



Netherlands – packaging EPR

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Status ● Draft, not yet peer-checked

THE SHORT VERSION

The Netherlands has the **most generous threshold in the Union**. Below **50,000 kg** of ordinary packaging a year you generally file nothing with Verpact and pay nothing — which for a genuine micro-seller is a real, substantial relief rather than a technicality. Two things spoil it. There is a **carve-out inside the carve-out**: single-use plastics and deposit containers sit entirely outside the threshold and must be registered from the first item. And Art. 45(3) has no threshold at all, so you can owe a Dutch representative while owing Verpact nothing.

Does it apply to me?

The core national law is the **Besluit beheer verpakkingen 2014**, and its definition is not shy: it expressly includes a business established abroad that directly sells packaged products to Dutch consumers through distance contracts. Responsibility does not pass to your customer or to the delivery company.

You ship to Dutch consumers, no Dutch establishment

You are the producer. Whether you owe Verpact anything depends on the threshold; whether you owe a representative does not.

You're established elsewhere in the EU

Caught by **Art. 45(3)** first sentence, no threshold.

You're established outside the EU

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

You ship under 50,000 kg of ordinary packaging

Generally **no Verpact declaration and no contribution** — genuinely. Keep the calculation. And read the next two sections before you rely on it.

You ship any single-use plastic packaging, beverage cans, or plastic soft-drink or water bottles

Register immediately, whatever the weight. The threshold does not reach these at all.

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 50,000 kg threshold

Verpact states that a producer or importer placing **more than 50,000 kg** of packaging on the Dutch market in a calendar year must register and file a declaration — and that the same rule applies to a company without a Dutch establishment selling online to Dutch consumers.

Below it, a business that can demonstrate it stays under does not normally file a declaration or pay the packaging waste management contribution for ordinary packaging. Not a reduced rate. Not a simplified form. Nothing.

We want to be clear that this is **real**, because most of these desks are spent puncturing thresholds that turn out to relieve less than advertised. Fifty tonnes of packaging is an enormous amount for a small maker — you would be shipping on a scale where none of this was ever your main problem. For a typical handmade seller using paper and cardboard, the Dutch answer to "what do I pay" is genuinely **zero**.

Verpact applies the threshold as a **total across packaging materials**, not per material. So you add everything together and compare once.

The carve-out inside the carve-out

This is where the Netherlands catches people, and it catches precisely the careful ones — the sellers who did the arithmetic, correctly concluded they were under 50,000 kg, and stopped reading.

Some packaging never gets the threshold at all

Businesses placing **single-use plastic (SUP) packaging, beverage cans, plastic soft-drink bottles or plastic water bottles** on the Dutch market must register **immediately, even below 50,000 kg**. Deposit-system obligations may apply as well.

So the Dutch test is two questions, not one, and they run in this order:

1

1. Is any of my packaging in the excluded categories?

SUP packaging, beverage cans, plastic soft-drink or water bottles. If yes — register, regardless of weight. The threshold is irrelevant to that packaging.

2

2. Only then: is my ordinary packaging under 50,000 kg?

Total across materials. If yes, no Verpact declaration or contribution for that ordinary packaging.

Worth thinking about honestly rather than hopefully. Plastic mailing bags, bubble wrap, plastic tape, shrink film — whether any of those fall inside the Dutch SUP packaging definition is a question to put to Verpact rather than to answer optimistically at your own desk. It is the single highest-value question you can ask about the Netherlands.

Being under it is a position you evidence

A threshold you rely on is a claim you may have to prove. Verpact may request evidence, and states that it may select below-threshold businesses for research or verification.

So keep an auditable packaging calculation even when you file nothing. It should record:

- packaging type
- unit weight
- annual sales quantities
- destination market

This is the cheapest compliance work in these desks. One spreadsheet, updated annually, is the difference between "we are under the threshold" being a defensible position and being an assertion. Do it once and it maintains itself.

The representative you owe anyway

Here is the part that feels wrong and is nevertheless the law.

Art . 45(3) has no threshold. A producer established in another member state selling by distance contract directly to Dutch end users must appoint an **EPR authorised representative** established in the Netherlands from 12 August 2026 — **even if it owes Verpact nothing at all.**

The Netherlands is therefore the clearest illustration in the Union of the proportionality problem the PPWR created. A seller shipping 200 kg of cardboard a year into the Dutch market pays no contribution, files no declaration, and is still required to retain a Dutch legal representative — a commercial arrangement that will cost meaningfully more than the EPR fee it accompanies, which is zero.

We think that is a bad outcome and it is one of the specific things **Art . 46(5)** — equal treatment without disproportionate burden on producers of small quantities — was written to constrain. Our [Observatory](#) exists to collect exactly this evidence. Meanwhile the duty applies, and the Dutch national workflow for it was still developing when we checked. Get written confirmation from Verpact or ILT before relying on the existing below-threshold route for sales made after 12 August 2026.

What it costs

Item	What we have
Ordinary packaging below 50,000 kg	Generally €0 contribution
Above the threshold	Per kilogram by material, on annual rates
SUP and deposit packaging	Can generate charges below the threshold, from the first item
Authorised representative	Not published. Commercial, quoted per provider — and owed regardless of the above

Verpact publishes a dedicated **registration form for non-European businesses**, which is more than most schemes offer and worth knowing about if you are outside the EU. Whether the same route

serves an EU-established seller is a fair question to ask them.

Reporting

Businesses inside the declaration system report the weight of packaging placed on the Dutch market, split by material. SUP and deposit packaging can also require **unit counts** rather than weights — a different measurement discipline, so find out early which you need.

A statutory report may also be required **before 1 August** for producers exceeding 50,000 kg.

Below the threshold there is nothing to file — but see [above](#) on keeping the calculation anyway.

Verpact would rather you didn't

The Netherlands does not impose a general mandatory recycling symbol for ordinary packaging. What is unusual is how strongly Verpact puts the opposite case.

Verpact strongly discourages the Green Dot on packaging sold only in the Netherlands, because it does not communicate recyclability. It is one of the few schemes in Europe to say so plainly rather than licensing the mark and leaving the confusion in place.

Worth reading alongside what is happening to the Green Dot generally: it is being phased out under the PPWR, and Belgium's scheme states the logo may no longer be used on packaging from **12 February 2027**. If you print for several markets, the Dutch position and the Belgian deadline point the same way.

Separate marking, return or consumer-information rules may apply to deposit containers, food-contact materials and specific SUP products. The EU harmonised sorting label under Art. 12(1) is **2028** at the earliest — do not design for it yet.

The threshold may not last

Verpact has indicated that it expects the 50,000 kg threshold to **lapse from around 12 August 2027**.

We flag this rather than bury it because of what it would mean. A business whose entire Dutch position rests on being under the threshold does not have a compliance arrangement — it has a temporary absence of one. If the threshold goes, that business needs a Verpact registration, a declaration and a contribution, starting more or less immediately.

Put a reminder in for spring 2027. Not to panic, but to check. This is precisely the kind of change that arrives quietly in a scheme's guidance rather than in the news, and the sellers it affects most are the ones who solved the Netherlands once and stopped looking.

If you don't

Enforcement is by the **Human Environment and Transport Inspectorate (ILT)**. For a typical small seller far below 50,000 kg using ordinary paper and cardboard, the practical risk today is modest, and we would rather say that than manufacture urgency.

It rises sharply in four situations: single-use plastic packaging you did not identify as such, deposit containers, a threshold calculation that turns out to be optimistic, and failure to complete the post-12 August 2026 PPWR steps.

And Art. 44(4) applies here as everywhere — the registration duty it protects is an EU one and does not follow the Dutch contribution threshold.

Known traps

Concluding you're under 50,000 kg and stopping there

Check the excluded categories first. Single-use plastics, beverage cans and plastic soft-drink or water bottles must be registered from the first item, and the threshold never applied to them.

Assuming plastic mailers and bubble wrap are ordinary packaging

Maybe. Whether they fall inside the Dutch SUP definition is a question for Verpact, and it is the one that decides whether you register at all.

Reading "no contribution" as "no representative"

Art. 45(3) has no threshold anywhere in the Union. The Netherlands is the market where you are most likely to owe a representative and nothing else.

Not writing the calculation down

Verpact may request evidence and may select below-threshold businesses for verification. A position you cannot evidence is a position you do not really have.

Treating the threshold as permanent

Verpact expects it to lapse from around 12 August 2027. Diarise a check for spring 2027.

Printing the Green Dot to look compliant

Verpact actively discourages it for Dutch-only packaging, and it is being phased out under the PPWR regardless.

Sources

Verpact administers the system and is the source for the threshold mechanics; ILT enforces. Where a claim rests on Verpact's own statement we have said so.

- 1** [Verpact — do I need to file a declaration?](https://www.verpact.nl/en) (<https://www.verpact.nl/en>)
Scheme source. Source for the 50,000 kg registration and declaration threshold applying to a company without a Dutch establishment selling online to Dutch consumers, for the threshold being applied as a total across materials, for the immediate registration requirement for SUP packaging, beverage cans and plastic soft-drink and water bottles regardless of weight, for the possibility of evidence requests and below-threshold verification, for the dedicated registration form for non-European businesses, and for the expectation that the threshold lapses from around 12 August 2027
- 2** [ILT — Human Environment and Transport Inspectorate](https://www.ilent.nl/) (<https://www.ilent.nl/>)
Official. The enforcement authority for Dutch packaging rules
- 3** [Business.gov.nl — packaging waste management contribution](https://business.gov.nl/regulation/packaging-waste-management-contribution/) (<https://business.gov.nl/regulation/packaging-waste-management-contribution/>)
Official. The government's own summary of the contribution and the requirements for packaging
- 4** [Besluit beheer verpakkingen 2014](https://wetten.overheid.nl/BWBR0035711/) (<https://wetten.overheid.nl/BWBR0035711/>)
The national decree. Source for the producer definition expressly including a business established abroad that directly sells packaged products to Dutch consumers through distance contracts

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