

EDA Bulletin: The '25 tonne' Small Producer EPR (Extended Producer Responsibility) Obligation Threshold

This note supplements the EDA's January 2026 'EPR for packaging' briefing note: it provides illustrative information to help EDA wholesaler Members understand if they exceed a 'Small Producer' threshold of 25 tonnes or more of relevant packaging per annum. 'Small Producers' are required to Register with the relevant enforcing authority.

If suitable packaging waste figures aren't available, assessing whether business activities involve over 25 tonnes of relevant packaging waste a year may not be obvious. Relevant tonnages depend greatly on whether the business carries out activities such as those shown below. So first, consider the following.

Do you engage in:

EPR Seller activity

- ...supplying packaged goods to customers who will then dispose of some, or all, of that supplied packaging?

EPR Importing activity

- ...importing prepacked goods or import and discard/ reuse some of this packaging?

Other EPR packaging-related activities such as:

- ...supplying goods with associated packaging that carries your company branding, including (but not limited to) your logo and/ or company name?
- ...using new packaging, eg repackaging/creating mixed shipments of traded goods?
- ...hiring/loaning out packaging that you own (e.g., a pallet pool system)?

What 25 tonnes of packaging might look like

Packaging weights will of course vary due to type and dimensions. However, 25 tonnes of packaging a year (around half a tonne a week) is roughly:

1,400 1200 x 1000mm pallets (18kg each)

OR

10,500 300m rolls of 500mm x 35m 17micro per pallet wrap (0.28kg/pallet)



OR

30,000 large (secondary) 400x 600x 320mm cardboard boxes (0.84kg each)



OR

833,000 small (primary) 226x 121x 89mm cardboard boxes (0.03kg each).



Note that if:

- you are a 'seller' *only* you only need to consider the packaging that you pass on to your end user customers (business or consumer). It might be that this packaging *does not* amount to 25 tonnes a year, in which case you are ***not obligated to register*** under packaging waste EPR;
- you are also an importer, or engage in other activities such as those above beyond selling, you are more likely to encounter the 25 tonne per annum threshold;
- your (e.g.) pallets come from a UK supplier, you do not have to count them under EPR if you are ***not passing them on to an end user***. You *will* have to count them though, if they are imported from outside of the UK, or you pass them on to an *end user*.

Example '25 tonne (per annum)' packaging scenario (using the weights above):

Supplying ('selling') to end users of the packaging:

- 375 Pallets - 6,750kg
- Pallet wrap (375 pallets) - 105kg
- Secondary cardboard boxes (16 x 375 pallets) - 5,040kg
- *Primary cardboard boxes (18 x 16 x 375 pallets) - 3,240kg

Primary/secondary cardboard (possibly pallets) are likely seller packaging that is passed to end users. Other potential packaging types may include materials such as clear polythene, polystyrene and card.

Total (supplied packaging) as above: 15,135kg

Importing product packaging

- 250 Pallets - 4,500kg
- Pallet corners (250 pallets x 4) - 23kg
- Pallet wrap (250 pallets) - 70kg
- Secondary cardboard boxes (16 x 250 pallets) - 3,360kg
- Primary cardboard boxes (18 x 16 x 250) - 2,160kg

Total imported packaging as above: 10,113kg

Total of both the above: 25,248kg (**25.25t**).

In this illustrative scenario the business should make immediate further enquires to confirm whether they need to register with the relevant enforcing authority under the legal 'EPR for packaging' requirements.