



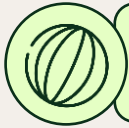
A positive approach to EPR

Considerations for a potential voluntary EPR (Extended Producer Responsibility) system for the UK Flooring Sector

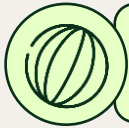
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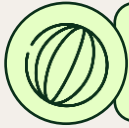
Presentation content



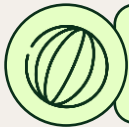
Who are WRAP?



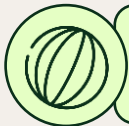
Introduction to EPR & Product Stewardship



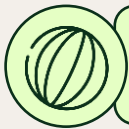
EPR for carpets/flooring in the United Kingdom



Similar existing systems internationally



Key elements of EPR / Product Stewardship



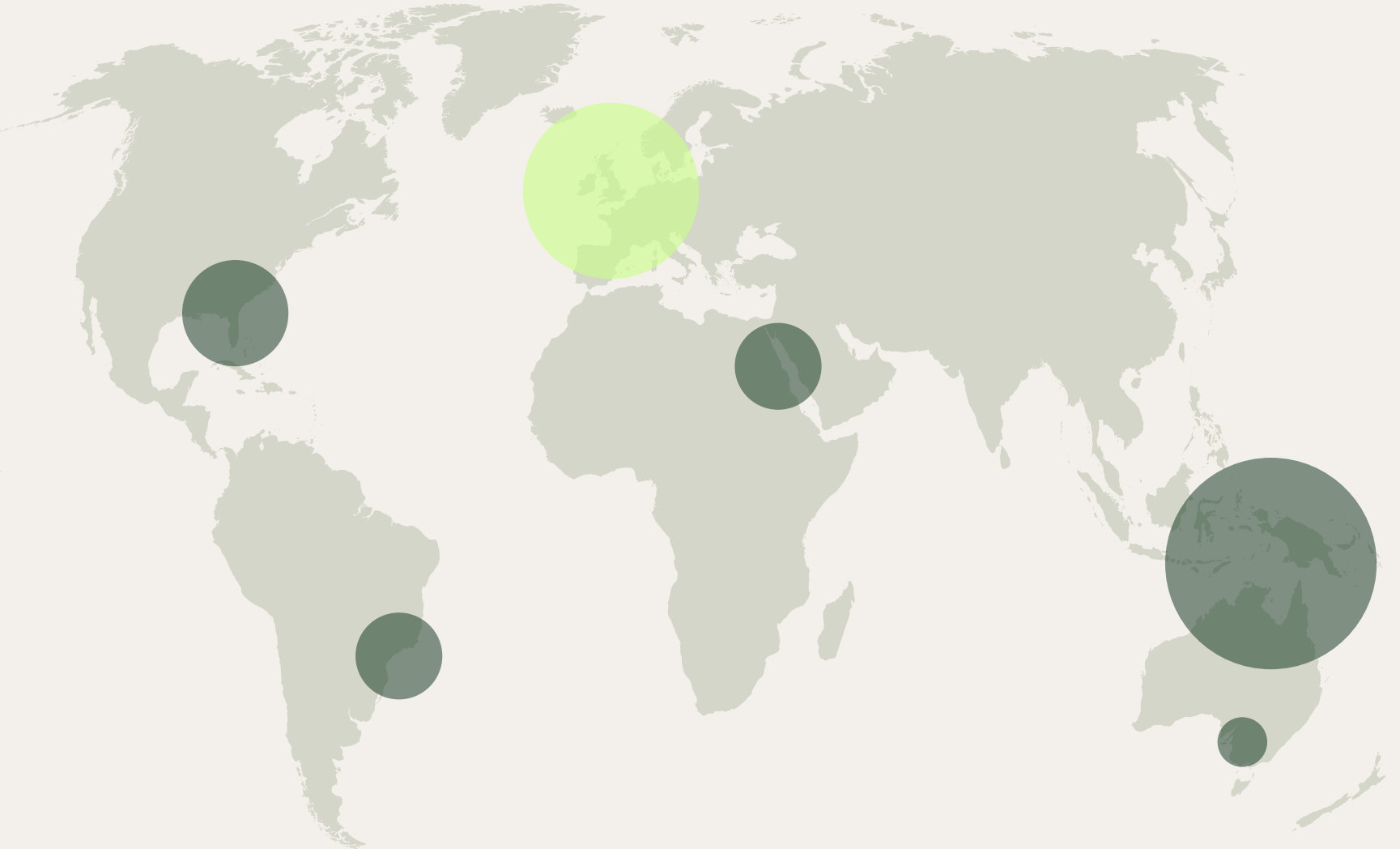
Progressive next steps

Who are WRAP?

Who are WRAP?

WRAP is a global environmental action NGO transforming our broken product and food systems to create Circular Living for the benefit of climate, nature and people.

WRAP works with governments, business and academia all over the world. We have headquarters in UK, USA, EU and Australia, and projects live in over 50 countries.



Who are WRAP?

WRAP has 300+ employees worldwide and EPR at WRAP is lead by Jordan Girling in his capacity as Head of Extended Producer Responsibility (EPR).



Jordan Girling

Head of Extended Producer Responsibility (EPR)

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Lead the [Textiles 2030](#) voluntary initiative support businesses to transition to more circular practices.



Live project helping Ireland to adopt Textiles EPR, transposing EU WFD.



Over 11 years experience working on EPR best practices internationally, incl [recent project](#).



Designed and implemented Textiles EPR system in Australia, [Seamless](#).



Formally [advise UK government](#) on policy recommendations for circular textiles



Published a 2025 [Textiles EPR FAQ](#) answering q's from various international experts.



Introduction to EPR & Product Stewardship

What is Product Stewardship?

Product Stewardship is an environmental management strategy that allows manufacturers, importers, and/or sellers of products to support the sustainable management of those products once they reach their end-of-life.

Collective action is more impactful and more administratively/financially attractive than independent coordination.

What is Extended Producer Responsibility (EPR)?

EPR is a mandatory form of Product Stewardship that is used to require manufacturers/importers/sellers to finance 100% of the costs associated with the sustainable management of the products/packaging that they place on the market once it reaches its end-of-life. The term 'Producer' encapsulates product manufacturers, imports, and sellers, hence the term 'Extended Producer Responsibility'.

EPR for carpets/flooring in the United Kingdom

In 2018, Defra and EA published a Resources & Waste Strategy. The Strategy stated that by the end of 2025, Defra will have reviewed and consulted on EPR systems for five new waste streams, one of which was 'bulky waste', which includes carpets.

With the eventual adoption of a mandatory EPR system for carpets in the UK, as indicated by the Strategy, WRAP understand that the UK Sustainable Flooring Alliance would like to consider designing a Product Stewardship / EPR system that best fits the exiting supply chains and operational procedures of the UK flooring sector on a voluntary basis.



Similar existing systems internationally

California, USA

Evolving from a carpet stewardship system established in 2010, AB 863, passed in Sept 2024, required adoption of EPR for carpets.

The Bill required recycled content rates of 15% by 2028, 30% by 2031, and 50% by 2035.

The Bill also required the regulator to conduct a Needs Assessment for resilient flooring by 1 Jan 2026.

Australia

Australia has a form of voluntary EPR, operated through the Seamless Product Stewardship scheme. The scheme will be mandated by government if it is not taken up by enough companies.

Seamless aims to have 60% of industry sign-up in order to divert 120,000 tonnes of end-of-life clothing from landfill by 2027 and to generate \$36 million per year.

Hungary

Whilst the revised EU Waste Framework Directive that would mandate Textiles EPR systems in every EU country does not include carpets or flooring, Hungary has included carpets in their system, as well as clothing and household textiles.

This EPR system permitted under Decree 80/2023 is active and charges HUF 145 (~£0.30) per kg sold. Domestic and foreign companies have EPR obligations in Hungary.

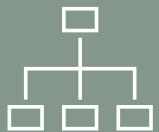
Key elements of EPR / Product Stewardship



Key elements of EPR / Product Stewardship

Product Scope

- Carpet, laminate, vinyl, wood, tile, marble.
- Household-use & Commercial/Industrial-use products?
- Indoor & Outdoor products?
- Scope categorisation is necessary to recognise the different waste management costs associated to different types of products.
- Are any exemptions necessary? E.g., play park rubber flooring made from recycled content.

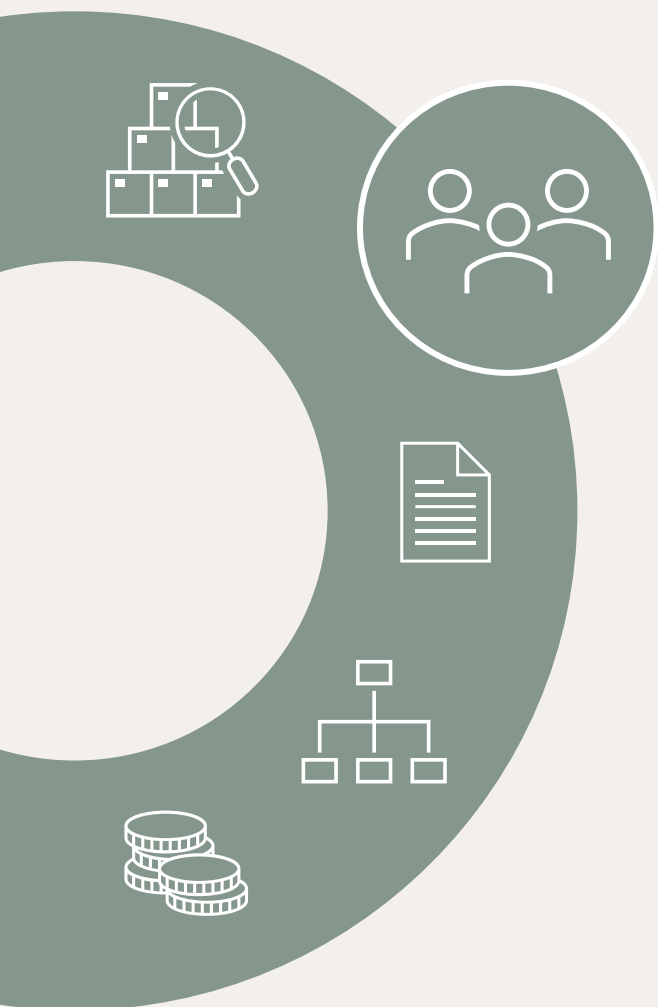


Key elements of EPR / Product Stewardship

Obligated Parties

It is important to clearly define obligated companies to ensure that the number of products obligated with an EPR fee is as close to 100% as possible.

‘Producers’ of Extended Producer Responsibility systems are traditionally defined as product manufacturers or product importers i.e., the companies placing the products on the market for the first time. Many systems also place obligations on foreign sellers and online marketplaces.



Key elements of EPR / Product Stewardship

Registration & Reporting

It is essential for have a platform and process for obligated 'producers' to be able to register as such so that system participation can be accurately monitored.

It is also essential that registered producers have the ability to systematically report sales data so that they can be charged EPR fees for the number of products that they introduce to the market.



Key elements of EPR / Product Stewardship

System Governance

EPR and Product Stewardship systems are typically governed by a Producer Responsibility Organisation (PRO) which accepts 'producer' registrations and data reports, charges EPR fees to producers accordingly, and disseminates fees to waste management infrastructure.

A PRO is usually created as a non-profit entity and operated by a collective group of obligated producers and other relevant industry stakeholders.



Key elements of EPR / Product Stewardship

EPR Fees

The true costs of waste collection, sorting, and treatment for different types of products within scope of the system should be calculated so that 'producers' can be charged EPR fees accordingly which fund the management of the products they place on the market once they eventually arise as waste.

EPR fees can be eco-modulated to incentivise more circular and sustainable products being placed on the market in the first instance.



What are progressive next steps?

- ④ Stakeholder engagement is essential when designing an EPR / Product Stewardship system.
- ④ Core elements of an upcoming EPR / Product Stewardship system must be designed so they fit the existing supply chains, operational practices, and existing waste management channels.
- ④ Whilst there are minimal existing EPR / Product Stewardship systems that exist for flooring globally, the concept of EPR has been applied to other products for decades. Consequently, it is possible to utilise EPR best practices which are replicable for the UK flooring sector.
- ④ Consideration for an eventual transition from a voluntary system to a mandatory system.





Thank you.

Any questions?

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