



Ireland – packaging EPR

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

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Ireland is the clearest case in these desks of a **certain duty with an unpublished procedure**. National law has long exempted small producers — the "major producer" test needs **both** 10 tonnes and €1 million of turnover to be exceeded — so a small foreign seller was genuinely outside mandatory Repak membership. From **12 August 2026** that stops being the whole answer: the PPWR imposes registration and an Irish representative with **no threshold at all**. Ireland designated its competent authorities in 2025 and had not published the operational route when we checked.

Does it apply to me?

The **European Union (Packaging) Regulations 2014**, as amended, apply to producers that supply packaging, packaging material or packaged products to the Irish market. They impose basic obligations on **all** producers, and additional duties on a "major producer". Layered on top since 12 August 2026 is the PPWR, which catches a distance seller directly.

You ship to Irish consumers, no Irish establishment

Yes, from 12 August 2026, for the PPWR registration and the representative — whatever your size. Whether Repak membership is *also* compulsory depends on the major-producer test.

You're below both national thresholds

Mandatory Repak membership is not triggered. The PPWR duties are, and they have no threshold. These are two different questions and Irish guidance has historically only answered the first.

You're established elsewhere in the EU

Caught by [Art. 45\(3\)](#) first sentence.

You're established outside the EU

Assume caught. Whether Ireland took the [Art. 45\(3\)](#) second-sentence option is **not published** as far as we can find.

You sell beverages in deposit-scheme containers

Separate registration, fees and logo requirements under Re-turn. Not covered by this page.

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 major-producer test

Ireland's national threshold is genuinely generous by European standards, and genuinely misunderstood. It has two limbs and they are **cumulative**.

Limb	Test
Weight	Packaging supplied exceeds 10 tonnes in a calendar year
Turnover	Annual turnover exceeds €1 million

Both must be exceeded. A business over €1 million in turnover but under 10 tonnes of packaging is not a major producer. Nor is a business shipping 15 tonnes on €600,000 of turnover. That is unusually forgiving — Czechia's equivalent two-limb test sits at 300 kg and CZK 25 million.

What being a major producer triggers is **mandatory Repak membership**. And since **1 January 2023** the alternative is gone: major producers can no longer self-comply through a local authority. If you are over both limbs, Repak is the route.

What it does **not** do — and this is the part Irish guidance was written before it needed to say — is touch the EU duties. Art . 44 registration and the Art . 45 (3) representative carry no threshold in any member state, and Ireland has no power to introduce one. A small foreign seller comfortably below both Irish limbs is still inside both EU duties.

The gap between duty and door

Ireland designated its PPWR competent authorities in 2025, by S . I . No . 541/2025. What we could not find, when we checked, was a public packaging-producer registration portal or a described application route for a small foreign distance seller.

A missing portal is not a missing obligation

Art . 44(4) forbids making packaging available on a member state's market before the producer is registered there. That is directly applicable and does not pause while a national implementation catches up. The gap is a scheduling and evidence problem for you — it is not a defence, and it is not a grace period anyone has granted.

The practical response is the one we give for Bulgaria and Cyprus. Ask, in writing, and keep the answer. A dated reply from the Department or from Repak saying what a foreign micro-seller should do today is the best evidence available while the route settles — and considerably better than an email you never sent.

Ireland is also the desk most likely to be out of date first. If you are reading this some months after the date at the top, check whether the register has gone live before you rely on a word of this section.

Repak

Repak is Ireland's only approved producer responsibility organisation for packaging, and its authorisation was renewed for ten years — to **2035** — aligned with the PPWR rollout. Whatever changes about the register, the scheme itself is stable.

Repak offers two membership shapes:

Membership	How it is priced
Regular	Fees linked to the type, quantity and destination of packaging placed on the Irish market

Membership	How it is priced
Scheduled	Fixed fees, for certain smaller business categories

Which one a foreign micro-seller falls into is not clearly published. Neither is whether Repak will take you at all if you are below the major-producer thresholds and joining voluntarily to satisfy the PPWR. Ask both questions together and get the answer in writing — that single email is the most productive thing you can do about Ireland today.

The representative

From 12 August 2026, Art . 45 (3) requires a producer established outside Ireland that sells packaging or packaged products directly to Irish end users to appoint an EPR authorised representative **established in Ireland**, by written mandate.

No official Irish directory of packaging representatives and no national appointment form were identified. So the mandate is a private document and its scope is your responsibility. Make it cover, by name:

- The PPWR duties as such
- Producer registration, once the Irish route exists
- Scheme membership
- Declarations
- Fees

Use only an Ireland-established provider. In a market where there is no register of representatives to check anyone against, the establishment requirement is the only hard test available.

What it costs

Item	What we have
Repak regular membership	By type, quantity and destination of packaging. Published fee schedules exist; the classification for a foreign micro-seller does not
Repak scheduled membership	Fixed fees for certain smaller categories. Ask whether you qualify
Producer registration	No fee identified — the route itself is not published
Authorised representative	Not published. Commercial, quoted per provider

We are deliberately not stating a single guaranteed minimum cost for Ireland. Repak publishes schedules; what we cannot tell you is which schedule applies to you under a system that is still being assembled. Get the quotation in writing alongside the classification.

Reporting

Repak members report packaging data under their membership terms and fee schedule. Keep records that distinguish **material**, **weight** and whether the packaging is **household or commercial** — that last split drives the fee in Ireland as in most member states, and is the one people forget to build in at the start.

Ireland's PPWR producer register will also require producer information and packaging reporting in the format established nationally. The submission timetable for small foreign distance sellers had not been published when we checked, so take it from the official procedure once released rather than from here.

Labelling and the deposit scheme

No Ireland-only recycling logo was identified as mandatory for ordinary e-commerce packaging.

Beverage containers covered by Ireland's **deposit return scheme** have separate registration, fee and deposit-logo requirements. Certain single-use plastic products also have their own marking and producer obligations. Both are separate workstreams from this page.

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

If you don't

Enforcement runs under the European Union (Packaging) Regulations 2014 as amended. On paper Ireland is the least aggressive market in this group of eight, and we would rather say so than manufacture alarm.

The risk profile changes after 12 August 2026 regardless. The PPWR duties apply directly to a business well below Ireland's historic major-producer thresholds — so a seller who was correctly outside the Irish system for years can be inside the EU one now without anything about their business having changed.

And Art. 44(4) applies here as everywhere: until the register entry exists you may not make packaging available on the Irish market. That the entry is currently hard to make does not change what the article says.

A citation worth correcting

Several widely circulated country profiles — including the one this desk was partly built from — attribute the EPR representative requirement to **"Article 46"** of the PPWR. It appears in the Ireland, Latvia, Lithuania, Luxembourg and Malta profiles alike, which suggests one source copied several times.

It is Art. 45(3). Art. 46 governs producer responsibility organisations — their authorisation, their duties and, at 46(5), the requirement that they treat producers equally "without placing a disproportionate burden on producers of small quantities of packaging, including small and medium-sized enterprises".

We flag it for two reasons. A wrong article citation is a bad thing to carry into a conversation with an authority or a lawyer. And Art. 46(5) is genuinely worth knowing about for its own sake — it binds the schemes themselves, not just the member states, and it is the strongest lever a small producer has when a fee structure falls hardest on the smallest members. See our [Observatory](#), which exists to build the evidence that provision needs.

Known traps

Reading the major-producer test as an exemption from everything

It exempts you from mandatory Repak membership under national law. It does not touch Art. 44 registration or the Art. 45(3) representative, neither of which has a threshold anywhere in the Union.

Treating one limb as the test

Both 10 tonnes **and** €1 million must be exceeded. A business over one and under the other is not a major producer.

Looking for the local-authority self-compliance route

Removed on 1 January 2023. Repak is the only approved scheme.

Reading "no published portal" as "no obligation"

The commonest mistake in every transitional country. The duty applies; the procedure is late. Ask in writing and keep the answer.

Relying on a desk that has gone stale

Ireland is the most likely of these eight to have moved since we wrote this. Check the date at the top of the page against today's before you act on it.

Sources

Irish legislation and the Department establish the national framework. Repak is the approved scheme and the source for the membership shapes — useful, and not a neutral source.

- 1 **European Union (Packaging) Regulations 2014 — S.I. No. 282/2014** (<https://www.irishstatutebook.ie/eli/2014/si/282/made/en/print>)

The national statutory instrument, as amended by S.I. 322/2020, S.I. 659/2022 and S.I. 167/2025. Source for the producer obligations and the cumulative major-producer definition: packaging supplied exceeding 10 tonnes in a calendar year AND annual turnover exceeding €1 million

- 2 **Department of Climate, Energy and the Environment — extended producer responsibility** (<https://www.gov.ie/en/department-of-climate-energy-and-the-environment/>)

Official. Source for mandatory Repak membership for major producers, the removal of local-authority self-compliance from 1 January 2023, and Repak's approval through 2035. Ireland's PPWR competent authorities were designated by S.I. No. 541/2025

- 3 **Repak — membership** (<https://repak.ie/>)

Scheme source for regular membership priced by type, quantity and destination of packaging, and scheduled membership at fixed fees for certain smaller business categories

- 4 **Environmental Protection Agency** (<https://www.epa.ie/>)

Official. Packaging waste statistics and information

- 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. 45(3)** on the representative — not Art. 46, see above — Art. 46(5) on equal treatment of small producers, 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
-



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