

COUNTRY EXAMPLE

17 SEPTEMBER 2020

OBLIGATIONS FROM ENFORCED LEGISLATION

1. LEGAL STATUS

National law on packaging waste	Yes (same or similar approach to EU Packaging Directive)
Definition of packaging	Packaging shall mean a product made of any type of material and intended for the containment, protection, handling, delivery, or the presentation of a product or products on offer to consumers or another end users provided it also 1. conceives a single sales unit for a consumer or another end user at the point of sale (hereinafter referred to as "sales packaging"), 2. conceives a group containing a certain number of sales units, whether this group is sold to a consumer or another end user, or whether it only serves to help to place products on shelves at the point of sale and may be removed from those products without thereby affecting any of their properties (hereinafter referred to as "grouped packaging"), or 3. facilitates the handling of a certain quantity of sales units or grouped packages and facilitates the transport thereof in order to prevent their physical damage during handling and transport (hereinafter referred to as "transport packaging"); the criteria defining the term "packaging", along with some examples, are set forth in Annex No. 1 to the Regulation.
Packaging in scope	All packaging manufactured, imported, held for sale or free distribution, offered for sale, sold, rented or distributed free of charge.
Obligated parties	Producer means anyone who, on a professional basis, packages or has packaged goods and intends to put them on the market.
Foreign legal entity selling to B2C end user obligated	Yes
Mandatory Authorized Representative for Distance Sellers	No
Sanctions and penalties for non-compliance	Existing

2. PACKAGING DESIGN REQUIREMENTS

Substance limits	Yes, according to EU Packaging Directive
Essential requirements	Yes, according to EU Packaging Directive

2. PACKAGING DESIGN REQUIREMENTS

Eco-Design criteria applicable for modulated fee (charged for take-back and recycling)	Yes
Material identification marking required	Voluntarily possible
Scheme identification marking required	Voluntarily possible
Other marking required	Yes

3. INFORMATION REQUIREMENTS

User information from producer required	Yes
User information required from producer	<input type="checkbox"/> On the packaging <input checked="" type="checkbox"/> Mandatory educational public campaigns run by producer <input type="checkbox"/> Voluntary educational public campaign run by producer <input type="checkbox"/> Educational public campaigns run by state <input type="checkbox"/> Details not prescribed in legislation <input type="checkbox"/> Not applicable <input type="checkbox"/> On website <input type="checkbox"/> In product documentation (e.g. IM, leaflets etc.) <input type="checkbox"/> In stationary shop
User information required from distributor in	<input checked="" type="checkbox"/> In stationary shop <input type="checkbox"/> On website in online-shop <input type="checkbox"/> Details not prescribed in legislation <input type="checkbox"/> Not applicable

4. HOW TO COMPLY WITH EPR OBLIGATION

Individual solution	Yes
Collective scheme	Yes
Environmental tax payment	No
State levy payment	No

5. TAKE-BACK REQUIREMENTS

Legal volume thresholds	Yes
Legal turnover thresholds	No
Recovery obligation	Yes
Recycling obligation	Yes
Prevention plan obligation required	No
Authorized scheme(s) existing	Yes
Registration of producer required	Individual registration or registration by compliance scheme
Retroactive registration required	Yes

5. TAKE-BACK REQUIREMENTS

Reporting requirements	Reporting only to Authority OR Collective Scheme
Retroactive reporting required	Yes

6. REUSE REQUIREMENTS

Legally defined reuse targets separate to recovery targets	No
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7. DEPOSIT REQUIREMENTS

Packaging with legally required deposit	Yes
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1. Introduction

General Description of the Market

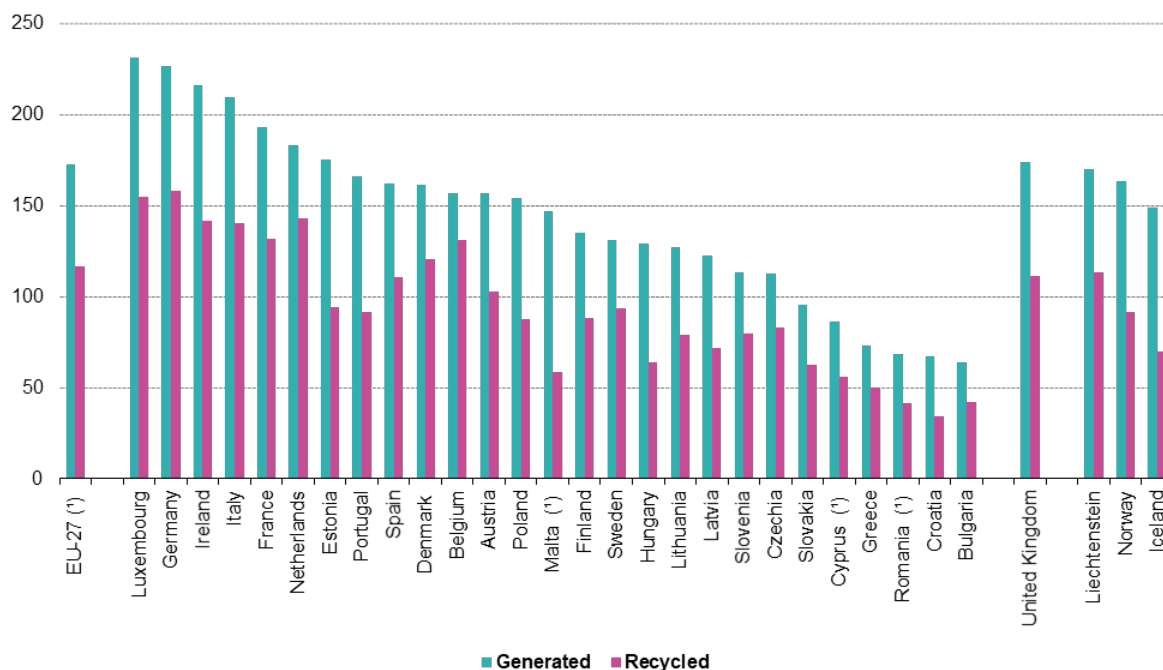
[Country] has been a member of the European Union community since 2004. The population of [Country] is around 1 million inhabitants. The amount of packaging waste generated in the country's territory is stable at the level of 1,0 million tonnes. Recovery solutions existing in the country provide enough capacity to meet the Packaging Directive recovery target of 60%. In 2001, Extended Producer Responsibility (EPR) requirements were introduced in the country legislation by an umbrella act – the Environmental Code. Specific requirements related to packaging producer registration and reporting are stipulated in a few separate legal acts. The producer has freedom of choice to fulfill his take-back obligations either by means of individual solution or by joining a collective scheme. Multiple packaging collective schemes operate on the market in [Country]; however, no clearing process has been established so far.

There is a deposit system for returnable glass containers existing in [Country].

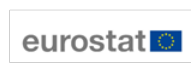
Packaging waste generation per inhabitant

Volume of all packaging waste generated and recycled per inhabitant, 2017

(kg per inhabitant)

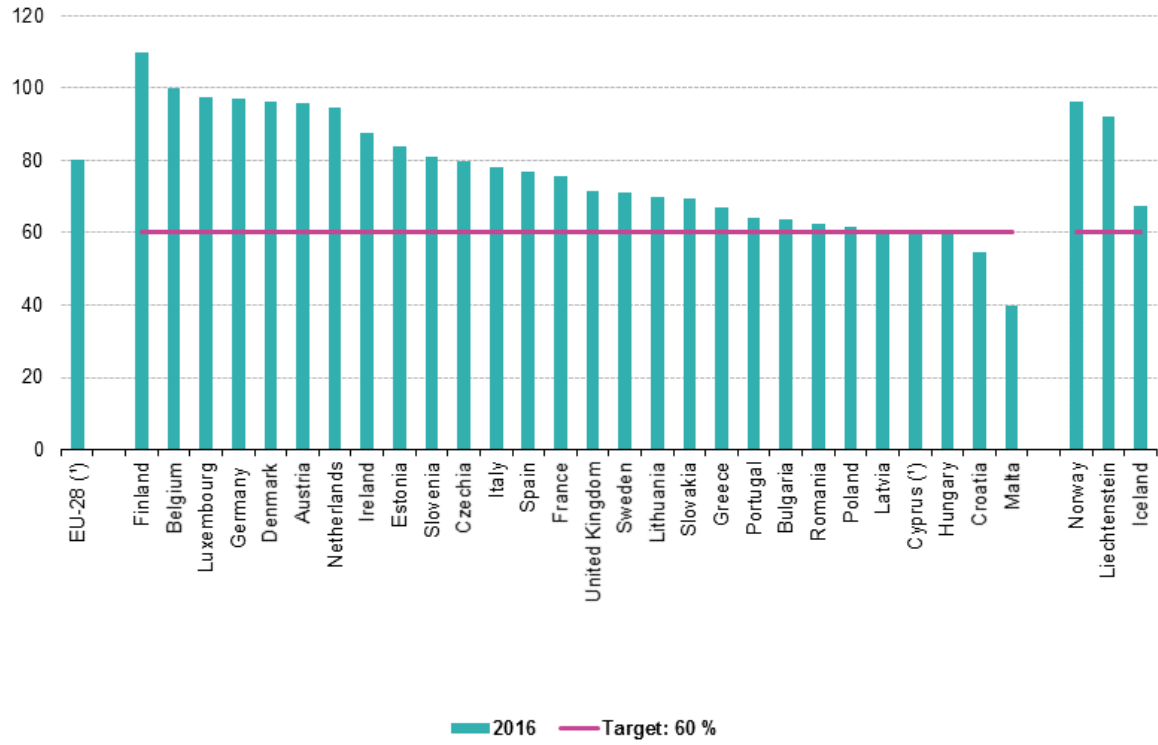


(*) Estimate: Italy, Cyprus, Malta, Romania (2016 data)
 Source: Eurostat (online data code: env_waspac)



Recovery rate

Recovery rate for all packaging waste, 2016
 (%)

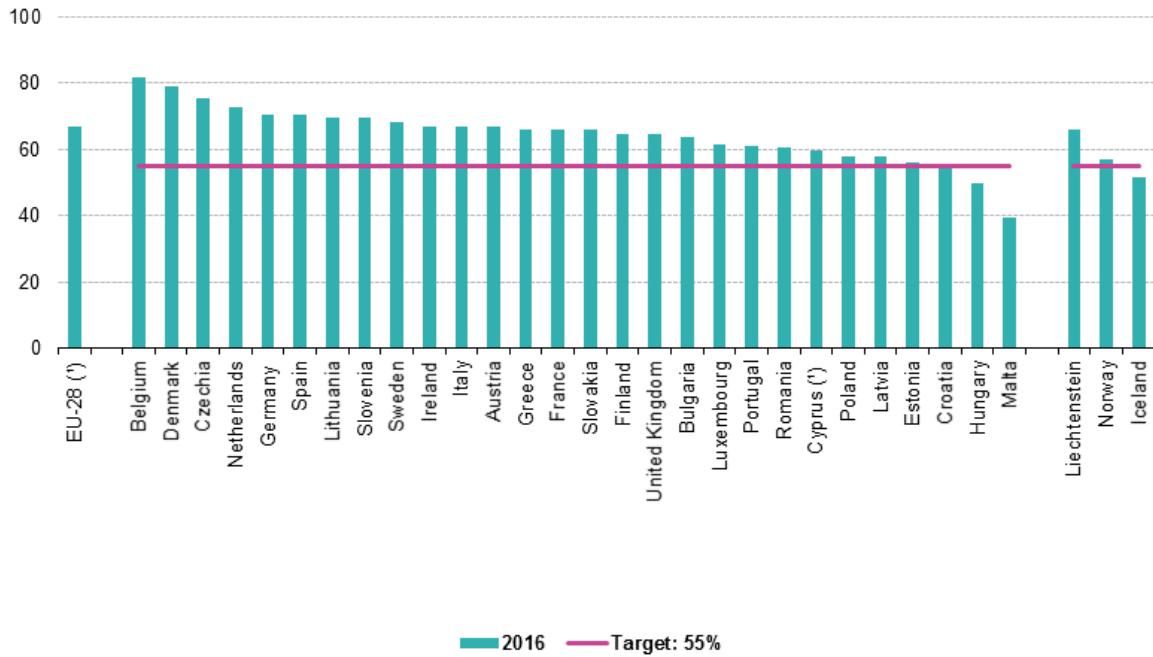


Note: ranked in descending order of recovery rate.
 (*) Estimate: Cyprus (2015 data)
 Source: Eurostat (online data code: env_waspac)



Recycling rate

Recycling rate for all packaging waste, 2016
(%)



Note: ranked in descending order of recycling rate.
(*) Estimate: Cyprus (2015 data)
Source: Eurostat (online data code: env_waspac)



2. Legal status

National law on packaging waste

The table below provides an overview of regulations affecting packaging and packaged products and waste thereof which are nationally published or in force:

Publication Date	Enforcement Date	Consolidation date	Links
Environmental Code			
2005-08-02	2005-08-02	2020-09-05	link
Packaging and Packaging Waste Regulation			
2017-03-27	2017-03-27	None	link

Up to our best knowledge, there are currently no official drafts in consultation revising existing regulations or adding new related regulations.

Definition of packaging

Packaging shall mean a product made of any type of material and intended for the containment, protection, handling, delivery, or the presentation of a product or products on offer to consumers or other end-users provided it also

1. conceives a single sales unit for a consumer or another end user at the point of sale (hereinafter referred to as “sales packaging”),
2. conceives a group containing a certain number of sales units, whether this group is sold to a consumer or another end user, or whether it only serves to help to place products on shelves at the point of sale and may be removed from those products without thereby affecting any of their properties (hereinafter referred to as “grouped packaging”), or
3. facilitates the handling of a certain quantity of sales units or grouped packages and facilitates the transport thereof in order to prevent their physical damage during handling and transport (hereinafter referred to as “transport packaging”); the criteria defining the term “packaging”, along with some examples, are set forth in Annex No. 1 to the Regulation.

Packaging in the scope of Extended Producer Responsibility: all packaging manufactured, imported, held for sale or free distribution, offered for sale, sold, rented, or distributed free of charge.

Packaging out of the scope of Extended Producer Responsibility: packaging of chemical products which can be a risk for human health or the environment.

The table below explains different definitions of packaging transposed to [Country] law from Packaging Directive 94/62/EC.

Term	National Definition	Same as EU Packaging Directive 94/62/EC
Packaging vs Non-Packaging (Annex 1 of Directive)	Same as in the EU Packaging Directive.	Yes
Sales Packaging or Primary Packaging	Packaging shall mean a product made of any type of material and intended for the containment, protection, handling, delivery, or the presentation of a product or products on offer to consumers or another end users provided it also conceives a single sales unit for a consumer or another end user at the point of sale (hereinafter referred to as “sales packaging”).	Yes

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<p>Grouped Packaging or Secondary Packaging</p>	<p>Packaging shall mean a product made of any type of material and intended for the containment, protection, handling, delivery, or the presentation of a product or products on offer to consumers or another end-users provided it also conceives a group containing a certain number of sales units, whether this group is sold to a consumer or another end user, or whether it only serves to help to place products on shelves at the point of sale and may be removed from those products without thereby affecting any of their properties (hereinafter referred to as “grouped packaging”).</p>	<p>Yes</p>
<p>Transport Packaging or Tertiary Packaging</p>	<p>Packaging shall mean a product made of any type of material and intended for the containment, protection, handling, delivery, or the presentation of a product or products on offer to consumers or another end-users provided it also facilitates the handling of a certain quantity of sales units or grouped packages and facilitates the transport thereof in order to prevent their physical damage during handling and transport (hereinafter referred to as “transport packaging”); the criteria defining the term “packaging”, along with some examples, are set forth in Annex No. 1 to the Regulation.</p>	<p>Yes</p>

In addition to the above definitions, [Country] law also defines the following terms:

Term	Definition
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Composite packaging	For the purposes of compliance with the obligations to recover packaging waste under art. 12 and to keep records under art. 15, packaging where a certain material constitutes at least 70 % of the packaging by weight shall be deemed to be packaging made from a single material.
Deposit packaging	Returnable packaging is packaging, for which there is a special way of returning the used packaging to the party who puts it into circulation.
Industrial packaging	Industrial packaging shall mean packaging designed exclusively to package products designated for non-household end-user.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 1
- Environmental Code Art. 4

Obligated parties

Obligated parties are legal entities and actors in the supply chain as listed in the table below.

Party	Definition	Take-back obligation
Economic Operator(s)	Not provided in the legislation.	NO
Manufacturer	Not provided in the legislation.	YES
Reseller	Not provided in the legislation.	NO
Importer	Importer means anyone who, on a professional basis, packages or has packaged goods and intends to put them on the market.	YES
Exporter	Not provided in the legislation.	NO
Distance Seller	Not provided in the legislation.	YES
Small Producer	Not provided in the legislation.	YES
Distributor	Not provided in the legislation.	YES
Packer/Filler/Repacker	Not provided in the legislation.	YES
Retailer	Not provided in the legislation.	YES

Placing on the market shall mean the moment when the packaging, whether separately or containing a product, is delivered or offered for delivery in the [Country] for the first time for the purposes of distribution or use or when the ownership rights related to the packaging are transferred for the first time; the cross-border transport of packaging or packaged products from another European Union Member State to the [Country] or the import of packaging or packaged products shall also be considered to be marketing, with the exception of those released into the procedure of active enhancement or temporary admission provided that, on termination of this procedure, the packaging or packaged products shall be exported from the [Country] in their entirety.

Making available on the market shall mean the delivery to another person of packaging separately or together with a product for the purposes of distribution or use, with the exception of cases of placing packaging on the market.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 1

Authorized representative

In [Country], the assignment of an Authorized Representative is not obligatory for Distance Seller based in the EU.

In [Country], the assignment of an Authorized Representative is not obligatory but voluntarily possible for every producer, including a distance seller.

Authorized Representatives fulfill the same responsibilities as producers.

Legal reference in legislation in [Country]:

- Environmental Code Art. 17
- Packaging and Packaging Waste Regulation Art. 4

Sanctions and penalties for non-compliance

The law stipulates penalties in case the obliged party does not fulfill regulatory responsibilities. The Ministry of Environmental Protection and Regional Development / State Environmental Supervision Department is legally authorized to prescribe penalties for:

Non-compliance	Sanction prescribed by law
Breach of a regulatory requirement to register	A fine on legal persons of between five hundred and seventy to one thousand euros
Failure to provide a statutory report on packaging waste, types of material used, and disposal	A fine on legal persons of between five hundred and seventy to one thousand euros.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 20

Foreign legal entity obligations

The table below explains the Go-to-Market strategies of foreign companies that sell products to the local market and which are affected by take-back obligations.

Type of sales operation	Foreign entity with local VAT	Foreign entity without local VAT
Sales to local retailers/distributors	Retailer is obliged	Yes
Sales to local B2C end-user	Yes	Yes
Sales to local B2B end-user	B2B end-user is obligated	B2B end-user is obligated
Take-over of obligation from local obliged party	No	No

Please refer to the subchapter Authorized Representative for more information about obligation and/or possibility to establish Authorized Representation for foreign companies.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 7

3. Packaging design requirements

Substance limits

Substance limits applicable to packaging are in line with EU Packaging Directive 94/62/EC.

The total content of Pb, Cd, Hg, and Cr(VI) in packaging shall not exceed 100mg/kg.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 5.3

Essential requirements affecting packaging design

Essential requirements affecting packaging design are existing. They are in line with the EU Packaging Directive 94/62/EC.

Details of requirements specific to the manufacturing and composition of packaging are as follows:

- Packaging shall be so manufactured that the packaging volume and weight be limited to the minimum adequate amount to maintain the necessary level of safety, hygiene and acceptance for the packed product and for the consumer.
- Packaging shall be designed, produced and commercialized in such a way as to permit its reuse or recovery, including recycling, and to minimize its impact on the environment when packaging waste or residues from packaging waste management operations are disposed of.
- Packaging shall be so manufactured that the presence of noxious and other hazardous substances and materials as constituents of the packaging material or of any of the packaging components is minimized with regard to their presence in emissions, ash or leachate when packaging or residues from management operations or packaging waste are incinerated or landfilled.

Details of requirements specific to the reusable nature of packaging (simultaneously satisfied) are as follows:

- the physical properties and characteristics of the packaging shall enable a number of trips or rotations in normally predictable conditions of use,

- possibility of processing the used packaging in order to meet health and safety requirements for the workforce,
- fulfil the requirements specific to recoverable packaging when the packaging is no longer reused and thus becomes waste.

Details of requirements specific to the recoverable nature of packaging are as follows:

- material recycling: packaging must be manufactured in such a way as to enable the recycling of a certain percentage by weight of the materials used in the manufacture of marketable products, in compliance with current standards in the Community. The establishment of this percentage may vary, depending on the type of material of which the packaging is composed.
- energy recovery: packaging waste processed for the purpose of energy recovery shall have a minimum inferior calorific value to allow optimization of energy recovery.
- composting: packaging waste processed for the purpose of composting shall be of such a biodegradable nature that it should not hinder the separate collection and the composting process or activity into which it is introduced.
- biodegradable packaging: biodegradable packaging waste shall be of such a nature that it is capable of undergoing physical, chemical, thermal or biological decomposition such that most of the finished compost ultimately decomposes into carbon dioxide, biomass and water.

Compliance with abovementioned essential requirements of the EU Packaging Directive 94/62/EC can be claimed when packaging meets requirements specified in EU harmonised standards provided below:

Standards Organisation	Reference	Title of the harmonised standard
CEN	EN 13427:2004	Packaging - Requirements for the use of European Standards in the field of packaging and packaging waste
CEN	EN 13428:2004	Packaging - Requirements specific to manufacturing and composition - Prevention by source reduction
CEN	EN 13429:2004	Packaging – Reuse
CEN	EN 13430:2004	Packaging - Requirements for packaging recoverable by material recycling
CEN	EN 13431:2004	Packaging - Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value

CEN	EN 13432:2000	Packaging - Requirements for packaging recoverable through composting and biodegradation - Test scheme and evaluation criteria for the final acceptance of packaging
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Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 35

Eco-design criteria for modulated fee

In order to reward the environmentally friendly design of packaging, the criteria for different environmental fees provided below are required by law. The criteria need to consider the following aspects:

1. PE or PP packaging incorporating at least 50% of recycled material from household, industrial or commercial packaging:

until 31-Dec-20: 50% reduction (Note: this rate has been applied to PE packaging already since Jan-19, as stipulated by a Jan-19 Decree)

from 1-Jan-21: 50% reduction for packaging incorporating at least 20% of recycled household packaging; 30% reduction for packaging incorporating less than 20% of recycled household packaging.

2. PS packaging incorporating at least 50% of recycled material from household packaging: 20% reduction from 1-Jan-21.

The bonuses for packaging must be financed by the contributions from packaging whose majority material is plastic.

A detailed pricing model is defined by EPR Compliance Organizations.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 15.1

Material identification marking requirements

The packaging can voluntarily carry a material identification mark. When packaging carries the mark, it can be done according to the e.g. art. 3 of EU Commission Decision of 28 January 1997 establishing the identification system for packaging materials pursuant to European Parliament and Council Directive 94/62/EC on packaging and packaging waste.


The producer has to make sure that the material identification mark:

If the person who places packaging or packaged products onto the market or into circulation labels this packaging or packaged product describing the material from which the packaging is produced, it shall be obliged to carry out such labeling in accordance with European Communities legislation.








List of packaging materials with codes and examples of material identification marks is shown below:

Material	Abbreviation	Code	Example of products	Example of mark*
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<i>Plastics</i>				
Polyethylene terephthalate	PET	1	Polyester fibres, soft drink bottles	
High-density polyethylene	HDPE	2	Plastic bottles, plastic bags, trash cans, oil cans, imitation wood	
Polyvinyl chloride	PVC	3	Window frames, bottles for chemicals, flooring, plumbing pipes	
Low-density polyethylene	LDPE	4	Plastic bags, buckets, soap dispenser bottles, milk bottles, plastic tubes	
Polypropylene	PP	5	Bumpers, car interior trim, industrial fibres, carry-out beverage cups	
Polystyrene	PS	6	Toys, flower pots, video cassettes, ashtrays, trunks, beverage/food coolers, beer cups, wine and champagne cups, carry-out food containers, Styrofoam	
All other plastics	O (OTHER)	7	Plastics such as Polycarbonate (PC), polyamide (PA), styrene acrylonitrile (SAN), acrylic plastics /polyacrylonitrile (PAN), bioplastics	

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<i>Paper and fibreboard</i>				
Corrugated fibreboard	PAP	20	Cardboard boxes	
Non-corrugated fibreboard (paperboard)	PAP	21	Cereal and snack boxes	
Paper	PAP	22	Newspaper, books, magazines, wrapping paper, wallpaper, paper bags, paper straws	
<i>Metals</i>				
Steel	FE	40	Food cans	
Aluminium	AL	41	Soft drink cans, deodorant cans, disposable food containers, aluminium foil, heat sinks	
<i>Wood</i>				
Wood	FOR	50	Furniture, chopping boards, brooms, pencils, cocktail sticks, wooden spoons	
Cork	FOR	51	Bottle stoppers, place mats, construction material	
<i>Textiles</i>				


Cotton	TEX	60	Towels, t-shirts, cotton buds/swabs, cotton pads	
Jute	TEX	61	Clothing	
<i>Glass</i>				
Clear glass	GL	70	jars	
Green glass	GL	71	wine glass	
Brown glass	GL	72		

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 20

Scheme identification marking requirements

According to legislation in [Country], packaging can carry a scheme identification mark.

The mark indicating that the producer meets take-back requirements is the Green Dot logo . Rights to affix this mark are granted by [Name of holder] based on the contract with producer.

The contractual scheme identification marking usage fees are as follows:

Type of fee	Unit
The fee is payable per type of material (minimum contribution of 140 EUR/p.a. for each company which is a participant when complying with a competitor)	Not applicable

Obligations related to scheme identification marking for different producers are shown in the table below:

Situation	Requirement
Producer POM below country threshold (if existing)	Not applicable

Separate agreement in case of complying with competitor	Yes
Solution for distance seller	Not applicable

4. Information requirements

Producer information requirements

According to the national legislation, the following information shall be provided by the producer to the end-user:

Scope of information to be provided: the possibilities of preventing packaging waste;

the return, collection and recovery systems at their disposal and their contribution to the reuse, recovery, and recycling of packaging and packaging waste;

the adverse environmental impact of excessive consumption of plastic bags;

the appropriate elements of the packaging and packaging waste management plans that are part of the national waste management plan are the subject of a specific plan pursuant to the law of 21 March 2012.

The information shall be provided in the following manner: awareness campaigns in collaboration with the Environmental Administration.

The table below shows the legally prescribed way of information provision.

Placement of user information	Requirement existing
On the packaging	NO
In product documentation	NO
Educational campaign	YES
Stationery shop	NO
Online shop	NO

Legal reference in legislation in [Country]:

- Environmental Code Art. 13

Retailer user information requirements

According to legislation in [Country], retailers of packaging or products in packaging shall inform final consumers about the possibility of the take-back of waste packaging at their points of sale.

It is legally required to display the information in their stationery shop.

Legal reference in legislation in [Country]:

- Packaging and Packaging Waste Regulation Art. 55

5. Take-back requirements

How to comply

The table below shows legally allowed ways of the fulfilment of take-back obligation by producers:

Type of solution	Solution allowed by local legislation	Compliance details
Tax payment	No	Not applicable
State mandatory collection and treatment fee payment	No	Not applicable
Individual compliance	Yes	The producer shall arrange reception points for discarded products, so as to facilitate the free-of-charge and easy delivery of the products. When determining the number of reception points required per region, account must be taken of the type, quality and predicted quantity of discarded products to be delivered, and of the environmental impacts and costs caused by reception and transport.
Collective compliance	Yes	Not applicable

Legal reference in [Country] legislation:

- Environmental Code Art. 15

Legal volume and turn-over threshold

According to legislation in [Country], producer, who meets following thresholds, is released from take-back obligation:

- 300 kg of packaging POM per calendar year.

Legal reference in legislation in [Country]:

- Packaging and Packaging Waste Regulation Art. 20

Recovery and recycling targets

According to legislation in [Country] Example, the recovery and recycling packaging targets listed below are to be met by Party putting on the market:

Packaging type	Recovery target in %	Recycling target in %
Plastics	recovery minimum target - 65 % of the total weight of packaging waste	22.5 % (counting exclusively materials that are recycled back into plastics)
Paper/Cardboard		60 %
Wood		15 %
Metal		50%
Glass		60 %

In case the abovementioned targets are not met, no additional product fee applies to the producer.

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 12, 4

Prevention plan

According to legislation in [Country], a producer does not have to prepare a waste packaging prevention plan.

Authorized scheme(s) operation on the market

The following collective schemes operate on the market in [Country]. Details about each collective scheme are available in the table below:

Name of collective scheme	Website	Scheme registration number
Name 1	collectivescheme1.com	12345678910
Name 2	collectivescheme2.com	12345678911
Name 3	collectivescheme3.com	12345678912

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 12

Registration at national register

According to legislation in [Country], the producer who complies individually shall register on the commencement of business operations in local authorities register (local authorities shall publish notices in one or more newspapers circulating in their respective functional areas at least once in each calendar year, publicizing details of all major producers in respect of whom such local authorities have issued Certificates of Registration or Certificates of Renewal of Registration under regulation 13, and indicating the obligation of such major producers to accept from any person free of charge packaging waste arising from products, packaging or packaging material of a type or brand sold or otherwise supplied by such major producers) using the registration form available under registrationform. com.

The registration of producers can be also performed by a collective scheme.

The producer has no obligation to show the registration number on any company documents.

The table below explains the registration process to the national register in more detail.

Registration process characteristic	Required?	Details
Registration		<p>Payment: An application for registration or for renewal of registration under regulation 13 shall be accompanied by a fee equivalent to €15 per tonne of packaging material and packaging placed on the market.</p> <p>Completed after: (a) six weeks of the date of receipt of an application for registration or renewal of registration,</p> <p>(b) two weeks after the date of receipt of further information or particulars requested by a local authority in connection with such an application. Procedure in case of a mistake in submitted registration is described in art. 14 (3-4).</p> <p>Other instructions: all the premises of the producer need to be registered separately.</p>
Confirmation of registration	Yes	Registration number: yes
Retroactive registration	Yes	From 2009
Re-registration	Yes	Annually by 31st January
Necessity of new registration	new registration necessary when the company name changes	Not applicable
De-registration	No	Not applicable

Producer shall provide the following company information for a successful registration:

Type of information	Required?
Corporate name	Yes
Trading name if applicable	No
Postal address	Yes
Billing address if different postal address	Yes

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Website	No
Proof of legitimate bank account	No
European tax number (VAT number)	No
Other national tax number	No
Contact for general queries	Yes
Name of the legal representative of the company	No
Information on packaging types placed on the market	Yes
Brand name of the Product	No
Product description/manual	No
Information on selling technique	No

Other specific information	business identity code; a description of the packaging placed on the market by the producer, and an assessment of its volume in tonnes per year, itemized by packaging material; a description of the separate collection and reception point network, transport, pre-treatment, reuse, recycling, other types of recovery and disposal of used packaging organized by the producer; where necessary, a justified proposal to limit the reception of plastic packaging waste to specific types of plastic, referred to in section 11; an assessment of the volume in tonnes of used packaging covered by the reuse and waste management system of the producer each year; a description of the provision of information on packaging and used packaging; information on the agreements concerning the organization of reuse and waste management and the contractual parties' environmental permits and any environmental management systems; a declaration stating that the information provided is true.
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Legal reference in legislation in [Country]:

- Environmental Code Art. 46
- Packaging and Packaging Waste Regulation Art. 62, 62, 44, 71, 73,74

Reporting

Every producer shall submit to the Ministry of Environmental Protection and Regional Development / State Environmental Supervision Department annually by the end of September the report containing Real POM volumes of packaging. All producers meeting the producer definition and volume threshold have to report..

An example of the reporting form is shown below:

linktoreportingtemplate.com.

Producer shall include the following information in the reporting form:

- 1) the volume in tonnes of packaging placed on the [Country] market;
- 2) the volume in tonnes of used packaging collected separately in [Country];

3) the volume in tonnes of used packaging that is reused, recycled or recovered in other ways, itemized by the treatment facility, together with the name and location of the treatment facility;

4) the achieved reuse and recycling rates and the rate of another recovery, and the basis for the assessment and calculation of the data provided;

5) where necessary, a description of the limited reception of plastic packaging waste to cover specific types of plastic, referred to in section 11;

6) the provision of information on packaging and used packaging. The information above shall be itemized by packaging material and treatment methods.

The table below shows other characteristics of reporting process in [Country]:

Specifics of reporting process	Applicability	Details
Report submission	Online submission: No Email/post submission: When submitting tracking information, the producer is primarily asked to use an electronic form. If this is not possible, the producer needs to fill out and print the pdf version of the report and send it to the Registry of the ELY Center.	
Reporting instruction	No	Not applicable
Retroactive reporting	Yes	It is possible to submit a report back to 2014 but the fine of 500-10000 EUR could be imposed.
Deduction of exports	Yes	
Reporting corrections	Yes	It is possible to correct within the deadline of the end of September either by correcting the report and resubmitting it or contacting the authority.
Payment process of tax or mandatory state environmental fee	Environmental tax: No State fee: No	Not applicable
Other reporting obligations	Payment for a checkup of the report - 130-1400 EUR depending on the turnover of the company.	

Producer, who complies collectively, shall submit to its contracted collective scheme(s) a report containing volumes of packaging put on the market according to contractual agreements.

Legal references in legislation in [Country] Example:

- Packaging and Packaging Waste Regulation Art. 20, 78, 79

- Environmental Code Art. 15

6. Reuse requirements

Legally defined reuse targets

According to legislation in [Country], producer does not have to meet any reuse packaging targets.

7. Deposit requirements

Legally defined deposit fee

According to legislation in [Country], producer has to apply a deposit on glass containers.

Details about deposit amounts are presented in the table below:

Packaging type	Deposit amount in (currency)
Wine bottle	3,- RUB
Bottle for mineral water	1,- RUB
Bottle for fruit syrup	3,- RUB
Beer bottle with crown cap	3,- RUB
Bottle for lemonade and soda water	3,- RUB
Bottle for mineral water	3,- RUB

The producer has to label deposit packaging with a deposit mark (linktomark.com).

Legal reference in [Country] legislation:

- Packaging and Packaging Waste Regulation Art. 20

LANDBELL GROUP SERVICES OFFERS

The Landbell Group is a leading supplier of services and consulting for global environmental and chemical compliance. It offers take-back/collection schemes for various waste flows, comprehensive services and consulting as well as respective software solutions from a single source. Established as a packaging scheme in Germany in 1995, Landbell Group operates 35 take-back/collection schemes worldwide and, up to now, has managed the collection of more than 3 million tons of waste electrical and electronic equipment, more than 7 million tons of packaging and more than 50,000 tons of used batteries towards environmental recycling.

For more information on Landbell Group and our services, please visit www.landbell-group.com or contact expertise@landbellgroup.com.

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