



**BETRIBER
&EMWELT**
ENTREPRISES
&ENVIRONNEMENT

Webinar “Extended Producer Responsibility (EPR) – Non-household and industrial packaging” (EN)

Online conference

29.01.2026 | 10:00-11:00



LUXEMBOURG
INSTITUTE OF SCIENCE
AND TECHNOLOGY



Administration
de l'environnement
Grand-Duché de Luxembourg

VALORLUX BE
THE
CHANGE



LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
et de la Biodiversité

OPENING WELCOME BETRIEB&UMWELT

Caroline Fedrigo

Senior Environmental Engineer, Luxembourg Institute of Science and Technology

AGENDA

Timing	Title	Speaker
10:00	Opening welcome & presentation of Betriber&Emwelt	Caroline Fedrigo, Senior Engineer, Luxembourg Institute of Science and Technology (LIST)
10:05	Legal framework and obligations of packaging producers	Tim Mirgain, Research Officer, Environment Agency (AEV)
10:20	The responsibilities and services of an accredited organization	Marc Bastian, Operations specialist, Valorlux ASBL
10:40	Q&A	
10:55	Conclusion	Caroline Fedrigo



**BETRIBER
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Platform on regulatory and
environmental information for
Luxembourgish companies

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LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
et de la Biodiversité

- * **Initiative** of Luxembourg Institute of Science and Technology (**LIST**) in partnership with the Ministry of the Environment, Climate, and Biodiversity (**MECB**) and the Environment Agency (**AEV**)
- * **Platform** on regulatory and environmental information for **Luxembourgish companies**
- * **Objective:** to raise awareness and inform proactively companies on regulatory or environmental topics
- * **Aim:**
 - Increase their regulatory compliance
 - Turning different environmental policies and requirements into an opportunity for innovation
- * **Free of charge activities** in collaboration with partners

PARTNERS



Administrations



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de l'environnement
Grand-Duché de Luxembourg



Administration
de la gestion de l'eau
Grand-Duché de Luxembourg



Administration
de la nature et des forêts
Grand-Duché de Luxembourg



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DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère du Logement et de
l'Aménagement du territoire
Cellule de facilitation urbanisme
et environnement

Professional federations and chambers



CHAMBRE
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Institutions



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CENTRE DE RESSOURCES DES TECHNOLOGIES
ET DE L'INNOVATION POUR LE BÂTIMENT



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HOUSE OF
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powered by Chamber of Commerce
& Chambre des Métiers

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ENTREPRENEURSHIP
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[COMMODO](#)

[MEILLEURES TECHNIQUES
DISPONIBLES](#)

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DES RESSOURCES](#)

[SUBSTANCES
CHIMIQUES](#)

[RESPONSABILITÉ ÉLARGIE DES
PRODUCTEURS \(REP\)](#)



Betriber&Emwelt est une plateforme d'informations réglementaires et environnementales pour les entreprises luxembourgeoises





* Summary information



* Tools and guides



* Events



* News

* Newsletter (4/an)

Suscribe to our newsletter !



ACTIVITIES



* Social media

Linked in

You Tube



Chemicals & Environment Luxembourg

Page de communication du Helpdesk luxembourgeois REACH, CLP et POP, et de la plateforme Betriber&Emwelt.



COMMODO

MEILLEURES
TECHNIQUES
DISPONIBLES

MANAGEMENT
ENVIRONNEMENTAL

LABEL SOLAR
IMPULSE
FOUNDATION

(DÉ)CONSTRUCTION ET
CIRCULARITÉ DES RESSOURCES

SUBSTANCES
CHIMIQUES

RESPONSABILITÉ ÉLARGIE DES
PRODUCTEURS (REP)



Equipements électriques et électroniques

[En savoir plus](#)



Emballages

[En savoir plus](#)



Batteries

[En savoir plus](#)



Produits du tabac avec filtre

[En savoir plus](#)

EPR
websection



EPR websection Details of web subsection



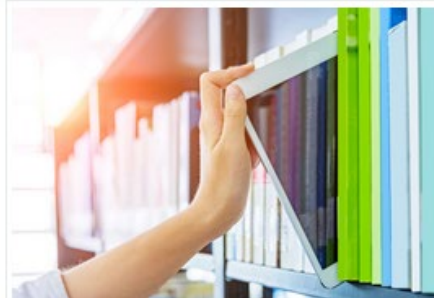
FAQ

En savoir plus



Réglementation

En savoir plus



Documentation

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Outils

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Liens utiles

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Contacts

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EVENTS (PRESENTATIONS, REPLAY) ON LINE

betriber-emwelt.lu

1

Ressources

2

Evènements

3

Archives

4

Année

The screenshot displays the website betriber-emwelt.lu. The top navigation bar includes links for 'A PROPOS' and 'RESSOURCES'. Below this, a horizontal menu lists categories: 'COMMODO', 'MEILLEURES TECHNIQUES DISPONIBLES', 'MANAGEMENT ENVIRONNEMENTAL', 'LABEL SOLAR IMPULSE FOUNDATION', and '(DÉ)CONSTRUCTION ET CIRC RESSOURCES'. A dropdown menu for 'RESSOURCES' is open, showing options: 'ACTUALITÉS', 'ÉVÉNEMENTS', 'OUTILS', and 'NEWSLETTER'. The main content area features two event listings. The first event, 'Webinaire « Déchets d’emballages non-ménagers/industriels : responsabilité élargie des producteurs (REP) »', is dated 28.01.2025. The second event, 'Restriction des substances dangereuses dans les équipements électriques et électroniques (Directive RoHS)', is dated 08.07.2025. Both listings include a thumbnail image, a title, a description, and a 'Date' field. A green arrow points from the second event listing to the 'Archives' section in the right sidebar. The sidebar contains a 'Filtres' section with dropdowns for 'Thématique' (set to 'Toutes') and 'Format' (set to 'Tous'), a 'Filtrer' button, and an 'Archives' section listing events by year: 2025 (12 événements), 2024 (2 événements), 2023 (2 événements), and 2022 (40 documents).

NEXT EVENTS



Webinaire « La responsabilité élargie des producteurs (REP) – Équipements électriques et électroniques (EEE) » (FR)

Conférence en ligne

19.03.2026 | 10:00-11:00



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GRAND-DUCHÉ DE LUXEMBOURG
MINISTÈRE DE L'ÉCONOMIE, DU
PÉRIERRE ET DU DÉVELOPPEMENT
DURABLE



Webinar “Extended Producer Responsibility
- Electrical and electronic equipment (EEE)”
(EN)

Online conference

19.03.2026 | 11:00-12:00



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GRAND-DUCHÉ DE LUXEMBOURG
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CONTACT



betriber-emwelt.lu – rubrique « contact »



betriber-emwelt@list.lu



+352 275 888 - 1



Luxembourg Institute of Science and Technology
41, rue du Brill | L – 4422 Belvaux



LEGAL FRAMEWORK AND OBLIGATIONS OF PACKAGING PRODUCERS

Tim Mirgain

Research Officer, Environment Agency



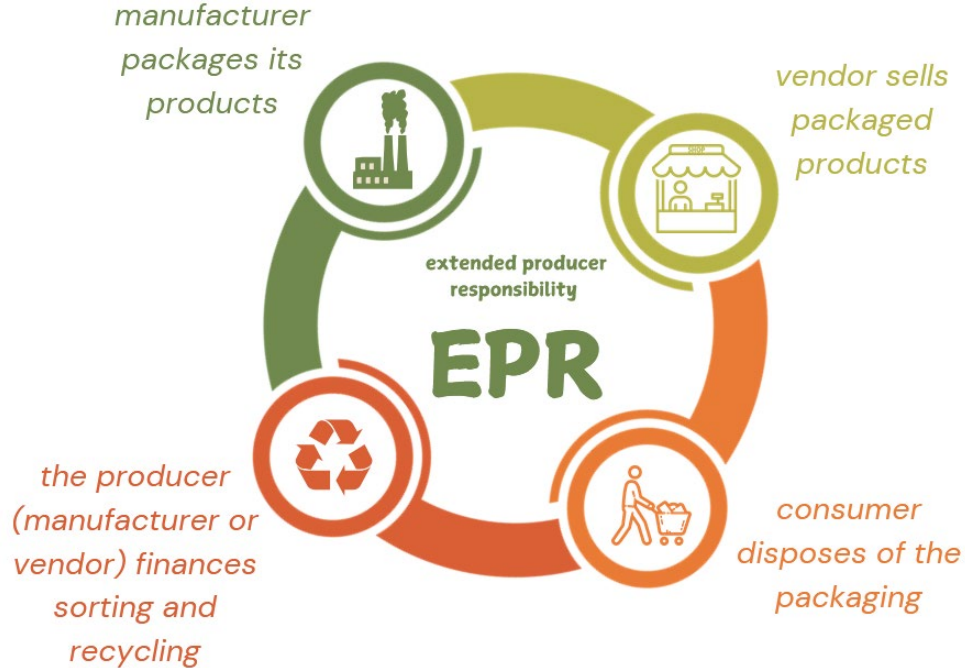
Administration
de l'environnement
Grand-Duché de Luxembourg

Overview

- Legal framework, responsibilities and obligations of producers
 - Regulatory context
 - Explanation of the concepts of non-household packaging and the definition of producer
 - Roles and responsibilities within the EPR system
 - What obligations apply to a company subject to this legislation?



Regulatory framework at EU and national level



- «The aim of an ERP system is to ensure that packaging placed on the market is responsibly managed throughout its life cycle. This is achieved by shifting the responsibility for managing waste generated by product consumption to the companies that place those products on the market.»
- Those responsibilities include:
 - improved product design,
 - prevention,
 - reuse preparation for re-use,
 - recycling,
 - and driving changes in societal behavior.



Definition of non-household packaging

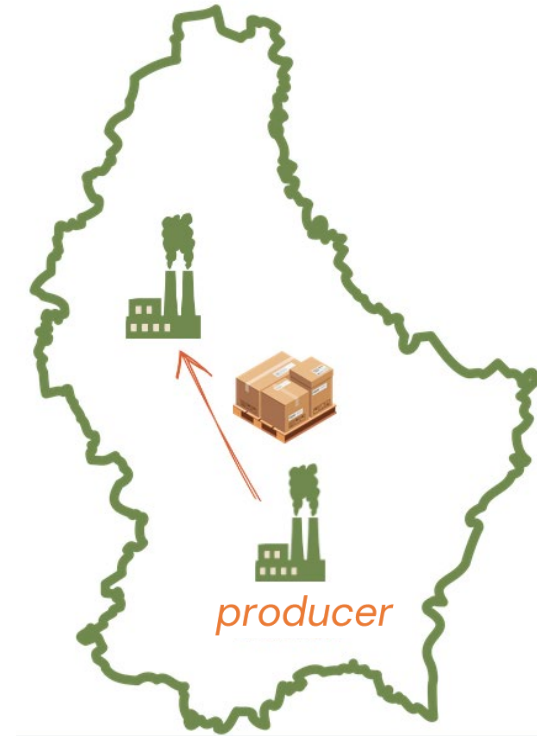
Non-household packaging waste refers to waste that does not come from households or from establishments whose waste is collected and treated in the same way as household waste:

- Tertiary packaging (stretch film, single-use pallets, corner protectors)
- Secondary/grouped packaging (cardboard boxes, cases, jerrycans)
- Primary packaging of products designed for the exclusive use of professionals (generally packaging for products > 10 kg / 10 L)
- Reusable packaging



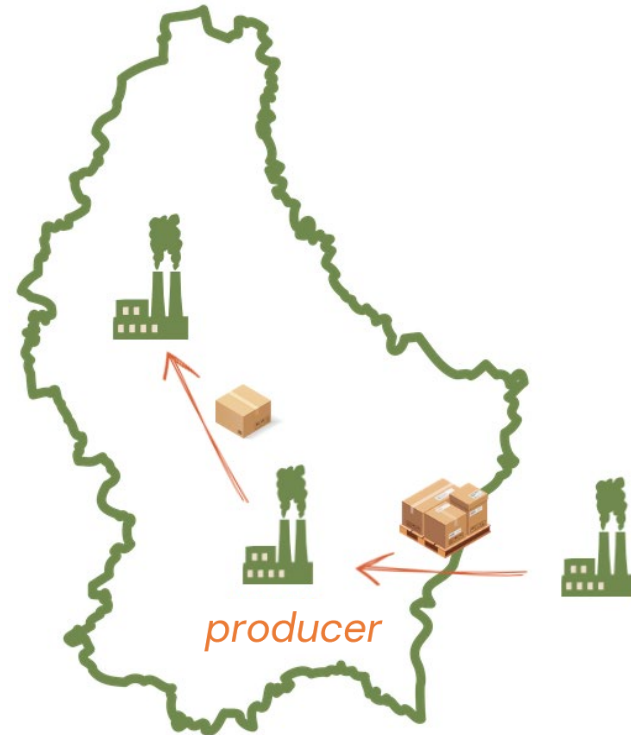
Definition of producer

- a) **établie au Grand-Duché** de Luxembourg qui, à titre professionnel, **remplit ou vend directement** au Grand-Duché de Luxembourg, quelle que soit la technique de vente utilisée, y compris par le biais de contrats à distance tels que définis à l'article L. 222-1 du Code de la consommation, et **met sur le marché luxembourgeois des produits emballés**
- *Translation:* **established in the Grand Duchy** of Luxembourg which, in a professional capacity, **fills or sells directly** in the Grand Duchy of Luxembourg, whatever the sales technique used, including through distance contracts as defined in Article L. 222-1 of the Consumer Code, and **places packaged products on the Luxembourg market.**



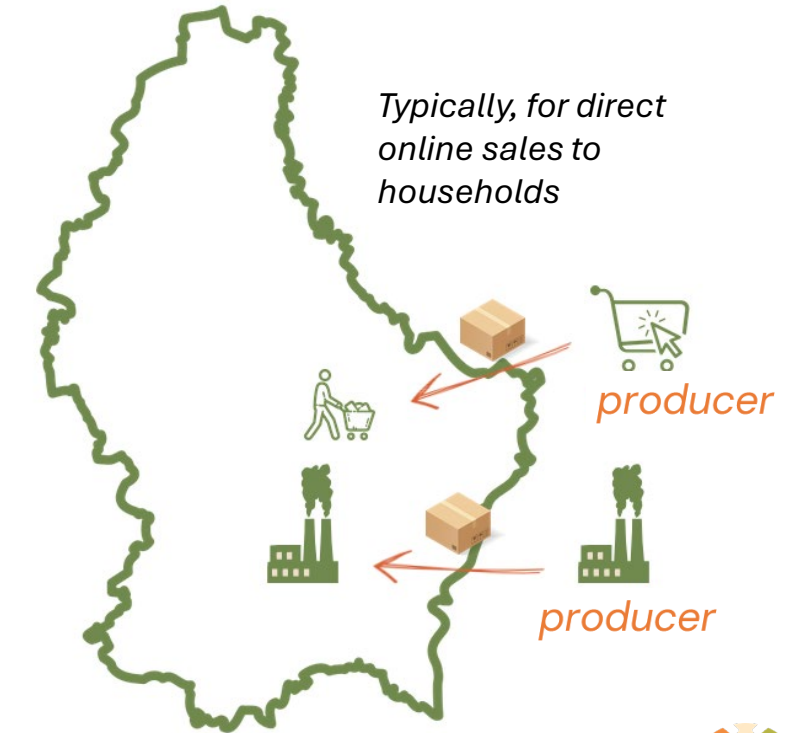
Definition of producer

- b) qui est le **premier acteur** à réceptionner, à titre professionnel, des **produits emballés importés** au Grand-Duché de Luxembourg par toute personne physique ou morale établie ou non au Grand-Duché de Luxembourg, quelle que soit la technique de vente utilisée, y compris par le biais de contrats à distance tels que définis à l'article L. 222-1 du Code de la consommation, **et met sur le marché luxembourgeois des produits emballés** ; ou
- b) which is **the first actor** to receive, in a professional capacity, **packaged products** imported into the Grand Duchy of Luxembourg by any natural or legal person established or not in the Grand Duchy of Luxembourg, whatever the sales technique used, including through distance contracts as defined in Article L. 222-1 of the Consumer Code, and **places packaged products on the Luxembourg market**; or”



Definition of producer

- c) **établie en dehors du Grand-Duché** de Luxembourg qui, à titre professionnel, **vend** des produits emballés au Grand-Duché de Luxembourg **directement à des ménages ou à des utilisateurs** autres que des ménages, quelle que soit la technique de vente utilisée, y compris par le biais de contrats à distance tels que définis à l'article L. 222-1 du Code de la consommation ; c)
- **established outside the Grand Duchy** of Luxembourg which, in a professional capacity, **sells** packaged products in the Grand Duchy of Luxembourg **directly to households or to users** other than households, whatever the sales technique used, including through distance contracts as defined in Article L. 222-1 of the Consumer Code;



Obligations

- Loi modifiée du 21 mars 2017 relative aux emballages et aux déchets d'emballages
 - Art. 6 (1) *“Producers are required to meet the minimum recycling rate targets.”*
 - Art. 8 *“ For non-household packaging, the producer must appoint a producer responsibility organisation (organisme agréé) to carry out all or part of these obligations on its behalf”*
- Loi modifiée du 21 mars 2012 relative à la gestion des déchets
 - Art.19 (7) The producer responsibility organisation has also:
 - 1) to carry out prevention and reuse measures;
 - 3) to ensure transparency of waste flows, in terms of quantities and destinations, treatment methods, and collection, recycling, and recovery rates;
 - 5) to register its members with the competent authority and to keep the list up to date.



Tim Mirgain

Unité stratégies et concepts

Administration de l'environnement

1, avenue du Rock'n'Roll . L-4361 Esch-sur-Alzette

offall@aev.etat.lu

www.emwelt.lu | www.gouvernement.lu



THE RESPONSIBILITIES AND SERVICES OF AN ACCREDITED ORGANIZATION

Marc Bastian

Operations specialist, Valorlux ASBL

Why Valorlux? *Shared resources, Shared compliance*

By pooling member resources, Valorlux enables your company to fulfil its EPR obligations for packaging at a competitive cost



Calculation of **national recycling rates** by combining **put-on-the-market** data with **collected packaging** quantities in Luxembourg



Traceability of packaging streams to their final destination - **Auditing of traders and final recyclers**, which may well take place beyond the borders of the European Union



Implementation of **PPWR requirements** to ensure that our members remain **compliant**



Prevention measures to **reduce packaging** quantities and comply with legal objectives



Incentives to encourage the **sorting** of industrial packaging and achieve the recycling objectives in the different laws

1. Which packaging is affected?

Which industrial packaging?

The declaration of industrial packaging is made in mass quantity per type of packaging

Industrial Green Dots

Paper Cardboard



Plastic



Wood



Metal



What is industrial packaging?

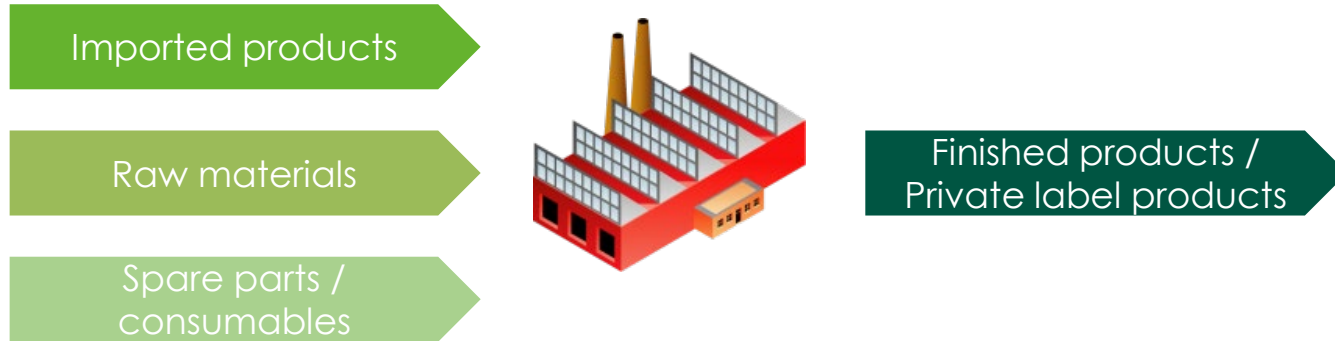
- Tertiary packaging (stretch film, single-use pallets, corner protectors)
- Secondary packaging (cartons, boxes, drums) excluding multipacks
- Primary packaging for products designed for professional use only (generally packaging for products >10 [kg]/[L])

Industrial packaging must be declared, in units of mass, on the platform Valbase Online

2. Operational model

Which industrial packaging?

Industrial packaging includes not only finished products but also the packaging of purchased products



You are responsible for finished products placed on the Luxembourg market, but also for packaging that you import if your supplier is not a member of Valorlux

How to declare industrial packaging?

Valbase offers two methods for declaring industrial packaging based on the information you have available

Method A

Declaration of mass based on **product data sheets** or **consumption**

- Applicable to all packaging for items for which the **theoretical weight** of the packaging is **known** from **product data sheets** or **annual consumption data** (e.g. stretch film consumption)



Method B

Declaration based on the mass collected in **waste containers**

- Applicable to all packaging of items for which the **theoretical mass** of the packaging is **unknown**
- The declaration is then made on the basis of the **certificate** you receive for the recovery of this waste by your **sanitation company**



The Valbase Online reporting tool

The declaration is made online on the Valbase platform for four packaging materials

LEGEND

Gross Weight A (kg)

Total weight per material, with the theoretical mass of the packaging known from product sheets or yearly consumption data.

Gross Weight B (kg)

Total weight per material based on **waste recovery certificates** provided by your sanitation company. This method is useful if the **theoretical packaging mass** of your purchased or imported products is **unknown**. However, for the packaging of items you have sold, you must use Gross Weight A.

% Packaging B

The estimated percentage of packaging in the specific waste container

Total Net Weight (kg)

$\text{Gross Weight A (kg)} + (\text{Gross Weight B (kg)} \times \% \text{ Packaging B})$

← Undo

Waste recovery certificates

You have submitted a type B industrial declaration. You must upload one or more waste recovery certificates from your collectors to accompany your declaration.

Id	Item	Gross Weight A (kg)	Gross Weight B (kg)	% Packaging B	Total Gross Weight	Total Net Weight	Unit Cost (€/kg)	Contribution (€)
IM01	Paper/Carton	4000	6000	86,40 %	10000	9184	0,014500 € / kg	133,17 €
IM02	Plastic	2000	1000	90,00 %	3000	2900	0,039500 € / kg	114,55 €
IM03	Wood	1500	0	37,50 %	1500	1500	0,014500 € / kg	21,75 €
IM04	Metal	500	300	10,00 %	800	530	0,039500 € / kg	20,94 €

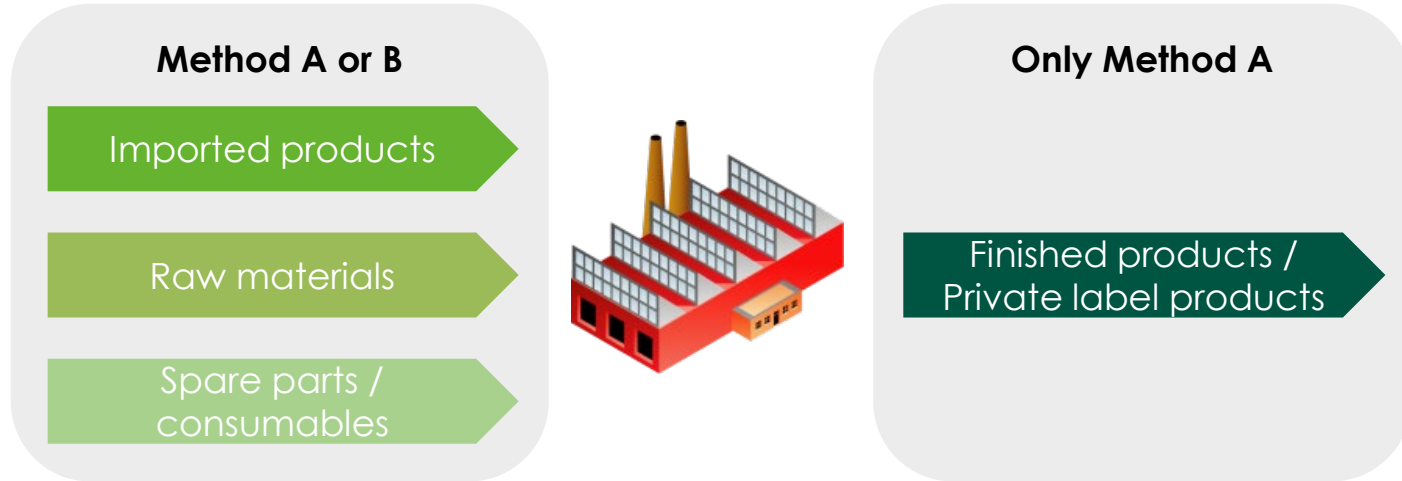
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Which industrial packaging?

Industrial packaging includes not only finished products but also the packaging of purchased products

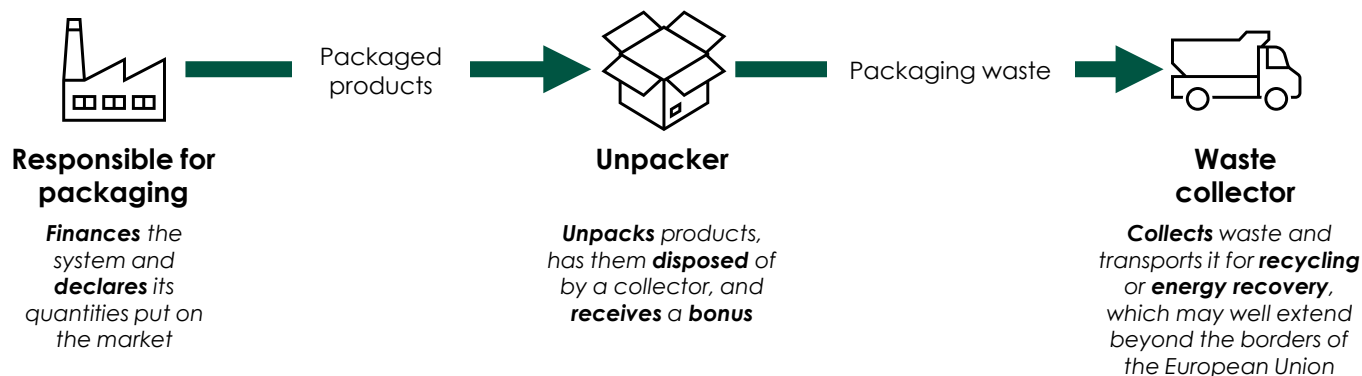


Method A: Using product data sheets or annual consumption data

Method B: Using certificates from your sanitation company

Who does what in the Extended Producer Responsibility system?

Valorlux coordinates the system in order to meet legal requirements. Your company may have one or more roles at the same time: unpacker, packaging responsible, or both?



You manage your waste as usual. Valorlux takes care of other procedures such as reporting, waste traceability through to recycling, and recycler audits to ensure your compliance.

3. Conclusions and next steps

What should I do?

Become a Valorlux member and submit your declaration of packaging put on the market for the year 2025 before 28 February

- 1 Each responsible for packaging will be required to provide an annual declaration of packaging placed on the market. The declaration must be made by the **end of February 2026** in relation to your **company's activity in 2025**.
- 2 Become a member of Valorlux quickly in order to fulfil your obligations by using the following link:

[Become a member Valorlux](#)
- 3 If you are eligible for bonuses, your approved collector will take care of most of the steps required to receive them. All you need to do is validate the bonus on the home page of Valbase and it will be paid to you.

Questions



For further information, please contact:

Marc Bastian

marc.bastian@valorlux.lu

QUESTIONS & ANSWERS

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**Administration
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SATISFACTION SURVEY



What is your opinion?

VILLMOOLS MERCI FIR ÄR PARTICIPATIOUN !

VIELE DANK FÜR IHRE BETEILIGUNG !

MERCI POUR VOTRE PARTICIPATION !

THANK YOU FOR YOUR PARTICIPATION !