned with delegated functions. **Annual report publication -** Contribute content and data. *PRO Year 3 (28/29)* **Review of lists of commonly binned or littered items, and commonly recycled items -** Lead review and validation process.	**What value does the PRO add?** The PRO adds value to PackUK by supporting the delivery of essential cross-cutting functions that underpin the transparency, accountability, and strategic direction of the EPR system. These include reviewing and publishing lists of commonly binned, littered, and recycled items; contributing to the development of operational strategies; and coordinating the production of annual reports. These activities require a combination of technical insight, stakeholder engagement, and clear communication. The PRO can help ensure that published materials are grounded in evidence, reflect real-world behaviours, and are accessible to a wide range of audiences - from producers and local authorities to the general public. By coordinating these outputs, the PRO also helps maintain consistency across the system and supports PackUK in meeting its statutory and strategic obligations. As the system matures, the PRO's role in developing operational plans and contributing to annual reporting becomes increasingly important. These functions ensure that the system remains forward-looking, performance-driven, and transparent to stakeholders and the public alike.

| | | Publication of lists of commonly binned or littered items, and commonly recycled items - Lead publication (subject to PackUK sign-off). Strategy and operational plan development - Lead development of annual strategy and delivery plan. Annual report publication - Lead drafting and coordination of publication (with PackUK approval). | What Value Would Valpak Add to the Development and Collaborative Operation of the PRO? Valpak is well equipped to deliver this value. We have extensive experience in producing high-quality, evidence-based publications through our work on the government's PackFlow reports, our recent LGA cost modelling study, work with both Defra and WRAP Cymru (Welsh Assembly Government) on packaging POM within the litterable categories, and our regular member communications. These outputs demonstrate our ability to translate complex data into accessible insights and to publish materials that are trusted by both industry and government. Again, Valpak would propose leveraging the considerable expertise of WRAP throughout, wherever appropriate.

We also have a strong track record in strategic planning and operational delivery, having led national compliance schemes and voluntary initiatives for over two decades. Our ability to convene stakeholders, gather and interpret data, and coordinate across sectors means we can ensure that published lists, strategies, and reports are not only accurate but also meaningful and actionable.

If appointed to operate the PRO, Valpak would bring the clarity, credibility, and coordination needed to support PackUK in delivering these foundational elements of the EPR system. |

| Functions not specified in the regulations | • Customer support

• Monitoring and evaluation

• Continuous improvement | *PRO Year 1 (26/27)*
Customer Support - Establish a dedicated support function (helpdesk, FAQs, onboarding materials). Begin tracking common queries.
Monitoring & Evaluation - Develop baseline KPIs and metrics. Begin collecting performance and satisfaction data.
Continuous Improvement - Launch a Continuous Improvement Forum. Gather stakeholder feedback and identify early optimisation opportunities.

PRO Year 2 (27/28)
Customer Support - Expand services to include live chat, webinars, and tailored guidance. Begin proactive outreach to under-engaged producers.
Monitoring & Evaluation - Conduct first annual evaluation of PRO performance. Publish findings and share with PackUK and stakeholders.
Continuous Improvement - Implement feedback loops. Pilot voluntary initiatives to address inefficiencies.

PRO Year 3 (28/29)
Customer Support - Fully integrate support into operations. Use analytics to personalise support and pre-empt issues.
Monitoring & Evaluation - Embed M&E into governance. Use insights to inform strategic planning and reporting.
Continuous Improvement - Formalise the forum as a standing advisory group. Launch a public dashboard to track progress on improvement initiatives. | **What value does the PRO add?**
The inclusion of these cross-cutting functions - though not specified in EOI or regulations - is essential to the success, responsiveness, and long-term sustainability of the pEPR system. The PRO adds value in the following ways:

Customer Support
Working to complement the roles and activities of compliance schemes, the PRO acts as a central point of contact to ensure that guidance is accessible, queries are resolved efficiently, and users are supported throughout their compliance journey. The PRO can work with other key operators in the system such as compliance schemes, producers and their trade associations, local authorities, waste management companies and reprocessors to provide coordinated and consistent central support, increase cooperation and reduce friction, increase engagement, and ensure consistent messaging across the system.

Monitoring and Evaluation
The PRO plays a vital role in tracking the performance of delegated functions, gathering feedback, and assessing the effectiveness of system components. This enables evidence-based decision-making, supports transparency, and ensures that the system evolves in line with policy objectives and stakeholder needs.

Continuous Improvement
By convening stakeholders and facilitating structured feedback loops, the PRO ensures that the pEPR system remains dynamic and responsive. The PRO can identify inefficiencies, pilot |

voluntary solutions, and share best practices - driving innovation and improving outcomes without requiring regulatory change.

What Value Would Valpak Add to the Development and Collaborative Operation of the PRO?

Customer Support

Valpak already operates a trusted, multi-channel support system for thousands of producers across the UK. Our experience running our long-standing compliance scheme operations means we understand the nuances and practicalities of producer needs and can provide tailored, responsive support from day one. Valpak achieved a 97% customer satisfaction rate during the challenging 2024 pEPR reporting period, as measured by an independent third-party expert survey of our members - demonstrating our ability to deliver reliable, high-quality support even under pressure. We would also look to leverage the expertise of other compliance schemes, that have range experience in delivering similar support.

Particular attention will be given to the needs of small and micro producers, ensuring that guidance is proportionate, onboarding is accessible, and compliance requirements are not unduly burdensome. This reflects our commitment to fairness and inclusivity across the producer base.

Monitoring and Evaluation

Our in-house consultancy team has delivered high-profile monitoring and modelling projects for government and industry, including the PackFlow reports and the LGA kerbside cost modelling

study. We bring robust data analysis, policy insight, and reporting expertise to ensure that monitoring is not only accurate but also actionable. Our consulting team have worked closely with WRAP for over two decades and would draw on their experience wherever appropriate.

Continuous Improvement
Valpak has a proven track record of launching and managing voluntary initiatives that improve system performance - such as the National Cup Recycling Scheme and our work on circularity pilots. We regularly convene stakeholder forums and are deeply embedded in both UK and international EPR networks, allowing us to bring fresh ideas and global best practice into the UK system, including through our Valpak Advisory Group industry roundtable events and memberships of PRO Europe and the PROsPA alliance.

Valpak's commitment to continuous improvement is demonstrated by our leadership in the Bower AI cup recycling project in Cardiff, delivered through the National Cup Recycling Scheme. This innovative pilot uses AI-powered image recognition via the Bower app to reward consumers for recycling paper cups, removing the need for barcodes or special packaging. By partnering with major brands and local stakeholders including Keep Wales Tidy, Valpak has demonstrated its ability to combine cutting-edge technology, behavioural incentives, and collaborative delivery to drive measurable environmental outcomes. This initiative reflects Valpak's proactive approach to piloting scalable solutions that enhance system

performance and public engagement - core principles of continuous improvement.

Member engagement.
Valpak's long-standing commitment to stakeholder engagement is exemplified by our operation of the Valpak Advisory Group (VAG) - a forum of our most engaged members and clients across our compliance schemes. Meeting 2 - 4 times per year, the VAG provides a structured yet informal space for two-way dialogue on regulatory developments, scheme performance, and strategic direction. This group enables us to test ideas, gather early feedback, and ensure that our services remain aligned with the needs of producers. The VAG's insights have directly informed our approach to scheme design, communications, and continuous improvement - demonstrating our ability to maintain meaningful, ongoing engagement with those most affected by the EPR system. Such a system could and should be replicated by the PRO.

Annual Impact Reporting
Valpak has a well-established track record in producing high-quality, evidence-based annual impact reports. These reports are a core part of our organisational transparency and accountability, providing stakeholders with clear insights into our performance, environmental outcomes, and progress against strategic objectives.

Our impact reports are developed using robust data collection and analysis methodologies, and they are structured to align with best practices in environmental and social governance

| | | | (ESG) reporting. They include detailed metrics on material flows, recycling outcomes, stakeholder engagement, and continuous improvement initiatives. This experience positions us well to support the PRO's monitoring and evaluation functions, ensuring that performance is not only measured accurately but also communicated effectively to producers, local authorities, and the wider public.

By embedding impact reporting into the PRO's governance framework, we can help ensure that the EPR system remains transparent, evidence-led, and is continuously improving. |
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What other activities will the PRO independently undertake? *(in addition to its delegated scheme functions)*
The other activities suggested for the PRO cannot intrude upon the Sovereign functions reserved for PackUK. Nor can they include any activity that would require additional legislation to be effective, for example, requiring a producer to do something or levying a mandatory charge. Activities, in other words, should be provided so that producers or others can engage with them on a voluntary basis.

- *Host a continuous improvement forum for PRN system.*
- *Investigate means by which the PRO could facilitate producers gaining increased access to recycled material.*
- *Freerider communications campaigns.*
- *Engagement with other PROs across Europe, to ensure alignment with PPWR and ensure best practice.*

While this document sets out Valpak's proposal, we believe that the best outcome for the system will come from combining the strongest elements of all credible submissions. We therefore support the consideration of any credible operator at this pre-selection phase, and advocate for an approach that adopts the best ideas from across the field before finalising the design for the next phase later in 2025.

The following activities are presented as an indicative list of ideas that Valpak could bring to the role of the PRO. They are not formal commitments, but rather a set of value-adding opportunities for consideration by PackUK, Defra and the devolved administrations as the scheme design evolves. These suggestions reflect areas where Valpak's existing expertise and infrastructure could be leveraged - but more importantly, they represent practical elements that we believe should be considered to ensure the long-term success, resilience, and effectiveness of the EPR system. Each idea is intended to support better outcomes for producers, local authorities, and the wider value chain, while maintaining flexibility as the final scope and governance of the scheme are defined.

Core Activities
PRO Year 1 (26/27)
Full Local Authority engagement and co-design - Establish formal mechanisms for LA representative (across the 4 nations) involvement in governance and steering groups. Begin co-design of key systems and data processes with LA.
By Nation Reporting - Engage with the National Governments and National Local Government Associations to co-develop a framework for measuring and reporting environmental outcomes specific to varying national circumstances independently, ensuring alignment with national policy and performance expectations.**PackFlow – universal performance baseline -** Use PackFlow methodology to establish a shared baseline for packaging flows and system performance. This builds on our

previous delivery of PackFlow2025 and various DRS material flow and value projects, which provided the foundational data and modelling to support the introduction of EPR and DRS in the UK.

Reprocessor engagement - Establish engagement with reprocessors to understand material quality requirements and identify barriers to effective recycling.

Host a continuous improvement forum for the PRN system (ensuring that the value of effective collections is realised by increasing recycling rates without losing collected material from recycling) - Establish a voluntary forum to gather stakeholder feedback on PRN system performance and improvement areas across a wide range of stakeholders.

Producer access to recycled materials – Deliver scoping project to assess potential mechanisms and assess the viability of implementation

Freerider communications campaigns - Design and launch initial awareness campaign targeting non-compliant producers and promoting fair participation.

Engagement with other PROs across Europe (PPWR alignment) - Initiate dialogue with European PROs and map key areas of regulatory convergence and divergence. Valpak has excellent links to other European schemes through its membership of PRO Europe.

5 Year Plan - Initiate development of a rolling 5-year plan for the EPR system, building on Valpak's experience supporting long-term planning under the PRN system and early PackFlow reports. Engage stakeholders across the packaging value chain to identify key investment signals, infrastructure needs, and policy dependencies.

PRO Year 2 (27/28)

Full Local Authority engagement and co-design - Expand LA participation in sub-system design and performance frameworks. Explore opportunities for paid consultancy work where appropriate and adds value.

By Nation Reporting – Pilot the nation-specific reporting framework in collaboration with each national government and their respective local government associations, using real data to test alignment with national priorities and refine indicators.

PackFlow – universal performance baseline - Update and expand PackFlow data to reflect evolving system dynamics and stakeholder needs.

Reprocessor engagement - Collaborate with reprocessors to improve material quality through data sharing, feedback loops, and targeted interventions.

Host a continuous improvement forum for the PRN system - Formalise the forum with regular meetings and structured outputs.

Producer access to recycled materials – Assess delivery pathway for implementation. Begin set-up procedure and pilot testing

Freerider communications campaigns - Expand campaign reach and messaging based on stakeholder feedback and early impact assessment.

Engagement with other PROs across Europe (PPWR alignment) - Participate in joint working groups and share UK insights into best practice and system design.

5 Year Plan - Publish the first 5-year system plan, outlining expected material flows, cost trajectories, and system performance targets. Use the plan to support alignment between producers, local authorities, and recyclers, and to inform voluntary initiatives and innovation pilots.

PRO Year 3 (28/29)

Full Local Authority engagement and co-design - Embed LA engagement in governance and delivery. Formalise co-design and reporting cycles. Support opportunities for paid consultancy work where appropriate and adds value.

By Nation Reporting – Embed nation-specific reporting into the PRO's annual reporting cycle, publishing tailored insights for each nation and supporting devolved governments in using the data to inform policy and performance improvement.

PackFlow – universal performance baseline - Integrate PackFlow outputs into strategic planning, reporting, and continuous improvement frameworks.

Reprocessor engagement - Embed reprocessor insights into system design to ensure consistent delivery of high-quality recyclables that maximise environmental and economic outcomes.

Host a continuous improvement forum for the PRN system - Embed the forum into the annual review cycle and publish recommendations for system enhancements.

Producer access to recycled materials – Begin implementation of mechanism.

Freerider communications campaigns - Maintain campaign momentum and integrate with broader compliance and public information strategies.

Engagement with other PROs across Europe (PPWR alignment) - Lead or co-lead international collaboration initiatives and publish comparative insights for UK stakeholders.

5 Year Plan - Embed the 5-year plan into the annual strategic cycle. Update the plan based on system performance, regulatory developments, and stakeholder feedback. Use it to guide continuous improvement, investment planning, and communications strategy.

Additional Activities

PRO Year 1 (26/27)
Voluntary data-sharing and benchmarking platform - Design a secure, anonymised platform for producers and LAs to share performance and cost data voluntarily.
Innovation accelerator for circular packaging - Launch a call for voluntary pilot projects or trials focused on reuse, refill, or recyclability improvements.
Training and capacity-building programme - Develop training modules for producers, LAs, and reprocessors on EPR compliance, data quality, and reporting.
Producer recognition scheme - Design a voluntary recognition scheme to highlight best practice in sustainable packaging and compliance.
Annual stakeholder conference - Plan and host a national conference to bring together producers, LAs, NGOs, waste management companies, reprocessors and policymakers. Our leadership of the DTS provides a proven model for how we can deliver voluntary, government-supported initiatives that drive system-wide improvements and stakeholder collaboration.

PRO Year 2 (27/28)
Voluntary data-sharing and benchmarking platform - Launch pilot benchmarking reports to help stakeholders understand their performance relative to peers.
Innovation accelerator for circular packaging - Provide technical support and visibility to selected projects. Share learnings with the wider sector.
Training and capacity-building programme - Deliver workshops and webinars across the UK. Tailor content to different stakeholder groups.
Producer recognition scheme - Launch the scheme and promote early adopters.
Annual stakeholder conference - Use the event to share progress, gather feedback, and showcase innovation.

PRO Year 3 (28/29)
Voluntary data-sharing and benchmarking platform - Expand platform functionality and integrate insights into continuous improvement and reporting cycles.
Innovation accelerator for circular packaging - Scale successful pilots and publish case studies to inform future policy and system design.
Training and capacity-building programme - Formalise training as part of onboarding and continuous learning for system participants.
Producer recognition scheme - Expand categories and integrate with public information campaigns.
Annual stakeholder conference - Institutionalise the conference as a key moment in the EPR calendar.

Aligning Front-End Coordination with Back-End Competition
While the core development of the pEPR scheme rightly focuses on transferring the full net cost of collection and sorting to producers, there is a risk that this front-end focus overshadows the critical role of the back end - where actual recycling takes place. The assumption that collection alone equates to recycling is flawed. Without effective downstream incentives and enforcement, only high-value, easily recyclable materials will be processed, while lower-value materials risk being discarded - undermining environmental outcomes and public confidence.

The PRO, as a single coordinating entity at the front end, is well placed to ensure that funding to local authorities is distributed fairly, efficiently, and transparently. However, this role must be closely aligned with a competitive and well-enforced back-end system - delivered by reprocessors, compliance schemes and monitored by regulators - to ensure that all collected material is given a viable route to recycling. As covered throughout the development of the pEPR scheme, it is valuable to ensuring that operators act in a coordinated manner and through the development and operation of the PRO maintain sight of the clear benefits to maintaining competition at the back end of the system:
- It rewards efficient recyclers and avoids subsidising inefficiency.
- It supports flexibility in funding, allowing resources to be directed where they are most needed.
- It helps avoid the build-up of large, static cash reserves by ensuring funds are actively used to drive outcomes.
- It promotes innovation and responsiveness, enabling the system to stretch toward higher recycling targets.
- And critically, it ensures best value for producers and, ultimately, consumers.

Valpak believes that the success of the whole pEPR system depends on this strategic alignment from the design phase. The PRO must work in partnership with compliance schemes and enforcement bodies to:
- Ensure that funding decisions at the front end support the viability of recycling at the back end.
- Monitor material flows and identify where commercial incentives alone are insufficient to drive recycling.

- Support transparency and accountability across the system, ensuring that environmental objectives are met - not just administrative ones.

This aligns to the system proposed by stakeholders through consultation, and designed by Defra and the Governments of the devolved administrations, and the responsibilities of actors in the process in relation to achievement of recycling targets. It is about recognising that collection without recycling is not success. A well-designed system must ensure that the front-end coordination role of the PRO complements and enables a competitive, outcomes-driven back end—so that all materials, not just the profitable ones, are recycled, and the system delivers on its environmental promise.

In line with international experience - including from RLG's (Valpak's sister company and part of the Reconomy Group) operations in Ontario and Québec - it is critical that the PRO's role is clearly limited to front-end coordination and does not extend into back-end service delivery or infrastructure ownership. This ensures that the PRO does not distort market dynamics or create barriers to innovation and competition in reprocessing and logistics. Valpak supports a model where the PRO facilitates transparency and data-sharing across the system but does not act as a market participant in downstream services.

Digital Infrastructure and Systems Readiness
One of the most commonly underestimated challenges in establishing a PRO experienced in other countries is the development and deployment of robust IT systems to support core operations - particularly in areas such as portal development (i.e.: producer registration, suppler registration, education), data collection and validation, material movement (Order Management), material composition auditing, fee calculation, reporting, and payment processing. Capital cost of technology platforms and delays in system development have been a key cause of disruption in other jurisdictions.

Valpak, together with our sister company RLG (also part of the Reconomy Group), brings a significant advantage in this area. RLG currently operates PROs and compliance systems across multiple jurisdictions in Europe and is a key vendor that operates the common collection system for packaging EPR in Ontario, Canada as well as supporting a number of other PROs in North and South America. RLG has developed a suite of modular, scalable IT platforms that are already in use in live regulatory environments. These systems are designed to be secure, interoperable, and adaptable to local regulatory requirements.

If appointed as the PRO, Valpak will work with RLG to tailor and deploy these proven systems to the UK context - containing startup costs, dramatically reducing the risk of delay, and ensuring that the PRO is operationally ready from day one. This includes:
- A configurable producer registration and reporting portal.
- Secure data exchange and validation tools.
- Fee calculation engines aligned with modulation and cost models.
- Payment and disbursement tracking systems.
- Material movement tracking (Order Management).
- Waste composition audit and data analysis.
- Real-time dashboards for performance monitoring and compliance.
- Systems to deliver essential training or guides to the program that is accessible to producers.
- Inbuilt whistleblowing functionality for reporting free riders.

This capability positions Valpak as a low-risk, fiscally responsible, high-readiness candidate for the role of PRO, with the digital infrastructure already in place to support a smooth and timely implementation of the scheme.

Wider Impacts – Environmental and Social Value
In addition to delivering its core delegated functions, the PRO has the potential to support broader environmental and social outcomes that align with the goals of the circular economy, alongside economic drivers. These include reducing the carbon footprint of packaging and supporting green job creation across the packaging value chain. Valpak, drawing on the experience of its consulting team in delivering two major studies for ReLondon - London's Packaging Footprint (2024) and The Circular Economy at Work (2022) - is well placed to support this agenda. These reports provide a robust methodology for quantifying the carbon and employment impacts of packaging systems and identifying practical levers for change.

The following are *illustrative examples* of the types of voluntary activities the PRO could undertake to quantify wider environmental and social value, and support and develop associated goals. These are not formal commitments, but rather an example of potential initiatives that could be explored in collaboration with PackUK, Defra, devolved administrations, local authorities and other stakeholders.

Illustrative examples of the type of activity that could take place in Year 1 (2026/27)
- Develop a methodology for estimating the carbon footprint of packaging placed on the market and managed under EPR, using the lifecycle-based approach from *London's Packaging Footprint*.
- Establish baseline estimates of jobs and skills supported by packaging reuse, recycling, and logistics, building on the framework from *The Circular Economy at Work*.
- Convene a "Beyond Recycling Metrics" working group to explore how the PRO can support broader circular economy outcomes, including carbon reduction and social value.
- Begin development of an economic impact model to assess the cost-effectiveness and system-wide value of different packaging interventions, including reuse systems, recycled content, and modulation strategies.

Illustrative examples of the type of activity that could take place in Year 2 (2027/28)
- Publish the first Packaging Carbon and Jobs Impact Report, quantifying avoided emissions and employment supported through EPR activities.
- Pilot a Green Skills for Packaging initiative in partnership with local authorities and training providers, focused on reuse, repair, and packaging logistics.
- Develop a dashboard to track progress against environmental and social KPIs, including carbon intensity per tonne of packaging and jobs per 1,000 tonnes managed.
- Use the economic model to produce a Cost-Benefit Analysis (CBA) of key system levers (e.g. modulation, reuse, collection strategies), to inform continuous improvement and policy alignment.

Illustrative examples of the type of activity that could take place in Year 3 (2028/29)
- Embed carbon and social impact metrics into the PRO's continuous improvement framework and annual reporting cycle.
- Support the development of a national Circular Packaging Skills Strategy, in collaboration with WRAP, CIWM, and devolved administrations.
- Explore the creation of a Circular Packaging Innovation Fund to support voluntary initiatives that deliver measurable environmental and social value.
- Use the economic model to produce a Cost-Benefit Analysis (CBA) of key system levers (e.g. modulation, reuse, collection strategies), to inform continuous improvement and policy alignment.

It is acknowledged that the current focus of pEPR is driving increased recycling and facilitating cost transfer to producers, but in line with wider priorities of the Governments of the UK and the devolved administrations, the PRO should also explore possibilities to enhance the broader circular economy as the system evolves. As a part of this initiative, the PRO should explore opportunities to enhance reuse and waste prevention as part of its voluntary activities, which by way of example would align to the stated priorities of the Welsh Government. This may include quantifying benefits of circular systems, supporting efficient reuse infrastructure requirements, and embedding reuse metrics into performance reporting.

Governance and Scheme Management
Valpak brings nearly three decades of experience in designing, governing, and operating complex producer responsibility schemes. Our leadership of national compliance schemes - including packaging, WEEE, and batteries - and a wide range of associated and voluntary initiatives, has equipped us with the governance structures, risk management protocols, and operational oversight needed to run a high-performing, accountable organisation. We have established processes for board governance, stakeholder representation, and regulatory compliance, all underpinned by ISO-certified quality and information security systems. This experience ensures that the PRO can be established with robust governance from day one, supporting transparency, accountability, and long-term system resilience, ensuring that no single stakeholder group, whether producers, compliance schemes, or service providers, can dominate decision-making. It is critical that stakeholders in this context include not only industry participants, but also local authorities, citizens, and the environment, whose interests must be represented in the governance and oversight of

the system. All governance processes will be underpinned by a commitment to transparency, including published decision-making criteria, stakeholder consultation protocols, and clear reporting lines.

To ensure transparency and avoid conflicts of interest, the PRO would be governed by a not-for-profit entity with clear separation from Valpak's other compliance operations, and with a clear distinction between operational delivery and strategic oversight. Valpak proposes a governance model that includes independent representation and safeguards to ensure that no single stakeholder or stakeholder group - whether producers, compliance schemes, local authorities, Defra or service providers - can dominate decision-making. This model draws on international best practice, including insights from within the Reconomy Group - specifically RLG's experience operating PROs in North America (Ontario and Québec), where transparency, accountability, and independence are critical to system success.

As an example of our commitment to working with Local and National Governments, we have reviewed the Welsh Government's position paper and acknowledge the importance of the service level agreement between PackUK and the four governments. We will ensure that the PRO's operations are fully aligned with the terms of this SLA and responsive to the priorities of each nation.

The PRO would also publish an annual transparency report covering governance, decision-making processes, and stakeholder engagement outcomes. While this proposal outlines a comprehensive model for a single PRO, we recognise that the system parameters may evolve. If it is deemed beneficial and practical, Valpak would support the development of a model that best suits system requirements.

Interaction of the Governance structures and Local Authorities
The governance model will ensure equal representation from all four nations, including mechanisms to reflect the specific needs of devolved administrations. This includes a commitment to engage with Irish, Scottish and Welsh stakeholders, including local authorities/councils and their representative bodies, to ensure that the PRO reflects the priorities of the economies of the devolved nations, their local and small businesses, their environment and their citizens.

We also recognise the importance of the forthcoming Scheme Agent role, which will provide independent oversight of the LA Improvement Action Plan (IAP) process. The PRO will work constructively with the Scheme Agent, respecting its independence and supporting its role in ensuring accountability and fairness.

Small Producer Support Charter
The PRO could also explore the development of a Small Producer Support Charter, outlining additional commitments to ensure that smaller obligated producers are not disadvantaged by the system. This could include simplified onboarding, IT light interaction, tailored guidance, and proportionate reporting requirements. This approach reflects lessons learned from Valpak's compliance experience and RLG's operations across North America, where the requirement to support accessibility and fairness for small businesses has become increasingly prevalent as the schemes developed. Example steps may include:

Year 1 (2026/27)
- Develop and launch a Small Producer Engagement Plan, including a dedicated onboarding pathway for small and micro producers.
- Create simplified guidance materials and compliance templates tailored to the needs of smaller businesses.
- Establish a dedicated small producer support channel (e.g. email, phone, live chat) and begin tracking common queries and barriers.

Year 2 (2027/28)
- Conduct a formal review of small producer engagement, including feedback surveys and focus groups to assess accessibility, clarity, and fairness.
- Refine onboarding and reporting tools based on user feedback.
- Launch a Small Producer Advisory Panel to ensure ongoing representation in system design and decision-making.

Year 3 (2028/29)
- Embed small producer considerations into the PRO's governance and continuous improvement frameworks.
- Publish an annual Small Producer Impact Report, highlighting participation rates, satisfaction levels, and areas for further support.
- Explore opportunities to digitally streamline compliance for small producers, including pre-filled forms and automated reminders.

Particular attention should be given to the needs of both small businesses, including those in devolved nations, and regional industries, and should include tailored support for SMEs within the devolved administrations. This reflects the economic structure of the four nations (and regions) and the importance of ensuring that the system is inclusive and proportionate.

Recruitment and Training
Valpak has been recruiting, training, and developing staff to deliver packaging producer responsibility services for over 28 years. This experience has equipped us with a deep understanding of the technical, regulatory, and operational competencies required to run a complex compliance system. Our established HR and onboarding processes are tailored to the needs of the sector, ensuring that new staff are quickly brought up to speed on both the regulatory framework and the practicalities of scheme delivery. We also operate under ISO-certified quality management systems, which embed continuous learning and performance review into our organisational culture.

If appointed as the PRO, we would implement a phased recruitment and training programme aligned with the staged delegation of functions. This would include early hiring of key leadership and technical roles, followed by structured onboarding, role-specific training modules, and mentoring from experienced Valpak personnel. We would also work with external experts where appropriate to ensure that staff are equipped to manage evolving responsibilities, including data governance, stakeholder engagement, and financial oversight. This approach ensures that the PRO builds capacity in a realistic, scalable way - supporting a smooth transition of functions from PackUK while maintaining high standards of delivery from day one.

Importance of a 5-year plan
Without a clear long-term view, producers and other stakeholders cannot make optimal decisions about packaging design, infrastructure investment, or innovation. Valpak's track record in supporting government with long-term planning, through initiatives such as PackFlow2025 and earlier PRN system reviews, demonstrates our ability to deliver credible, evidence-based roadmaps. As PRO, we would ensure that the system is not only reactive but also forward-looking, enabling a more stable, cost-efficient, and environmentally effective EPR framework.

Valpak have historically been a very forward looking organization. We have a well-defined three-year growth strategy, with a strong commitment to advancing Extended Producer Responsibility (EPR) to ensure it is fair, effective, and efficient for producers. We are driving sustainable growth by investing in data services, expanding our team by 50 people in the past year alone. As EPR regulations evolve, we will continue to enhance our technology solutions to provide valuable packaging insights and equip our customers with tools and information to reduce their environmental impact where possible. Innovation is at the core of our strategy and we are proactively adapting our services to align with upcoming legislation such as deposit return schemes (DRS), the impacts of PPWR (Packaging and Packaging Waste Regulation) implementation across Europe and Textiles EPR. Through the work of our dedicated policy team to engage a wide range of contacts within government and across industry, we're a leading voice in the evolution of producer responsibility systems, and work to ensure regulatory changes are practical, effective and in the common interest. Having this foresight and expertise helps ensure our systems and processes are ready to support a smooth transition, helping businesses comply efficiently when these new requirements take effect. To support our operations, we will hire, train, and retain top talent, fostering a workplace culture that keeps our employees motivated, fulfilled, and happy.

ESG Reporting
The PRO must have an effective and efficient ESG action plan. In doing so, the PRO must ensure that its activities are inclusive of small businesses and transparent to all stakeholders, including citizens and environmental groups. This could be developed as follows:

Year	Environmental (E)	Social (S)	Governance (G)
Year 1: Foundation & Baseline (2025/26)	• Conduct a full carbon footprint assessment (Scope 1, 2, and partial Scope 3). • Establish baseline metrics for energy, waste, water, and travel.	• Conduct a DEI (Diversity, Equity & Inclusion) audit. • Launch employee engagement survey.	• Formalise ESG governance structure (e.g. ESG Steering Committee). • Publish first ESG policy.

	• Begin supplier sustainability screening.	• Map community and stakeholder engagement activities.	• Begin ESG risk mapping and materiality assessment.
Year 2: Integration & Improvement (2026/27)	• Set science-based emissions reduction targets.	• Launch DEI training and inclusive recruitment practices.	• Publish first ESG report aligned with Global Reporting Initiative (GRI) or Task Force on Climate-related Financial Disclosures (TCFD) or other reporting standard.
	• Launch internal sustainability initiatives (e.g. green travel policy, waste reduction).	• Establish community partnership programme.	• Integrate ESG KPIs into leadership performance reviews.
	• Begin reporting on Scope 3 emissions.	• Introduce employee volunteering days.	• Begin supplier ESG audits.
Year 3: Leadership & Transparency (2027/28)	• Achieve measurable reductions in emissions and waste.	• Measure and report on social impact of community programmes.	• Achieve external ESG assurance or certification (e.g. B Corp, ISO 14001).
	• Pilot circularity initiatives in operations.	• Launch mentorship or apprenticeship schemes.	• Publish full ESG impact report.
	• Offset residual emissions (if applicable).	• Conduct second DEI audit to measure progress.	• Embed ESG into procurement and board-level decision-making.

Information Security and Data Governance

Robust information security and data governance are essential to the success and credibility of the EPR system, particularly given the volume and sensitivity of data that will flow between producers, local authorities, and the scheme administrator. Recent high-profile cyber incidents, including those affecting major UK retailers, underscore the importance of ensuring that the PRO has mature, independently verified systems in place from the outset.

Valpak is exceptionally well positioned to meet this need. We are certified to ISO 27001, demonstrating our commitment to the highest standards of information security management. These certifications cover not only our technical infrastructure but also our governance, risk management, and incident response protocols.

We have a long-standing track record of securely handling producer data, including direct integrations with member systems for compliance reporting, cost modelling, and performance benchmarking. Our systems are designed to ensure data integrity, confidentiality, and availability, while enabling efficient, user-friendly data exchange.

If appointed as PRO, Valpak's existing infrastructure and protocols would be deployed from day one, ensuring that data security is not an afterthought but a front-loaded priority. This includes secure onboarding processes, access controls, audit trails, and encryption standards that are already embedded in our operations. Our experience also enables us to support producers and local authorities in meeting their own data responsibilities, offering guidance and tools to ensure compliance and reduce risk across the system.

By leveraging Valpak's proven capabilities in this area, the PRO would benefit from a ready-made, resilient IT and data security framework - minimising risk, building trust, and ensuring that the EPR system is underpinned by secure, scalable digital infrastructure.

Drawing on Experience

Valpak has drawn on international expertise from within the Reconomy Group - particularly RLG's experience operating in PRO systems in North America - to ensure that this proposal reflects global best practice in PRO design and governance. We recognise the importance of building a system that is transparent, inclusive, and resilient - and that avoids the pitfalls of overly centralised or models dominated by a small number of very large producers.

Candidate guidance

Eligibility and selection
Only non-for-profit body corporates will be considered for selection under this EOI. The definition applied is as stated in the amending legislation: "a body corporate which uses money earned by, or donated to, that body corporate solely to pursue its objectives and which does not distribute income to its members, directors or officers except for reasonable remuneration for goods or services supplied to that body". Candidates will need to demonstrate that they currently meet this requirement through providing details of their company registration, their articles of association and a copy of their members' agreement. Alternatively, if the proposed company has not yet been formed, the candidate must provide a clear commitment from its proposed members that they will form a not-for-profit body corporate before the proposed date for the submission of formal applications in autumn 2025.

Candidate selection will be based primarily upon the level of support each candidate has from liable packaging producers or those bodies representing them; consideration will also be given to the breadth of support across different packaging sectors. Consideration will be also given to the level of support from, and consultation with, other relevant stakeholders (e.g. producers that are not liable producers, local authorities, compliance schemes). This mirrors the requirements within the amending legislation that the scheme administrator (PackUK) and the four nations must be satisfied that a PRO candidate is suitable for appointment, taking into account "the level of support for the body's appointment among persons appearing to the scheme administrator to represent the interests of producers and other persons likely to be affected by the appointment".

The four nations will select up to three eligible candidates to invite for further discussions of their proposals.

Responses may be discounted entirely where they fail to demonstrate sufficient support from obligated producers. The four nations may choose to select a single candidate where that candidate demonstrates substantially greater support from liable producers than other candidates, provided that the candidate also demonstrates support from other relevant stakeholders.

The PRO functions specified by candidates will not determine which candidates are selected; however, incomplete or low-quality responses may be excluded from further consideration. Responses without a proposal will be excluded from further consideration.

Proposing functions for the PRO
Candidates must set out their proposals for the role of the PRO in the functions of the PRO section.

In the functions of the PRO section, activities currently undertaken by PackUK are listed in the function column, alongside the regulations in the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 which govern the performance of these activities. These are further broken down into sub-functions, activities which together amount to the performance of the overall function.

For each function candidates must indicate which, if any, of the listed sub functions the PRO should take on in each of the first three years following its appointment and provide a brief high-level summary of benefits of the PRO taking on these sub functions. To do so without disruption to the operation of the scheme, the process of taking on PackUK's functions should be phased over three years.

Proposals must be realistic, accounting for the difficulty of taking on functions in the first years of the PRO's operation, factoring in both the need to develop the organisation's capacity to deliver the scheme alongside practical considerations such as the time required to set up governance, establish data sharing agreements and recruit and train staff to take on more complex tasks.

To ensure that the organisation appointed as the PRO remains an independent private sector body, the minimal set of Sovereign functions, those which must be retained by PackUK as a public body, have been established with HMT and identified in this EOI form. Sovereign functions are functions under UK law that can only be performed by the Government. The Sovereign functions relating to the pEPR scheme are clearly indicated in this document. This will remain a central consideration in appointing the PRO and the four nations will continue to engage with HMT and the Office for National Statistics (ONS) will continue throughout this process.

Candidates must also indicate what other activities, beyond those functions delegated by PackUK, they intend to undertake independently if appointed as the PRO. This is important in demonstrating the coherent role the PRO is proposing to take within the system and will also serve to cement the status of the PRO as an autonomous private sector organisation whose activities are not solely defined by Government. The other activities suggested for the PRO cannot intrude upon the Sovereign functions reserved for PackUK. Nor can they include any activity that would require additional legislation to be effective, for example, requiring a producer to do something or levying a mandatory charge. Activities, in other words, should be provided so that producers or others can engage with them on a voluntary basis.

Next steps
Candidates will be informed of the outcome of this EOI by 24 June 2025. If your organisation is selected, you will be invited to ongoing engagement with the four nations to reach policy agreement on your proposals for the role of the PRO, concluding by early September 2025.

Candidates will be asked to provide further detail and elaboration to their proposals over the course of this engagement, working with officials to map the functions agreed for the PRO against the requirements set out in the regulations. The intended outcome of this process is a single blueprint for the delegation of functions and activities to the PRO agreed to by the four nations. This blueprint will be used as the basis for the formal PRO appointment process and for the conditions of appointment for the PRO.

Any organisation, including those that did not participate in the engagement with the four nations, can then participate in the formal PRO appointment process starting in autumn 2025.

PLEASE NOTE:
Selection under this EOI process does not guarantee an organisations eventual appointment, or eligibility for appointment, as the PRO. The formal appointment process, which PackUK is due to launch in Autumn 2025, will set out the assessment and eligibility criteria for the PRO. Final assessment criteria for the formal appointment process may set a higher bar for candidate eligibility with respect to support from obligated producers and other relevant stakeholders and will introduce additional assessment criteria which will test candidate's suitability for appointment to carry out functions agreed for the first year of PRO operation. At a minimum, PRO candidates will be required to demonstrate they can provide value for money in delivering scheme functions.

Additional information
The pEPR scheme is established by the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024, found on the legislation.gov.uk website.

For assistance with this form please contact packaging@defra.gov.uk