



Croatia – packaging EPR

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Status ● Draft, not yet peer-checked

THE SHORT VERSION

Croatia did not need the PPWR to reach you. Its **2023** packaging regulation already names a seller established in another member state **or a third country** who supplies Croatian consumers by distance contract, and already makes them appoint a Croatian representative. So if you have been shipping to Croatia without one, your exposure **starts well before 12 August 2026**. The rhythm is the other shock: Croatia reports **monthly** and pays **monthly**, and the fee accrues whether you file or not.

Croatia got there first

Most of this site is about a change that happened on 12 August 2026. Croatia is the desk where that framing misleads you, so it is worth being blunt at the top.

The Croatian representative duty is national law that already applied. The **Ordinance on packaging and packaging waste, single-use plastic products and fishing gear containing plastic (NN 137/2023)** expressly covers a person established in another EU member state **or a third country** who sells packaged products directly to Croatian consumers exclusively through distance contracts, and requires them to appoint in writing a legal or natural person registered to conduct business in Croatia.

Two consequences follow, and neither is comfortable. First, Croatia answered the Art. 45(3) second-sentence question — whether the duty reaches producers established outside the EU — before the question was asked. It does. A UK or US seller is inside the Croatian rule on its own terms, not by inference from an EU option.

Second, if you have been selling to Croatian consumers for the last couple of years without a representative, **12 August 2026 is not your start date**. The Croatian obligation is older than that, and the fee that goes with it accrues by the month. This is the one country in our first nine where "we're getting compliant now" may need to be a conversation about the past as well as the future — and where a representative worth hiring will tell you that straight away.

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?](#)

Does it apply to me?

You ship to Croatian consumers, no Croatian entity

Yes. Named expressly in NN 137/2023 and caught by [Art. 3\(1\)\(15\)\(c\)–\(d\)](#) PPWR. Appoint a representative, register in RPPO, report monthly, pay the fee.

You're established elsewhere in the EU

Caught, under both the Croatian ordinance and [Art. 45\(3\)](#) first sentence.

You're established outside the EU

Caught, expressly. The Croatian text names third countries. There is no need to guess at the EU option here.

You only sell small quantities

No help. We found **no general low-volume exemption** for a foreign distance seller's registration, representative, reporting or fee obligations.

You sell beverages, single-use plastics or hazardous goods

Additional regimes. Deposit-return, single-use plastic products and packaging that becomes hazardous waste each carry their own rules and charges on top of this page.

You're established in Croatia

No representative needed. You register and report in your own name.

The representative

The appointment has to be **in writing**, and it has to be to a legal or natural person **registered to conduct business in Croatia**. That person is then responsible for fulfilling your obligations — registration, reporting and the fee.

Unlike Germany, where the representative sits alongside a registration you must complete personally, in Croatia the representative is the one **with the access**. Practical entry to RPPO runs through Croatia's government e-services and may require Croatian electronic credentials. That is a large part of why the appointment comes first here rather than last.

1

1. Appoint, in writing

A legal or natural person registered to do business in Croatia. Keep the signed mandate — it is the document the Fund approves against.

2

2. They upload the authorisation to RPPO

Statement or power of attorney, uploaded for **Fund approval**. This is a decision, not an automatic acceptance — allow time for it.

3

3. They register you, per producer

A representative registers separately for each producer it represents. There is no bulk entry that quietly covers you.

4

4. Reporting and payment begin immediately

Monthly. See [below](#) — this is the part that breaks processes designed for annual filing.

Tell the Fund when things change. The representative must notify FZOEU **immediately** if the producer ceases to exist or changes representative. If you switch provider, that notification is part of the handover — confirm in writing that it has been made rather than assuming.

RPP0 and who files

The register is the **Register of Producers with Extended Responsibility — RPP0**, an electronic database managed by the **Environmental Protection and Energy Efficiency Fund (FZOEU)**. It holds registration, product and packaging declarations, fee calculation and compliance monitoring in one place, which is tidier than most member states manage.

RPP0 is not packaging-only. It covers electrical and electronic equipment, batteries, lubricating oils, tyres, vehicles, single-use plastics and fishing gear as well. If you sell more than packaged goods into Croatia, that is one register with several obligations rather than several registers — useful to know before you go looking for a second portal that does not exist.

On Art . 44 (3), Croatia's answer is yes in substance: the representative carries the registration. Appoint first, then let them file. Registering yourself first, if you could manage it at all, would be work you then have to unpick.

There is no scheme to choose

This is the structural difference that most English-language guides get wrong about Croatia, usually by describing it as though it had a market of competing compliance organisations like Germany or Austria.

For ordinary packaging, Croatia is a state fee system. You declare what you placed on the Croatian market and pay a **waste-management fee to FZOEU**. The Fund then carries the recovery targets. There is no household packaging PRO to shop around for, and no membership to negotiate.

A separate approved-organisation route exists for packaging that becomes **hazardous** waste, and deposit-return and regulated single-use plastic items have their own arrangements. But for a seller shipping ordinary goods in ordinary boxes, the answer to "which scheme should I join in Croatia" is: none — you pay the Fund.

The upside is that there is nothing to compare and no membership minimum to clear. The downside is that there is no organisation whose job it is to do your reporting for you, which is why the representative matters more here than in a country where a PRO absorbs the admin.

Monthly, and monthly again

What	When
Packaging data to RPP0	By the 20th of the current month , for the previous month

What	When
Waste-management fee	By the end of that month
Reusable packaging	Annual, by 20 January for the previous calendar year
Certified report on recycled plastic content	By 1 March annually

So January's packaging is declared by 20 February and paid by 28 February. It is a twelve-times-a-year obligation with a payment attached each time, and it is the single most demanding cadence among our first nine desks.

Correcting a claim you may have read. Several circulated country profiles — including the one this desk was partly built from — describe Croatian packaging reporting as **quarterly, by the 10th**. FZOEU's current RPPO guidance is monthly by the 20th, with payment by month end. The quarterly description is out of date. The annual one is **reusable** packaging, by 20 January, which is probably where the confusion started.

Practically: put this on a recurring internal task with an owner, not in someone's head. A process built for an annual EPR filing will not survive contact with Croatia, and the failure mode is silent — you simply stop filing in month three and find out much later.

What it costs

The principal cost is the waste-management fee itself, calculated from the **weight and type** of packaging material placed on the Croatian market, using the applicable unit fee and any relevant adjustment coefficients. FZOEU publishes the governing rules and current notices.

Item	What we have
Waste-management fee to FZOEU	By weight and material, with coefficients. No universal micro-business minimum published
RPPO registration	No separate registration charge identified
Authorised representative	Not published. Commercial, quoted per provider
Deposit-return / single-use plastics	Additional, where they apply to your goods

We have deliberately not printed a per-tonne figure. Croatian unit fees and coefficients are set by instrument and revised, and a number lifted from a secondary summary is exactly the kind of thing that gets quoted back at us a year later. Ask your representative for the current calculation on your own

material mix — and note that unlike a scheme minimum, this fee scales from the first kilogram, so a very small seller pays very little rather than a floor.

Why the marketplace cares

An online platform can itself be treated as the producer for goods sold by a seller who is not registered.

That single rule explains most Croatian marketplace behaviour, and it is worth understanding rather than resenting. The platform is not being officious when it asks for RPPO evidence before it will let you list — it is managing a liability that lands on **it** if you turn out to be unregistered. Which is also why platforms serving Croatia tend to ask earlier than elsewhere, ask for documents rather than a number, and delist faster when the answer is unsatisfactory.

Alongside this sits Art . 45(4)–(6) PPWR, which requires the platform to obtain your registration number and self-certification and to make best efforts to verify it **before** onboarding you, and requires fulfilment providers to suspend service where a gap is not remedied. In Croatia the national rule and the EU rule point the same way and reinforce each other.

The practical answer is to have the RPPO decision and the representative mandate ready as **files**, not as a reference typed into a form field. It turns a two-week back-and-forth into an upload.

The evidence pack

Because the Croatian fee accrues monthly and is calculated from your own declarations, the records are not filing admin — they are the derivation of a debt. Keep, dated:

- Invoices and sales records for Croatian orders
- Packaging weight calculations by material — primary, secondary and transport
- Every submitted report, as submitted
- RPPO decisions, including the approval of your representative's authorisation
- Proof of payment for each month

Croatia counts primary, secondary and tertiary packaging. The outer carton and any grouping count, not only the retail box — a seller who reports only the product packaging under-reports, and under-reporting a monthly fee compounds twelve times a year.

Labelling and deposits

No Croatia-only recycling label applies to ordinary shipping packaging. Packaging must still meet the applicable composition, minimisation, reuse and recyclability requirements — the EU-level design rules, most of which bite from **1 January 2030**.

Separate marks and registration steps apply to beverage containers inside the deposit-return system, to single-use plastic products, and to packaging with hazardous contents. If you sell any of those, treat this page as the floor rather than the answer.

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

Administrative enforcement runs under Croatian waste law. But the sharper consequence in Croatia is not the penalty — it is the arithmetic.

An unregistered period turns into a quantified debt. Because the fee accrues monthly on packaging you demonstrably placed, a past period is not an open question to be argued about. It is a calculation waiting to be run against your own shipping records.

Add the marketplace rule above, and the practical enforcement of Croatian EPR is substantially delegated to the platforms — who act quickly, without notice, and without any interest in your explanation.

Art. 44(4) applies here as everywhere: until the register entry exists you may not make packaging available on the Croatian market at all.

Known traps

Treating 12 August 2026 as your Croatian start date

The Croatian representative and registration duties for foreign distance sellers come from the 2023 ordinance, not from the PPWR. If you have been shipping to Croatian consumers since before then, get advice on the back period rather than quietly starting the clock today.

Filing quarterly because a guide said so

Monthly, by the 20th, fee by month end. The quarterly-by-the-10th description is out of date and appears in several circulated profiles. The annual filing is **reusable** packaging only, by 20 January.

Looking for a Croatian PRO to join

For ordinary packaging there isn't one. You declare to RPPO and pay FZOEU. Time spent comparing Croatian compliance schemes is time spent comparing things that do not exist.

Reporting only the retail packaging

Primary, secondary and transport packaging all count. Because the fee is monthly, an under-reporting habit compounds twelve times a year before anyone notices.

Changing representative without notifying the Fund

The representative must notify FZOEU immediately on a change. During a handover that is exactly the task that falls between two providers. Confirm in writing that it has been done.

Expecting to register yourself

RPPO access runs through Croatian government e-services and may need Croatian electronic credentials. Appoint first. Trying to do it the other way round is where foreign producers lose weeks.

Sources

The Fund and the national ordinance establish the obligations. Where a claim rests on a secondary source we have said so in the body text rather than leaving it to a footnote.

- 1 **FZOEU — Register of Producers with Extended Responsibility (RPPO)** (<https://www.fzoeu.hr/en/register-of-producers-with-extended-responsibility-rppo/10208>)

Official. Source for what RPPO is and which product streams it covers, for the requirement that foreign manufacturers register, for the authorised representative uploading authorisation documents for Fund approval and registering separately per producer, for the duty to notify the Fund immediately on a change, and for the reporting rhythm: data by the 20th of the current month for the previous month with the fee due by month end, reusable packaging annually by 20 January, and the certified recycled-plastic-content report by 1 March

- 2 **RPPO in the ISGO portal** (<https://isgo-portal.haop.hr/en/app/rppo-register-producers-extended-responsibility>)

Official. The register application itself, reached through Croatia's government e-services

- 3** **Environmental Protection and Energy Efficiency Fund (FZOEU)** (<https://www.fzoeu.hr/en/>)
Official. The body that takes the declarations, calculates and collects the waste-management fee, and carries the recovery targets for ordinary packaging
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- 4** **Ordinance on packaging and packaging waste, single-use plastic products and fishing gear containing plastic — NN 137/2023** (<https://narodne-novine.nn.hr/>)
Official gazette. Source for the definition covering a person established in another member state or a third country selling to Croatian consumers exclusively by distance contract, and for the written appointment of a person registered to conduct business in Croatia as authorised representative
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- 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. 45(3) on the representative, Art. 45(4)–(6) on marketplaces and fulfilment providers, and Art. 12(1) on the 2028 harmonised label
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- 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
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- 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**
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An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.