



## Italy – packaging EPR

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

**Status** ● Draft, not yet peer-checked

### THE SHORT VERSION

Two things about Italy that nothing else in these desks prepares you for. First, Italy already requires you to **label the packaging** — material code plus separate-collection information — under a national duty that is **live now**, not in 2028. It is the Italian requirement foreign sellers most often discover late, and it is a print-run problem. Second, the plastic tariff runs from **€40 to €790 a tonne** depending on recyclability band. Italy does not encourage better packaging. It prices it.

### Does it apply to me?

Italy's packaging framework sits mainly in **Legislative Decree 152/2006** and is administered through **CONAI**, the National Packaging Consortium. Packaging imported from abroad is subject to the environmental contribution because its use generates waste on Italian territory — which is the principle that reaches you.

#### You ship to Italian consumers, no Italian establishment

**Yes from 12 August 2026** under the PPWR. Under the current CONAI rules you may already be covered — see [the platform question](#) first, because it changes the answer.

#### You sell through a platform with a CONAI arrangement

The platform may be handling the contribution. CONAI recognises simplified arrangements agreed between platforms and EPR systems. Establish which world you are in before doing anything.

### You sell from your own shop, no platform

Then it is yours. CONAI states that where the business does not use the platform service, it must join and complete the necessary obligations.

### You're established outside the EU

Caught by the PPWR producer definition. Whether Italy took the [Art. 45\(3\)](#) second-sentence option on the representative is **not published** as far as we can find.

### You brand your own packaging

Then the labelling section below is not optional reading. It is the duty most likely to cost you a print run.

**This desk covers EPR only** — except that Italy's national labelling duty sits inside it. If your own name, logo or brand is on the packaging, PPWR *also* makes you the **manufacturer**: separate EU-level conformity duties from 12 August 2026. See [manufacturer or producer?](#)

## Ask your platform first

Italy is the one country in these desks where the first question is not about the register at all.

**CONAI recognises simplified arrangements agreed between platforms and EPR systems.** Where a foreign seller uses the platform's service, the contribution may already be handled. Where it does not, the seller must join and complete the obligations itself.

So the sequence is: ask the marketplace, in writing, whether it operates a CONAI arrangement covering your sales, and get the answer before you sign anything with anyone. Two failure modes follow from skipping it — paying a contribution the platform already paid, or assuming it did when it did not.

Note that this is an arrangement about the **CAC**, the environmental contribution. It is not a substitute for Art. 44 registration under the PPWR, which is a duty on the producer, and a platform arrangement does not discharge it.

# CONAI and the seven consortia

CONAI sits above seven material consortia. You deal with CONAI; the consortia do the material-specific work.

| Consortium | Material               |
|------------|------------------------|
| RICREA     | Steel                  |
| CIAL       | Aluminium              |
| COMIECO    | Paper and cardboard    |
| RILEGNO    | Wood                   |
| COREPLA    | Plastic                |
| BIOREPACK  | Compostable bioplastic |
| COREVE     | Glass                  |

An approved **autonomous system** exists in law as an alternative. It is not a practical route for an ordinary small business, and we mention it only so you recognise the term if a consultant offers it.

## The foreign-company route

CONAI has a dedicated door for companies established abroad, and it is an email address rather than a portal:

**[aziendaestera@conai.org](mailto:aziendaestera@conai.org)**

Foreign companies may request the special foreign-company membership form by writing to that address. It is not the domestic form and you will not find it by working through the ordinary member journey.

One nuance worth being precise about. Under the **national** CONAI rules, membership for a foreign seller is framed as **optional** — the CAC is otherwise owed, declared and paid by whoever carries out the placing, unless it has already been paid by a foreign company that has (optionally) registered with CONAI. That optionality belongs to the Italian contribution system.

**Art. 44 registration under the PPWR is not optional.** Do not let the word "optional" in CONAI's framing of its own membership migrate across to the EU registration duty. They are different obligations with different sources.

## The labelling duty, live now

This is the section to read if you read nothing else on this page.

**Italy requires environmental labelling of packaging under Legislative Decree 152/2006.** Packaging should identify the packaging material using the applicable **Commission Decision 97/129/EC** code, and provide appropriate **separate-collection information** for consumers. Digital channels may be used in permitted cases.

Three reasons this catches people. It is a **national** duty, so it does not appear in EU-level PPWR summaries. It applies **now**, unlike the Art. 12(1) harmonised sorting label, which is 2028 at the earliest. And it lands on the **artwork** rather than on a form — which means the cost of finding out late is a print run, not a filing.

The harmonised PPWR labelling system will progressively replace or modify national requirements. That is a reason to check CONAI's current labelling guidance before you print, not a reason to wait: the Italian duty is what applies to the boxes you ship this month.

## What it costs

CONAI membership includes a one-time fixed participation fee of **€5.16**, with a possible variable component. That is not a typo, and it is the smallest joining fee in any of our desks. The money is in the contribution.

| Material               | CAC from 1 July 2026      |
|------------------------|---------------------------|
| Steel                  | €5 / tonne                |
| Wood                   | €10 / tonne               |
| Aluminium              | €12 / tonne               |
| Glass                  | €40 / tonne               |
| Paper and cardboard    | from €45 / tonne, by band |
| Compostable bioplastic | €246 / tonne              |

| Material | CAC from 1 July 2026                       |
|----------|--------------------------------------------|
| Plastic  | €40 to €790 / tonne, by recyclability band |

**A twentyfold spread inside a single material.** Two plastic packs of identical weight can differ by €750 a tonne on recyclability band alone — and several plastic bands rise again from **1 October 2026**. If you ship plastic into Italy in any volume, the band your material falls into is worth establishing precisely rather than approximately.

## Declarations

| When                 | Frequency                                                                                                   |
|----------------------|-------------------------------------------------------------------------------------------------------------|
| First year           | <b>Quarterly</b>                                                                                            |
| From the second year | Annual, quarterly or monthly — depending on the contribution declared in the previous year and the material |

Periodic declarations are normally due by the **20th day of the month following the reporting period**, submitted through CONAI's online declaration portal. Since 2026 the online declaration service is **mandatory** for compiling and submitting all forms, including contribution requests and exemption/reimbursement requests — there is no paper route left.

Small importers may be eligible for **simplified or flat-rate procedures**. Ask about these by name; they are the kind of thing that exists in the guide and does not get volunteered.

## The representative

From 12 August 2026 Art . 45 (3) requires a producer established in another member state or a third country selling packaged products directly to Italian end users to appoint an EPR authorised representative established in Italy.

Italy had not published an official PPWR representative register or appointment procedure when we checked. There is a useful national precursor, though: CONAI guidance already allows a foreign company that joins voluntarily to **elect a special domicile in Italy** with an appointed person or legal entity.

**A special domicile is not an Art. 45(3) representative.** It is the same practical machinery — a named Italian party who receives and acts — but a different legal appointment. If your CONAI arrangement already includes one, that is a good starting point and a good provider to ask, not a box already ticked.

## What changed for 2026

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CONAI publishes an annual guide, and the 2026 edition made three changes worth knowing about even if you are new to Italy:

### Export reimbursement threshold doubled

From **€25,000 to €50,000** under the simplified procedure. If you bring packaged goods into Italy and ship some back out again, this is money.

### Group-company reimbursement procedure

A new reimbursement/exemption route for exporting companies belonging to the same corporate group.

### Online declaration made mandatory

For all forms, including contribution requests and exemption or reimbursement requests.

Contribution values also moved: from 1 January 2026 for wood, plastic band B1.2 and glass, and from 1 July 2026 for biodegradable and compostable plastic. Rates in Italy move more often than in most member states — take them from the current guide rather than from a desk.

## If you don't

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Enforcement runs under Legislative Decree 152/2006, alongside the CAC liability itself. We do not have a verified headline figure and will not invent one.

The distinctively Italian exposure is the **labelling** one. It is separately enforceable, it is visible on the product rather than buried in a filing, and it is the requirement a foreign seller is most likely to have been breaching without knowing — on every parcel, for as long as they have been shipping.

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

## Known traps

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### **Not asking the platform whether it already handles the CAC**

CONAI recognises platform arrangements. Skipping this question risks either paying twice or assuming cover you do not have.

### **Missing the labelling duty entirely**

Material code per Decision 97/129/EC plus separate-collection information, live now under D.Lgs 152/2006. It does not appear in EU-level PPWR summaries because it is national, and it is a print-run problem rather than a filing one.

### **Reading CONAI's "optional" as applying to registration**

Foreign-company CONAI membership is framed as optional in the national contribution system. Art. 44 registration under the PPWR is not optional anywhere.

### **Budgeting plastic at one rate**

€40 to €790 a tonne by recyclability band, with several bands rising again from 1 October 2026. Establish your band rather than averaging.

### **Looking for the foreign-company form on the website**

It comes from [aziendaestera@conai.org](mailto:aziendaestera@conai.org). There is a dedicated route and it is an email.

### **Assuming a CONAI special domicile satisfies Art. 45(3)**

Same machinery, different appointment. Ask the provider to do both explicitly.

## Sources

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The Italian statute establishes the framework and the labelling duty. CONAI is the consortium and the source for the contribution mechanics — useful, and not a neutral source.

- 1 **CONAI — Contributo Ambientale (CAC)** (<https://www.conai.org/imprese/servizi-gestione-adempimenti-consortili-e-opportunita-imprese/contributo-ambientale/>)

Scheme source. Source for the contribution being owed on packaging imported from abroad because its use generates waste in Italy, for the CAC being declared and paid by whoever carries out the placing unless already paid by a foreign company optionally registered with CONAI, and for the declaration frequencies and the 20th-of-the-following-month deadline

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- 2 **CONAI — Guida al Contributo Ambientale 2026** (<https://www.conai.org/news-e-press/online-la-nuova-guida-alladesione-e-allapplicazione-del-contributo-ambientale-conai/>)

Scheme source. The annual reference guide. Source for the 2026 changes: the export reimbursement threshold doubling from €25,000 to €50,000, the new group-company reimbursement procedure, mandatory online declaration for all forms, and the contribution changes for wood, plastic band B1.2, glass and compostable plastic

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- 3 **CONAI — membership and the seven material consortia** (<https://www.conai.org/>)

Scheme source for the €5.16 one-time participation fee, the dedicated foreign-company route at [aziendaestera@conai.org](mailto:aziendaestera@conai.org), the special-domicile arrangement for voluntarily joining foreign companies, the platform simplified arrangements, and RICREA, CIAL, COMIECO, RILEGNO, COREPLA, BIOREPACK and COREVE

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- 4 **Legislative Decree 152/2006 — Codice dell'ambiente** (<https://www.gazzettaufficiale.it/>)

The national framework. Source for the environmental labelling duty: material identification using the Commission Decision 97/129/EC code plus separate-collection information for consumers

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