POSITIVE ID LABELS

UK PACKAGING EPR

YOUR LABEL AND YOUR RAM RATING

Recyclability assessment methodology
Hot wash, coverage and PET rules
Ink and PFAS automatic reds
Recycling labels: where things stand
Correct as of 20 October 2026

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How to use this checklist

Under UK packaging extended producer responsibility (EPR), large producers rate their household packaging red, amber or green using the recyclability assessment methodology (RAM). Red packaging pays higher fees. Several RAM rules are about labels: the adhesive, the face material, how much of the pack it covers, and the inks. Use this checklist to check your packs. This is general information, not legal advice.

Questions about your labels? Call Positive ID Labels: **01332 864895 sales@pid-labelling.co.uk**

Key compliance dates

DATE	REGULATION	REQUIREMENT
Apr 2025	RAM v1.1	Version used for the 2026 reporting year
1 Jan 2026	Reporting year	2026 assessments use RAM v1.1 (1 Jan to 31 Dec 2026)
1 Jul 2026	RAM 2027	Published; updated 20 August 2026
1 Jan 2027	**Reporting year**	**RAM 2027 applies (1 Jan to 31 Dec 2027)**
1 Apr 2027	Labelling	Planned recycling label rule not enforced (reported)
Each year	PackUK	New RAM version published before each reporting year

Label rules at a glance

These rules come from the RAM 2027 materials assessment guidance on gov.uk (updated 20 August 2026). They decide whether a label helps or hurts a pack's red, amber or green rating. Check the current version each year.

■ RIGID PLASTIC BOTTLES, TUBS AND TRAYS

- [ ] **1. Adhesive must release in a 70 to 90°C hot wash** — CRITICAL
  If the label adhesive does not release during a standard 70 to 90°C hot wash, the pack is rated red.

- [ ] **2. Coverage over 60% of a different material** — URGENT
  A label or sleeve of a different material or polymer covering more than 60% of the surface makes the pack amber.

- [ ] **3. PET bottles and trays: labels must float** — CRITICAL
  Labels or sleeves of a polymer other than PET with a density above 1 g/cm3 make the pack red. Floating materials such as polypropylene separate at the plant.

- [ ] **4. HDPE and PP packs: avoid PVC and metallised films** — CRITICAL
  Labels or sleeves made of PVC, aluminium, metallised PET or metallised PS make the pack red.

- [ ] **5. Carbon black and sorting machines**
  Carbon black that stops near-infrared detection makes the pack red.

■ PAPER, BOARD, GLASS AND METAL

- [ ] **6. Paper and board: watch non-paper content**
  More than 10% non-paper content by weight makes the pack amber.

- [ ] **7. Linerless paper labels: silicone limit**
  Paper labels are amber if the silicone release coating is more than 0.3% of the label's weight.

- [ ] **8. Glass has no label rules**
  Soda-lime glass jars and bottles carry no label rules. A label attached with adhesive is assessed as part of the jar.

☐ **9. Steel and aluminium**
Amber only above 30% non-metal content by weight.

■ AUTOMATIC REDS FOR ANY PACK

☐ **10. Inks must follow the EuPIA exclusion policy**
Inks not manufactured in line with the European Printing Ink Association exclusion policy make the pack red automatically.

CRITICAL

☐ **11. PFAS limits**
More than 1 ppm total PFAS, or in food packaging more than 25 ppb of any individual PFAS or of total PFAS, makes the pack red.

CRITICAL

☐ **12. Missing data counts against you**
Household packaging that has not been assessed, or lacks the detail needed to assess it, is rated red.

URGENT

Actions by role

Large producers must assess household packaging and report the results. Smaller producers may be asked for the same data by customers and retailers. Start with your highest-volume packs.

■ BRAND OWNER

- [ ] **13. List your household packs by volume** URGENT
  Note the container material, the label material and the share of the pack the label covers.
- [ ] **14. Find out who assesses your packs**
  If you are a large producer, you report. If not, check which of your customers need data from you.
- [ ] **15. Budget for fee differences**
  Red-rated packaging pays higher disposal fees than amber or green. A label change can be cheaper than the fee gap.

■ PACKAGING TECHNOLOGIST

- [ ] **16. Check each label against the rule table**
  Work through items 1 to 12 for each pack format.
- [ ] **17. Ask for wash-off evidence on rigid plastics** CRITICAL
  Request hot wash release data at 70 to 90°C for the adhesive used on each plastic pack.
- [ ] **18. Confirm label density on PET**
  Ask for the face material's polymer and density, and whether it floats.

■ ARTWORK AND DESIGN

- [ ] **19. Keep coverage below 60% where you can**
  On rigid plastic packs, a label of a different material covering more than 60% of the surface gives an amber rating.
- [ ] **20. Avoid direct print on clear or white HDPE and PP**
  Direct printing on clear or white HDPE or PP packs is red, except batch codes and expiry dates.

- [ ] **21. Recycling labels are not mandatory yet**
  Reports from OPRL and the trade press say on-pack recycling labels will not be required in the first stage of EPR. Treat this as reported until gov.uk confirms it.

■ PURCHASING

- [ ] **22. Ask suppliers for written material data**
  Ink compliance statements (EuPIA), PFAS declarations, face material and adhesive details. Keep them on file for your report.

  URGENT

- [ ] **23. Recheck when a specification changes**
  A new adhesive, face material or finish can change the rating.

What we can do

Positive ID Labels prints in Melbourne, South Derbyshire. We do not assess or certify RAM ratings: that stays with the producer. We help you choose and document the label.

■ HOW WE HELP

- [ ] **24. Material data for your report**
We are gathering recyclability data from our ink, labelstock and adhesive suppliers, so we can answer your questions with documents.

- [ ] **25. Talk through your pack**
Container material, coverage, conditions in use and adhesive options. The right combination depends on your container.

- [ ] **26. Reorder reminders**
When your job completes, we can set a reminder based on your usage so a specification change is planned, not rushed.

■ SOURCES (CHECKED 20 OCTOBER 2026)

- [ ] **27. GOV.UK: RAM 2027 overview and materials assessment guidance**
gov.uk/government/publications/assess-packaging-recyclability-recyclability-assessment-methodology-ram-2027 (first published 1 July 2026, updated 20 August 2026).

- [ ] **28. GOV.UK: how to assess your packaging waste (RAM v1.1)**
gov.uk/guidance/recycling-assessment-methodology-how-to-assess-your-packaging-waste.

- [ ] **29. OPRL help centre: labelling under pEPR (reported)**
help.oprl.org.uk/en/knowledge/what-are-the-mandatory-requirements-for-labelling-under-epr.

NEXT STEPS

Checking your packs?

Ask us for the label data.

Labels printed in Melbourne, South Derbyshire, on digital and flexo presses.

Tell us about your container and your label.
We will share the material information you need
for your EPR report, and talk through options.

We give you a quote, not an estimate:
the price we quote is the price you pay.

Tell us your labelling challenge on 01332 864895.

CALL
01332 864895

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WEB
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SCAN TO READ THE FULL GUIDE

pid-labelling.co.uk/pepr-ram-label-recyclability/