

FAQs – The UK Packaging Pact

1.0 What is the difference between a target-based Pact and a goal-based Pact?

Following extensive consultation with signatories, the decision was made to maintain the same level of ambition but evolve from fixed targets to broader, impact-focused goals. This shift reflects the increasingly complex policy landscape and ensures that businesses are not penalised by factors outside their control, such as legislative delays or infrastructure gaps, while still driving coordinated action.

The Roadmap, which will be co-created with signatories, will set out the level of ambition for each of the goals with quantifiable aims that signatories can then adopt. The new model keeps the collective ambition and accountability of the previous Pact but provides greater flexibility for signatories to set individual KPIs that align with their packaging portfolios, suppliers, and business priorities.

Importantly, this approach makes the Pact more inclusive and resilient, empowering both large FMCG companies and SMEs to participate meaningfully, adapt to policy changes, and continue moving decisively toward a circular packaging system.

2.0 Will the Pact work in alignment with PackUK's plans?

Yes. The UK Packaging Pact is being developed in close collaboration with PackUK to ensure that voluntary industry action complements and supports the delivery of statutory Packaging Extended Producer Responsibility (pEPR) reforms. The two programmes are designed to be mutually reinforcing: PackUK sets the regulatory framework and compliance mechanisms, while the Pact provides a pre-competitive space for industry to act collectively, test solutions, and share insights that inform future regulation.

In short, PackUK provides the legislative framework, while the Pact helps members go beyond compliance - accelerating change, improving access to quality recycle, and demonstrating where government and industry collaboration can deliver the greatest impact.

3.0 How will WRAP work with government to ensure EPR funds are invested effectively?

WRAP will work closely with PackUK, Defra, the devolved governments, and industry to ensure that evidence from the UK Packaging Pact directly informs how EPR funds are targeted and spent. Through *Goal 3: Support Circular Infrastructure Investment*, the Pact will act as a pre-competitive evidence hub, collating real-world data and insight from across the packaging value chain. This includes mapping material flows, analysing system bottlenecks, and identifying where losses, quality issues, or investment gaps exist.

By identifying priority areas - such as improved film and flexible packaging sortation, small-format capture, and domestic reprocessing capacity - WRAP can present clear, evidence-based recommendations on where EPR and complementary funding will have the greatest impact.

The Pact will also convene investors, recyclers, local authorities, and brands to align on solutions and ensure public and private funding work hand in hand.

4.0 What strategies are being considered to encourage consumers to prefer packaging solutions geared towards reduction and reuse?

Citizen behaviour change will be central to Goal 2. The focus will be on making reuse systems *frictionless* and convenient for citizens - for example, "buy anywhere, return anywhere." Return-to-store is one option, but return via kerbside may prove easier for citizens.

At present, citizens have limited access to reusable or refillable packaging, so we must increase availability. WRAP's experts in behaviour change will support Goal 2's development to ensure reuse systems work effectively for people and businesses alike.

5.0 Will WRAP provide more guidance on RAM and its impact on packaging design?

Yes. WRAP will continue to provide detailed guidance to help businesses understand and apply the Recyclability Assessment Methodology (RAM) as it becomes embedded within Extended Producer Responsibility (EPR) and the wider UK Packaging Pact framework.

WRAP works closely with PackUK, OPRL, and the UK Plastics/Packaging Pact members to maintain consistency between the RAM, Simpler Recycling, and future UK/EU standards such as the PPWR.

Crucially, members are encouraged to design *beyond compliance* - driving innovation, eliminating low-value materials, and supporting a truly circular packaging system.

6.0 How do you define problematic or unnecessary packaging?

Packaging is considered unnecessary when it does not provide essential protection, functionality, or user benefit, and its removal or reduction would not compromise product integrity, safety, hygiene, or regulatory compliance.

This includes:

- Packaging whose use is avoidable or where reusable alternatives are available
- Packaging that exceeds what is required for transport, storage, or sale
- Packaging that is not recyclable or hampers the recycling process
- Packaging likely to leak into or pollute the environment
- Materials or formats that hinder circular design or reuse

All packaging materials must also comply with relevant chemical safety regulations, including REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals).

7.0 Will there be a legal requirement for clear OPRL to support consumer recycling?

The UK Packaging Pact fully supports clear, consistent, and mandatory on-pack recycling labelling to help citizens recycle with confidence and reduce contamination.

WRAP continues to work with OPRL, PackUK, and government to align recyclability information with the RAM and Simpler Recycling reforms, with the ambition that *every* consumer packaging item carries accurate disposal instructions across all UK nations.

8.0 Is the UK Packaging Pact the first of a global network of Packaging Pacts?

The UK Packaging Pact remains part of the global network of Plastics Pacts, aligned under a shared vision for a circular economy for plastics and packaging. The UK is currently the only Pact extending to *all* packaging, but many others are observing its development.

Participation in the UK Packaging Pact strengthens local impact while connecting businesses to global best practice, shared innovation, and coordinated international action.

9.0 How will reuse for primary packaging be measured - by weight or volume?

We will assess the proportion of packaging by *unit/volume* that is reusable versus single use (aligned to WEF and PPWR definitions and measurement).

This approach ensures the focus remains on *actual reuse activity*, not simply material throughput.

10.0 Will producer take-back schemes be recognised within EPR?

Yes. Take-back and collection schemes - whether for flexibles, refillables, or specific materials - are key to closing the loop. Through the Pact, WRAP will work with PackUK, government, and industry to map where these schemes operate, assess their effectiveness, and identify how they can complement or feed into EPR delivery.

11.0 Goals 3 and 4 seem broad and may overlap with the role of Pack UK and the future Producer Responsibility Organisation (PRO). How will this be managed?

Goal 3 and Goal 4 focus on the areas that sit around the formal EPR system - providing the evidence, coordination and pre-competitive collaboration that statutory schemes alone cannot deliver.

- Goal 3 builds an independent, shared evidence base to identify where investment is most needed to close material loops, improve recyclate quality and increase UK processing capacity. The Pact will not distribute EPR funds but will inform and guide where those investments can achieve the greatest impact, helping Pack UK and government target resources efficiently.
- Goal 4 focuses on simplifying and aligning packaging data across the system. Packaging data spans Pack UK and the future PRO, but also the Deposit Management Organisation, Plastic Packaging Tax, Material Facilities sampling, and other reporting requirements. The Pact will look across all of these interfaces to ease reporting burdens for businesses, while improving overall efficiency, interoperability and traceability.

By creating a collaborative space where industry can test ideas, share insights and align definitions, the Pact strengthens (rather than replaces) the work of Pack UK and the PRO.

12.0 How does open data help the framework, and what are the plans in this domain?

The aim is not to share confidential data but to build a *Packaging Data Strategy* focused on interoperability. This includes:

- Mapping data taxonomies to create a “packaging data dictionary”
 - Mapping data flows and reporting systems
 - Future-proofing systems against new requirements
 - Improving traceability across the packaging value chain
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13.0 What do you mean by £5 of benefits for every £1 invested, and how was this calculated?

An independent cost-benefit analysis for WRAP and government funders found that for every £1 spent, £5.23 in benefits is generated.

This includes savings for waste producers and raw material users (including landfill tax), reductions in carbon emissions, improvements in air quality, lower long-term energy costs, disamenity benefits (quality-of-life value), and productivity gains.

14.0 What are the costs involved in being a founding member of the Packaging Pact?

It depends on the business type and UK turnover. Indicative membership bands range from £2,000 to £42,000. For full details, contact UKPackagingPact@wrap.ngo.

15.0 How are non-plastic packaging stakeholders being engaged, and how can we help?

Engagement has gone far beyond existing Plastics Pact members. WRAP has consulted material sector bodies, trade associations, recyclers, converters, and manufacturers across paper, card, metal, and glass.

Government and devolved administrations have also been closely involved to ensure alignment and avoid duplication.

You can help by encouraging participation from non-plastic sectors, sharing evidence and innovation, and joining as a founding member to help shape goals and KPIs for your sector. The more cross-material voices at the table, the stronger and more representative the Pact will be.

16.0 Will the Pact address natural polymers and bio-based materials as alternatives?

Yes. This sits within Goal 1. The focus is to understand where bio-based materials can best displace non-renewables, what the barriers to adoption are (particularly legislative), and how to support their use where appropriate. WRAP will continue to play an advocacy role as policy evolves, supporting responsible adoption of bio-based materials.