

Packaging EPR for Imported Goods and How an Indian Exporter Registers Abroad

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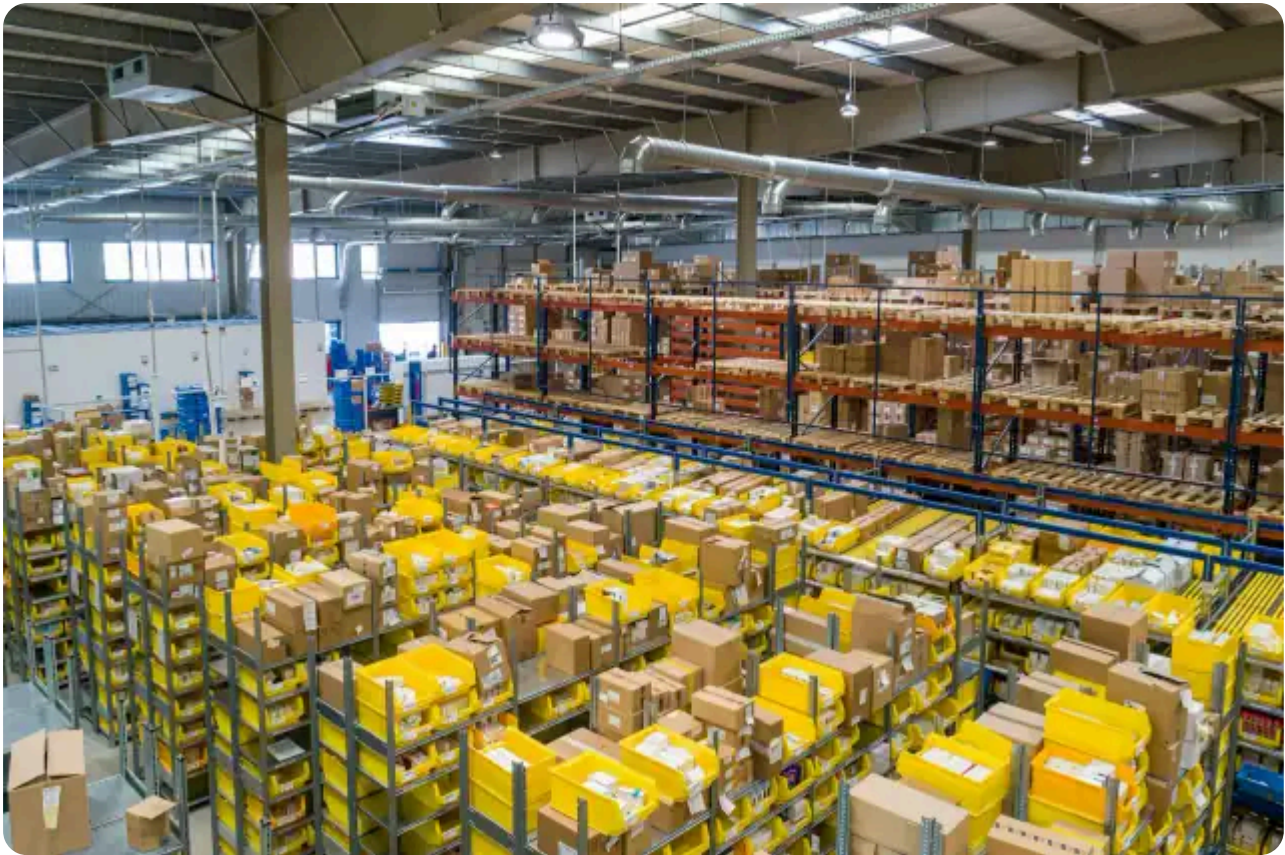
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Packaging EPR makes whoever first puts packaging on a market pay for its end of life. When a buyer imports, the buyer usually carries it. When an Indian exporter sells straight to EU end users, the exporter does, and since 12 August 2026 it must name an authorised representative in each EU country it sells into.

The Short Version

- Who carries EPR depends on who first places the packaging on the market, and that is a contract choice under your Incoterm and your sales model.
- A non-EU seller supplying EU end users directly needs an authorised representative in each member state from 12 August 2026.
- The UK only obligates businesses established in the UK, so UK importers carry it, not the Indian factory.
- Germany checks your registration number in the public LUCID register, and marketplaces delist sellers who lack one.
- The exporter's job in every model is the same - accurate packaging weights by material, per SKU.

The carton your goods arrive in has a bill attached, and most buyers don't see it until a marketplace freezes their listings. That bill is extended producer responsibility (EPR) for packaging. Every market in this guide makes somebody pay for the collection and recycling of the boxes, polybags, tape and hangtags that come in with your stock, and the only real question is who that somebody is.



This guide is part of our [certifications and compliance hub](#). It has two halves. The first is for the importer in the EU, the UK, Australia or New Zealand. The second is for the Indian exporter, especially one selling straight to foreign customers through a marketplace or its own website, who now has to register abroad.

1. What Packaging EPR Actually Charges For

EPR isn't a certificate. Nobody inspects your factory and hands you a mark. It's a registration plus a recurring report of how much packaging, by material and weight, you put on a market, and a fee paid to a scheme that funds recycling. The fee rises with weight and with materials that are hard to recycle, so a heavy mixed-material pack costs more than a light mono-material one.

Three things are almost always required –

- **Registration** with a national register or regulator, which gives you a number.
- **Joining a scheme** (a producer responsibility organisation, called a dual system in Germany and an eco-organisme in France) that collects the fees.
- **Reporting** the weights you placed on the market, usually yearly, sometimes twice a year.

The part buyers get wrong is the word "producer". In EPR law it rarely means the factory. It means the business that first makes the packaging available on that market, which for imported goods is usually the importer and sometimes the foreign seller. I find this the single most useful sentence in the whole topic, so it's worth reading twice.

2. Who Is the Producer in Each Sales Model

The same carton of cotton tees can make three different businesses liable depending on how it's sold. Here's how it falls out in practice.

How the goods reach the market	Who usually carries packaging EPR
You import, take title, then sell (FOB, CIF, FCA)	You, the importer
Indian exporter ships DDP and sells to you, a local business that uses the goods	Check the national rule. In the EU the exporter may be the producer for that market
Indian exporter sells straight to consumers (own site, Amazon, Etsy)	The exporter, through an authorised representative in the EU
You sell under your brand, a contract packer imports for you (UK)	You, the brand owner

So the Incoterm you sign quietly decides who registers. We cover the terms themselves on the [Incoterms hub](#), and the "who's the importer" question on our [importer of record](#) page.

3. The EU Rule That Changed on 12 August 2026

The EU's Packaging and Packaging Waste Regulation, Regulation (EU) 2025/40, known as the PPWR, replaced the old directive and now applies across all member states. Its Article 45 says a producer that isn't established in a member state must appoint an authorised representative for EPR in that member state. Germany's packaging register, ZSVR, flagged the 12 August 2026 changes on its home page, and the Commission put out updated PPWR FAQs on 3 August 2026 ([ZSVR](#), read 17 October 2026).

What that means in plain words – an Indian seller who ships parcels directly to customers in Germany, France and Spain now needs three representatives, one per country, and one registration in each. One representative firm can cover several countries, but the registration is national every time.

A wrinkle worth knowing about. A Commission proposal from December 2025 would pause EPR obligations for some EU-established businesses, and compliance guides agree non-EU producers are outside that pause. We couldn't read the current legal text at EUR-Lex, which served a bot check, so check the state of it with your customs broker or your national register before you rely on any pause.

4. Germany, France, the UK, Australia and New Zealand

Germany

Germany has run the LUCID register since 2019. If you distribute packaged goods in Germany then you must be registered in LUCID, and for packaging that ends up with private households you must also take part in a dual system (ZSVR). The register is public. Anyone can search a company name or a registration number, and marketplaces must check it before letting you sell. A seller missing from LUCID doesn't get a polite warning, the listing goes.



France

France works through eco-organismes (Citeo, Léko and Adelphe for household packaging), a unique identifier (IDU) issued by the environment agency ADEME, Triman and Info-tri sorting labels on household packaging,

and a yearly declaration of volumes. A foreign seller selling directly to French consumers is the producer. If a French importer takes title, that importer is (Kaufland Global Marketplace, [EPR guidelines for France](#), read 17 October 2026). The Triman logo is a design job for your packaging supplier in India, so brief it early.

The UK

The UK runs its own packaging EPR outside the PPWR. You're obligated if you carry out a packaging activity (importing goods in packaging counts), you're established in the UK, you handled more than 25 tonnes of packaging last year and your worldwide turnover was £1 million or more. Above 50 tonnes and £2 million you're a large producer with six-monthly reporting, recycling evidence and PackUK fees. If you import on behalf of someone else then that someone else carries it ([GOV.UK](#), updated 19 August 2026).

The useful bit for this guide - only UK-established businesses are obligated. "Established" includes having a UK branch, warehouse or even a UK returns address, so an Indian seller using a UK fulfilment centre should read that list carefully.

Australia

Australia runs packaging through the Australian Packaging Covenant, managed by APCO, which brand owners above a turnover threshold join. The page we read didn't state the threshold or say how overseas suppliers fit, so check the current threshold on [APCO's own page](#). In practice the Australian importer or brand owner is the member, and it'll ask you for pack specs.

New Zealand

New Zealand named plastic packaging a priority product under the Waste Minimisation Act 2008, which means a mandatory stewardship scheme is

coming. We found no official page confirming the scheme is in force on 17 October 2026, so check the current status with the Ministry for the Environment before you plan around it.

5. What an Importer Should Check

If you're the producer then your data is only as good as your supplier's. Here's what to settle and when.

1. **At quotation.** Decide who's the producer in each market, then write it into the PO next to the Incoterm. One line saves an argument later.
2. **At sampling.** Ask for a packaging bill of materials per SKU – each component, its material, its weight in grams, and whether it's printed, laminated or coated. A carton with a plastic window is two materials, not one.
3. **At pre-production.** Approve the artwork with the marks your market needs (Triman and Info-tri for France, for example), and check the factory hasn't swapped a paper bag for a plastic one to save cost.
4. **At shipment.** Weigh a few packs yourself or have the inspector weigh them. Declared weights drift.
5. **If your supplier sells direct.** Ask for its LUCID number and look it up yourself on the [public register](#). Ask for the name of its authorised representative in each EU country.

Red flags are easy to list – a supplier who says "EPR is your problem" while shipping DDP to your consumers, pack weights that are suspiciously round, or a registration number nobody can find on the register.

6. India's Own EPR and What It Means for Exporters

India runs its own packaging EPR under the Plastic Waste Management Rules, through a central portal for producers, importers and brand owners (PIBOs) run by the Central Pollution Control Board ([CPCB EPR portal](#)). Brands active in more than two states register with CPCB, others with their state board. That system is about plastic packaging placed on the Indian market.

We couldn't find an official CPCB document saying whether packaging on goods exported straight out of India counts toward a PIBO's Indian obligation. So if you're an Indian exporter that also sells at home, check the current treatment of export packaging on the CPCB portal or with your EPR filer, and keep export and domestic packaging volumes in separate records either way.

7. How an Indian Exporter Registers Abroad

If you ship to importers who take title, your job is data and labels. If you sell straight to foreign end users, the registration is yours. These steps assume the second case for the EU and the UK.

Step 1 – Map where you sell and how. List each country, and whether the buyer is an importer, a business end user or a consumer. Allow a day. This decides which countries need a registration at all.

Step 2 – Build the packaging data per SKU. Component, material, weight, quantity per unit, and units shipped per country last year. Pull it from your packing list and your packaging supplier's specs. Allow one to two weeks the first time, and it's the hardest step by far.

Step 3 – Appoint an authorised representative in each EU country you sell into directly. You sign a written mandate and give it your company

documents and data. The representative registers you, reports and pays fees on your behalf, but you stay legally responsible. Some marketplaces offer this service, and independent firms do too. Expect a few weeks per country.

Step 4 – Register in each national register. In Germany that's LUCID, and the system participation contract with a dual system follows. In France it's an eco-organisme membership and an IDU from ADEME. Registers differ in speed, and some aren't fully set up for the new representative route yet, so check each one.

Step 5 – Put your registration numbers where marketplaces ask for them. Amazon, Etsy and the rest now ask for EPR numbers per country in seller settings. Missing numbers block listings.

Step 6 – Fix your artwork. Add Triman and Info-tri for France and any other national marks. Brief your carton and label printer in India with the files. Allow two to three weeks including proofs.



Step 7 – Report and renew. Report volumes on each country's calendar (France asks for a yearly declaration, the UK every six months for large producers, Germany yearly to LUCID and the system). Keep seven years of records, which is what the UK asks for and a safe rule elsewhere.

Step 8 – Send your B2B buyers the data even when you're not the producer. A short pack spec sheet per SKU with weights by material is the most useful thing you can give an importer. Buyers remember the supplier who sent it without being asked.

If juggling several representatives, registers and calendars sounds like a full-time job then that's because it nearly is. [SourcingSync](#) can manage the supplier side of it for buyers, from collecting pack data to checking weights at inspection.

8. A Worked Example

This example is an illustration built from the rules above, not a real firm.

A Kolkata jute bag maker sells three ways. It ships FOB to a Hamburg wholesaler, sells on Amazon Germany and Amazon France through its own seller account, and ships CIF to a Melbourne retailer.

For Hamburg, the wholesaler is the producer in Germany and registers in LUCID. The maker sends a pack spec sheet (jute bag, paper hangtag, polybag, carton, with weights). For Amazon Germany and France, the maker is the producer. It appoints a representative in each country, gets a LUCID number and a French IDU, joins a dual system and an eco-organisme, prints Triman on the French packs and enters both numbers in Seller Central. For Melbourne, the retailer handles APCO and asks for the same spec sheet.

One data sheet, three uses. That's the honest shape of EPR for most Indian exporters. More on the product in our [jute bags guide](#).

FAQ

Is EPR the same as a certificate? ^

No. It's a registration and a recurring report with fees. There's nothing to frame on the wall, only a number to show.

Does the PPWR apply to goods I import into the EU for my own business? v

Can one authorised representative cover the whole EU? v

Does UK packaging EPR apply to an Indian factory? v

What packaging data should I ask my Indian supplier for? v

Next Steps

- Settle who the producer is in each market and write it into your PO.
- Get a per-SKU pack spec from your supplier at the sampling stage.
- Read our [restricted substances guide](#) for what's allowed in the packaging itself.
- See [eco-labels and green claims](#) before you print "recyclable" on anything.
- Look ahead to the [digital product passport](#), which will ask for some of the same data.