

# How to Assess Your Packaging Waste Using the Recyclability Assessment Methodology (RAM)

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## Introduction

From **1 January 2025**, large producers supplying household packaging must assess its recyclability and report the results to the Environment Agency.

This guidance provides an overview of the **Recyclability Assessment Methodology (RAM)** to help businesses assess and classify their packaging in compliance with **Extended Producer Responsibility (EPR) for packaging** regulations.

## Who Must Comply?

- Only **large producers** (organisations meeting specific turnover and packaging thresholds) must report recyclability data.
- **Small producers** are not required to submit recyclability assessments but may have other obligations under EPR.

## What Packaging Must Be Assessed?

- Only **household packaging** (packaging typically disposed of in domestic waste streams) must be assessed.
- Producers must collect and report recyclability data for all packaging they supply.

## Categories of Material

Packaging materials are classified into **eight categories**:

1. Paper and board
2. Fibre-based composite materials
3. Plastics (separate guidance exists for **rigid plastics** and **flexible plastics**)
4. Steel
5. Aluminium
6. Glass
7. Wood
8. Other

If packaging is made of multiple materials, assess it under the material with the greatest **weight**.



## Drinks Containers

- **Glass containers:** Assess separate components like metal lids separately unless labels are **non-removable**.
- **Steel, aluminium, and PET containers:** Include all components in the total weight and report based on the predominant material.

## Outputs: The Red, Amber, Green (RAG) Scale

The recyclability of packaging is classified as:

- **Red:** Difficult to recycle due to collection, sortation, or reprocessing barriers.
- **Amber:** Recyclable with **challenges**, requiring specialist processing or lower efficiency in sorting/reprocessing.
- **Green:** Widely recyclable within the **UK's existing recycling infrastructure**.

## Materials That Are Exempt

- Reusable packaging, unless **imported** into the UK.
- Packaging exported from the UK by the producer.

## Automatic Red ('Problematic Packaging')

Some packaging automatically receives a **red rating** if it contains any of the following:

- **Integrated electrical components** or **batteries** classified under **Electrical and Electronic Equipment (EEE)** regulations.
- **Substances of Very High Concern (SVHC)** under UK REACH regulations.
- **Printing inks** that do not comply with **EuPIA Exclusion Policy**.
- **Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)** that have been **intentionally added**.

## How Recyclability Ratings Affect Costs ('Modulation')

- The **fees for packaging disposal** will vary based on recyclability.
- Easily recyclable materials (**green**) will have **lower fees**.
- Hard-to-recycle packaging (**red**) will incur **higher disposal fees**.
- Full details of **modulated fees** will be published in 2025.

## Reporting Requirements for 2025

- Large producers must **submit recyclability assessment data** for all household packaging placed on the market.
- The **data must be included** in the packaging report submitted via the **Report Packaging Data (RPD) service**.
- Further details on **data submission processes** will be published closer to the reporting deadline.

## Getting Help with Packaging Assessments

If you **lack technical details** about your packaging:

Smart Comply can help you with this process to ensure you are reporting correctly.

## Updates to the RAM

- The RAM will be reviewed and updated **annually**, aligned with **EPR reporting periods**.
- Updates will reflect **innovation, market changes, and regulatory updates**.

## Who Decides Recyclability Ratings?

- A **Technical Advisory Committee (TAC)** will oversee the **annual review** of the RAM.
- Reviews will be conducted in **line with reporting schedules** to maintain accuracy and industry alignment.

## Conclusion

This guidance helps businesses comply with **EPR regulations** by assessing and reporting packaging recyclability using the **RAM framework**. Compliance ensures:

- **Accurate recyclability classification** of packaging.
- **Fair fee structures** that reward sustainable packaging choices.
- **Contribution to the circular economy** by promoting **better material choices**.

For further details, refer to the **full RAM technical guidance** or contact Smart Comply for further support.