



Slovenia – packaging EPR

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

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Slovenia had the representative rule before the PPWR did, and it works the way the well-run ones do: you appoint a Slovenian representative in writing, and **that representative completes your registration**. The thing to unlearn is the threshold. Slovenia **abolished** its 15,000 kg limit in **2021** — if you are reading a comparison table that still lists it, that table is five years out of date. And there is a second regime most guides never mention: a packaging **environmental levy** run by the tax authority, with its own quarterly return.

Does it apply to me?

Slovenia regulates packaging through the **Decree on Packaging and Packaging Waste**. The rules cover all packaging placed on the Slovenian market, and the producer is the **first person placing** packaging or packaged goods there.

That expressly includes a foreign business selling packaged goods directly to final users in Slovenia by distance communication. This is not an inference from the PPWR — it is in the Slovenian text, and it was there before 12 August 2026.

You ship to Slovenian consumers, no Slovenian establishment

Yes. Appoint a Slovenian representative in writing, register through them in ARSO, join a DROE.

You're established elsewhere in the EU

Caught by the Slovenian rule already, and by [Art. 45\(3\)](#) first sentence.

You're established outside the EU

Read it as caught. The Slovenian requirement turns on the absence of Slovenian establishment rather than on EU membership.

You only sell small quantities

No exemption. None for registration, none for ordinary EPR participation. See [below](#) — the old threshold is gone.

You're established in Slovenia

No representative needed. Register in ARSO and join a DROE in the normal way.

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 threshold that isn't there

Most of these desks are spent explaining what a national threshold does and does not relieve. Slovenia is simpler and needs saying loudly, because the stale number is still circulating.

The 15,000 kg threshold was abolished in 2021

Slovenia formerly exempted producers below 15 tonnes from financing packaging-waste management. That relief is **gone**. There is now no general low-volume exemption from registration or from ordinary EPR participation.

It appears in older comparison tables and in guides that have not been revisited, usually alongside a reassuring note that Slovenia is easy for small sellers. It was, once. A business that entered the Slovenian market on that basis and never re-checked has been non-compliant for several years without any change in its own behaviour.

If you have Slovenian sales history and no ARSO registration, this is the paragraph to act on. The exposure predates the PPWR entirely.

The representative registers you

Slovenia belongs to the group — with Croatia, Estonia, Hungary and Spain — whose own law reached foreign distance sellers before the Regulation did. Under existing Slovenian law a foreign producer must appoint, by **written authorisation**, a legal person or sole trader established in Slovenia.

That representative completes the foreign producer's registration in the ARSO packaging producer register and carries out the assigned national obligations. It is the mechanism of entry, not an extra box on top of a registration you do yourself.

Which sets the order of operations: **appoint first, then register**. Every packaging producer must be entered in the ARSO register, whether using an individual or a collective system — so the register entry is not optional even for a producer that has arranged everything else.

The DROE route

Producers must finance and organise packaging-waste management either collectively through a licensed **DROE** — a packaging-waste management company — or, where legally eligible, through an approved individual system.

For a small distance seller the DROE is the route. The individual system exists in law and is not a realistic option for anyone shipping parcels to consumers.

Route	Who reports to ARSO	How often
Collective (DROE)	The DROE reports consolidated data	Four times a year
Individual system	You report directly	Four times a year

So Slovenia runs on a quarterly national rhythm even though, in the collective route, the filing is your scheme's job rather than yours. What you owe the DROE — and when — comes from your contract. Read it for the internal deadlines, because those are the ones that will actually bind you.

The second regime

This is the part of Slovenia most guides omit, and it is a separate legal and administrative world from everything above.

A packaging environmental levy administered by the Financial Administration (FURS) may apply, with its own registration and a **quarterly ETROD return**. It should be checked separately from ARSO and DROE compliance.

Two authorities, two regimes, two sets of paperwork:

	Packaging EPR	Environmental levy
Who	ARSO, plus your DROE	FURS — the tax authority
What	Register, finance and organise waste management	A levy, with its own registration
Filing	Data to the DROE; consolidated to ARSO four times a year	Quarterly ETROD return

Slovenia joins Latvia in the small group where a tax authority sits inside the packaging picture. The failure mode is the same in both: a seller solves the environmental side, considers the country finished, and never discovers the fiscal one.

Ask whether the levy applies to you as its own question. Not as a follow-up to the DROE conversation — your DROE is not the tax authority and may not volunteer it.

Reporting

In the collective route you keep **material-by-weight records** and submit data to your DROE, which reports consolidated data to ARSO four times a year. In an individual system you report directly to ARSO on the same rhythm.

We have not verified a single national producer-facing deadline that applies to a foreign seller in the collective route, and we are not going to print one. The dates that will bind you are in the DROE contract. Take them from there on the day you sign.

Record sales, grouped and transport packaging by material and weight. As everywhere, the outer box and the filler count.

What it costs

Item	What we have
ARSO registration	No separate fee identified
DROE contribution	Contractual, by material and weight

Item	What we have
Slovenian representative	Not published. Commercial, quoted per provider
Environmental levy	Separate, via FURS, where it applies

Slovenia is a market of about two million people and the packaging volumes involved will be small. Since the 15-tonne threshold went, the cost of being compliant here is dominated by the fixed elements — the representative and the administration — rather than by the tonnage. That is the proportionality problem in miniature, and one of the reasons the [Observatory](#) exists.

Labelling

Material-identification marks **may** be used but are not generally compulsory for ordinary packaging in Slovenia. Product-specific EU or Slovenian markings may still apply depending on what you sell.

The EU harmonised sorting label under Art . 12 (1) applies from **12 August 2028** at the earliest, or 24 months after the implementing acts, whichever is later. The artwork will be fixed by those acts — do not design for it yet.

If you don't

The environmental inspectorate enforces, with the Ministry of the Environment, Climate and Energy setting policy and ARSO holding the register and the data. We do not have a verified penalty figure and will not invent one.

The Slovenian risk worth naming is the historical one. Because the 15-tonne threshold disappeared in 2021 rather than in 2026, a seller relying on it has a gap measured in **years**, not months — and unlike the PPWR changes, nothing about it was newsworthy enough to prompt a review.

And Art . 44 (4) applies as everywhere: no making available before the register entry exists.

Known traps

Relying on the 15-tonne threshold

Abolished in 2021. It survives in older comparison tables and in advice that has not been revisited. There is no general low-volume exemption in Slovenia.

Missing the environmental levy entirely

A separate regime, administered by FURS, with a quarterly ETROD return. Ask about it as its own question — ARSO and your DROE are not the tax authority.

Trying to register before appointing the representative

The representative completes the foreign producer's registration. Appoint first; the order is not a preference.

Assuming the DROE's reporting is your deadline

The DROE reports to ARSO four times a year. What you owe the DROE, and when, is in your contract and will be earlier.

Treating 12 August 2026 as your Slovenian start date

The Slovenian producer definition and representative duty predate it. If you have sales history here, the exposure does too.

Sources

ARSO and the Slovenian decree carry this page. Where we could not verify a producer-facing deadline we have left it to the DROE contract rather than guessing.

- 1** **ARSO — Slovenian Environment Agency** (<https://www.arso.gov.si/>)
Official. Maintains the packaging producer register and receives packaging-market data. Source for every packaging producer requiring a register entry whether using an individual or collective system, and for DROEs reporting consolidated data to ARSO four times a year, with individual systems reporting directly on the same rhythm
 - 2** **Ministry of the Environment, Climate and Energy** (<https://www.gov.si/drzavni-organi/ministrstva/ministrstvo-za-okolje-podnebjje-in-energijo/>)
Official. Sets policy; the environmental inspectorate enforces
-

3 Decree on Packaging and Packaging Waste (<http://www.pisrs.si/>)

The national decree. Source for the producer being the first person placing packaging or packaged goods on the Slovenian market, expressly including a foreign business selling directly to final users in Slovenia by distance communication; for the written appointment of a legal person or sole trader established in Slovenia as representative, who completes the foreign producer's registration; and for the abolition of the former 15,000 kg threshold in 2021

4 Financial Administration of the Republic of Slovenia (FURS) (<https://www.fu.gov.si/>)

Official. Administers the packaging environmental levy, with its own registration and a quarterly ETROD return — a regime separate from ARSO and DROE compliance

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. 44(3) on delegated registration, **Art. 45(3)** on the representative 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.