



Czechia – packaging EPR

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Status ● Draft, not yet peer-checked

THE SHORT VERSION

Czechia is one of the more workable countries in this set. The machinery already exists: a public List of Persons, a Ministry application that lets your **representative file in its own name**, one collective system, a published fee of **CZK 1,600**. Two things to get right. The reporting is **quarterly**, not annual. And the famous **300 kg exemption** is two tests rather than one — and even when you meet both, it relieves the Czech national layer and **not** the EU duties underneath it.

Does it apply to me?

Act No. 477/2001 Coll. applies to packaging placed on the market or into circulation in Czechia. Businesses that import, fill or sell packaging may be responsible for take-back, recovery, record-keeping and registration. Layered on top since 12 August 2026 is the PPWR, which catches a distance seller directly under Art. 3(1)(15)(c) and (d).

You ship to Czech consumers, no Czech establishment

Yes, unless you genuinely meet both limbs of the national exemption — and even then, see [below](#), because the EU duties survive it.

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 Czechia took the third-country option in [Art. 45\(3\)](#) second sentence is **not published** as far as we can find.

You ship single-use plastic packaging listed in Annex 4 Parts C or D

A Czech representative was already compulsory for a foreign distance seller of those items, before the PPWR. If that is your product, your obligation is older than 12 August 2026.

You're established in Czechia

No representative needed. Register and contract 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?](#)

The 300 kg exemption

This is the most quoted number in Czech packaging compliance and the most frequently mangled. It is real. It is also two conditions, and it does less than people think.

Limb	Test
Weight	No more than 300 kg of packaging placed on the Czech market in the calendar year
Turnover	Annual turnover no more than CZK 25 million

Both, not either. A business over CZK 25 million in turnover is outside the exemption no matter how little packaging it ships. A business shipping 400 kg is outside it no matter how small its turnover. Vendor tables that print "300 kg" as a standalone weight exemption are describing something that does not exist.

Where both limbs are met, the exemption relieves the **national** duties: take-back, recovery, and the obligation to apply for entry in the List of Persons. You must still be able to **prove** both limbs — keep the evidence. A business that relied on the weight limb alone and turns out to have exceeded the

turnover limb is treated as having had the full obligations throughout the relevant period, retrospectively.

And the part almost nobody says out loud. A national exemption cannot disapply an EU regulation. Art . 44 registration and the Art . 45 (3) representative carry **no threshold in any member state**, and Czechia has no power to introduce one. So the honest position is that the 300 kg / CZK 25m test lifts the Czech national layer and leaves the EU layer exactly where it was.

We would rather say that plainly than let anyone discover it later. It is the same structural error we flagged in Slovakia's supposed "under 100 kg, no representative" rule and in the Netherlands' 50,000 kg figure — national relief being reported as an EU exemption. See the [library](#) for the pattern.

The representative

Czechia is comparatively easy here because the national machinery predates the EU duty. A foreign business not established in Czechia may appoint a Czech-established authorised representative **by written contract**, and has been able to for some time.

Situation	Position
Single-use plastic packaging in Annex 4 Parts C or D	Already compulsory under Czech national law for a foreign distance seller
Ordinary packaging, before 12 August 2026	Voluntary under national law
Ordinary packaging, from 12 August 2026	Compulsory — Art . 45 (3) PPWR

The practical benefit of that history is that Czech providers know how to do this, EKO-KOM publishes representative contract options, and the Ministry has a dedicated application form for the situation. Compare Bulgaria or Cyprus, where you are asking for something nobody has a process for.

The List of Persons

The official register is the Ministry of the Environment's **List of Persons (Seznam osob)** under the Packaging Act. Two things about it matter more than anything else on this page.

1**Your representative may apply in its own name**

Czechia took the Art . 44 (3) option. There is a dedicated Ministry application for an authorised representative to apply for entry on behalf of the foreign producer it represents. So the order is: appoint first, then let them file. This is the opposite of Germany.

2**There is a 60-day clock**

An obligated producer must apply for entry **within 60 days after the registration obligation arises**. Late entry is a breach in its own right — separate from, and additional to, having sold while unregistered.

That 60-day clock starts from the obligation, not from the day you notice it. For a seller who has been shipping to Czech customers for a while, the honest reading is that it started some time ago.

The List is public, which is worth knowing in both directions: a marketplace or a customer can check whether you are on it, and you can check whether a representative or supplier is who they claim to be.

EKO-KOM and the quarter rule

Take-back and recovery duties can be met independently, transferred under the statutory route, or fulfilled collectively through an **authorised packaging company**. For ordinary packaging that company is **EKO-KOM**, and for a small foreign seller it is the only realistic route.

Joining means signing a Czech-language collective-compliance contract; you receive a participant certificate and a client number once payment clears.

The contract covers packaging from the calendar quarter in which it is signed. Not from the date of signature, and not retrospectively to the start of the year. Sign in April for shipments you made in January and Q1 is uncovered.

So if you are regularising a Czech position mid-year, the sequencing question is not "when can we sign" but "which quarter does this land in, and what do we do about the ones before it". Ask EKO-KOM that directly — it is a question they will have been asked many times, and a vague answer from a provider is a reason to get a clearer one.

What it costs

Item	Price	Note
EKO-KOM annual fee	CZK 1,600	Excl. 21% VAT. Made up of CZK 800 administration and CZK 800 for the State Environmental Fund / maintenance of the official list
Material-based EPR fees	Per price list	Charged separately, by material, type and quantity
Single-use plastic littering charges	Where applicable	Additional, for the regulated items
Authorised representative	Not fixed by the Ministry	Commercial, quoted per provider

CZK 1,600 is roughly €65 at the time of writing, which makes Czechia one of the cheaper markets to be formally in — the annual fee is not the part that will hurt. The variable is the material-based fee on your actual mix, and the representative's own charge.

Note that the CZK 800 register component is a genuine state charge rather than a scheme markup. It is one of the few places in this set where the register itself costs anything at all.

Quarterly reporting

Quarter	Statement due
Q1 — January to March	30 April
Q2 — April to June	30 July
Q3 — July to September	30 October
Q4 — October to December	30 January of the following year

Four reminders, not one. Czechia is one of the few member states on a quarterly rhythm. A compliance calendar built around the EU Art . 44 (7) date of 1 June will miss three of the four Czech deadlines and will not tell you it has.

Records must be complete and accurate, and EKO-KOM audits selected clients. A business relying on the 300 kg exemption still has to keep enough evidence to prove **both** limbs were met — the exemption removes filings, not record-keeping.

Labelling

The Czech Packaging Act does **not** generally require packaging material identification. Where you choose to identify the material, the marking must comply with the applicable EU rules.

The Green Dot and EKO-KOM marks are **scheme trademarks**. They record a relationship with a system; they are not general proof that packaging is recyclable, and you should not print either without the right to use it.

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. The reusable-packaging label under Art. 12(2) follows on 12 February 2029.

If you don't

Administrative enforcement runs through the Ministry of the Environment and the Czech Environmental Inspectorate under Act No. 477/2001 Coll. EKO-KOM separately audits client declarations, which is a different and more likely first contact.

The specifically Czech risk is the exemption one. A business that took the 300 kg figure at face value, did not check its turnover, and did not register is treated as having had the **full** obligations throughout — not as having made a late filing. That is a retrospective position covering however long the belief lasted.

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

Known traps

Reading 300 kg as a standalone weight exemption

It is 300 kg **and** CZK 25 million turnover. Both, provable. This is the single most repeated Czech error and it appears in tables that otherwise look authoritative.

Thinking the exemption reaches the EU duties

It does not and cannot. Art. 44 registration and the Art. 45(3) representative have no threshold anywhere in the Union. A member state cannot legislate one in.

Setting your calendar to 1 June

Czechia reports quarterly: 30 April, 30 July, 30 October, 30 January. Three of those are invisible to anyone working from the EU annual date.

Signing the EKO-KOM contract in the wrong quarter

Cover runs from the calendar quarter of signature. Shipments in an earlier quarter are not retrospectively covered by signing later.

Letting the 60-day clock run

Entry in the List of Persons must be applied for within 60 days of the obligation arising. The clock starts with the obligation, not with the realisation.

Registering yourself first

Czechia lets your representative apply in its own name. Appoint first, then file — doing it the other way round is work you may have to unpick.

Sources

Primary law and the Ministry first, then the authorised packaging company. Where a claim rests on a scheme's own statement we have said so in the body text rather than leaving it to a footnote.

- 1 Act No. 477/2001 Coll. on Packaging — consolidated text** (<https://www.zakonyprolidi.cz/cs/2001-477>)
The national statute. Source for the scope of the packaging obligations, the two-limb small-business exemption, the List of Persons and the enforcement framework
 - 2 Czech Ministry of the Environment — packaging** (<https://www.mzp.cz/cz/obaly>)
Official. Source for the List of Persons, the application for entry within 60 days of the obligation arising, and the dedicated application allowing an authorised representative to apply in its own name for the foreign producer it represents
 - 3 EKO-KOM — PPWR** (<https://www.ekokom.cz/en/clients/ppwr/>)
Scheme source. EKO-KOM's own account of what the PPWR changes for its clients. EKO-KOM is the authorised packaging company — useful, and not a neutral source
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4 EKO-KOM — joining, contracts, fees and statements (<https://www.ekokom.cz/en/>)

Scheme source for the CZK 1,600 annual fee excl. 21% VAT split into CZK 800 administration and CZK 800 State Environmental Fund / list maintenance, for the contract covering packaging from the calendar quarter of signature, for the quarterly statement deadlines of 30 April, 30 July, 30 October and 30 January, and for the representative contract options

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)–(2) on the 2028 and 2029 labels

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.