

PACKR8 RESOURCE GUIDE

EPR for Dutch producers, Afvalfonds in 2026.

How Afvalfonds works, what changes under PPWR, eco-modulation criteria, and how the figures interact with the rest of your packaging data.

WRITTEN BY THE PACKR8 TEAM

NIEUWKOOP, NL

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01 / Afvalfonds in one paragraph.

Afvalfonds Verpakkingen is the Dutch Producer Responsibility Organisation (PRO) for packaging. It collects fees from producers placing packaged goods on the Dutch market and uses those fees to finance collection, sorting, and recycling. Filing is mandatory if you place more than 50 tonnes of packaging on the Dutch market in a year. Below that threshold there is a simplified declaration. Above it, the full filing applies.

Until PPWR, Afvalfonds set its own data definitions and its own eco-modulation criteria. From 2026 the data definitions are harmonised with PPWR, which means the figures you file with Afvalfonds match what you use elsewhere. The fee structure remains national; the inputs do not.

02 / Who must file.

Any producer or importer placing packaging or packaged goods on the Dutch market. The 50 tonne threshold is total packaging across all SKUs in a calendar year. Online marketplaces with non-EU sellers are co-responsible, mirroring PPWR.

If your group sells through multiple Dutch entities, the filing entity is the legal entity that places the goods on the market. Group-level consolidation is not allowed unless one entity acts on behalf of others under a documented arrangement.

03 / What you file, in fields.

The annual Afvalfonds declaration, in 2026, asks for tonnage by material and packaging type, with breakdowns that map to PPWR Article 6 and Article 7 categories.

- Tonnage of plastic packaging by polymer (PET, HDPE, PP, PS, PVC, other), split by primary, secondary, tertiary.
- Tonnage of paper and cardboard packaging.
- Tonnage of glass packaging.
- Tonnage of metal packaging (aluminium and ferrous separately).
- Tonnage of wood packaging.
- Tonnage of composite packaging where no single material exceeds 95 percent by weight.
- Recycled content percentage per plastic packaging type (this is new under harmonised PPWR rules).
- Recyclability grade distribution (A / B / C share of plastic packaging, also new).

04 / Eco-modulation under PPWR.

Eco-modulation is the bit where the fee per tonne goes up or down based on environmental performance. Under PPWR the criteria are harmonised: recyclability grade, recycled content

percentage, presence of restricted substances. Each lever moves the fee.

Grade A packaging gets a discount. Grade B is neutral. Grade C is heavily penalised, on top of which it becomes illegal in 2030. Producers ahead of the curve on Annex II compliance pay less per tonne than producers who delay.

Recycled content above the Article 7 minimum gets a discount; below the minimum (where transitional arrangements still allow it) is penalised. Restricted-substance presence above threshold disqualifies the packaging from the discount tier entirely.

05 / How Afvalfonds connects to PPWR.

Afvalfonds is a Dutch filing portal. The data feeding it is the same data feeding the PPWR Declaration of Conformity for each packaging unit. If those two figures disagree, you have a control problem regardless of which one is wrong.

Producers running PPWR-ready packaging records find Afvalfonds filing collapses to a reporting query. Producers maintaining separate Afvalfonds spreadsheets and PPWR DoC packs find themselves reconciling two truths every year. The first state is the goal.

Common audit catch. When Afvalfonds-reported tonnage and the corresponding sales volume in the ERP do not match, the regulator will ask why. The mismatch is usually packaging changes that hit production but not the Afvalfonds master, or unit conversions that drifted. Closing the loop means treating the Afvalfonds figure as a derived output, not a manually maintained one.

06 / Practical filing rhythm.

Afvalfonds operates on a calendar-year filing cycle. The annual declaration is due by 31 March of the following year. Producers above the threshold also pay quarterly advances based on the previous year, with reconciliation at year-end.

Practically this means your packaging master needs to be in shape by January at the latest, with a clear materials breakdown per SKU and the volumes shipped through Dutch entities tied back to ERP. Producers running this on spreadsheets typically lose two weeks in March every year reconstructing the data.

07 / Frequently asked questions.

What is the threshold for Afvalfonds filing?

50 tonnes of packaging placed on the Dutch market in a calendar year. Below the threshold a simplified declaration applies; above it, the full filing.

Has Afvalfonds changed under PPWR?

The data definitions are harmonised with PPWR from 2026, which means the figures you file with Afvalfonds align with PPWR Article 6 and 7 categories. The fee structure and filing portal remain Dutch.

How does eco-modulation work?

Recyclability grade, recycled content percentage, and restricted-substance presence each adjust the fee per tonne. Grade A and high recycled content get discounts; grade C and below-target recycled content are penalised.

When is the filing due?

31 March of the following calendar year. Quarterly advances apply for producers above the 50-tonne threshold.

08 / About PackR8.

PackR8 is the packaging compliance platform for European producers preparing for PPWR and EPR. One source of truth for packaging data, with PPWR Declarations of Conformity, EPR filings, and audit evidence generated automatically from your records.

We started PackR8 because the same data problem was breaking the same teams every year. Smart sustainability leads with real strategies, stalled by packaging data that lived in eleven tabs of a spreadsheet maintained by someone in another country.

PackR8 fixes that. One packaging record per SKU. Full version history. Evidence pinned to every claim. Role-aware views for sustainability, packaging, and compliance teams. From that foundation, Declarations of Conformity, EPR filings, and audit responses become outputs rather than annual fire drills.

Talk to us.

The person you book a demo with is one of the team that built the platform. No SDR. No discovery calls. No funnel. Just a thirty-minute conversation about your packaging programme, and an emailed quote afterwards if it makes sense to keep going.

Website	packr8.com
Book a demo	calendly.com/packr8
LinkedIn	linkedin.com/packr8
Registered office	Smidsvuur 2, Nieuwkoop, Netherlands
Legal entity	PackR8 B.V., KvK 42045909