



Spain – packaging EPR

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THE SHORT VERSION

Spain had the representative rule before the EU did, and wrote it more broadly than most: **Art. 17.2 of Royal Decree 1055/2022** names producers established in another member state **or in a third country**. Two Spanish features have no equivalent elsewhere. Your registration number — **ENV/YEAR/XXXXXXXXXX** — must appear on your **invoices**, like the French IDU. And if you appoint no representative, the **first Spanish distributor or trader may become subsidiarily responsible** — which is why Spanish trade customers ask about this before you raise it.

Does it apply to me?

Spain regulates packaging through **Royal Decree 1055/2022**, under the waste framework of Law 7/2022. The national authority is **MITECO**. The rules cover domestic, commercial and industrial packaging — **including packaging used for distance sales**, which it names.

You ship to Spanish consumers, no Spanish establishment

Yes. Appoint a Spanish representative, join a SCRAP, register in the RPP, put the ENV number on your invoices, declare annually.

You're established elsewhere in the EU

Caught — expressly by Art. 17.2, and by **Art. 45(3)** first sentence.

You're established outside the EU

Caught, expressly. Art. 17.2 names producers established "in another EU Member State or in a third country". No inference required.

You only sell small quantities

No general exemption from registration, representation or EPR. Under 15 tonnes you may use a simplified reporting procedure — a shorter form, nothing more.

You sell to Spanish trade customers

Read [the next section](#). Your compliance is contractually their problem too, and they know it.

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?](#)

Art. 17.2 – and who pays if you skip it

Article 17.2 of Royal Decree 1055/2022: producers established in another EU member state or in a third country that market products in Spain must appoint a natural or legal person **located in Spain**. The representative holds evidence of the mandate and performs the producer obligations covered by that appointment.

That is a pre-PPWR national duty, drafted to reach third countries, and it means Spain is one of the countries where Art. 45(3) added a European layer to something already in force rather than creating a new obligation.

The consequence Spain built in

If no representative is appointed, the first Spanish distributor or trader may become subsidiarily responsible. The obligation does not evaporate — it moves down the chain to whoever in Spain first handled your goods.

This is a genuinely well-designed enforcement mechanism and it changes the commercial dynamics. Your Spanish distributor is not being difficult when it asks for your RPP registration before it will take

stock — it is protecting itself from carrying your EPR liability. Expect the question early, expect it in writing, and have the answer ready.

For a direct-to-consumer seller with no Spanish trade customers, there is nobody below you in the chain for it to land on — which means the exposure stays with you rather than being shared.

The RPP and the ENV number

The register is the **Registro de Productores de Producto (RPP)**, packaging section, operated by MITECO. A producer or its authorised representative registers **electronically**.

Registration asks for:

- the packaging **categories**
- whether packaging is **single-use or reusable**
- the relevant **EPR system certificate**

That last item sets the order. You need the SCRAP membership certificate *before* you can complete the RPP registration. So: representative, then scheme, then register — not the other way round.

The assigned number has the format **ENV/YEAR/XXXXXXXXXX**. Registration numbers are **public**, which is how a distributor or an authority checks you without needing to ask.

The number goes on your invoices

The ENV number must appear on invoices and other commercial documentation accompanying packaged products.

Spain joins France (the IDU on your website and contractual information) and Poland (the BDO number on business documents) in the group of member states where your registration identifier has to be **visible on paperwork** rather than sitting in a portal.

It is trivial to satisfy — one line in an invoice template — and easy to overlook entirely, because nothing prompts you and no filing deadline surfaces it. In Spain it is also the thing a cautious distributor looks for first, since it is the quickest way to check that a supplier is registered.

Beyond that, Spain has packaging marking and consumer-information rules, but the sources we read do not establish a single Spain-only recycling logo that must appear on all ordinary e-commerce packaging. Deposit, compostability and reusable-packaging rules may apply depending on your

product. The EU harmonised sorting label under Art . 12(1) is **2028** at the earliest — do not design for it yet.

Choosing a SCRAP

Producers must meet EPR obligations individually or through an authorised collective system — a **SCRAP**. For a foreign small seller the collective route is the only realistic one.

The system you choose must cover your packaging category — domestic, commercial or industrial. That is not a detail: a membership covering the wrong category produces a certificate that will not support your RPP registration for the packaging you actually ship.

System	Coverage
Ecoembes	Domestic non-glass packaging
Ecovidrio	Domestic glass
Procircular	Domestic, commercial and industrial
Ecotic Envases	Domestic, commercial and industrial
Ubica Envases	Domestic, commercial and industrial

MITECO lists the authorised systems — take the current list from MITECO rather than from a comparison page. Spain is unusually well supplied here: five or more authorised systems is the widest choice in these twenty-seven desks, and worth using. Request a written quotation from more than one.

What it costs

Item	What we have
State-set minimum price	None. Spain does not publish one
Collective system fee	By system, material, weight and category
Authorised representative	Commercial, quoted per provider
Registration support	Often bundled — ask whether it is

Ask for a quotation that separates three lines: the EPR fee, the registration support, and the authorised-representative charge. Providers bundle them differently, and with five systems to compare you cannot compare bundles — only components.

31 March, and the 15-tonne form

Registered producers or their representatives report packaging placed on the Spanish market for each calendar year. The normal deadline is **before 31 March** of the following year, though MITECO may publish a specific reporting window.

Volume	Procedure
15 tonnes a year or more	Full declaration
Under 15 tonnes a year	Simplified declaration procedure

The 15-tonne rule is a reporting simplification and nothing else. It does not remove the obligation to appoint a Spanish representative, to register in the RPP, or to arrange EPR compliance. Spain's own guidance says so explicitly, which is more than most member states bother to do about their own thresholds.

Count sales, grouped and transport packaging, separated by material and packaging category. The category split matters more in Spain than in most markets because it has to match the coverage of the SCRAP you joined.

The plastic tax is a different regime

Spain also runs a plastic packaging tax, entirely separate from EPR. Being registered for EPR says nothing about the tax, and paying the tax says nothing about your EPR position. Two regimes, two sets of filings, two authorities.

We flag it here rather than explain it, because it is genuinely outside the scope of a packaging-EPR desk — but a seller who solves the RPP and the SCRAP and considers Spain finished may have solved half the country.

If any of your packaging is non-reusable plastic, treat the tax as a separate question and ask about it by name. It is the Spanish equivalent of Slovenia's environmental levy or Latvia's Natural Resources Tax: the fiscal half of a picture that most guides only cover the environmental half of.

If you don't

The packaging rules sit within Spain's waste-law enforcement framework and non-compliance can lead to administrative sanctions. But the mechanism that actually operates first is commercial rather than punitive.

Registration numbers are **public** and must appear on commercial documentation, which allows distributors and authorities to check compliance without any investigation. And the subsidiary-responsibility rule gives your Spanish trade partners a direct financial reason to check. In practice you will be asked by a customer long before you are asked by MITECO.

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

Known traps

Trying to register before joining a system

RPP registration requires the EPR system membership certificate. Representative, then SCRAP, then register.

Joining a system that covers the wrong category

Domestic, commercial and industrial are different coverages. The certificate has to match the packaging you actually place on the market.

Leaving the ENV number off your invoices

It must appear on invoices and commercial documentation accompanying packaged products. One template line, and the first thing a cautious Spanish distributor looks for.

Reading 15 tonnes as an exemption

It is a simplified reporting procedure. Representative, RPP registration and EPR participation all apply from the first package.

Assuming EPR registration covers the plastic tax

Separate regime, separate filings. Solving one says nothing about the other.

Skipping the representative because you sell B2B

That is precisely when the subsidiary-responsibility rule bites — on your Spanish distributor, who will find out and act on it.

Sources

The Royal Decree and MITECO carry this page. The authorised systems are the practical route and are not treated as evidence of the legal obligation.

- 1 **Royal Decree 1055/2022 on packaging and packaging waste** (<https://www.boe.es/eli/es/rd/2022/12/27/1055>)

The national instrument. Source for **Article 17.2** — producers established in another EU Member State or in a third country that market products in Spain must appoint a natural or legal person located in Spain, who holds evidence of the mandate and performs the covered obligations — and for the first Spanish distributor or trader becoming subsidiarily responsible where no representative is appointed

- 2 **MITECO — Registro de Productores de Producto (RPP), packaging section** (<https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/flujos/registro-productores.html>)

Official. Source for electronic registration by the producer or its authorised representative, the required packaging categories, the single-use or reusable classification, the EPR system certificate requirement, the ENV/YEAR/XXXXXXXXXX number format and the duty to show it on invoices and commercial documentation, the annual declaration normally before 31 March, the simplified procedure below 15 tonnes, and the official list of authorised packaging SCRAPs

- 3 **Law 7/2022 on waste and contaminated soils for a circular economy** (<https://www.boe.es/eli/es/l/2022/04/08/7>)

The framework statute behind Royal Decree 1055/2022, and the source of the enforcement and sanctions regime. It also establishes Spain's plastic packaging tax, which is separate from EPR

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 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.