

On-Pack Recycling Label (OPRL) Q&A

25 September 2023, 12:00 – 13:00

Q. Is packaging that is in contact with a product in scope of UK Extended Producer Responsibility (EPR)?

A. Packaging that is in contact with a product is classed as primary packaging and is in scope of EPR. Primary packaging is defined in section 6(1)(a) of the [draft Regulation](#) as “*packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase.*”

Q. What is ‘shipment’ packaging?

A. Shipment packaging is defined in section 6(1)(d) of the [draft Regulation](#) as “*packaging in addition to primary packaging on items which are sold online or by mail order which are either delivered direct to the purchaser or collected by the purchaser from a shop or other collection point after they have been purchased.*”

Q. Will the use of the Recycle Now ‘swoosh’ be mandatory, as well as the words ‘Recycle’ / ‘Do not Recycle’?

A. Labelling requirements are outlined in Chapter 2 of the [draft Regulation](#). It will be mandatory to include both the logo and the accompanying statement.

Q. Can the wording be ‘recyclable’ rather than ‘recycle’?

A. The text is prescribed in the [draft Regulation](#). As currently drafted, the label must state “Recycle” or “Do Not Recycle” and it must be accompanied by the relevant logo.

Q. Is there a minimum size threshold below which on-pack recyclability labelling will not be required under UK EPR?

A. Recyclability labelling is mandatory on primary and shipment packaging; however, the [draft Regulation](#) states that on-pack labelling is not required on any packaging where the surface area of the largest surface of the packaging is less than 25cm².

Q. If compostable packaging will be required to be labelled 'Do Not Recycle', will cardboard and paper also follow this rule?

A. It is important to note that not all cardboard and paper are recyclable because sometimes they are treated in a way that prevents them from breaking down. However, you can get materials that are both compostable and recyclable. If you want to focus on compostability as a feature of packaging, it will have to be labelled ‘Do Not Recycle’. If the packaging is made from recyclable

cardboard and paper, it is advisable to focus on its recyclability, at least until compostable packaging can be effectively handled via an alternative route.

Q. Will the labelling requirements apply to medicinal products?

A. The labelling requirements apply to all primary and shipment packaging, except drinks containers that are subject to a Deposit Return Scheme and ‘exempt packaging’ as outlined in 13(2) of the [draft Regulation](#). While medicinal products are outside of CTPA’s remit, recycling information for medicinal products is outlined in section 24 of the **draft** Regulation.

Q. What are the minimum sizes for the logo and text?

A. The minimum size requirements can be found in section 26 of the [draft Regulation](#). It is as follows:

26.—(1) For the purposes of regulations 22(2)(a) and 23(1) and (2)—

(a) if the surface area of the largest surface of the packaging is 80 square centimetres or more—

(i) words must be in a font in which letters have an x-height of at least 1.2mm, and

(ii) the symbol must be at least 9.5mm in height where the symbol is displayed in portrait orientation, or 3.5mm in height where it is displayed in landscape orientation;

(b) if the surface area of the largest surface of the packaging is less than 80 square centimetres—

(i) words must be in a font in which letters have an x-height of at least 0.9mm, and

(ii) the symbol must be at least 7mm in height where the symbol is displayed in portrait orientation and 3.5mm in height where it is displayed in landscape orientation.

(2) In paragraph (1), “x-height” refers to the height of a lower-case letter which does not extend above or below the line, such as “x”.

Q. How will labelling work for packaging where some components can be recycled and others cannot?

A. Packaging must detail the recycling information for each component. According to section 26(3) of the [draft Regulation](#), this may be placed on an outer or main component or it can be placed on each individual component:

(3) Where the primary packaging of a product consists of a number of components or ancillary elements the producer may—

(a) place the label required by regulation 23 on an outer component, or the main packaging component, indicating if each component is or is not recyclable, or

(b) place the label required by regulation 23 on each component indicating whether that component is or is not recyclable.

Q. Do you have to be a member of OPRL to be able to use the ‘Recycle’ and ‘Do Not Recycle’ labels?

A. Currently, you must be a member of OPRL to use the recyclability labels due to the licence agreement. However, at some point in future, the licence will change, and companies will not have to be a member of OPRL to use the labels. A date from which the licence will change has not yet been specified.

Q. Can the OPRL labels be used in communications with suppliers to inform them about the upcoming changes?

A. WRAP is the licence owner and would need to make this decision. However, labelling requirements are outlined in Chapter 2 of the [draft Regulation](#).

Q. With regards to take back schemes, are there any restrictions on what the packaging can be recycled into? For example, hard to recycle plastic turned into other products, such as construction materials.

A. Large organisations can offset their household costs if they self-manage consumer waste that cannot be recycled kerbside; however, they must have evidence that the waste has been recycled. ‘Recycling’ for the purposes of EPR has the meaning given in Article 3(17) of the [Waste Directive](#), which states:

“‘Recycling’ means any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.”