Responses to multiple-choice questions will be shared externally solely as broad aggregated statistical data, and any confidential, personal, identifiable or commercially sensitive information shared in the text response boxes will not be shared externally. Text responses containing non-sensitive information, when shared externally, will be anonymised - for example: "one paper producer said".

What type of stakeholder are you? \Diamond

Large Packaging Obligated Producer (greater than £2m annual turnover and supply or import greater than 50 tonnes per year of packaging on to the UK market), liable to pay pEPR fees

Other Packaging Producer, not liable to pay pEPR fees

Trade body or industry representative

NGO/Charity

O UK local government or council representative

Waste management company or organisation

Other





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2	2 Which material categories are you most concerned with? (select all that apply)	
	All material categories	
	Aluminium	
	✓ Fibre-Based Composite	
Department	Glass	
for Environm	Paper or board	Making
Food & Rura	✓ Plastic	change
	Steel	
	Wood	
	Other (any materials not listed above - for example, bamboo, ceramic, copper, cork, hemp, rubber, wool, silicone etc.)	



What are you unsure about? How can we make it clearer? (optional)

4

5

Yes

O No

O Unsure

Need to ensure that from Autumn 2025 procedures are in place to regularly assess (i) the RAM procedure (ii) the RAM results, including specific queries



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What are you unsure about? How can we make it clearer? (optional)

6

RECOUP hasn't got objective data to challenge the calculations to produce the 1.2 times the base fee. However, the system needs to ensure that from A



Q6. RECOUP hasn't got objective data to challenge the calculations to produce the 1.2 times the base fee. However, the system needs to ensure that from Autumn 2025 procedures are in place to regularly assess (i) the RAM procedure (ii) the RAM results, including specific queries (iii) ensuring that the uplift in base fees is adequate and fair to cover the waste management costs.





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8



RECOUP hasn't got objective data to challenge the calculations to produce the 1.2 times the base fee. However, the system needs to ensure that from A



Q8. RECOUP hasn't got objective data to challenge the calculations to produce the 1.2 times the base fee. However, the system needs to ensure that from Autumn 2025 procedures are in place to regularly assess (i) the RAM procedure (ii) the RAM results, including specific queries (iii) ensuring that the uplift in base fees is adequate and fair to cover the waste management costs.



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9

Yes

O No

O Unsure

10

Having seen the fee factors proposed, do you foresee changing any of your existing plans to use more recyclable materials in your packaging? (Optional: If you do not produce packaging, do you foresee changes in the industry more broadly)? 🔗

Add more details (optional)

Strict and binding rules regarding packaging which has been designed with no consideration for end-of-life will incentivize moves towards design for c

Q10. Strict and binding rules regarding packaging which has been designed with no consideration for end-of-life will incentivize moves towards design for circularity.





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Unsure
12
(optional). Please also add your contact email if you would like us to contact you directly for follow ups.
Regarding the v1.1 RAM document, the most pressing issue is the materials or combinations which have been removed from the RAM "for assessment"

How many years of fixed fee factors should PackUK aim to provide in future in advance to provide sufficient certainty and to drive

You can print a copy of your answer after you submit

investment in switching to more sustainable packaging?



11

3 years

5 years

10 years or more

Never give out your password. Report abuse



Q12. Regarding the v1.1 RAM document; The most pressing issue is the materials or combinations

which have been removed from the RAM "for assessment".

Comparing to current UK guidelines; the following are now deemed acceptable. Reviews for the

following need confirming with some urgency:

- Attached label or sleeve over 40% (bottle) 60% (PTTs) of total surface area Amber in Recyclability by Design
- PET trays with PE seal layer Red in RBD
- HDPE items with fillers eg. Talc, CaCO3 Red in RBD
- Attached labels or sleeves comprised of paper Amber in RBD

In addition, the following queries remain from v.1.

Flexibles:

- Fruit nets added to flexible packaging list – how would these be sorted? Has this been

trialled?

- Specific barrier layers (SiOx, AlOx etc.) removed from 'red' list. Although OK in small quantities, this omission may result in higher quantity used, which the recycling industry may find difficult to cope with. The list of barrier layers needs some research but should be reintroduced, possibly as 'Amber' with a note concerning maximum quantity.
- Polyolefin film minimum 80% PO mono- reduced from minimum 90% PO mono. "Any..... below this threshold are classified as red." No indication of the % required for classifying as 'green' or classifying as 'amber'.

Rigid:

- 'Inks that bleed' removed. Why? This is a fundamental of all recyclability guidelines. We are aware of new technology - washable inks - in development; is this the reason?

Having reviewed the RAM against accepted recyclability guidelines; there are many other differences; of which the following need urgent review:

- Glass components, metal springs, ball bearings (PET bottles, PE bottles, PP bottles)
- Opaque or solid colours (PET bottles)