



Hungary – packaging EPR

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Status ● Draft, not yet peer-checked

THE SHORT VERSION

Hungary is the most **machined** system in this set. One concession company (**MOHU**), no choice of scheme, an eight-digit product code on every line, a quarterly declaration due on the 20th and an invoice payable in **15 days**. The representative requirement is not new either — **Decree 80/2023** has required foreign e-commerce sellers to act through a Hungarian representative with a Hungarian tax number since 2023. Everything ties together into an audit trail, which is efficient if you are in it and unforgiving if you are not.

Does it apply to me?

Hungary has operated a centralised extended producer responsibility system since **1 July 2023**, and packaging is a covered "circular product". A foreign business that sells covered products directly to Hungarian households or other users through e-commerce is treated as **first placing them on the Hungarian market** — which makes it the producer.

You ship to Hungarian consumers, no Hungarian establishment

Yes. Representative, MOHU registration, authority registration, KF codes, quarterly declarations, fees.

You're established elsewhere in the EU

Caught, under both Decree 80/2023 and **Art. 45(3)** first sentence.

You're established outside the EU

Read it as caught. Section 10 of Decree 80/2023 is written around a "foreign-established producer" using an electronic commerce service, without distinguishing EU from third country.

You only sell a little

No help. No general low-volume or micro-business exemption was identified for registration, representation, reporting or the fee.

You're established in Hungary

No representative needed. Register and report in your own name.

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 representative

Like Croatia and Estonia, Hungary did not wait for the PPWR.

Section 10 of Government Decree 80/2023. A foreign-established producer selling circular products in Hungary through an **electronic commerce service** must fulfil its obligations **through an authorised representative**. The representative may be a natural or legal person established in Hungary, must have a **Hungarian tax number**, and must be appointed **in writing**. It is responsible for fulfilling the producer's obligations under the decree.

Two limbs, and the second is the one to check: Hungarian establishment **and** a Hungarian tax number. Ask for the tax number before you sign, the same way you would ask a Belgian representative for its EPRiBEL reference or a German one for its LUCID AR ID.

Note the framing — the producer fulfils its obligations **through** the representative. That is a stronger arrangement than the parallel-track model in Germany, and it means the representative is genuinely in the workflow rather than sitting beside it. Which in Hungary matters, because the workflow is where all the complexity lives.

Two registrations

This catches people out because most member states have one. Hungary has two, in different systems, and both are needed.

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1. The MOHU Partner Portal

The concession company's own onboarding. This is the commercial relationship — the contract, the account, the invoicing.

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2. The national waste-management authority

Applied for through the official electronic administration route associated with OKIR / OKIRkapu. This is the regulatory registration.

The authority registration must be applied for BEFORE packaging is placed on the Hungarian market. Not in the same month, not shortly after — before. It is a precondition of placing, which is also exactly what Art . 44 (4) requires at EU level.

Because the representative is the party responsible for completing your obligations, arrange it **first** and let it work both registrations. Trying to do the portals yourself and then bolt a representative on afterwards is the long way round.

MOHU, and no alternatives

MOHU MOL Waste Management Ltd is the national concession company. It organises collective compliance and invoices the EPR fee. Hungary does **not** offer a choice of competing household-packaging organisations.

The data flow is worth understanding because it explains why accuracy matters more here than in a country where you send numbers straight to a scheme:

Step	Who
Record packaging by material, category and KF code	You / your representative
Submit the quarterly quantity declaration	You / your representative → the national authority
Transfer the declared data	The authority → MOHU

Step	Who
Calculate and invoice the EPR fee	MOHU

So your declaration to the **regulator** is what generates your bill from the **concession company**. There is no second chance to correct a number informally with a scheme, because the number did not go to the scheme — it went to the authority first.

KF codes

Hungary classifies every covered item with an **eight-digit KF circular-product code**. Your packaging has to be recorded by material, category and the applicable code.

Get the codes right at the start, not at the first audit

The KF code is the spine of the whole Hungarian system. The declaration keys off it, the fee calculation keys off it, and any review keys off it. A misclassification is not a cosmetic error — it produces a wrong fee, and the correction runs backwards through every quarter you filed it in.

This is one of the clearest cases in our desks for using the representative properly rather than treating it as a mailbox. Classifying packaging into a Hungarian eight-digit taxonomy is exactly the kind of task where local familiarity is worth more than the fee.

What it costs

There is no general annual micro-business minimum. Fees are charged per kilogram and depend entirely on the material. The official **2026** rates:

Material	2026 rate
Wood	HUF 22 / kg
Glass	HUF 107 / kg
Other packaging	HUF 129 / kg
Textile	HUF 148 / kg
Paper / cardboard	HUF 173 / kg
Metal	HUF 186 / kg

Material	2026 rate
Composite	HUF 191 / kg
Plastic	HUF 219 / kg

Wood to plastic is a tenfold spread. In Hungary the choice of void fill is a pricing decision, not a packing preference. Paper at 173 against plastic at 219 is closer than most people expect, but wood at 22 is in another category entirely.

MOHU invoices after quarterly reporting. VAT treatment and the representative's own service charge are additional and separate — neither is in the per-kilogram table.

Quarterly, then 15 days

Quarter	Declaration due
Q1 — January to March	20 April
Q2 — April to June	20 July
Q3 — July to September	20 October
Q4 — October to December	20 January

Then the second clock starts. MOHU issues the invoice from the declared data and **generally requires payment within 15 days of receipt**. So the filing rhythm is quarterly but the cash rhythm is tighter — an invoice arriving in late April is due in early May, not at the end of the quarter.

Keep sales records, packaging-weight calculations, KF-code classifications, declarations, invoices and proof of payment. In a system this joined-up, the evidence pack is mostly a matter of saving what the system already produced.

Labelling

No general Hungary-only recycling logo was identified as mandatory for ordinary shipping packaging. Packaging must still comply with the applicable composition, minimisation and waste-management rules.

Separate requirements apply to **deposit-return beverage containers** and to certain single-use plastic products. If either is in your range, that is a different workstream.

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

If you don't

Failure to register, to report accurately or to pay can trigger waste-management enforcement and financial penalties. We do not have a verified headline figure and will not invent one.

What makes Hungary different is the audit trail, not the tariff. Registration, quarterly declaration and MOHU invoice all reference each other. A discrepancy is arithmetic rather than argument — which cuts both ways: it is hard to be accidentally non-compliant without it showing, and hard to explain it away once it does.

And underneath, Art. 44(4): until the registration exists you may not make packaging available on the Hungarian market at all — a point Hungarian law already makes in its own terms by requiring the authority registration before placing.

"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.

In Hungary the point is doubly academic. Even if the EU duty were suspended tomorrow, **Section 10 of Decree 80/2023 is national law** and would be entirely unaffected. A foreign e-commerce seller would still need a Hungarian representative. See our [note on the proposal](#).

Known traps

Doing only one of the two registrations

MOHU Partner Portal **and** the national waste-management authority via OKIR. Different systems, both required, and the authority one has to be applied for before you place packaging on the market.

Appointing a representative without a Hungarian tax number

Decree 80/2023 requires both limbs — established in Hungary and holding a Hungarian tax number. Ask for the number before signing.

Guessing at KF codes

The eight-digit code drives the declaration, the fee and any review. A misclassification propagates backwards through every quarter it appeared in.

Budgeting for the declaration date and not the payment date

You declare by the 20th after the quarter; MOHU then invoices and generally wants payment within 15 days of receipt. The cash lands sooner than the calendar suggests.

Assuming plastic and paper cost about the same

HUF 219 against HUF 173 is closer than elsewhere — but wood is HUF 22. If you have a choice of void fill, Hungary rewards it more than most markets.

Waiting for the Omnibus

Hungary's representative rule is national law from 2023 and would survive any EU suspension untouched.

Sources

The decree and the authority establish the obligations; MOHU is the concession company and the source for the fee mechanics.

1 Government Decree 80/2023 — Section 10 (<https://njt.hu/>)

National legislation. Source for the requirement that a foreign-established producer selling circular products in Hungary through an electronic commerce service fulfil its obligations through an authorised representative established in Hungary, holding a Hungarian tax number, appointed in writing

- 2** **MOHU — EPR system overview and registration** (<https://mohu.hu/>)
Concession source. Source for the collective compliance model, the absence of competing household-packaging organisations, the data flow from the authority to MOHU, the 2026 per-kilogram packaging rates and the invoice payment window

- 3** **MOHU Partner Portal** (<https://partner.mohu.hu/>)
The producer / representative onboarding portal

- 4** **OKIR / OKIRkapu — electronic environmental administration** (<https://okirkapu.gov.hu/>)
Official. The route for the national waste-management authority registration that must be applied for before placing packaging on the market, and for the quarterly quantity declarations using KF codes

- 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 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 — and one that would not touch Hungary's national rule in any event

- 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.