



## Luxembourg – packaging EPR

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

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

### THE SHORT VERSION

Luxembourg is the simplest market in these desks and the easiest one to skip by accident. National law **already** treats a business established outside Luxembourg that sells packaged products directly to Luxembourg households or professional users as responsible for that packaging — this did not start on 12 August 2026. There is **one** accredited organisation, a **€50** minimum contribution and **one** deadline a year. The country is small enough that sellers assume it does not count. It does.

### Does it apply to me?

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

**Yes — and already did.** Luxembourg's own definition captures you. Contract Valorlux, report annually, and from 12 August 2026 add the PPWR registration and a representative.

#### You sell to Luxembourg businesses

**Also yes.** The national definition covers sales directly to Luxembourg households *or professional users*, and non-household packaging has been in the Valorlux report since the 2024 reporting year.

### You're established elsewhere in the EU

Caught by [Art. 45\(3\)](#) first sentence for the representative, on top of the existing national responsibility.

### You're established outside the EU

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

### You only send a handful of parcels a year

No exemption identified for low packaging quantities or micro-businesses. Luxembourg is a market of roughly 670,000 people — small volumes are the norm here, not an argument.

**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?](#)

## It already applied

Most of this site is about what changed on 12 August 2026. In Luxembourg the more useful statement is what **didn't**.

**Luxembourg's national legislation already assigns responsibility directly to the foreign seller.** A business established outside Luxembourg that sells packaged products directly to Luxembourg households or professional users is the entity responsible for that packaging, and must be covered through an accredited organisation. That predates the PPWR.

The practical consequence is uncomfortable and worth stating plainly: if you have been shipping to Luxembourg customers for a few years without a Valorlux contract, **12 August 2026 is not your start date**. Your exposure is older. Luxembourg joins Croatia, Estonia and Hungary in that group — countries whose own law got there before the Regulation did.

What the PPWR adds is the formal **producer-registration** framework and the **Art. 45(3)** representative. Both are new. The underlying responsibility is not.

Valorlux ASBL is the only accredited organisation identified by the Luxembourg authorities, and it covers **both** household and non-household packaging. There is nothing to compare and no scheme selection to make.

| Packaging     | What is required                                                               |
|---------------|--------------------------------------------------------------------------------|
| Household     | Contract an accredited organisation to perform <b>all</b> relevant obligations |
| Non-household | Contract an accredited organisation for <b>all or part</b> of the obligations  |

The Environment Agency — **Administration de l'environnement (AEV)** — oversees packaging EPR and publishes a list of registered companies. But the current official guidance sends packaging-responsible businesses straight to Valorlux, which in practice makes the scheme the route in rather than a step after registration.

Non-household is in scope now

Since the 2024 reporting year, industrial and non-household packaging is included

If you set up your Luxembourg reporting before that change and have not revisited it, you are probably reporting only consumer packaging — which means you are under-reporting, quietly, every year.

For a small distance seller the practical question is whether any of your Luxembourg orders go to businesses, and whether the packaging around them becomes waste at a business rather than in a household. If you ship pallets, bulk outers or trade orders, that is non-household packaging and it belongs in the declaration.

Include household, transport and — where relevant — non-household packaging in the assessment. It is one report either way; the change is what goes into it.

What it costs

| Item                                 | Price |
|--------------------------------------|-------|
| Valorlux minimum annual contribution | €50   |

| Item                        | Price                                                                           |
|-----------------------------|---------------------------------------------------------------------------------|
| Above the minimum           | By type and quantity of packaging declared, on the applicable Green Dot tariffs |
| Government registration fee | No separate standard fee identified for foreign packaging producers             |
| Authorised representative   | Not published. Commercial, quoted per provider                                  |

**€50 makes Luxembourg the cheapest market in these desks to be compliant in** — cheaper than Cyprus at €100, Bulgaria at €80, Finland at €74. The cost of Luxembourg is administrative, not financial: one contract, one report, and whatever your representative charges.

Which is worth weighing against the alternative. A seller who decides Luxembourg is too small to bother with is avoiding a €50 contribution while carrying an unbounded exposure under a national rule that has applied for years.

## 28 February

Valorlux members submit an **annual packaging report** through **Valbase Online** covering all packaging placed on the Luxembourg market. The recurring deadline is **28 February**, for the previous calendar year.

Two declaration methods are available and the choice shapes what you have to record all year:

| Method            | What it needs from you                        |
|-------------------|-----------------------------------------------|
| <b>Detailed</b>   | Material weights                              |
| <b>Simplified</b> | Predefined product categories and sales units |

**Agree the method with Valorlux before the year starts, not before the deadline.** The simplified route counts sales units; the detailed route needs weights per material. Deciding in February which one you are on means reconstructing whichever data you did not keep.

Retain the calculations and evidence supporting the reported material weights or product units. One report a year is a light obligation — the records behind it are the part that has to run continuously.

## The representative

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From 12 August 2026 Art . 45 (3) requires a producer established in another member state and selling directly to end users in Luxembourg to appoint an EPR authorised representative **established in Luxembourg**.

The current Luxembourg guidance we reviewed makes foreign direct sellers responsible for packaging but does **not** publish a separate pre-PPWR representative procedure for ordinary packaging, and no official directory of commercial representatives was identified.

**Small market, thin supply.** Luxembourg is unlikely to have a deep field of representative providers, and the ones that exist may serve larger clients. Ask Valorlux who they see acting in this role — in a country this size, the scheme will know.

## The register question

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The Environment Agency publishes a list of registered companies. From 12 August 2026 the PPWR requires producers to be entered in the producer register **before** placing packaging or packaged products on the market — the Art . 44 (4) bar that applies everywhere.

What was not fully published when we checked is the exact Luxembourg workflow for a foreign micro-business under that framework. Confirm it with AEV or Valorlux when the national PPWR procedure appears — and in the meantime, get the Valorlux contract in place, because that is the part of the obligation that is unambiguous today and has been for years.

## Labelling

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No Luxembourg-only on-pack mark was identified as mandatory for ordinary shipping packaging.

Note that Valorlux operates on **Green Dot** tariffs, and the Green Dot is being phased out under the PPWR — Belgium's scheme states the logo may no longer be used on packaging from 12 February 2027. If you sell into several markets, do not solve one labelling question by adding a symbol another market is about to prohibit.

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

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Membership of the accredited organisation is stated as **mandatory**, and the national definition expressly captures businesses established outside Luxembourg selling directly to Luxembourg users.

We have not verified a headline penalty figure and will not invent one.

The operative bar is Art . 44 (4): until the register entry exists you may not make packaging available on the Luxembourg market. And behind that sits the older national responsibility, which has been running for as long as you have been shipping.

## Known traps

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### **Deciding Luxembourg is too small to bother with**

The contribution starts at €50. The exposure does not scale down with the country, and the national responsibility has applied for years rather than since August.

### **Reporting only consumer packaging**

Industrial and non-household packaging has been in the report since the 2024 reporting year. A setup from before then is under-reporting.

### **Choosing the declaration method in February**

Detailed needs material weights; simplified needs product categories and sales units. Pick before the year starts, then keep the matching records.

### **Assuming Luxembourg is covered by your Belgian or French arrangement**

It is a separate member state with its own accredited organisation, its own register and its own deadline. Proximity is not coverage.

### **Treating 12 August 2026 as the start date**

The national responsibility for foreign direct sellers predates it. If you are regularising, ask about the back period rather than starting the clock today.

## Sources

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Guichet.lu and the Environment Agency establish the national framework. Valorlux is the accredited organisation and the source for the practical route — useful, and not a neutral source.

- 1 **Guichet.lu — extended responsibility of packaging producers** (<https://guichet.public.lu/en/entreprises/sectoriel/commerce/gestion-dechets/responsabilite-elargie-producteurs-emballages.html>)

Official. Source for the national definition capturing businesses established outside Luxembourg that sell packaged products directly to Luxembourg households or professional users, for the requirement to contract an accredited organisation for all household obligations and all or part of the non-household ones, and for Valorlux being the only accredited organisation identified

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- 2 **Administration de l'environnement (AEV) — packaging and packaging waste** (<https://environnement.public.lu/>)

Official. The Environment Agency oversees packaging EPR and publishes the list of registered companies

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- 3 **Valorlux** (<https://www.valorlux.lu/>)

Scheme source for the €50 minimum annual contribution, contributions calculated by type and quantity on the applicable Green Dot tariffs, the detailed and simplified declaration methods, the annual report through Valbase Online with a 28 February deadline, and the inclusion of industrial and non-household packaging since the 2024 reporting year

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- 4 **Amended Law of 21 March 2017 on packaging and packaging waste** (<https://legilux.public.lu/>)

The national statute, as amended by the Law of 9 June 2022

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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 — several circulated profiles cite "Article 46" for this and are wrong — 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.