



Bulgaria – packaging EPR

Last checked 15 August 2026 **Keeper** Desk open — keeper wanted

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Bulgaria has had a packaging register and an EPR system for years, and the register itself is **free**. The obstacle is not the cost and not the law — it is **access**. Submissions to the national waste system run on a **qualified electronic signature**, and Bulgaria has not published a route for a producer established abroad. So the first thing you do here is not a filing. It is a question, in writing, to a recovery organisation: *will you contract with a company that isn't Bulgarian, and who files?*

Does it apply to me?

Bulgarian packaging law attaches to the person who **first places packaged goods on the Bulgarian market**. Where you ship direct to a Bulgarian customer, that person is you — and from 12 August 2026 Art. 3(1)(15)(c) and (d) of the PPWR say so in terms that leave no room to argue.

You ship to Bulgarian consumers, no Bulgarian establishment

Yes. You are the producer. Register, arrange compliance, keep the records.

You're established elsewhere in the EU

Caught. **Art. 45(3)** first sentence applies with no threshold.

You're established outside the EU

Assume caught. Whether Bulgaria took the third-country option in [Art. 45\(3\)](#) second sentence is **not published** as far as we can find. Unknown is not the same as no.

You only sell small quantities

No help. We found **no general low-volume exemption** in the official Bulgarian guidance. The obligation attaches on first placing, whatever the weight.

You're established in Bulgaria

No representative needed. Register and pick a compliance route in the normal way.

This desk covers EPR only. Everything below is the **producer** role. 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?](#)

Three routes, one realistic

Bulgaria gives a producer three ways to discharge its recovery and recycling obligations. It is worth knowing all three exist, because guides that mention only the first will make the system sound simpler than it is — and the third is the one that turns up as a penalty later.

Route	What it means	Realistic for a small seller?
Collective	Join an authorised packaging waste recovery organisation, which takes on the targets for its members	Yes. The only practical route
Individual	Obtain approval to meet the recovery targets yourself	No. Approval, infrastructure and evidence you will not have
State product fee	Pay the state instead of recovering anything	Rarely by choice. It is also what you fall back into if your organisation misses its targets — see below

The governing texts are the **Waste Management Act**, the **Ordinance on Packaging and Packaging Waste** and the **product-fee ordinance**. The Ministry of Environment and Water supervises; the **Executive Environment Agency** keeps the register.

NISO and the signature problem

The register is the **National Waste Information System — NISO**, run by the Executive Environment Agency. Persons placing products on the market that later become widely generated waste are entered in public registers through it, and there is a specific register for persons placing **packaged goods** on the market.

There is no fee. Neither to be entered in the NISO register nor to maintain the entry. Whatever you end up paying in Bulgaria, it is not registration.

What there is instead is a gate. Applications and documents are submitted **electronically using a qualified electronic signature**. A QES is a specific legal instrument, normally issued to an identified person or company by a Bulgarian or EU-recognised trust service provider, and it is the reason foreign producers stall here rather than at any of the substantive steps.

Bulgaria's official guidance does not explain the onboarding route for a micro-business established abroad. That is a genuine gap and we are not going to paper over it. It is also, importantly, **not a defence** — the duty in Art. 44 exists whether or not the member state has published a convenient way to satisfy it.

1

1. Ask a recovery organisation whether it will contract with you

Before anything else. Not all of them will take a company established outside Bulgaria, and the answer decides the whole route. Ask by email so you have it in writing.

2

2. Ask who files in NISO, and on whose signature

The question that actually matters: does the organisation submit under your mandate, or do you need your own qualified electronic signature? Do not buy a QES before you have this answer.

3

3. Put the appointment of a representative in writing

Even without a published Bulgarian form. A dated written mandate on file is better evidence than waiting for a procedure that may not arrive this year.

4

4. Start the packaging specification and the monthly record

From your first Bulgarian order, not from the day the registration completes. The records are supposed to cover the period you were obliged, not the period you were organised.

The authorised representative

Art. 45 (3) applies directly in Bulgaria as everywhere else: a producer selling by distance contract to end users in a member state where it is not established shall appoint an EPR authorised representative there. There is no threshold on that duty and Bulgaria cannot lower it.

What Bulgaria has **not** done is publish a national procedure or an official directory of representatives. So the practical shape of it here is different from Germany or Denmark, where there is a register field waiting for the appointment. In Bulgaria the realistic approach is to fold the representative role into the contract with your recovery organisation, name it explicitly, and keep the mandate.

Don't let "no procedure" become "no appointment". The absence of a form is an administrative gap, not an exemption. A written mandate that predates your first shipment is worth having even if nobody has yet asked you for it.

The recovery organisations

The Ministry publishes the authorised organisations along with annual decisions recording whether each one met its recovery targets. Operators identified in official or operator sources include:

Organisation	What we have
ECOPACK Bulgaria	Publishes a 2026 minimum annual fee of €80 excl. VAT . Base rates around €0.118/kg paper and cardboard, €0.125/kg most plastics, with discounts only on stated reporting and payment conditions
ECO PARTNERS Bulgaria	2026 rates of about €0.082/kg paper and cardboard and €0.087/kg plastics, excl. VAT
ECOBULPACK Bulgaria	Active operator. We have no published 2026 rate
Bulecopack	Active operator. We have no published 2026 rate

These are examples of published scheme pricing, **not statutory prices**. Contract, administration and any representative fees sit on top and are quoted per provider. Confirm the current list of authorised organisations with the Ministry rather than with us — authorisations are granted and withdrawn, and a list is exactly the kind of thing that rots.

What it costs

Item	Indicative price	Note
NISO registration	€0	No registration fee and no annual maintenance fee
ECOPACK minimum annual fee	€80 / year	Excl. VAT, 2026
Material rate — paper & cardboard	€0.082–0.118 / kg	Range across the two organisations that publish, excl. VAT
Material rate — plastics	€0.087–0.125 / kg	Same
Qualified electronic signature	Not established	May not be needed at all if your organisation files under mandate. Establish that first
Authorised representative	Not published	Commercial, quoted per provider

Treat the "€375 a year" figure with suspicion. It circulates in English-language EPR comparisons as Bulgaria's packaging registration cost. The Bulgarian register has **no fee**. What that figure describes is a vendor's own service price, and quoting it as a state charge makes Bulgaria look four times more expensive than it is.

Records and declarations

Bulgaria expects more continuous documentation than most of its neighbours, and this is the part that catches sellers who arrive expecting a single annual filing.

Document	Rhythm
Internal company packaging specification	Maintained. The description of what your packaging is, by material
Monthly declaration	By the 15th of the following month
Annual declaration	Annual

Where you have joined a recovery organisation, it normally provides its own reporting portal and its own deadlines under the contract — those are the dates that will actually be enforced against you, so take them from the contract rather than from this page. Split records by material: paper and cardboard, plastics, glass, metals, wood, composites and other.

We have not verified a single national annual date for a foreign producer and have deliberately not printed one.

The liability you inherit

Your scheme's failure can become your bill. The Ministry publishes annual decisions on whether each authorised organisation met its recovery targets. Where an organisation did not, its **members** can become liable for the state **product fee** for that period.

This is unusual and it is worth pausing on. In most member states the scheme is a way of transferring risk away from you. In Bulgaria the transfer is conditional on the scheme actually performing, and the assessment arrives **retrospectively**, after a period you have already paid for and closed.

The practical consequence is that price is not the only thing to compare when you choose. Ask a candidate organisation for its published target results for the last few years, and treat a reluctance to produce them as an answer. The cheapest membership attached to a scheme that misses its targets is not the cheapest option.

Labelling

No general Bulgarian recycling logo applies to ordinary paper or plastic shipping packaging used by a small foreign seller. Bulgarian-language marking rules exist for specific regulated products, for reusable packaging and for plastic carrier bags — check those separately if they are what you sell.

The EU harmonised sorting label under Art . 12 (1) applies from **12 August 2028** at the earliest, or 24 months after the implementing acts, whichever is later. Its artwork will be fixed by those acts. Do not design for it yet.

If you don't

Enforcement runs through the Ministry of Environment and Water and the product-fee regime rather than through a single headline fine we can quote, and we are not going to invent one.

The mechanism that has teeth is the one described above: the product fee. It is a calculated liability rather than a discretionary penalty, which means it can be assessed for a past period on the basis of quantities you reported — or, if you reported nothing, on the basis of what the authority estimates.

That is the structural reason to keep the monthly record even while the registration route is unresolved.

And underneath everything, Art . 44 (4): until the register entry exists you may not make packaging available on the Bulgarian market at all.

What we don't know

More than we would like, and Bulgaria is the desk where saying so matters most — because the confident-sounding English-language summaries of this country are mostly reselling each other.

Whether Bulgaria took the third-country option

Unknown. [Art. 45\(3\)](#) second sentence lets a member state extend the representative duty to producers established outside the EU. We have found no Bulgarian source either way. Assume owed.

Whether a representative may register in your place

Unknown. [Art. 44\(3\)](#) is a per-state option and Bulgaria has not published its answer. This is the question to put to the Executive Environment Agency in writing.

Whether a foreign producer can register without a Bulgarian QES

Unknown, and the most practically important gap on this page.

The annual declaration date for a foreign producer

Unverified. Take it from your organisation's contract.

Known traps

Buying a qualified electronic signature before asking whether you need one

The natural first move, and possibly wasted money. If your recovery organisation files under your mandate, you may never touch NISO yourself. Ask first.

Treating "no published procedure" as "no obligation"

It is an administrative gap. Art. 44 and Art. 45(3) apply regardless, and a period spent waiting for Bulgaria to publish a form is a period of unregistered selling.

Choosing a recovery organisation on price alone

Bulgaria is one of the few places where your scheme's failure to meet its targets can land on you as a product-fee liability, retrospectively. Ask for published target results before you compare tariffs.

Budgeting from the "€375 registration" figure

The register is free. That number is a vendor service price wearing a state charge's clothes.

Assuming a single annual filing

Bulgarian guidance expects a packaging specification, a monthly declaration by the 15th of the following month, and an annual declaration. Building the monthly habit late means reconstructing it from invoices, which is where errors and assessments come from.

Sources

Official Bulgarian sources establish the register, the compliance routes and the product-fee framework. Recovery-organisation pages are used for the practical route and for published 2026 prices, and are not treated as evidence of the legal obligation.

- 1** **Executive Environment Agency — public waste registers** (<https://eea.government.bg/bg/r-r/r-te/registray/main6>)

Official. The public registers, including the register of persons placing packaged goods on the market

- 2** **Executive Environment Agency (IAOC)** (<https://eea.government.bg/>)

Official. The agency operating NISO, the National Waste Information System, in service since 1 January 2021. Source for electronic submission with a qualified electronic signature, and for the absence of any registration or annual maintenance fee

3 Ministry of Environment and Water — waste registers (<https://www.moew.government.bg/bg/otpaduci/registri/>)

Official. The supervising ministry, the list of authorised recovery organisations and the annual decisions on whether they met their recovery targets

4 Ordinance on Packaging and Packaging Waste (<https://old.eea.government.bg/bg/nsmos/waste/naredba-pt>)

Official. The national ordinance sitting under the Waste Management Act, alongside the product-fee ordinance

5 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. 3(1)(15)(c)–(d) on the distance-selling producer, 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

6 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

7 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. **Not read in full by us**



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