



Sweden – packaging EPR

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Status ● Draft, not yet peer-checked

THE SHORT VERSION

Sweden is the most transparent system in these twenty-seven desks and one of the least forgiving. The national rule already reached foreign distance sellers before the PPWR did, and the duties apply **regardless of quantity**. Two numbers to hold on to: the under-**1 tonne** rule removes a **SEK 1,250** enforcement fee and **nothing else** — and failing to appoint an approved PRO can attract an environmental sanction fee of **SEK 30,000**. The register is public, so non-compliance here is easy to see.

Does it apply to me?

Sweden's system is governed principally by **Ordinance (2022:1274)** on producer responsibility for packaging. It expressly includes sellers established outside Sweden that sell packaging or packaged goods **directly to final users in Sweden**. From 12 August 2026 the national definition aligns with the PPWR, with the Swedish EPA remaining the registration and reporting authority.

You ship to Swedish consumers, no Swedish establishment

Yes. Appoint a PRO, register before you supply, report annually. This was true before the PPWR.

You sell only to Swedish businesses

Still yes. The test is professional placing on the Swedish market and supply directly to a final user — a business can be a final user.

You're established elsewhere in the EU

Caught. [Art. 45\(3\)](#) first sentence applies from 12 August 2026, and the Swedish national duties applied before it.

You're established outside the EU

Registration and PRO membership apply. On the representative, see [below](#) — Sweden has signalled its intention but you should confirm the final national rule.

You place under 1 tonne a year

Exempt from the **SEK 1,250 enforcement fee** — unless you are liable for littering fees. Nothing else changes.

You think you might qualify for a PRO exemption

Almost certainly not. It exists only by individual decision in narrow circumstances — certain high-rotation reuse systems, or packaging that becomes hazardous waste. It is not a small-business exemption.

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 PRO comes first

Most member states have you register and then arrange a scheme. Sweden inverts that, and attaches the largest single sanction figure in these desks to getting it wrong.

Appoint or provide an approved PRO BEFORE supplying packaging

Every packaging producer must appoint or provide a producer responsibility organisation approved by the Swedish EPA **before** supplying packaging. The two approved packaging organisations identified by the authority are **Näringslivets Producentansvar i Sverige AB (NPA)** and **TMResponsibility AB (TMR)**.

Failure to appoint a PRO can lead to an environmental sanction fee of **SEK 30,000** — roughly €2,600. That is not a discretionary penalty scaled to your size; it is a fixed sanction, and it dwarfs the actual

cost of compliance for a small seller several times over.

The PRO finances and organises packaging-waste management and normally collects producer data and fees. It may also handle your registration — see below — but the appointment is the step that has to happen first.

Registering with Naturvårdsverket

A producer must notify the **Swedish Environmental Protection Agency** before placing packaging on the Swedish market. Registration is completed in the agency's producer-responsibility **e-service**, and a PRO may offer registration as part of its service.

The required information includes:

- the producer's name and contact details
- an identification or tax number — **a foreign producer may use its tax or VAT identification number** where it has no Swedish organisation number
- the appointed PRO
- the basis on which the business is the producer

Registration remains the producer's responsibility even where a PRO submits it.

Sweden is explicit about this, and it is the right way round: the execution can be delegated, the accountability cannot. If your PRO says it has registered you, check the public register and confirm.

That the register is **public** is worth knowing in both directions. It makes your own status verifiable to a Swedish customer or marketplace — and it makes non-compliance straightforward for the authority to identify without any investigation.

The under-1-tonne rule

Sweden has a threshold, and it is one of the narrowest in Europe — which makes it a good test of whether a guide is reading carefully.

What it removes	What it leaves
The SEK 1,250 per-producer, per-calendar-year government enforcement fee — and not even that if you are liable for littering fees	Registration. PRO membership. Record-keeping. Reporting. PRO packaging fees. Everything.

Responsibility applies regardless of quantity. That is the Swedish position in one sentence. The under-1-tonne rule is about a single fee of roughly €110 — it is not a small-business exemption and Sweden does not present it as one.

Compare the Netherlands at 50,000 kg, where a micro-seller may genuinely owe nothing, or Ireland at 10 tonnes plus €1 million. Sweden's threshold is three orders of magnitude tighter and buys you a fee waiver rather than a regime change.

The representative, and what Sweden has signalled

Sweden's position moved on 12 August 2026, and it is worth setting out both sides of that date.

Period	Position
Until 12 August 2026	A producer not established in Sweden may appoint a Sweden-established producer representative by written power of attorney — or may fulfil the obligations directly. Optional.
From 12 August 2026	Art. 45(3) requires a producer established in another member state selling directly to Swedish end users to appoint an EPR authorised representative in Sweden. Not optional.

And on third countries, Sweden has signalled its direction. The Swedish EPA has stated that Sweden **intends** national rules to require representatives for producers both within and outside the EU. That is an intention rather than a confirmed rule — so if you are established outside the EU, confirm the final Swedish procedure before shipping rather than assuming either answer.

Our reading for a non-EU seller: plan on needing one. Sweden has said what it means to do, the direction of travel across the Union is the same, and the cost of being wrong in the other direction is the market.

31 March, and your PRO's earlier date

Each year the producer must ensure the Swedish EPA receives data for the preceding calendar year. The Swedish system uses **31 March** as the annual reporting date for the relevant statutory packaging reports.

Quantities are reported by weight and packaging material, with additional categories including:

- consumer packaging
- reusable packaging
- specified single-use plastic packaging

- deposit-system containers

Work to your PRO's internal cut-off, not the statutory date. Many producers report through their PRO, which will set an earlier deadline of its own — and you remain responsible for the accuracy and timely submission of your data either way.

Ordinary shipping boxes, paper envelopes, tape, labels and protective filler must all be included in packaging accounting even though nothing is printed on them and nobody asks about them individually.

What it costs

Item	Amount	Note
Government enforcement fee	SEK 1,250 / producer / calendar year	Exempt under 1 tonne, unless liable for littering fees
PRO packaging fees	By material, weight and recyclability	Recyclability is priced into the tariff
Littering fees	Fixed and variable	Certain single-use plastic packaging only
Authorised representative	Not published	Commercial, quoted per provider

SEK 1,250 is roughly €110 — Sweden is not an expensive market to be registered in. What makes it demanding is the absence of any volume relief from the obligations themselves, and the fixed sanction behind the PRO requirement.

The sanction fees

Sweden is one of the few member states to publish specific figures rather than leaving enforcement to be discovered, which we think is to its credit even though the numbers are uncomfortable.

Failure	Consequence
Late registration	Can trigger a sanction — from 1 January 2024
Failure to appoint a PRO	Environmental sanction fee of SEK 30,000

Add the public register and the picture is clear: the system is comparatively transparent, which makes non-compliance easier to identify, and the penalties are fixed rather than negotiated.

Sweden also cooperates internationally. Like Finland, the Swedish authority works with customs and with EPR authorities in other member states — which makes "a small foreign shop will never be noticed" a weaker assumption in the Nordics than elsewhere.

Labelling

There is no general Swedish EPR membership logo that must be printed on ordinary parcels. Packaging must comply with the applicable EU and Swedish material, design and product-specific marking rules.

Deposit beverage containers and specified single-use plastic products have separate requirements — and the latter can attract those additional fixed and variable littering fees.

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.

Known traps

Registering before appointing a PRO

The PRO must be appointed or provided **before** you supply packaging, and failing to appoint one carries a SEK 30,000 sanction fee. It is the first step, not a follow-up.

Reading the 1-tonne rule as an exemption

It removes a SEK 1,250 enforcement fee and nothing else — and not even that if you are liable for littering fees. Responsibility applies regardless of quantity.

Assuming your PRO's registration is your registration

A PRO may submit it. Sweden is explicit that registration remains the producer's responsibility. The register is public — check.

Working to 31 March

Your PRO will have an earlier internal cut-off, and that is the date that actually governs whether your data arrives in time.

Non-EU sellers assuming no representative is needed

The Swedish EPA has stated it intends national rules to cover producers both within and outside the EU. Confirm the final position rather than assuming the convenient reading.

Leaving tape, labels and filler out of the accounting

All of it counts, in the categories Sweden asks for — consumer, reusable, specified single-use plastic and deposit containers.

Sources

The Swedish EPA and the ordinance carry this page. Sweden publishes more specifics than most member states, which is why this desk has more numbers in it than its neighbours.

- 1** Naturvårdsverket — producer responsibility for packaging (<https://www.naturvardsverket.se/en/>)
Official. Source for notification before placing packaging on the market, the producer-responsibility e-service, a foreign producer using its tax or VAT identification number where it has no Swedish organisation number, registration remaining the producer's responsibility even where a PRO submits it, the two approved packaging PROs (NPA and TMR), the requirement to appoint or provide a PRO before supplying packaging, the SEK 1,250 annual enforcement fee with the under-1-tonne exemption, the SEK 30,000 environmental sanction fee for failing to appoint a PRO, sanctions for late registration from 1 January 2024, the 31 March annual reporting date, and the statement that Sweden intends national rules to require representatives for producers both within and outside the EU
- 2** Ordinance (2022:1274) on producer responsibility for packaging (<https://www.riksdagen.se/>)
The national instrument. Expressly includes sellers established outside Sweden that sell packaging or packaged goods directly to final users in Sweden
- 3** 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 — several circulated profiles cite "Article 46" for this and are wrong — and Art. 12(1) on the 2028 harmonised label
- 4** 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.