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**9<sup>th</sup> October 2023**

Via email to [packaging@defra.gov.uk](mailto:packaging@defra.gov.uk)

**GS1 UK Response to:** Consultation on the draft Producer Responsibility Obligations Regulations

GS1 UK is a not-for-profit membership body that sets and enables global standards across industry. Our standards are used ten billion times per day and form the basis of a global business language that identifies, captures and shares key information on products around the world – with the best known being barcodes and QR codes.

We welcome the opportunity to respond to the consultation on the producer responsibility regulations, especially in relation to labelling requirements and the collection of data and futureproofing, as GS1QR is adopted across industry.

GS1 Standards form the backbone of traceability and supply chain logistics globally for almost 50 years across many different industries. Our standards are being used to underpin a range of environmental measures, policies and responsibilities, such as Deposit Return Schemes and Digital Product Passports.

In order to establish a fully circular economy, nations must have full traceability of what materials are in use, and how they are reused throughout their lifespan. Hundreds of thousands of businesses globally already use GS1 standards to enable this traceability within their own systems, and interoperability with other businesses and partners.

We would strongly encourage any circular economy strategy to seriously consider how it can make best use of existing standards. We have responded to the relevant questions below, but if you have any additional questions or queries, please contact our head of policy using the details at the end of this document.

Kind regards,  
Laura Milillo  
Head of Retail

**Q14. Are the requirements for the provision of recycling information and packaging labelling clear?**

Yes, the requirements are clear, however there is already competition on some packaging for real-estate given the number of pre-existing regulatory demands.

GS1 UK would encourage the exploration of digital labelling via the use of GS1QR, which would allow for this information to be distributed on the packaging, alongside other legal requirements digitally.

This also allows for context-based scanning, the ability to update the information, and communicate with the consumer more actively once the product has been produced. This approach is already in action in the French wine industry, with those bottles carrying digital labelling, and used in a wider range of products in Italy.

**Q 31. Are the new conditions and reporting requirements for accredited reproprocessors and exporters clear?**

We are concerned that current reporting requirement proposals are based on a manual reporting platform requiring significant time commitment and opening the door for human error, rather than one supported by existing and widely used data standards alongside an API.

Using the already existing GS1 Global Data Model supports regulatory compliance in this pace. It allows industry members with updated standards to meet current and future EPR regulations, such as the Packaging and Packaging Waste Regulations (PPWR).

Furthermore, the GS1 Global Data Model provides a framework and best practice guidance that can evolve to meet changing industry and regulatory requirements, assisting GS1 members in transitioning to a legally compliant and resource-efficient packaging economy aligning with the regional EPR goals.

This helps establish clear and consistent reporting via the data model with set and simple attributes collected in a common way.

**Q34. Please raise up to three areas of EPR packaging policy that you would like us to consider in the first review and rank in order of priority.**

Firstly, over the next five years we expect a switch lead by industry from 1D barcoding to 2D or GS1QR codes. Whilst these new standards will carry all the relevant information traditional barcodes do, there are exponentially more possibilities that industry will take advantage of.

To comply with EPR and other recycling labelling regulations across Europe, companies may add a GS1 QR Code, enabling more informed consumer engagement with the scheme – as is already done in France and Italy (mentioned previously)

For example, scanning the GS1 QR Code would enable consumers to find the correct recycling information for that particular product, as well as how to dispose in the UK, as well as provide foreign consumers with recycling information if that product were to be exported – all within a single code. This would simplify cross-border labelling compliance for British businesses.

In some cases, industry is already making the move to GS1QR because of its more agile abilities in carrying data and connecting with the consumer. As part of any review, consideration should be given to evolving data standards such as GS1QR which any EPR scheme could look to take further advantage of.

This could help with better data reporting, and tracking materials throughout their lifecycle. Our traditional standards are already used over ten billion times a day globally, and offer full interoperability across industry and government sectors.

Whilst GS1 UK are already in contact with some areas of government, if we can assist with any briefings on GS1QR and the next evolution of barcoding, we would be happy to provide this.

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