



Greece – packaging EPR

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

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Greece is clear about **who** you are and vague about **how**. Greek law expressly names a business established in another member state or a third country selling packaged goods directly to Greek households by distance contract — you are the producer, no argument. Then it gives you a register in Greek, a scheme whose tariff is not published, and no appointment procedure for the representative. The rule that concentrates the mind is the marketplace one: Greek law can shift EPR responsibility **onto the platform** unless you supply proof of your own registration.

Does it apply to me?

Greek packaging law places responsibility on persons that package goods, import packaged goods, or place packaged goods on the Greek market. HERRCO's published guidance goes further than most national texts and expressly includes **natural or legal persons established in another EU member state or a third country** that professionally sell packaged goods directly to Greek households or other users through distance contracts.

You ship to Greek consumers, no Greek establishment

Yes. Register in EMPA, join an approved system, appoint a representative, declare.

You're established elsewhere in the EU

Caught, under both the Greek producer definition and **Art. 45(3)** first sentence.

You're established outside the EU

Caught as a **producer** — the Greek definition names third countries expressly. Whether Greece also took the [Art. 45\(3\)](#) second-sentence option on the *representative* is unconfirmed, so assume it is owed.

You only sell a little

No help. No general low-volume exemption was identified for registration or system participation, and HERRCO states that audits may cover businesses of any size.

You sell through a marketplace

Read [the marketplace rule](#) before anything else. It is the part of Greek law most likely to affect you first.

The obligation covers packaging **from all sources and materials** — sales, grouped and transport packaging alike. There is no version of this where only the retail box counts.

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?](#)

EMPA and EOAN

The official register is the **National Producer Register**, universally called **EMPA**, operated by **EOAN** — the Hellenic Recycling Agency. Producers create an online account and register the applicable product category.

The register issues evidence of registration, and that document matters more in Greece than almost anywhere. It is what a marketplace will ask for, and it is what stops responsibility for your packaging landing on the platform. Keep it as a file, not as a number in an email.

On [Art. 44\(3\)](#) — whether a representative may register in your place — Greece has not published an answer. The fact that producers create their own EMPA account points towards personal registration, but that is an inference from a portal design, not a legal position, and we are not going to dress it up as one. Ask EOAN before you assume either order.

The marketplace rule

Greek law can shift EPR responsibility to the online platform unless the seller supplies proof of its own producer registration.

Croatia has a version of this and so, in a softer form, does Art . 45(4)–(6) of the PPWR. Greece's is worth singling out because of what it does to the platform's incentives. A marketplace that cannot see your EMPA evidence is not merely failing to police you — it is potentially carrying your obligation itself. Platforms respond to that the way you would expect: they ask early, they ask for documents, and they suspend listings rather than correspond.

So the practical order of operations for a marketplace seller in Greece is the reverse of the intuitive one. You do not sell, get asked, and then register. You register, save the evidence, and have it ready before the first request — because the request tends to arrive as a deadline rather than a question.

HERRCO

A producer must arrange **alternative management** of its packaging: either an approved individual system, or — realistically — a participation contract with an approved collective system. **HERRCO** operates the nationwide Collective Alternative Management System (RECYCLING) and accepts responsible packagers, importers and foreign distance sellers.

Participation covers your contribution toward collection and recycling. It does not move the registration, the declarations or the payment obligation off you — HERRCO is explicit that the producer remains responsible for correct registration, declarations and payment.

The tariff is not public, and that is unusual

HERRCO states that contributions are **not fixed** and may be adjusted under the participation contract, with rates approved within the system's authorised framework and generally linked to material and quantity. We could not find a current public micro-business minimum or a complete 2026 tariff table on the official public pages. That is not a criticism of HERRCO — it is a fact you need to plan around, because it means you cannot budget Greece before you have talked to them.

The representative

From 12 August 2026 Art . 45(3) requires a producer established outside Greece that makes packaging available directly to Greek end users to appoint an EPR authorised representative established in Greece. No threshold, no election.

Greece had not published a complete appointment procedure, an official form or a public directory when we checked. So the mandate is a private document, and what goes in it is up to you. Cover, explicitly:

- Support with the EMPA registration and keeping the entry current
- Membership of the collective system
- Submission of packaging declarations
- Payment of contributions
- Correspondence with EOAN

In a market where the administration runs in Greek, the representative is doing considerably more real work than in, say, Denmark. Price it accordingly, and pick on capability rather than on fee.

What it costs

Item	What we have
EMPA registration	No separate registration fee identified
HERRCO contribution	Not published. Set in the participation contract, linked to material and quantity
Joining or administration charges	Not published. Ask for these separately — they are the ones that get left out of a verbal quote
Authorised representative	Not published. Commercial, quoted per provider

Greece is the least budgetable country in this group. We would rather print an honest table of blanks than a plausible-looking number lifted from a comparison site — and if you get a real quotation, it is one of the more useful things you could send us.

Reporting

Members submit packaging declarations through the system's declaration application using their account credentials. All relevant primary, secondary and tertiary packaging placed on the Greek market should be included unless a specific exclusion applies.

We are not printing a Greek deadline, because there isn't a single public one. The English guidance does not give one general date for every producer. The date that will be enforced against you is in your participation contract — take it from there and diarise it the day you sign.

Keep material-weight calculations, sales records, invoices, system declarations and proof of EMPA registration. HERRCO may audit declaration data **irrespective of company size**, which is a deliberate

statement and worth reading as one.

The language problem

We would normally leave this to a footnote. In Greece it belongs in the body, because it changes what the job actually is.

The register and most of the administrative material are primarily **in Greek**. Not partially, not with an English mirror that lags — primarily. For a foreign micro-business that turns a form-filling exercise into a dependency: you will need practical support from your representative or your system provider, and the quality of that support is the difference between Greece being a two-week task and a two-month one.

Choose the representative for language and access, not for price. This is the one market in our set where we would say that flatly. A cheap mandate with nobody who can read a EOAN letter is not a saving.

Labelling

HERRCO members may use the **Green Dot** trademark under the participation contract. As everywhere, the mark indicates financial participation in a recovery system — it does **not** mean the packaging is recyclable. Do not print it before the contract grants you the right to.

No general Greece-only recycling mark was identified as mandatory for ordinary shipping packaging. Product-specific rules, single-use-plastic markings and deposit-return packaging must be checked separately where they apply to you.

The EU harmonised sorting label under Art . 12 (1) applies from **12 August 2028** at the earliest, with its artwork fixed by implementing acts. Do not design for it yet.

If you don't

Greek waste legislation — principally Law 2939/2001 on packaging and alternative management, and Law 4819/2021 on the integrated waste framework — provides both **administrative and criminal** penalties. We have not verified a specific figure for a packaging registration failure and will not invent one.

In practice the mechanism you are most likely to meet is commercial rather than criminal: a marketplace acting on the responsibility-shift rule, and HERRCO auditing a declaration. Both arrive faster than an authority does.

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

"It's been suspended"

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. See our [note on it](#).

Known traps

Selling on a Greek marketplace before you have the EMPA evidence

The platform may be carrying your obligation until you produce it. That makes it act fast and without much correspondence. Register first, save the evidence as a file, and have it ready before you are asked.

Budgeting Greece before talking to HERRCO

The tariff is not published. Any number you find in an English comparison table is somebody's guess or somebody's service fee.

Waiting for a published deadline

There isn't one general public date. The enforceable deadline is in your participation contract — read it on the day you sign, not the following January.

Choosing a representative on price

The administration is in Greek. A representative who cannot actually operate in the language and the portal is not a cheaper version of the same thing.

Declaring only the retail packaging

Primary, grouped and transport packaging all count, from all sources and materials. And HERRCO says audits are not limited by company size.

Printing the Green Dot because you joined

The right to use it comes from the participation contract, and the mark says nothing about recyclability in any case.

Sources

The Greek authority and register establish the framework. HERRCO is used for the practical route and for the producer definition covering foreign distance sellers — it is the approved collective system, which makes it useful and not neutral.

- 1 EOAN — Hellenic Recycling Agency** (<https://www.eoan.gr/>)
Official. The national EPR authority, operator of the National Producer Register and the body that approves alternative-management systems
 - 2 EMPA — National Producer Register** (<https://empa.eoan.gr/>)
Official. Account creation, product-category registration and the evidence of registration that a marketplace will ask for
 - 3 HERRCO — Hellenic Recovery Recycling Corporation** (<https://www.herrco.gr/>)
Scheme source. Source for the producer definition expressly covering persons established in another member state or a third country selling by distance contract to Greek households, for coverage of sales, grouped and transport packaging, for contributions being set in the participation contract rather than published, for audits irrespective of company size, and for the Green Dot being a mark of financial participation
-

4 **Law 2939/2001 and Law 4819/2021** (<https://www.eoan.gr/>)

The Greek packaging and alternative-management statute and the integrated waste-management framework, which together carry the administrative and criminal penalties

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 Art. 12(1) on the 2028 harmonised label

6 **COM(2025) 983 — Environmental Omnibus proposal** (<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

7 **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



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