

## Subject: Why You're Seeing an EPR Charge – A Quick Explanation

We've had a few questions recently about the new **EPR (Extended Producer Responsibility)** charges appearing on invoices, especially from smaller businesses who believe they're exempt. We completely understand the confusion, so we've put together a quick explainer to help clarify how this works and why you may be seeing a charge.

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### What is EPR?

Extended Producer Responsibility is a UK regulation that requires companies who place packaging on the UK market to take financial responsibility for its environmental impact, including the cost of collecting, sorting and recycling it.

This system is being rolled out in phases and applies to packaging from 2025 onward.

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### Do you have a legal obligation under EPR?

**ALL BUSINESSES**, large and small, who are placing packaging onto the UK market have an obligation under EPR, either directly or indirectly.

The payment method depends on your business size and how much packaging you place on the market:

- **Over £2 million turnover and more than 50 tonnes of packaging/year:**  
You are a **large producer**. You must **report and pay** EPR fees directly to the regulator.
  - **£1–2 million turnover and 25–50 tonnes of packaging/year:**  
You are a **small producer**. You must **report** your packaging data to the regulator, but you pay the EPR fee to your supplier, who in turn pays the regulator.
  - **Under £1 million turnover or less than 25 tonnes/year:**  
You are a **micro producer**. You have **no direct reporting**. You pay EPR to your supplier, not directly to the regulator. Your supplier is responsible for reporting and paying to the regulator.
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### So why are you seeing a charge from us?

Even if you are exempt or not required to pay directly, **Glassworks International is not**.

As the **importer** of the packaging, we are classed as the **obligated party** under EPR. That means:

- We are legally required to report and pay fees on all packaging we import.
  - These fees are part of our compliance costs and are passed on through our pricing, just like fuel or freight surcharges.
  - This is not a government tax, it's a **commercial charge** to reflect our obligations under the law.
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### What if I don't think I should be charged?

This system is based on **who places the packaging on the UK market** not just on whether your own business is exempt.

If the packaging enters the waste stream and **you don't pay the fee**, then the **supplier (us)** does. That's why non-obligated businesses may still see EPR fees, because the cost lies with us and we pass that on transparently.

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### What does the invoice line say?

To avoid any confusion, we use a consistent line on all affected invoices:

“As the obligated importer of packaging under the UK EPR system, we are responsible for EPR fees on all packaging, including that supplied to customers who fall below the £1m turnover threshold. We include these charges to reflect the costs we incur on your behalf in complying with this legislation.”

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### Can I opt out of this charge?

No. This is a compliance cost that forms part of our supply pricing. It is not optional once commercial terms are agreed.

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### Where can I read more?

- Official Government Guidance: <https://www.gov.uk/guidance/packaging-waste-extended-producer-responsibility>
  - Our blog: [Extended Producer Responsibility \(EPR\): What You Need to Know in 2025](#)
  - Or speak to your Glassworks account manager – we're here to help.
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Thanks for taking the time to read this. We're committed to keeping our pricing transparent and compliant as the new rules come into effect. Please don't hesitate to get in touch with any further questions.

Best regards  
**Glassworks International**