



Austria – packaging EPR

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THE SHORT VERSION

If you ship packaged goods to consumers in Austria and you have no seat or branch there, **you are not allowed to register yourself**. Austrian law requires you to appoint an authorised representative established in Austria, who takes on your obligations and reports in your name. This is the mirror image of Germany — and the reason a buying group works here.

This desk covers EPR only. Everything below is the *producer* role — the representative, the licensing, the reporting. If your own name, logo or brand is on the packaging, PPWR also makes you the *manufacturer* of it: a separate set of EU-level conformity duties that took effect on the same date and is not country-specific. See [manufacturer or producer?](#)

Does it apply to me?

Austria's packaging obligations attach to whoever first places packaging on the Austrian market. For a distance seller that means: if an Austrian consumer orders from you and a parcel crosses the border with your packaging around it, you placed that packaging on the Austrian market.

You sell to Austrian private consumers, no Austrian seat

Yes — and you must appoint a representative. Mandatory since 1 January 2023.

You sell only to Austrian businesses (B2B)

Different regime. Appointing a representative is **optional** for sellers established in the EU/EEA supplying non-private end users.

You have an Austrian seat or branch

You register and license yourself, in the normal way. No representative needed.

You sell only through a marketplace

Check the marketplace's terms before assuming you're covered. Since 12 August 2026 [Art. 45\(6\) PPWR](#) requires the platform to obtain your registration number and a self-certification *before* letting you sell — so it will ask you for one rather than supply it. A platform *may* pay your EPR fees under written mandate ([Art. 45\(4\)](#)), but it cannot do your registration or reporting unless you appoint it as your representative.

Austria is late implementing the PPWR nationally. The WKO states that national legislation under the PPWR is still outstanding, and that the definitions in the AWG 2002 must be read consistently with the Regulation until it arrives. In practice this desk describes a working system, because the Austrian representative regime already did what Art. 45(3) now asks. But expect the wording — and possibly the process — to be tidied up when the implementing act lands, and re-check before relying on any detail here.

The representative – the thing that surprises people

In Germany, registration is a strictly personal duty and nobody may do it for you. Austria took the opposite route: a foreign distance seller *cannot* discharge these duties alone, and cannot sign up to an Austrian scheme directly for consumer sales. You appoint a **Bevollmächtigter** — an authorised representative — and they carry the obligations.

Legal basis

[§§ 16a–16e Verpackungsverordnung 2014](#) together with the [AWG 2002](#) . The duty to appoint sits at [§ 12b Abs. 1 AWG 2002](#) . Since 12 August 2026 the same duty also arrives directly from [Art. 45\(3\) PPWR](#) , which needs no national implementation to bite.

In force since

1 January 2023 under Austrian law — three and a half years before the PPWR. Austria did not wait, which is why nothing changed here on 12 August while Germany's world turned over.

Who can be one

A natural or legal person with a **seat in Austria** and a domestic delivery address.

What they take on

All of your obligations under the AWG and the Packaging Ordinance — licensing, the mass notifications, and dealing with the authorities.

Form of appointment

A **notarially certified power of attorney**, in German or English, stating the scope, your explicit consent, and their authority to contract on your behalf.

Can you do it yourself instead?

No — not for sales to private consumers without an Austrian establishment.

Why this matters for a buying group. Where the law forces every foreign seller through a representative, the representative's fee is a genuine common cost — the same service, bought a hundred times over at retail. That is exactly the kind of line KontorBund exists to negotiate once.

How you actually get registered

You don't touch most of this yourself — your representative does. It's here so you can tell whether a provider is doing the job properly.



The representative registers in EDM

At edm.gv.at, under the waste-specific profile for producers and other reporting duties.

2

The certified power of attorney goes to the ministry

Submitted through EDM to the BMLUK for examination. German or English, notarially certified.

3

The ministry records the appointment

On approval, your representative's status is entered in **ZAREg**, the central register.

4

Access and licensing follow

The Umweltbundesamt issues secondary-user access, and your representative signs you up to one of the approved systems and files your quantities.

Household or commercial – the split that decides your bill

Austria separates **Haushaltsverpackung** (packaging that ends up with households) from **Gewerbeverpackung** (packaging that ends up at businesses), and treats them differently. Getting the split wrong is the most common and most expensive mistake on this file.

Household packaging

Must be licensed with an approved collection and recovery system. This is where the fees are.

Commercial packaging

Not licensed the same way — obligations run instead to taking it back free of charge.

Who decides which is which

The Abgrenzungsverordnung — the delimitation ordinance — sets the criteria. Sending to consumers puts you squarely in household.

Do you have to print anything on the box?

Short answer for a small distance seller: **no, not yet** — with one exception that catches people who brand their own packaging.

The harmonised sorting label

The pictogram label telling the customer which bin the material goes in.

[Art. 12\(1\) PPWR](#) applies it from **12 August 2028** at the earliest — later still if the implementing acts slip, because the trigger is 24 months from their entry into force, whichever is later. Nothing to do on 12 August 2026.

An Austrian national symbol

There isn't one for ordinary household shipping packaging. Austria's rules here are about licensing, reporting and the representative, not about printing a mark.

The one that *does* apply now

If your name or logo is on the packaging you are likely its **manufacturer**, and

[Art. 15\(5\)](#) and [15\(6\)](#) require an identifier plus your name and a postal address on it — from 12 August 2026. That is an EU-wide conformity duty, not an Austrian one. See [manufacturer or producer?](#)

Separately

Deposit-return and single-use-plastic marking rules are their own regimes and can apply to specific product types regardless of the above.

Thresholds and small quantities

The old de minimis rule — roughly €730,000 of turnover or 300 kg of paper — **was abolished on 1 January 2023**. If you are still working from a guide that mentions it, that guide is out of date. There is no general exemption for being small.

What survives is lighter *administration*, not exemption. A **Kleinabgeber** can settle the licensing duty with a flat payment and skip the volume reporting entirely. The flat-rate arrangements the systems offer run to **1,500 kg of household packaging and 1,500 kg of commercial packaging** a year — two separate limbs, not one combined figure. This page previously quoted only the household limb.

For most makers, this is the whole ballgame. A shop shipping a few hundred parcels a year is nowhere near either limb, so the realistic Austrian cost is a flat annual fee plus the representative — not a tonnage bill.

And there is a second, EU-level lightening. Art. 44(8) PPWR gives a producer placing **under 10 tonnes** a year on a member state's market a reduced reporting set — Annex IX Part B point 2 rather than point 1. It is not an exemption from registration, from the representative or from paying, and a member state may set a lower figure for a given year if it would otherwise lack data. But it applies everywhere in the EU, including here, and everyone reading this page is under it.

The approved systems

Six collection and recovery systems are approved under § 29 AWG 2002. Your representative signs you up to one; you are not obliged to take whichever one they happen to prefer.

ARA

Altstoff Recycling Austria AG — the largest and oldest

Austria Glas Recycling

Austria Glas Recycling GmbH

Bonus

Bonus Holsystem für Verpackungen GmbH & Co. KG

ERP Austria

European Recycling Platform (ERP) Austria GmbH

Interzero

Interzero Circular Solutions Europe GmbH

Reclay

Reclay Systems GmbH

How often you report

Reporting frequency scales with the size of your expected licence fee, not with your turnover. Small sellers land in the top row, and Kleinabgeber on a flat rate report not at all.

Expected licence fee	Reporting frequency
Flat-rate Kleinabgeber ($\leq 1,500$ kg household + 1,500 kg commercial)	No volume reporting
Up to €1,500 a year	Annually
€1,500 – €20,000 a year	Quarterly
Over €20,000 a year	Monthly

What it costs

These are provider list prices we found published, not quotes we've negotiated, and not a recommendation. They are here to give you an order of magnitude — and to be replaced by real member quotes as they come in. **Rechecked 14 August 2026:** the ERP figure on this page was previously given as ~€169 and has been corrected.

Item	Indicative price	Note
Flat-rate licence, small volumes	~€129.50 / year	ERP (Landbell Group), excl. VAT. Covers 1,500 kg household + 1,500 kg commercial
Flat-rate licence, small volumes	~€150 / year	Interzero, excl. VAT, same two limbs. Its representative fee is quoted separately
All-in-one: licence + representative	~€248 / year	Includes notarial handling of the power of attorney
Small quantities, no minimum order	On application	Reclay / activate states it accepts small quantities without a minimum
Volume-based licensing	By weight and material	Applies once you pass the small-quantity rule

Have you paid one of these? Post what you actually paid in **#quotes-and-costs** and it goes into the [Observatory](#) dataset, anonymised. Published list prices are the worst rate available; what members actually pay is the number nobody has.

What happens if you don't

Breaches are administrative offences under § 79 AWG 2002. Failing to appoint a representative falls in the mid band.

Category	Fine range	Covers
§ 79 Abs. 2	€450 – €8,400	Includes failure to appoint a representative under § 12b Abs. 1. Minimum €2,100 for commercial operators.
§ 79 Abs. 1	€850 – €41,200	More serious waste offences. Minimum €4,200 for commercial operators.
§ 79 Abs. 3	up to €3,400	Record-keeping, notification and documentation failures.

Enforcement is not only ministerial. The Verpackungskoordinierungsstelle (VKS) runs audits on behalf of the systems, typically on a three-to-five-year cycle. The practical risk for a small seller is less the headline fine than the back-payment plus audit costs, which routinely exceed what the licence would have cost in the first place.

Every figure above is Austrian law, not PPWR. The Regulation's own penalty article, Art. 68, only requires member states to lay down PPWR penalties by **12 February 2027**. Until then the enforcement you can actually be hit with here is the AWG's, which has been in force for years and is what the table sets out.

There is a grace period – and it does not cover this page

The Commission's August FAQ is reassuring about enforcement from 12 August: a member state that finds non-compliance **must first require the operator to put an end to it**, and authorities should support operators "rather than following a sanction-oriented approach" instead of reaching straight for prohibitions or recalls.

Read the article it rests on before relying on that. [Art. 62](#) is headed **Formal non-compliance** and its list is entirely conformity-side: a missing or defective declaration of conformity, incomplete technical documentation, Art. 15 and Art. 18 administrative failures, Articles 24 to 29. **Failing to register or to appoint a representative is not in it.** The warn-first rule protects you on the packaging-conformity side. It does nothing for you on this page.

GPSR is a separate problem

Packaging EPR and product safety are different regimes with different representatives, and solving one does not solve the other. The General Product Safety Regulation requires an EU-based **Responsible Person** for consumer products, with no exemption for small or low-volume sellers. If you are outside the EU and shipping to consumers, you cannot be your own Responsible Person without an establishment in the Union.

An Austrian packaging representative is *not* automatically your GPSR Responsible Person. Check what you're actually buying before assuming you're covered.

"It's been suspended"

You will be told this, usually by someone selling you something, and it is worth answering once.

It is a proposal, and it is not in force. The Commission published it on **10 December 2025** as part of the Environmental Omnibus (COM(2025) 983): a suspension of the EPR authorised-representative obligation for EU-established producers until 2035. The Council **dropped the EPR provisions from its Environmental Omnibus mandate on 24 June 2026**, so there is no Council position for Parliament to negotiate against. Parliament's own draft reports of May 2026 would in any case narrow the suspension to micro and small enterprises and to packaging and textiles only.

Until something is adopted and enters into force, Art. 45(3) applies as written, and it has applied since 12 August 2026. We think the proposal is worth watching and worth arguing about — see our [note on it](#) — and we do not think it is worth planning around.

Known traps

Guides that still quote the €730,000 de minimis

It was abolished on 1 January 2023. A surprising number of blog posts and even some advisers have not updated. Check the date on anything you read, including this page.

Assuming a German setup covers Austria

They are opposite systems. LUCID registration does nothing for you in Austria, and an Austrian representative does nothing for you in Germany, where you must register personally.

Treating the power of attorney as a formality

It has to be notarially certified and has to state scope and authority properly. A defective mandate means you are trading unregistered while believing you are compliant.

Mixing up household and commercial packaging

The split drives what you pay and what you report. If your representative hasn't asked you about it, they haven't done the job.

Counting only the product's own box

The outer carton, the tape, the filler, the card an earring is mounted on — all of it is packaging you placed on the market, and all of it counts towards the 1,500 kg line. We keep a concrete list: [what counts as packaging](#).

Assuming the marketplace handles it

Platforms increasingly ask sellers to supply a valid registration number rather than supplying one on your behalf. "Selling on Amazon or Etsy" is not itself a compliance position.

Sources

Primary law first, then the official portals, then the secondary summaries we cross-checked against. Where a claim on this page rests only on a secondary source, we've said so above.

- 1** [AWG 2002 § 79 — administrative penalties](https://www.jusline.at/gesetz/awg/paragraf/79) (https://www.jusline.at/gesetz/awg/paragraf/79)
Statutory fine ranges, consolidated text
- 2** [Verpackungsverordnung 2014 — consolidated text \(RIS\)](https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20008902) (https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20008902)
Official legal information system of the Republic of Austria; §§ 16a–16e cover representatives
- 3** [USP.gv.at — Authorised representatives for packaging and single-use plastics](https://www.usp.gv.at/themen/betrieb-und-umwelt/abfallrecht/weitere-informationen-abfallrecht/abfall-und-produktregelungen/transport-und-verkaufsverpackungen/bevollmaechtigte-fuer-verpackungen-und-einwegkunststoffprodukte.html) (https://www.usp.gv.at/themen/betrieb-und-umwelt/abfallrecht/weitere-informationen-abfallrecht/abfall-und-produktregelungen/transport-und-verkaufsverpackungen/bevollmaechtigte-fuer-verpackungen-und-einwegkunststoffprodukte.html)
Official government business portal: who must appoint, the EDM route, certified power of attorney, ZAReg
- 4** [BMLUK — Collection and recovery systems](https://www.bmluk.gv.at/themen/abfall-und-kreislaufwirtschaft/abfallsammlung-behandlung-und-verbringung/verpackungen/sammeln_verwerten.html) (https://www.bmluk.gv.at/themen/abfall-und-kreislaufwirtschaft/abfallsammlung-behandlung-und-verbringung/verpackungen/sammeln_verwerten.html)
Ministry page and official list of approved systems under § 29 AWG 2002

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- 5** EDM — Elektronisches Datenmanagement Umwelt (<https://edm.gv.at/>)
The registration portal itself
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- 6** IT-Recht Kanzlei — FAQ on packaging licensing in Austria (<https://www.it-recht-kanzlei.de/verpackung-en-lizenzierung-oesterreich-faq.html>)
Secondary. Source for the 1,500 kg Kleinabgeber rule and the reporting-frequency bands
-
- 7** IT-Recht Kanzlei — Representatives for foreign online traders (<https://www.it-recht-kanzlei.de/verpackungsrecht-oesterreich-bevollmaechtigter-online-handel.html>)
Secondary. Source for the self-registration prohibition and notarial certification
-
- 8** VKS — Verpackungskordinierungsstelle (<https://www.vks-gmbh.at/wissenswertes/>)
The body that runs the audits
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- 9** ARA — PPWR guide, English edition (<https://www.ara.at/en>)
Maps the PPWR role definitions onto the Austrian system. ARA is an industry body and one of the six approved systems — secondary material, and not a neutral source
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- 10** Regulation (EU) 2025/40 (PPWR) — EUR-Lex (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040)
Read in full, 14 August 2026. Source for Art. 44(3) on delegating registration, Art. 44(8) on the 10-tonne reporting threshold, Art. 45(3) on the representative, Art. 45(4) and (6) on marketplaces, Art. 12(1) on the 2028 label, Art. 62 on formal non-compliance and Art. 68 on the February 2027 penalties deadline
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- 11** European Commission — PPWR Frequently Asked Questions, 2nd edition (https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en)
DG ENV Unit B01, August 2026 (KH-01-26-068-EN-N). **Read in full, 14 August 2026** — this page previously said we hadn't. Source for the enforcement approach from 12 August and the confirmation that there is no general micro-enterprise exemption from EPR
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- 12** European Commission — PPWR guidance (Commission Notice), 30 March 2026 (https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en)
The guidance document, distinct from the FAQ above and complemented by it. **Still not read in full by us** — where a claim rests on it, we have said so
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- 13** WKO — EU-Verpackungsverordnung: PPWR-Pflichten ab 2026 (<https://www.wko.at/abfall/eu-verpackungsverordnung-ppwr>)
Secondary, but the Austrian chamber of commerce. Source for what applies in Austria from 12 August, and for the statement that Austrian national implementing legislation is still outstanding
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An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.