



IVCIE

Commission interrégionale de l'Emballage
Interregionale Verpakkingscommissie

PACKAGING AND PACKAGING WASTE REGULATION (PPWR)

FAQ

EPRiBEL

Commission interregionale de la REP
Interregionale Commissie voor de UPV

Keywords

1. *legislation*

2. *register*

3. *register*

4. *legislation*

5. *register*

Questions

What is Belgium's interpretation of the PPWR Regulation (Regulation (EU) 2025/40)?

Who is the competent authority for the register in Belgium?

Is there a Belgian register of producers for packaging?

Is there a Belgian legislation implementing the PPWR (Regulation (EU) 2025/40)?

Can the register of producers be used to check if a producer is compliant with the legislation?

Answers

Regulation (EU) 2025/40 on packaging and packaging waste (also known as PPWR, or Packaging and Packaging Waste Regulation) is a Regulation, as its title indicates. It is not a directive, and Member States do not have the authority to interpret it. The only competent authority to interpret the PPWR is the European Commission.

The Interregional Commission for EPR (EPRiBEL) is the Belgian competent authority for the EPR component of the PPWR (Regulation (EU) 2025/40) and, as such, also for the register. As far as most obligations of manufacturers (and importers into the European market) are concerned, the [Belgian competent authority is the federal administration responsible for product standards](#). Questions concerning the Federal competence in the field of product standards, can be addressed to the [helpdesk](#), where you select "product standards".

The Belgian register of producers for packaging is still under development.

As far as the EPR part of the PPWR (Regulation (EU) 2025/40) is concerned, the answer is no; the Belgian legislation is still under preparation. As far as most obligations of manufacturers and importers (into the EU) are concerned, we refer to [the Belgian federal administration competent for product standards](#). Questions concerning the Federal competence in the field of product standards can be addressed to the [helpdesk](#) where you select "product standards".

Yes. The register will be publicly accessible free of charge. Only confidential data and information that is protected under privacy legislation will not be made public. The registration will only be possible for producers that are compliant.

Keywords

6. *register*

7. *register*

8. *register*

9. *register, self-compliance*

Questions

Am I compliant with the legislation if I register as a producer in Belgium? Is the registration enough?

Am I, as a Belgian company, automatically registered in the register of producers for packaging?

How can I register as a producer for packaging in Belgium?

How can I register as a self-compliant producer for packaging in Belgium?

Answers

Registration is not enough to be compliant with the EPR legislation on packaging waste in Belgium. A producer needs to comply with the EPR legislation before he can register. To comply with the EPR legislation on packaging waste, a producer either has to set up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, or has to become a member of a PRO (producer responsibility organisation). If the producer becomes a member of a PRO, the PRO takes on the responsibility for registering its member.

No. There will be no automatic registration in the register of producers for all Belgian companies. However, members of a registered and approved PRO (producer responsibility organisation) will, under the upcoming legislation, be registered by the PRO.

A producer needs to comply with the EPR legislation before he can register. To comply with the EPR legislation on packaging waste, a producer either has to set up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, or has to become a member of a PRO (producer responsibility organisation). If the producer becomes a member of a PRO, the PRO takes on the responsibility for registering its member. If the producer sets up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, he will be able to ask EPRIBEL for a registration.

A producer needs to comply with the EPR legislation before he can register. To comply with the EPR legislation on packaging waste, a producer either has to set up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, or has to become a member of a PRO (producer responsibility organisation). If the producer becomes a member of a PRO, the PRO takes on the responsibility for registering its member. If the producer sets up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, he will be able to ask EPRIBEL for a registration.

Keywords

10. register

11. register, registration number

12. producer

13. producer

14. producer, “de minimis”, micro-enterprise

15. producer, “de minimis”, micro-enterprise

Questions

What is the registration procedure? Is there a cost for the registration?

How and when do I get my registration number?

Who is the producer of packaging in Belgium?

When does a producer need to be identified for packaging in Belgium?

Will there be a “de minimis” (minimum threshold for producer obligations) in Belgium?

I am a foreign micro-enterprise and I sell a few packaged products to end users in Belgium. Am I considered a producer in Belgium?

Answers

A producer needs to comply with the EPR legislation before he can register. To comply with the EPR legislation on packaging waste, a producer either has to set up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, or has to become a member of a PRO (producer responsibility organisation). If the producer becomes a member of a PRO, the PRO takes on the responsibility for registering its member. If the producer sets up an own system to collect and to recycle/recover the packaging he has put on the Belgian market, he will be able to ask EPRiBEL for a registration. There will be a cost for the registration.

A registration number will be provided as soon as the Belgian legislation implementing the PPWR (Regulation (EU) 2025/40) comes into force. Under this upcoming legislation, producers that are member of a PRO will get their registration number from EPRiBEL by way of their PRO and producers that are self-compliant will get their registration number upon approval of their registration by EPRiBEL, after payment of the registration fee.

The term producer is defined in the PPWR (Regulation (EU) 2025/40). Further information is available through [this link](#).

If a packaging becomes waste in Belgium, a producer needs to be identified for it.

There is no “de minimis” in the PPWR (Regulation (EU) 2025/40). There will be no “de minimis” in the upcoming Belgian legislation. All producers have to comply with the legislation. However, producers responsible for less than 10 tonnes of packaging waste will have a simplified annual reporting.

Yes. If, as a micro-enterprise within the meaning of the PPWR, you purchase your packaging in your own country, you are not the manufacturer. However, if you supply your products to Belgian end users as a distributor, you are indeed the producer.

Keywords

16. producer, foreign company

17. producer, foreign company

18. producer

19. authorised representative

Questions

Is the producer for packaging in Belgium always a Belgian company?

If I am a foreign producer in Belgium, what are my obligations?

Are Incoterms relevant in determining who the producer is?

Is there a list of registered or approved “authorised representatives for the EPR” in Belgium?

Answers

No. If a foreign company sells packaged products directly to a Belgian (household or professional) end user, it will generally be the producer in Belgium for the packaging. In all other cases, the producer will generally be a Belgian company.

As a foreign producer in Belgium, you have the same obligations as a Belgian company. However, you will, in the upcoming Belgian legislation, also have the obligation to designate an “authorised representative for the EPR” in Belgium. This authorised representative will take over the EPR obligations from the producer on the basis of a contract. He will be responsible for reporting and paying the membership fees to the PRO (producer responsibility organisation).

Incoterms (International Commercial Terms) are official rules of global trade, drawn up by the International Chamber of Commerce (ICC). They define buyer and seller responsibilities worldwide for the delivery of goods under sales contracts; for transport, transport costs and customs formalities (export/import), and determine how costs and risks are allocated to the parties. They are not really relevant in determining who the producer is.

“Authorised representatives for the EPR” will be able to register with EPRiBEL, which will make a list of registered “authorised representatives for the EPR” available on www.epribel.be. For all “authorised representatives for the EPR” wishing to register, EPRiBEL will verify if the contract they intend to use with their clients is compliant with the PPWR (Regulation (EU) 2025/40) and the Belgian legislation, and if they have sufficient means to cover their obligations under the PPWR and the Belgian legislation. Producers are strongly advised to work only with an “authorised representative for the EPR” that appears on the list published by EPRiBEL.

Keywords

20. authorised representative

21. authorised representative

22. producer, private label, contract work

Questions

Is an “authorised representative for the EPR” obliged to register in Belgium if he wants to represent a producer in Belgium?

What are the obligations of an “authorised representative for the EPR”?

Who is the producer in the case of private label / contract work (products manufactured by a third party for a retailer or brand owner and sold under the retailer’s or brand owner’s name)?

Answers

According to the Belgian legislation there is no obligation for an “authorised representative for the EPR” to register with EPRiBEL. However, it is highly recommended. The registration of “authorised representatives for the EPR” is likely to be imposed by European law in the near future. An “authorised representative for the EPR” that is registered with EPRiBEL will appear on the official list of registered “authorised representatives for the EPR”, giving producers looking for an “authorised representative for the EPR” the certainty that the “authorised representative for the EPR” meets the necessary quality requirements.

Legally, the “authorised representative for the EPR” assumes responsibility should the producer fail to fulfil its EPR obligations, such as the obligation to report packaging put on the market to the PRO or to pay the associated fees. Consequently, the standard mandate signed with his clients must stipulate that all obligations are covered, and the authorised representative must possess sufficient financial resources to meet these obligations in the event of the producer’s default.

To answer this question, first, the question should be asked who the “manufacturer” is in the case of private label / contract work (goods manufactured by a third party for a retailer/brand owner and sold under the retailer’s or the brand owner’s name). As a rule, the retailer/brand owner will be the manufacturer. For more detailed information on the “manufacturer” we refer to the [FAQ published by the European Commission](#).

Afterwards, the question can be asked whether the manufacturer is also the producer. If the manufacturer is established in the country where the packaging becomes waste, he will, as a rule, be the producer; if not, he will most likely not be the producer.

Keywords

23. producer, logistics transport, contract work

24. producer, foreign company

25. producer, foreign company, logistics transport

26. producer, foreign company, logistics transport

27. contract work

28. contract work

Questions

Who is the producer if a foreign manufacturer uses a carrier (Belgian or foreign) to transport its products to a Belgian end user?

Who is the producer if a foreign company (A) (e.g. Dutch) buys its products from a manufacturer (B) in another European country (e.g. France) in order to supply them to an end user in Belgium?

Who is the producer if a foreign company (A) (e.g. Dutch) buys its products from a manufacturer (B) in another European country (e.g. France) in order to supply them to an end user in Belgium, and if the manufacturer arranges the transport?

Who is the producer if a foreign company (A) buys its products from a Belgian manufacturer (C) to supply them to an end user in Belgium, and if the manufacturer arranges the transport?

In the case of contract work, who is the producer of the packaging removed from the products by the Belgian contract worker on behalf of a foreign ordering company?

In the case of contract work, who is the producer of the packaging removed from the products by the Belgian contract worker on behalf of a Belgian ordering company?

Answers

It is the foreign manufacturer who signs the sales contracts with its customers. Whether the packaged products are transported by the manufacturer itself from its warehouse(s) or by a third party (a carrier or even a contract packer) on the manufacturer's behalf does not alter the responsibility; the manufacturer commissioning the transport remains the producer. It must appoint an authorised representative for the extended producer responsibility in Belgium.

It is the foreign company (A) that arranges for the product to be transported to the Belgian end user and is, therefore, the producer in Belgium.

See previous answer.

The fact that the manufacturer (B) transports the product directly to the end user does not affect the responsibility.

See previous answer.

The fact that the manufacturer (C) transports the product directly to the end user and that the product was manufactured in Belgium does not affect the responsibility.

Where the ordering company is a foreign company, the Belgian contract worker (unpacker) is the producer.

- Where the ordering company is a Belgian company, if the goods originate in Belgium, there is already a producer in Belgium.

- Where the ordering company is a Belgian company, if the goods originate from abroad, the ordering company is the producer.

Keywords

29. producer, sales and grouped packaging

30. producer, transport, service and “primary production” packaging

31. producer, reusable packaging

32. producer, online sales

33. producer, online sales

Questions

Who is the producer for sales and grouped packaging?

Who is the producer for transport, service and “primary production” packaging?

Who is the producer for reusable packaging?

In the case of a company selling products, from Belgium or abroad, to online consumers (households) in Belgium, who is the producer?

If a company is selling products, from Belgium or abroad, online to consumers (households) in Belgium exclusively on an online platform, what are its obligations?

Answers

To determine the producer for sales and grouped packaging, the packed product needs to be considered. The producer is defined in the PPWR (Regulation (EU) 2025/40). Further information is available through [this link](#).

To determine the producer for transport, service and “primary production” packaging, the packaging itself needs to be considered. The producer is defined in the PPWR (Regulation (EU) 2025/40). Further information is available through [this link](#).

For household reusable packaging, the manufacturer (for instance, a beverage producer) will most likely be the producer. For industrial & commercial reusable packaging, where a pool owner retains ownership of the reusable packaging, he will, as a rule, be the producer. The pool owner, whether he is established in Belgium or abroad, has the obligation to report the reusable packaging put on the Belgian market.

A company selling products, from Belgium or abroad, directly to online consumers (households) in Belgium is the producer for the packaging.

Under the upcoming legislation, a producer selling on an online platform needs to be registered in the Belgian register of producers. To do this, assuming self-compliance is not feasible, he needs to become a member of a PRO (producer responsibility organisation). The PRO will take care of the registration of the producer. However, if the producer is selling exclusively on an online platform that operates a “pay-on-behalf” system, whereby the online platform assumes the responsibility to become a member of a PRO and report to this PRO, a further simplification is possible, whereby the producer only reports to the online platform and the online platform takes care of the PRO membership and reporting. The producer, if established outside Belgium, does not need to designate an “authorised representative for the EPR” in Belgium. The producer will get a registration number from EPRiBEL through the PRO and the online platform.

Keywords

*34. producer,
online sales*

*35. producer,
online sales*

Questions

What if a company is selling products, from Belgium or abroad, online to consumers (households) in Belgium on several online platforms?

What if a company is selling products, from Belgium or abroad, online to consumers (households) in Belgium on an online platform (or on several online platforms), as well as in its own store or through its own online store?

Answers

Under the upcoming legislation, a producer selling on an online platform needs to be registered in the Belgian register of producers. To do this, assuming self-compliance is not feasible, he needs to become a member of a PRO (producer responsibility organisation). The PRO will take care of the registration of the producer. However, if the producer is selling exclusively on an online platform that operates a “pay-on-behalf” system, whereby the online platform assumes the responsibility to become a member of a PRO and report to this PRO, a further simplification is possible, whereby the producer only reports to the online platform and the online platform takes care of the PRO membership and reporting. The producer, if established outside Belgium, does not need to designate an “authorised representative for the EPR” in Belgium. The producer will get a registration number from EPRiBEL through the PRO and the online platform.

Under the upcoming legislation, a producer selling on an online platform needs to be registered in the Belgian register of producers. To do this, assuming self-compliance is not feasible, he needs to become a member of a PRO (producer responsibility organisation). The PRO will take care of the registration of the producer. However, if the producer is selling exclusively on an online platform that operates a “pay-on-behalf” system, whereby the online platform assumes the responsibility to become a member of a PRO and report to this PRO, a further simplification is possible, whereby the producer only reports to the online platform and the online platform takes care of the PRO membership and reporting. The producer, if established outside Belgium, does not need to designate an “authorised representative for the EPR” in Belgium. The producer will get a registration number from EPRiBEL through the PRO and the online platform.

Keywords

36. online platforms

37. reporting

38. reporting

39. reporting

Questions

What are my obligations as an online platform, on which producers are selling products, from Belgium or abroad, online to consumers (households) in Belgium?

How do I report the packaging I put onto the Belgian market?

Do I only report on one-way packaging?

Do I report household packaging and industrial & commercial packaging together?

Answers

First of all, you need to evaluate if, as an online platform and a service provider, you are not yourself a producer in Belgium, in which case you need to comply with the producer obligations. As far as your clients are concerned, you may choose to operate a “pay-on-behalf” system, whereby you assume the responsibility to become a member of a PRO and report to this PRO on behalf of your clients. In this case, you will report globally, for all of your members, to the PRO, but you will also provide the PRO with identification data on each member (producer) and on the quantities of packaging each member (producer) has put on the Belgian market. You will provide both the PRO and EPRiBEL, on demand, with all information about the methods you use for the calculation of the global quantities and about the independent audit of those calculations. If established outside Belgium, you need to designate an “authorised representative for the EPR” in Belgium.

Your reporting needs to be done annually in the Belgian register of producers for packaging. However, you only need to report directly to the register if you are a self-compliant producer. If, as a producer, you are a member of a PRO (producer responsibility organisation), you report annually to the PRO and the PRO will transfer the information into the register.

No. You need to report on one-way packaging, as well as on “all packaging”, which is the sum of one-way packaging and reusable packaging that is put on the market for the first time. You also need to distinguish between household and industrial & commercial packaging.

No. You need to distinguish between household and industrial & commercial packaging. You also need to report on one-way packaging, as well as on “all packaging”, which is the sum of one-way packaging and reusable packaging that is put on the market for the first time.

Keywords

*40. information
on packaging*

*41. waste recovery,
reuse single-use
packaging*

Questions

What information do I need to print on my packaging, following the PPWR (Regulation (EU) 2025/40)?

Do I become a producer if, for the shipment of my orders in Belgium, I exclusively reuse single-use cardboard boxes that have already been put on the Belgian market and for which I am not already the producer?

Answers

For this question, we refer to the [FAQ published by the European Commission](#) and to the competent [Belgian authority](#). Questions concerning the Federal competence in the field of product standards, can be addressed to the [helpdesk](#), where you select “product standards”.

No. By reusing those boxes to ship your orders within Belgium, you extend the life of existing packaging. This reuse does not result in new packaging being put on the market and does not make you a producer of those boxes in Belgium. However, if you use those cardboard boxes for shipments to consumers in other European countries, you may be considered a producer there.

*42. further
information*

If you do not find answers to your questions here, we invite you to consult the [FAQ published by the European Commission](#).

The interpretation of European Union legislation ultimately rests with the Court of Justice of the European Union.

