



Poland – packaging EPR

Last checked 17 August 2026 **Keeper** Desk open — keeper wanted

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Poland's system is mature, cheap and well documented — **PLN 100** a year for a micro-enterprise. The barrier is not money and not law. It is the **login**: electronic access to BDO normally needs a person who can authenticate through Poland's national identity system, typically with a **PESEL number and trusted profile**. And the famous 1,000 kg relief is **de minimis aid you have to claim, in writing, by 15 March, every single year**. Miss the filing and you owe the ordinary obligations as though it never existed.

Does it apply to me?

Poland's rules sit primarily in the **Act of 13 June 2013** on packaging and packaging waste management, alongside the Waste Act. A business that first makes products in packaging available in Poland is the **introducer** — and direct online sales from another country put the foreign seller in that role rather than the consumer or the parcel carrier.

You ship to Polish consumers, no Polish branch

Yes. BDO registration is required *before* you begin. Apply to the Marshal of the Mazowieckie Voivodeship.

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

You introduce no more than 1,000 kg a year

You may **apply** for de minimis relief from specified recycling, product-fee and education duties. Registration, records and the annual report remain. See [below](#) — it is conditional and annual.

You have a Polish branch

Apply to the marshal competent for that branch rather than to Mazowieckie.

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?](#)

BDO, and one office for all foreigners

The register is **BDO** — the national database on products, packaging and waste management. It is administered nationally and maintained through the voivodeship marshals, which sounds like sixteen possible front doors and is not.

A foreign business without a Polish branch applies to the Marshal of the Mazowieckie Voivodeship. One office, for every foreign applicant. If you have a Polish branch you apply to the marshal competent for that branch instead.

The timing rule is strict and worth reading twice: registration is required **before beginning the regulated activity**. Not before the first report, not within some window of the first sale — before you start. That is the same bar [Art. 44\(4\)](#) sets at EU level, and Poland got there first.

The login problem

Every country in these desks has an obstacle. Bulgaria's is a qualified electronic signature, Greece's is the language, Croatia's is the monthly rhythm. Poland's is identity.

Electronic access normally requires Polish national authentication

Official BDO guidance states that a foreign business may act through a **representative or proxy**, and that electronic access normally requires a person able to authenticate through Poland's national login system — commonly using a **PESEL number and trusted profile**.

A PESEL is a Polish personal identification number. It belongs to a **person**, not to your company, and you are unlikely to have one. So the practical shape of Polish compliance is that you need someone who does — a proxy, an adviser, a representative — and arranging that is the actual project. The registration itself is straightforward once someone can open the account.

Solve this before you take Polish orders, not after. Poland's own guidance warns that foreign sellers face practical access barriers if they wait until orders have already begun — because at that point you are selling unregistered while you look for a person with a trusted profile.

The 1 Mg de minimis route

You will see this quoted as "exempt below 1,000 kg". It is more conditional than that, in two distinct ways.

What it is	What it isn't
Relief from specified recycling, product-fee and public-education obligations, where you introduce no more than 1 Mg (1,000 kg) in a calendar year	An exemption from BDO registration, record-keeping or the annual report
De minimis aid — a state-aid instrument with its own paperwork	Automatic. It has to be claimed, correctly, every year

You must file the required de minimis aid declarations and information through BDO by 15 March. Missing the application leaves the business liable for the normal obligations and fees for that year — not as a penalty, but simply because the relief was never granted.

So the honest way to describe Poland's 1,000 kg rule is that it converts an EPR cost into an **annual administrative task**. Whether that is a good trade for you depends on how reliably you will remember 15 March every year, and on what a recovery organisation would have charged instead. For some sellers the organisation is genuinely the simpler answer.

And as everywhere: it is national relief. Art . 44 registration and the Art . 45(3) representative are untouched by it.

Proxy is not representative

Poland is the clearest case in these desks of two similar-sounding appointments doing different jobs, and it would be easy to buy one and think you have both.

	BDO proxy / representative	Art. 45(3) authorised representative
Comes from	Polish BDO practice	EU regulation, from 12 August 2026
Purpose	Operating the electronic account	Carrying your EPR obligations in Poland
Solves	The login problem	The legal-responsibility problem

Do not assume an ordinary BDO proxy satisfies the PPWR role. One is about portal access, the other about legal responsibility. A provider may well offer both — ask them to say so explicitly, in the mandate.

The Art . 45(3) appointment must be by written mandate to a Poland-established representative. Poland's implementation and registration workflow for it was still developing when we checked, so confirm how the mandate and registration must be recorded before shipping after 12 August 2026.

What it costs

Item	Amount	Note
BDO registration fee	PLN 100 micro-enterprise · PLN 300 other	One of the few genuine state registration charges in the Union
BDO annual fee	Same amounts	Not paid in the same year as the registration fee. Generally due by the end of February
Recovery organisation	Contractual	Or use the 1 Mg de minimis route instead
Product fee	Where recycling obligations are not met	The consequence of neither meeting targets nor claiming relief
Proxy / account access	Commercial	The person with the trusted profile

Item	Amount	Note
Art. 45(3) representative	Not published	Separate appointment, separate fee

PLN 100 is roughly €23. Poland is not an expensive market to be registered in — it is a fiddly one to get into, and the costs that matter are the human ones.

15 March

The annual packaging report goes through BDO, normally by **15 March** for the previous calendar year. It records packaging placed on the Polish market by material and weight, and the method used to meet the recovery and recycling duties.

15 March is two deadlines wearing one date. The annual report, and — if you are claiming it — the de minimis documentation. Both. A business that files the report and forgets the aid declarations has claimed nothing.

Separately, the **annual fee** is generally due by the end of February. So the Polish year has a February payment and a March double filing, and then nothing until the following February.

The BDO number on your documents

After registration the assigned **BDO number** must be shown on documents connected with the regulated activity — invoices, contracts, relevant sales documentation.

This puts Poland in the same group as France (the IDU) and Spain (the ENV number): countries where your registration identifier has to appear on commercial paperwork rather than sitting in a portal. It is easy to satisfy and easy to forget entirely, because nothing prompts you.

It is not a recycling label. The BDO number is an administrative identifier for business documents, not a consumer mark for packaging. And the Green Dot is not a substitute for BDO registration or EPR compliance — printing one does nothing about the other.

Poland imposes no general mandatory recycling logo on ordinary packaging. Material-identification and environmental markings must be accurate where used. The EU harmonised sorting label under Art. 12(1) is **2028** at the earliest — do not design for it yet.

If you don't

Poland operates a mature register with mandatory pre-registration, annual fees, annual reporting and a requirement to display the BDO number. Where recycling obligations are not met, a **product fee** becomes payable — which is the mechanism that catches a business that neither joined an organisation nor successfully claimed the de minimis relief.

The practical risk for a foreign seller is **access** rather than intent. Waiting until orders have begun is how businesses end up trading unregistered while they solve the login — and the registration duty is a pre-condition of starting, not a formality to catch up on.

Art. 44(4) says the same thing in EU terms: no making available before the register entry exists.

Known traps

Leaving the login until you have orders

Electronic access normally needs a person who can authenticate through Poland's national system, typically with a PESEL and trusted profile. Find that person before you start selling, not after.

Treating the 1,000 kg rule as automatic

It is de minimis aid. You claim it through BDO by 15 March every year. No filing, no relief — and the ordinary obligations apply for that year.

Filing the report and forgetting the aid declarations

Both are due 15 March. They are separate documents doing separate jobs.

Assuming your BDO proxy is your PPWR representative

Portal access and legal responsibility are different appointments. Ask your provider to cover both, explicitly, in writing.

Missing the February fee

The annual fee is generally due by the end of February and is not paid in the same year as the registration fee — which makes the first year and every year after it look different.

Leaving the BDO number off your invoices

It has to appear on documents connected with the regulated activity. Nothing will prompt you, and it is a simple thing to be caught on.

Sources

BDO and the Polish ministry carry this page. Where a claim rests on BDO's own operational guidance rather than statute we have said so in the body text.

- 1** **BDO — main portal and registration system** (<https://bdo.mos.gov.pl/>)
Official. Source for registration being required before beginning the regulated activity, for foreign businesses without a Polish branch applying to the Marshal of the Mazowieckie Voivodeship, for a foreign business acting through a representative or proxy, for electronic access normally requiring authentication through Poland's national login system using a PESEL number and trusted profile, for the PLN 100 / PLN 300 registration and annual fees with the annual fee due by the end of February, for the 15 March annual report and de minimis filing, and for the BDO number appearing on documents connected with the regulated activity
- 2** **Ministry of Climate and Environment — BDO Register** (<https://www.gov.pl/web/klimat>)
Official. The ministry responsible for the register and the packaging framework
- 3** **Act of 13 June 2013 on packaging and packaging waste management** (<https://isap.sejm.gov.pl/>)
The national statute, alongside the Waste Act. Source for the "introducer" concept and the 1 Mg de minimis relief from specified recycling, product-fee and public-education obligations
- 4** **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 — and Art. 12(1) on the 2028 harmonised label

- 5 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.