

The Government support line for EPR packaging registration/compliance enquiries is:

Tel: 0300 060 0002

Page 1 of 3 – Updated Friday 16 January 2026/V3

Extended Producer Responsibility for packaging:

'Small Producer' Wholesalers

This note aims to help EDA wholesaler Members who may be a 'Small Producer' under the 'EPR for packaging' regulatory regime. It also outlines legal obligations on Small Producers, including the need to register promptly with the national Regulator – see further details below.

If you believe your business may be covered by the 'EPR for packaging' regime then please refer to the latest guidance from the Government and Regulator and/or contact a suitable packaging Compliance Scheme for more information and assistance.

Extended producer responsibility (EPR) for packaging waste was introduced by the Producer Responsibility Obligations (Packaging Waste) Regulations 2024. Depending on turnover and packaging-related activities a UK business that supplies and/or imports packaging may be obligated under these Regulations as a 'Small Producer' (SP). If so, it will need to register and collect (and eventually report) certain annual packaging data, outlined below.

Threshold for SP activity obligations

A business may be an SP if it meets the following turnover and packaging activity criteria:

- annual turnover between £1 million and £2 million and responsible for supplying and/or importing more than 25 tonnes of packaging in the UK; or
- annual turnover over £2 million and responsible for supplying and/or importing between 25 tonnes and 50 tonnes of packaging in the UK. and if it is
- undertaking a specified *packaging activity*.

For wholesalers, the relevant packaging activity is (at minimum) '**selling**' – this is supplying filled packaging directly to a UK 'end user' of that packaging, whether a consumer or a business. An 'end user' may remove, reuse, recover or dispose of packaging supplied to them by a wholesaler.

Required actions

The two key minimum requirements on *obligated* SP wholesalers under the EPR regime are to:

- 1) register with the regulator *as soon as possible* (notably if looking to use a compliance scheme*) and no later than 1 April 2026; and
- 2) collect 2026 information about which UK nation your supplied packaging has (most likely) been discarded in – known as 'nation of sale data'.

1) Small producer registration: obligated wholesaler SPs are required to register with the appropriate national Regulator. This involves annual registration, with the 2026 fees shown below.

Please note: the note above provides available headline information on the EPR for packaging requirements affecting Small Producers. It does not seek to interpret EPR packaging legislation, and the Government/national Regulator is the source of official guidance. Fee-based compliance schemes can also help with practical compliance.

The Government support line for EPR packaging registration/compliance enquiries is:
Tel: 0300 060 0002

Page 2 of 3 – Updated Friday 16 January 2026/V3

Regulator Fees <i>(no VAT applicable)</i>	
Regulator Small Producer <u>Registration Fee</u> via a Compliance Scheme*	£696
Regulator Small Producer <u>Registration Fee</u> via direct registration (not via a CS)	£1303
Regulator Resubmission Fee <i>(per legal entity on the submission)</i>	£512 <i>per resubmission</i>
Note: Regulator <u>Late Registration Fee</u> <i>(per legal entity)</i>	£386 <i>per late registration</i>

Registering

Potentially obligated SPs may find a practical approach to assessing whether they need to register is to contact a recognised Compliance Scheme* (these are fee-based but can offer considerable support with ongoing regulatory compliance).

For wholesaler SPs with a confirmed EPR packaging obligation, who have not yet registered:

1. Enrol asap as an obligated producer on the Report Packaging Data (RPD) site, to show intention to comply with the EPR regime: <https://www.gov.uk/guidance/report-packaging-data>
2. Decide whether to join a compliance scheme.

*Third party packaging compliance schemes

Compliance schemes (CSs) are fee-based third parties that can help organisations understand and meet their EPR packaging requirements, notably:

- paying registration fees on the SP's behalf;
- advising on data collection;
- reporting packaging data.

A choice of packaging CSs is available. If you choose to work with a CS first make sure they appear on the compliance scheme public register.

2) Nation of sale data: this shows which UK nation packaging has been sold, hired, loaned or discarded in. It includes packaging that is imported and then discarded. Obligated SPs are advised to collect 2026 nation of sale data *now* since it is expected there will be a legal requirement to *report* this data to your national regulator in April 2027.

Please note: the note above provides available headline information on the EPR for packaging requirements affecting Small Producers. It does not seek to interpret EPR packaging legislation, and the Government/national Regulator is the source of official guidance. Fee-based compliance schemes can also help with practical compliance.

The Government support line for EPR packaging registration/compliance enquiries is:

Tel: 0300 060 0002

Page 3 of 3 – Updated Friday 16 January 2026/V3

Other EPR packaging activity (beyond selling)

Businesses that carry out any of the following packaging activities will have *additional/other* duties under the EPR regime that are *not covered in this note*:

- supplying packaged goods to the UK market under own brand
- placing goods into unbranded packaging
- importing products in packaging and discard the packaging
- owning an online marketplace platform (allowing non-UK businesses to sell into the UK)
- hiring or loaning out reusable packaging
- supplying empty packaging.

Furthermore, this note does *not* cover the packaging obligations on **Large Producers** under the EPR regime. You may be a Large Producer organisation, with additional EPR obligations, if *both* of the following apply (subject to your overall packaging activities):

- your business has an annual turnover of £2 million or above;
- your business is responsible for supplying or importing more than 50 tonnes of packaging in the UK.

Official guidance on the requirements of the 'EPR for packaging' regime is at:

[Extended producer responsibility for packaging: who is affected and what to do - GOV.UK](#)

We would like to acknowledge the helpful assistance of the 'Wastepack' Compliance Scheme in producing this information note (Daisy.malyon@wastepack.co.uk).