

Environment Agency Communication

10.50 am, Thursday 29 July

Dear packaging waste reprocessors and exporters,

Please find a communication from Defra regarding the Packaging waste Recycling Note (PRN) system, following the publishing of packaging waste data yesterday.

The four Governments and regulators are committed to maintaining the integrity of the Packaging waste Recycling Note (PRN) system and taking robust action against fraud and error that undermines legitimate businesses and recycling targets.

At the start of this year, strengthened regulations came into effect, introducing stricter accreditation requirements for reprocessors and exporters, tighter export evidence requirements, a fit and proper person test, and increased accreditation fees to support regulatory compliance monitoring.

These steps have been taken alongside wider government action, including the new Waste Crime Action Plan, the toughest ever crackdown on illegal waste, introducing Digital Waste Tracking, tightening regulation to close the loopholes criminals exploit, to enable tougher enforcement to disrupt and punish them, and direct action to clean up the damage they leave behind.

These actions are having a positive impact, deterring those seeking to commit waste crime from entering the system, and identifying those already active in the system.

However, the four Governments and regulators are aware of concerns that this positive and proactive activity could have a short-term impact on the availability of PRNs and PERNs. We continue to monitor the impact on the market and on the 2026 recycling obligations.

The release of January to June data, including waste balances, provides valuable new information on the extent to which PRN and PERN supply this year is likely to meet demand. We will work with key stakeholders to better understand this data and any plans reprocessors and exporters have to increase supply in the remainder of the year.

If the ongoing data review and stakeholder engagement activities indicate a material risk to meeting the 2026 producer recycling obligations, the four governments, in collaboration with the regulators, may consider appropriate mitigating actions.

Should this occur, we will seek to ensure any intervention does not undermine the basic principles of producer responsibility. This includes maintaining sufficient ambition within producers' recycling obligations, while ensuring that legitimate reprocessors and exporters are not adversely affected.

All reprocessors, exporters, compliance schemes and producers must comply with the requirements of the regulations. Any attempt to manipulate the market, either through holding back the raising or sale of evidence, or pausing the purchase of evidence, may impact assessing any change to current recycling expectations and could result in enforcement action by regulators.

The new summary log process, which provides an enhanced level of information for regulators, is designed to enable the regulators to identify possible non-compliance much earlier and take appropriate action.

Regulators are also closely monitoring the situation through their compliance activities. They expect reprocessors and exporters to continue to follow their sampling & inspection plans and business plans, to issue evidence of recycling appropriately and invest PRN/PERN revenue to increase recycling.