



Belgium – packaging EPR

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THE SHORT VERSION

Belgium is the one country where 12 August didn't only change the rules — it changed **who the producer is**. Belgian firms that used to carry your packaging as the "responsible company" largely stopped, and their foreign suppliers became the producer instead. If a Belgian customer has told you they no longer handle your packaging, they are **right**. The registration itself is unusually easy — your scheme does it for you — but your representative has to be registered with **EPriBEL** in its own right, and 2026 has to be declared in two halves.

What changed on 12 August

Before 12 August 2026 Belgium ran its own system, built around a national concept called the **verpakingsverantwoordelijke** — the "responsible company". It was usually a Belgian entity: the importer, the filler, or the business that first put the packaged goods on the Belgian market. If you sold to a Belgian distributor, that distributor generally carried your packaging.

The PPWR replaced that concept with the EU-wide term **producer**. The two look similar and are not the same, and the Belgian authority has been explicit that the definitions "differ significantly". The consequence is the part everyone underestimates:

Responsibility moved across the border. Belgian companies that imported packaged goods — the authority's "Type C" — mostly **stop** being producers on 12 August, and their **foreign suppliers become producers instead**. Nobody had to do anything for that to happen. It followed from the definition changing underneath both of you.

So there are two ways you can find yourself in scope in Belgium, and only one of them involves you having changed anything. The first is the ordinary one: you ship direct to Belgian consumers. The second is that you have sold to a Belgian trade customer for years, they carried the packaging, and on 12 August that stopped being true.

This desk covers EPR only. Everything below is the **producer** role — the representative, the scheme, the declarations, the fees. 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 12 August 2026 and is not country-specific. See [manufacturer or producer?](#)

Does it apply to me?

You ship to Belgian consumers, no Belgian establishment

Yes. You are the producer. Appoint a representative established in Belgium, contract a compliance organisation, get registered, declare.

You sell to a Belgian business that used to handle the packaging

Check with them, urgently. If they were a "Type C" importer they most likely stopped being the producer on 12 August and you started. This is the single most likely way to be non-compliant in Belgium without having changed a thing.

You're established elsewhere in the EU

Caught. [Art. 45\(3\)](#) first sentence applies with no threshold, and the Belgian requirement is written around "foreign producers".

You're established outside the EU

Read it as caught. EPRIBEL and Fost Plus both state the representative requirement for "foreign producers" without separating EU from non-EU. We have not found a Belgian source that carves third countries out, and the safe reading is that there isn't one.

You ship only rigid transport packaging – pallets, crates

Possibly not you. Responsibility for reusable rigid transport packaging can sit with the Belgian manufacturer of that packaging where one exists. Worth asking before you register for it.

You're established in Belgium

No representative needed. You contract a scheme and declare in the normal way.

There is no small-quantity exemption to fall under. Belgium's old **300 kg** figure was relief from the **take-back** obligation only — it never covered the annual reporting duty, and it has nothing to do with Art. 44 registration or the Art. 45(3) representative. See [known traps](#).

Household or industrial?

Belgium is one of the countries that splits packaging into two streams handled by two different organisations, and you have to get this right before you can do anything else — they are separate contracts with separate registrations.

Stream	Organisation	Typical case
Household	Fost Plus	Anything that ends up in a household's bin. A parcel sent to a consumer is household packaging — box, filler, tape and all
Industrial & commercial	Valipac	Packaging that becomes waste at a business. Pallets, shrink wrap, bulk outers delivered to a trade customer

The test is where the packaging becomes waste, not who you invoiced. A consumer parcel is household packaging even if you also run a wholesale business. If both apply to you, you contract **both** organisations. There is no single Belgian scheme that covers the two.

Above both sits the public authority: the Interregional Packaging Commission, which is becoming the **Interregional Commission for EPR — EPRiBEL**. It is interregional by design, so Flanders, Wallonia and Brussels-Capital are one registration, not three. That is the good news in the Belgian system and it is worth saying plainly, because the three-region structure frightens people off.

The authorised representative

From 12 August 2026 a foreign producer must be represented by an EPR authorised representative in Belgium. Belgium states the requirement in two limbs, and the second one is where the money gets wasted:

1**It must be established in Belgium**

A Belgian legal presence. The ordinary limb, and the one everybody satisfies.

2**It must itself be registered with EPRiBEL**

The representative has to be on the Belgian register in its own right. A Belgian company that is willing to sign but is not registered does **not** discharge your duty — you will have paid for a mandate that does nothing.

Ask one question before you sign anything. "Are you registered with EPRiBEL as an authorised representative, and what is your reference?" If the answer is vague, walk. This costs nothing to ask and it is the only part of the Belgian route where a provider can take your money and leave you exposed.

Who registers you

Belgium took the Art. 44(3) option, and took it generously. You do not have to register yourself. In practice the normal Belgian route is that **the compliance organisation registers you**: Fost Plus states plainly that it handles registration **collectively on behalf of its members**. A company that is not a member of a recognised organisation registers directly with EPRiBEL instead.

This is the mirror image of Germany, where registration is a personal duty that nobody may do in your place. If you have been reading German guidance and bracing for a portal you have to work yourself, Belgium is the opposite experience — and the sequencing follows from that.

1**1. Work out your stream**

Household, industrial, or both. Everything downstream forks here.

2**2. Appoint a Belgian representative that is registered with EPRiBEL**

Both limbs. Get the EPRiBEL reference in writing.

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3. Contract Fost Plus and/or Valipac

And let them carry the register entry. Fost Plus says collective registration costs members significantly less than registering individually.

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4. Complete whatever they ask for

Fost Plus already holds most of the data for existing members and requests the gaps through its MyFost portal. Answer those requests — they are what the registration is built from.

Registration is still the bar, however easy it is. Art . 44(4) forbids making packaging available in a member state before you are registered there. Belgium quotes that article back at you in its own transition notice. Easy to satisfy is not the same as optional.

2026 is a split year

Because the producer changed identity mid-year, Belgium expects 2026 to be declared **in two pieces by two different parties**. The Belgian authority has said so directly.

Period	Who declares it
1 January – 11 August 2026	The outgoing responsible company under the old Belgian system
12 August – 31 December 2026	The PPWR producer — which may be you, and may not have been before

Two practical consequences. First, if you became the producer on 12 August, your first Belgian declaration covers **a part-year**. Declare it as a part-year. Do not annualise it to look tidier — the figure is supposed to be the packaging you actually placed from 12 August, and an inflated one costs you money you do not owe.

Second, split your own records at that date now, while you still can. Going back through a year of shipments in February to find the 12 August line is a miserable afternoon, and it is entirely avoidable.

What it costs

Item	Indicative price	Note
Fost Plus minimum contribution	€100 / year	Reduced to €50 where you pay by direct debit. Household packaging
Valipac minimum financing contribution	€50 / year	Industrial and commercial packaging
Fost Plus material rate — paper & cardboard	€0.1503 / kg	2026 rate. Other materials have their own rates
Valipac — recyclable non-plastic	€20 / tonne	2026 rate
Valipac — recyclable plastic	€63 / tonne	2026 rate
Valipac — non-recyclable	€126 / tonne	2026 rate. The gap between this and the €20 row is the whole point of the tariff
Registration in the producer register	No annual fee before 2027	Fost Plus states no annual registration fees are charged before calendar year 2027
Authorised representative	Not published	Commercial, quoted per provider. One of the figures we most want from members

Scheme minima are the floor, not the bill. Material rates apply on top, and a representative's own fee is separate again. For a small direct seller the realistic Belgian cost is the minimum contribution plus a modest material charge plus whatever the representative asks — and it is that last number that nobody publishes, in Belgium as everywhere else.

Reporting

Belgian packaging quantities are reported **annually**, and in the normal route your compliance organisation handles the formalities — that is a large part of what you are paying it for. Under the pre-PPWR system, every company placing packaged products on the Belgian market had a reporting obligation regardless of the 300 kg take-back threshold, and nothing about the PPWR made that lighter.

Confirm the exact date with your scheme rather than with us. Belgian scheme declaration deadlines cluster in the first quarter, but we have not verified a single national date that applies to every organisation, and we would rather leave a gap here than print a date you might diary.

Keep the packaging weight by material, and keep it split at 12 August 2026 for this year. Both halves of the split year have to come from somewhere.

The Green Dot comes off

Deadline on your artwork, not your paperwork. Fost Plus states that the Green Dot name and logo are being phased out under the PPWR, and that the logo **may no longer be used on packaging from 12 February 2027**.

If your boxes, labels or tape carry the Green Dot — and a lot of European packaging does, often because a supplier put it there years ago and nobody revisited it — this is a print deadline. Work it into your normal stock cycle now. The expensive version of this is discovering it when you have eleven months of pre-printed cartons in a warehouse.

Worth knowing what the mark ever meant: the Green Dot never certified that packaging was recyclable. It recorded that a financial contribution had been paid into a recovery system. Removing it changes nothing about your obligations and nothing about the packaging.

Beyond that there is no general Belgian on-pack mark for ordinary shipping packaging. The EU harmonised sorting label under Art. 12(1) is **2028** at the earliest and its artwork will be fixed by implementing acts — do not design for it yet.

If you don't

Sanctions sit in the interregional Cooperation Agreement on packaging waste and are enforced through EPRiBEL, which licenses the compliance organisations, takes the declarations and supervises the system. We have not verified a headline maximum figure and are not going to invent one.

The operative bar is simpler than any fine and worth more attention. Art. 44(4) means that until the register entry exists you may not make packaging available in Belgium at all. That is not a late filing that gets penalised — it is unlawful placing on the market for the whole period, which is also exactly the thing a marketplace will act on without waiting for an authority.

"It's been suspended"

You will meet this claim in Belgium more than most places, because several widely circulated country profiles wrote it into their Belgian pages: that an EU proposal will suspend the cross-border representative requirement until 2035, so you might as well wait.

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). 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. A guide that describes the representative as something you can defer is describing a world that does not exist yet and may never. 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

Assuming your Belgian customer still carries your packaging

The most Belgian trap there is. The producer definition changed underneath both of you on 12 August, and "Type C" importers largely stopped being producers. Nobody sends you a letter about it. Ask your Belgian trade customers in writing what they think the position is now, and keep the reply.

Appointing a Belgian representative that isn't registered with EPRiBEL

Belgium requires both limbs. A mandate to an unregistered Belgian company looks like compliance, costs like compliance and isn't compliance. Ask for the EPRiBEL reference before signing.

Reading the 300 kg figure as an exemption

It was relief from the **take-back** obligation under the old national system. Annual reporting applied more broadly even then, and neither Art. 44 registration nor the Art. 45(3) representative has any threshold at all. A national relief cannot disapply an EU regulation — that is true here and in every other country where you will be shown a comfortable-looking number.

Contracting one organisation when you need two

Household and industrial are separate systems. A business that sells both direct to consumers and in bulk to trade customers needs Fost Plus and Valipac, not whichever one it happened to find first.

Annualising the 2026 part-year

If you became the producer on 12 August, your first declaration covers roughly four and a half months. Declaring a full year of packaging you were not responsible for is a voluntary donation.

Bookmarking the old domain and assuming it means nothing changed

The authority is renaming from the Interregional Packaging Commission to EPRIBEL and moving from `ivcie.be` to `epribel.be`. Old links still resolve. The correspondence will not look the same, and a letter from a name you do not recognise is not spam.

Sources

Primary law first, then the official authority, then the two compliance organisations. Where a claim on this page rests only on a scheme's own statement, we have said so in the body text rather than leaving it to a footnote.

- 1 [EPRIBEL / Interregional Packaging Commission — PPWR: important change for responsible companies from 12 August 2026](https://www.ivcie.be/en/packaging-and-packaging-waste-regulation-ppwr-important-change-for-responsible-companies-from-12-august-2026/) (<https://www.ivcie.be/en/packaging-and-packaging-waste-regulation-ppwr-important-change-for-responsible-companies-from-12-august-2026/>)

Official. The authority's own transition notice. Source for the replacement of "responsible company" by "producer", the statement that the definitions differ significantly, the Type A–D analysis and the movement of Type C responsibility to foreign suppliers, the split declaration year, and the quotation of Art. 44(4)

- 2 [EPRIBEL — Interregional Commission for EPR](https://www.ivcie.be/en/) (<https://www.ivcie.be/en/>)

Official. The Belgian competent authority, moving to `epribel.be`. Where the producer register and the authorisation of compliance organisations sit

- 3** [Fost Plus — PPWR Insights 8: mandatory registration in the producer register](https://www.fostplus.be/en/blog/ppwr-insights-8-mandatory-registration-in-producer-register-fost-plus-handles-it-for-you) (https://www.fostplus.be/en/blog/ppwr-insights-8-mandatory-registration-in-producer-register-fost-plus-handles-it-for-you)

Scheme source. Source for collective registration on behalf of members, the requirement that a foreign producer's authorised representative be established in Belgium *and* registered with EPRiBEL, the absence of annual registration fees before calendar year 2027, and the MyFost data-completion route. Fost Plus is one of the two accredited organisations — useful, and not a neutral source

- 4** [Fost Plus — membership, declaration and 2026 rates](https://www.fostplus.be/en) (https://www.fostplus.be/en)

Scheme source for the €100 minimum contribution, the €50 direct-debit rate, the €0.1503/kg paper and cardboard rate, and the statement that the Green Dot logo may no longer be used on packaging from 12 February 2027

- 5** [Valipac — industrial and commercial packaging](https://www.valipac.be/en) (https://www.valipac.be/en)

Scheme source for the €50 minimum financing contribution and the 2026 rates of €20/t recyclable non-plastic, €63/t recyclable plastic and €126/t non-recyclable

- 6** [Regulation \(EU\) 2025/40 \(PPWR\) — EUR-Lex](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040)

Read in full, 14 August 2026. Source for Art. 3(1)(15) on who the producer is, Art. 44(2) and 44(4) on registration, Art. 44(3) on delegated registration, Art. 44(8) on the 10-tonne reporting threshold, Art. 45(3) on the representative and Art. 12(1) on the 2028 harmonised label

- 7** [COM\(2025\) 983 — Environmental Omnibus proposal](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2025%3A983%3AFIN) (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2025%3A983%3AFIN)

The proposal that would suspend the EPR representative duty for EU-established producers to 2035. A proposal, not law. Council dropped the EPR provisions from its mandate on 24 June 2026

- 8** [European Commission — PPWR Frequently Asked Questions, 2nd edition](https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en) (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. Source for the enforcement approach from 12 August and for the micro-enterprise position in §XVIII

- 9** [European Commission — PPWR guidance \(Commission Notice\), 30 March 2026](https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en) (https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en)

The guidance document, distinct from the FAQ above. **Not read in full by us**



An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.