



Cyprus – packaging EPR

Last checked 15 August 2026 **Keeper** Desk open — keeper wanted

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Cyprus has a working packaging EPR system, one collective scheme, one deadline and a modest entry fee — the mechanics are among the simplest in the Union. What it does **not** have, as far as we can find, is a published route for a producer established abroad: no appointment form for the representative, no clear statement of which register entry you need. So the Cypriot task is unusually small and unusually manual. Two written questions, then a membership.

Does it apply to me?

Cypriot packaging law is written around businesses that **package products** or **import packaged products** into Cyprus. Read literally, that framing does not obviously describe a foreign shop posting parcels to Cypriot customers — which is exactly why some sellers have concluded they are outside it.

From **12 August 2026** that reading no longer helps. The PPWR defines the producer directly, and Art. 3(1)(15)(c) and (d) catch a business established in another member state or a third country that supplies packaged products directly to Cypriot end users. The EU definition applies whether or not the Cypriot text has caught up with it.

You ship to Cypriot consumers, no Cypriot establishment

Yes. You are the producer. Arrange collective compliance, appoint a representative, declare each February.

You're established elsewhere in the EU

Caught. [Art. 45\(3\)](#) first sentence applies with no threshold.

You're established outside the EU

Assume caught. Whether Cyprus took the third-country option in [Art. 45\(3\)](#) second sentence is **not published** as far as we can find.

You only sell small quantities

No exemption identified. There is no Cypriot threshold based on turnover or packaging weight that removes the obligation — the scheme's smallest fee band starts at zero.

You're established in Cyprus

No representative needed. Join the collective system and declare in the normal way.

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 gap in the middle

We want to be precise about what is missing here, because "Cyprus hasn't published a procedure" is easily misheard as "Cyprus doesn't require anything".

Question	Answer
Is there a packaging EPR obligation?	Yes. National law plus the PPWR
Is there a competent authority?	Yes. The Department of Environment, which licenses systems, inspects and audits
Is there a collective system to join?	Yes. Green Dot Cyprus, which describes itself as the only one
Is there a published registration route for a <i>foreign</i> producer?	Not that we can find
Is there a representative appointment form or official directory?	No

Cyprus does operate an **Electronic Waste Registry**, but its public registration pages are written for waste-related businesses and activities and do not clearly identify it as the packaging producer register for someone in your position. Guessing between that and a Department of Environment entry is not a good use of a week.

Ask, in writing, and keep the reply. Where a member state has not published a foreign-producer procedure, a dated written answer from the authority or the licensed system is the best evidence available — and it is worth far more than a screenshot of a page that does not mention you. Email, not phone.

Green Dot Cyprus

Cypriot packaging law requires obligated businesses to recover and recycle prescribed quantities of what they place on the market, either through an approved **individual** system or an approved **collective** one. For a small seller the individual route is theoretical. Green Dot Cyprus states that it is the **only collective compliance system for packaging waste in Cyprus**, and that it assumes the recovery and recycling responsibility of its contracted members.

That has one practical implication worth stating plainly: there is nothing to compare. In Germany or Austria a large part of getting compliant is choosing between systems. In Cyprus, if collective compliance is your route, the choice has been made for you — which removes a decision and also removes any competitive pressure on price.

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1. Ask whether they will contract with you at all

The gating question for a company established outside Cyprus. Get it in writing before you plan a launch date.

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2. Ask the Department of Environment which entry you need

Producer register, Electronic Waste Registry, or membership alone. This is the unpublished part — do not guess between them.

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3. Appoint a representative established in Cyprus

Owed under Art . 45 (3) whether or not a Cypriot form exists for it. A written mandate on file beats waiting.

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4. Join, and diarise the end of February

One deadline a year, covering the previous calendar year. Pick a declaration format and stay on it.

The representative

Art. 45 (3) applies from 12 August 2026: a producer established outside Cyprus supplying directly to Cypriot end users appoints an EPR authorised representative established in Cyprus. No threshold, no exceptions in the Regulation itself.

Cyprus had not published a dedicated appointment form, an official directory or a complete onboarding procedure when we checked. But there is one useful signal about what the role is expected to **do** here: Green Dot Cyprus treats the representative as holding administrative responsibility for the **accuracy and timeliness of the declarations** submitted to it.

So appoint someone who will actually see your numbers. A representative carrying responsibility for the accuracy of a declaration it never reviews is a bad arrangement for both of you. Whoever you appoint should be receiving your packaging figures before February, not on the day of the deadline.

What it costs

Green Dot Cyprus publishes both material-based fees and a set of simplified annual categories. For a small seller the categories are the relevant part:

Band	Annual fee
0 – 1 tonne	€100
1 – 2 tonnes	€142.50
2 – 5 tonnes	€237.50

Published material rates include roughly €44.78/tonne for household carton, €100.60/tonne for household PET or HDPE, €41.14/tonne for commercial corrugated carton and €36.05/tonne for commercial plastic.

Confirm the 2026 figure before you budget. The fee page is labelled as approved fees for **2017–2025** while the category table remains publicly displayed. That is not necessarily out of date — approved tariffs often run on — but it is not a 2026 confirmation either. Ask for the current figure in writing, along with whether VAT, a joining charge or a representative fee sits on top.

For context: at €100 a year for the first tonne, Cyprus is one of the cheapest markets in this set to be compliant in. The cost of Cyprus is not money. It is the time spent establishing what the route is.

The February declaration

Members declare, by the **end of February**, the packaging they placed on the Cypriot market during the previous calendar year. One filing, once a year — after Croatia's monthly rhythm or Czechia's quarterly one, Cyprus is a relief.

Several declaration formats are available: a detailed declaration, a pesticide-specific detailed declaration, a catalogue declaration, a drinks-specific catalogue declaration, and a declaration with categorisation.

Pick one format and stay on it. Switching formats between years makes your own history hard to compare and makes an audit harder to answer, because the auditor cannot line up like with like. The format that is easiest to produce from your order data is usually the right one.

You may be audited

Green Dot Cyprus has the right to audit member declarations and states that **about twenty companies are audited every year**, by certified auditors, throughout the year.

Twenty is a small number in absolute terms and a meaningful one in a market the size of Cyprus. Treat the declaration as something that has to be reproducible from records rather than estimated from memory — the derivation is what an auditor asks for, not the total.

The scheme also states that access to member data is restricted to specific Green Dot Cyprus executives, and that third parties and board members cannot see it. Worth knowing if commercial sensitivity is what has been holding you back from declaring accurately.

The Green Dot is not a recycling mark

Green Dot Cyprus is explicit about this and it is worth repeating, because the symbol is misread across Europe: the Green Dot indicates that a **financial contribution has been paid** to a packaging recovery system. It does **not** mean the packaging is recyclable, and it is not a mandatory Cypriot mark.

Members may be granted the right to use it. Do not print it before you have that right — using a scheme trademark you are not licensed for is a different problem from an EPR problem, and a more expensive one.

Note also that the Green Dot is being phased out at EU level under the PPWR. Belgium's scheme, for one, states the logo may no longer be used on packaging from 12 February 2027. If you sell into several markets, do not solve a Cypriot labelling question by adding a symbol another market is about to prohibit.

The EU harmonised sorting label under Art. 12(1) applies from **12 August 2028** at the earliest. Its artwork will be fixed by implementing acts. Do not design for it yet.

If you don't

The Department of Environment licenses the compliance systems, carries out inspections and audits, and has previously reported issuing fines to non-compliant producers. We do not have a verified maximum figure and will not invent one.

As everywhere, Art. 44(4) is the operative bar: until the register entry exists you may not make packaging available on the Cypriot market. The awkwardness in Cyprus is that the entry you need is precisely the thing that is unpublished — which is the strongest argument for getting a written answer from the Department rather than waiting for clarity to arrive.

What we don't know

Which register entry a foreign producer needs

The central gap. Producer register at the Department of Environment, the Electronic Waste Registry, or scheme membership alone — the official material does not separate them for your case.

Whether Cyprus took the third-country option

Unknown. [Art. 45\(3\)](#) second sentence. Assume owed.

Whether a representative may register in your place

Unknown. [Art. 44\(3\)](#) is a per-state option and Cyprus has not published its answer.

The 2026 fee

The published category table is labelled 2017–2025. Probably still current; not confirmed.

The "under 2 tonnes, no targets" claim

Reported in secondary sources: that producers below 2 t/yr register and report but carry no recovery or recycling targets. Plausible as a description of the national target regime, **not confirmed** in the official material we read — and even if right, it is relief from targets, not from registration, membership or the representative.

Known traps

Reading the national framing and concluding you're outside it

Cypriot law talks about businesses that package or import products. You do neither, in the ordinary sense of the words — and you are still the producer, because the PPWR says so directly from 12 August 2026.

Guessing between the two registries

The Electronic Waste Registry looks like the answer and may not be. Ask the Department of Environment which entry applies to a foreign packaging producer and keep the reply.

Budgeting from a fee table labelled 2017–2025

It is still displayed and may still be current. "May still be" is not a budget. Ask for the 2026 figure with VAT and any joining charge spelled out.

Printing the Green Dot because you joined

Membership does not automatically license the mark, the mark does not mean recyclable, and the mark is being phased out at EU level anyway.

Relying on the "under 2 tonnes" claim

We could not confirm it, and at its best it removes recovery targets — not registration, not membership, and certainly not Art . 45 (3), which has no threshold in any member state.

Estimating the annual declaration

About twenty members are audited each year by certified auditors. In a market this size that is not a remote possibility. The declaration should be reproducible from records.

Sources

Official Cypriot sources establish the framework and the Department of Environment's supervisory role. Green Dot Cyprus is used for the practical membership route, the deadline and the published fees, because it is the licensed collective system — useful, and not a neutral source.

- 1 Green Dot Cyprus — packaging declarations 2026** (<https://greendot.com.cy/en/green-dot-member-declarations/packaging-statements-2026/>)

Scheme source. Source for the end-of-February declaration deadline covering the previous calendar year, the available declaration formats, the statement that about twenty companies are audited every year by certified auditors, and the confidentiality of member data

- 2 Green Dot Cyprus — membership and packaging fees** (<https://greendot.com.cy/en/>)

Scheme source for the statement that it is the only collective packaging compliance system in Cyprus, for the simplified annual categories (€100 for 0–1 t, €142.50 for 1–2 t, €237.50 for 2–5 t), for the published material rates, for the fee page being labelled as approved fees for 2017–2025, for the representative holding administrative responsibility for declaration accuracy and timeliness, and for the Green Dot symbol indicating a contribution rather than recyclability

- 3 Cyprus Department of Environment** (https://www.moa.gov.cy/moa/environment/environmentnew.nsf/index_en/index_en)

Official. The competent authority for extended producer responsibility: licenses individual and collective systems, inspects and audits

4 [Regulation \(EU\) 2025/40 \(PPWR\) — EUR-Lex](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040) (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 and Art. 12(1) on the 2028 harmonised label

5 [European Commission — PPWR Frequently Asked Questions, 2nd edition](https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en) (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

6 [European Commission — PPWR guidance \(Commission Notice\), 30 March 2026](https://environment.ec.europa.eu/topics/waste-and-recycling/package-waste_en) (https://environment.ec.europa.eu/topics/waste-and-recycling/package-waste_en)
The guidance document, distinct from the FAQ above. **Not read in full by us**



An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.