Mondsey

EPR SURVIVAL GUIDE

The EPR Survival Guide for E-Commerce Sellers

Everything you need to know about EU packaging compliance - before it catches up with you.

27

national systems

6

priority markets

2026

PPWR becomes applicable

PRACTICAL EU PACKAGING COMPLIANCE FOR E-COMMERCE SELLERS

START HERE

What EPR means - and why it reaches your operation.

Extended Producer Responsibility is a simple idea with complicated consequences. If you put packaging into an EU country - whether from outside the EU or from another member state - you are financially and legally responsible for what happens to that packaging after your customer throws it away.

This is not optional. It is not something that only applies to large companies. If you sell a single product in a padded mailer to a customer in Berlin, you have a packaging obligation in Germany. Ship a parcel from Warsaw to Paris, and you have one in France too. A German seller expanding into Spain, Italy, and the Netherlands has three new obligations on top of the one they already manage at home. Every country. Every shipment. Every piece of tape, void fill, and cardboard box.

The principle has been part of EU law for decades, but enforcement was historically patchy. That changed. Marketplaces like Amazon now require EPR registration numbers before they will list your products. National regulators have built digital registries that cross-reference seller data. And from August 2026, the new EU Packaging and Packaging Waste Regulation (PPWR) tightens the rules further still.

Every country.	Every shipment.
A separate obligation can arise in each destination market.	Packaging responsibility follows the goods into the market.

THE SCALE OF THE PROBLEM

The EU is one market for customers - not for packaging compliance.

The EU is not one market. It is 27 separate legal jurisdictions, each with its own packaging registry, its own approved compliance scheme, its own fee structure, its own reporting format, its own deadlines, and its own penalties.

Sell across six EU countries - a modest footprint for most cross-border e-commerce businesses, whether you are based inside the EU or outside it - and you face six separate registrations, six annual declarations, six different fee calculations, and six different regulatory authorities who can fine you independently. Your home country registration, if you have one, covers only your home country.

Here is what that looks like in practice:

6	6	6
registrations	declarations	authorities

SIX PRIORITY MARKETS

One European framework. Different national systems.

01	**Germany**	requires registration with the LUCID packaging register at the Zentrale Stelle Verpackungsregister, plus a separate contract with a licensed dual system operator. Your data must match perfectly across both systems, or you are flagged as non-compliant. Fines reach up to 200,000 euros.
02	**France**	requires membership of an approved eco-organisation (typically CITEO), an IDU identification number, and the Triman sorting logo on all packaging - in French. Both your retail packaging and your shipping materials are in scope. Samples and gifts count too.
03	**Italy**	requires CONAI membership plus registration with the relevant material consortium (there are seven). Plastic packaging alone is classified into nine contribution tiers based on recyclability. Reporting frequency depends on your contribution volume - monthly if it exceeds 31,000 euros per year.
04	**Spain**	requires registration in the national producer register (RPE) and a Punto Verde contract with Ecoembes. All of this is governed by Royal Decree 1055/2022.
05	**The Netherlands**	operates through Verpact (formerly Afvalfonds Verpakkingen), with annual declarations due by 31 March and a waste management contribution calculated per kilogram by material type.
06	**Ireland**	channels everything through Repak, the sole approved compliance scheme, with penalties for serious non-compliance reaching up to 500,000 euros.

Six countries. Six systems. Six sets of rules. And we have not mentioned Austria, Belgium, Poland, Sweden, or any of the other markets you might be selling into.

THE OPERATING MODEL

Five recurring obligations. One thing that changes: the country.

The obligations follow a pattern, even if the details differ everywhere:

01	Register	with the national packaging authority or approved compliance scheme in every country where you place packaged products on the market. "Placing on the market" includes shipping directly to consumers. If your package crosses a border - whether from outside the EU or from one member state to another - you are the producer in the destination country. Being registered in your home market does not cover you elsewhere.
02	Report	your packaging volumes, typically by weight and material type. Some countries want annual declarations. Others require quarterly or monthly reporting above certain thresholds. The reporting formats are not standardised - even between EU member states.
03	Pay	an environmental contribution based on the type and weight of packaging you use. Fees vary enormously. Paper and cardboard are generally cheap. Plastic is expensive - and getting more so as eco-modulation penalises hard-to-recycle materials and rewards recyclable ones.
04	Label	your packaging in accordance with local requirements. Italy requires material identification codes and disposal instructions in Italian. France requires the Triman logo with French sorting instructions. Ireland requires deposit return labels on beverage containers. The EU-wide harmonised labelling regime does not fully arrive until 2028. Until then, a German seller shipping to France and Italy needs French labelling for one market and Italian labelling for the other - on top of whatever Germany requires.
05	Appoint an authorised representative	if you are based outside the country where you sell. From August 2026, non-EU sellers must have a local representative in each member state where they sell via distance selling. EU-based sellers shipping cross-border into other member states may also need local representation depending on the national implementation.

PPWR

What changes from August 2026.

The EU Packaging and Packaging Waste Regulation (Regulation 2025/40) replaces the old Packaging Directive with a directly applicable regulation. The key distinction: directives let each country implement the rules differently; a regulation applies uniformly.

Here is the implementation timeline:

12 August 2026	The regulation becomes applicable. PFAS restrictions on food-contact packaging take effect. The zero-threshold rule means every producer reports from the first kilogram. Online marketplaces must verify EPR registration before allowing listings.
12 February 2027	EPR scheme identification via QR code required. Member states must establish penalty regimes. Take-away food and drink providers must offer reusable alternatives.
12 August 2028	Harmonised material composition labelling required on all packaging.
1 January 2029	Minimum recycled content standards for plastic packaging. 90% separate collection targets. Deposit return system requirements.
1 January 2030	Restricted packaging formats banned. Reuse targets: 40% for transport packaging, 10% for beverages. Recyclability grading becomes compulsory. Maximum empty space ratios enforced - meaning you cannot ship small products in oversized boxes.

The direction is unmistakable: more reporting, higher fees for non-recyclable materials, and real consequences for non-compliance.

RISK

The first consequence is usually operational, not a fine.

The financial penalties are significant - up to 200,000 euros in Germany, 500,000 euros in Ireland - but they are rarely the first thing that hurts.

Marketplace delisting is the immediate risk. Amazon already requires EPR numbers for Germany, France, Spain, and other markets. Missing numbers mean suspended listings. Suspended listings mean lost revenue.

Retrospective liability is the quieter risk. Registering late does not erase the obligation for the period you were selling without registration. Compliance schemes can - and do - calculate backdated fees.

Customer trust is the longer-term risk. As sustainability labelling becomes more visible, selling products with non-compliant packaging becomes a reputational liability.

Marketplace delisting	Retrospective liability	Customer trust
The immediate commercial risk.	Late registration does not erase earlier obligations.	Visible non-compliance becomes a reputational risk.

THE HIDDEN COMPLEXITY

The regulation is only half the work.

The regulations themselves are only part of the challenge. The practical difficulties are what catch most sellers:

Language barriers. Germany's LUCID portal operates in German and English, but many dual system operators communicate primarily in German. France's requirements include French-language labelling. Italy's environmental labelling must be in Italian. Spain's RPE registration process is in Spanish. This is not just a problem for non-EU sellers - a Polish company expanding into France and Italy faces the same language hurdles as a British one.

Material classification. How you classify your packaging determines what you pay. A shipping mailer with a plastic lining is not the same as a pure cardboard box. Italy's COREPLA system has nine tiers for plastic alone. Getting the classification wrong means paying the wrong fees - and potentially facing penalties.

Scope confusion. Most sellers think of packaging as the box the product comes in. In practice, the obligation covers everything: the retail box, the shipping carton, the void fill, the bubble wrap, the tape, the labels, the desiccant packets. France even includes samples and promotional items.

Data reconciliation. Germany requires your packaging volumes to match exactly between your LUCID declaration and your dual system contract. Discrepancies trigger compliance flags. Keeping this aligned across multiple countries, with different reporting periods and formats, is an ongoing operational burden.

Changing rules. Fee rates change annually. Eco-modulation criteria evolve. New labelling requirements phase in on different dates in different countries. What was compliant last year may not be compliant this year.

WHO THIS APPLIES TO

If you sell physical products into the EU, start here.

If you sell physical products to consumers in any EU member state, and those products have packaging of any kind, this applies to you.

It does not matter where you are based. A UK company shipping to EU customers, an American brand selling through Amazon, and a French company expanding into Germany and Spain all have the same obligation: register in every country where they place packaged products on the market. Your home country registration - if you have one - does not extend across borders.

It does not matter how small you are. Germany has no volume threshold. Under the PPWR's zero-threshold rule, the obligation starts from the first kilogram of packaging placed on the market.

It does not matter whether you use a marketplace or your own website. If you are the entity introducing the packaged product to the market, you are the responsible producer. (Marketplaces have their own verification obligations, which is why they now demand your registration numbers.)

In practice, the intra-EU seller often faces the larger compliance burden. A non-EU seller entering Europe for the first time knows they need to set things up from scratch. An EU-based seller who has been compliant at home for years may not realise that shipping across a border within the single market creates an entirely new obligation in the destination country - with a different registry, different fees, different deadlines, and potentially a different language.

It does not matter where you are based.	It does not matter how small you are.	It does not matter how you sell.

WHAT GOOD LOOKS LIKE

Compliance is maintenance, not a milestone.

Businesses that handle EPR well tend to share a few characteristics:

They treat it as an ongoing operational process, not a one-off registration exercise. Packaging volumes change. Fee rates change. Regulations change. Compliance is maintenance, not a milestone.

They track their packaging at the material level - not just "boxes" but the weight of corrugated cardboard, the weight of plastic tape, the weight of paper labels. This granularity is what the declarations require, and getting it right from the start is far easier than reconstructing it later.

They think about packaging design through the lens of compliance cost. Switching from a multi-material mailer to a mono-material one can reduce fees by 20-40% in countries with mature eco-modulation systems like France and the Netherlands. The environmental benefit and the financial benefit point in the same direction.

They have systems that can scale. One country is manageable. Six countries with different deadlines, formats, and fee structures is a different proposition entirely. Spreadsheets work until they do not.

A SIMPLE OPERATING CHECK

01 **Track packaging by material**
Know the weight of cardboard, plastic, tape, labels and other components.

02 **Keep registrations live**
Treat declarations, fees and scheme changes as recurring operations.

03 **Watch design choices**
Mono-material and recyclable packaging can reduce cost as eco-modulation matures.

04 **Build for more than one market**
A process that works in one country can break under six different calendars and formats.

THE BOTTOM LINE

Get ahead of compliance before compliance catches up with you.

EPR compliance is not going away. It is getting stricter, the penalties are getting larger, and the enforcement mechanisms - particularly through marketplace verification - are getting more effective.

The businesses that will thrive in European e-commerce are the ones that get ahead of this. Not because it is exciting, but because it removes the risk of marketplace suspensions, regulatory fines, and the operational chaos of trying to catch up after the fact.

The guides that follow cover the six largest EU markets individually: Germany, France, Italy, Spain, the Netherlands, and Ireland. Each one walks through the specific registration requirements, fee structures, reporting deadlines, and practical considerations for that country.

Read the ones that matter to your business. And then decide whether you want to manage this yourself, or whether your time is better spent on the parts of your business that actually generate revenue.

This guide is provided for general information purposes and does not constitute legal or regulatory advice. EPR regulations change frequently. Always verify current requirements with the relevant national authority or an experienced compliance provider.

One country is manageable.
Six countries is an operating system.

The point of a good compliance process is not to make regulation interesting. It is to make it predictable.

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