Lithuania — packaging EPR

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

Status Draft, not yet peer-checked

THE SHORT VERSION

Lithuania has a mature system that was built for Lithuanian companies. **GPAIS** handles producer registration and packaging accounting, two licensed organisations handle the recycling obligation, and the official guidance explains all of it thoroughly — for entities inside Lithuania's own producer and importer definitions. For a small business established elsewhere and shipping direct to Lithuanian consumers, **no complete route has been published**. The duty is not in doubt. The door is.

Does it apply to me?

Lithuanian producers and importers must register, keep packaging records and arrange waste-management responsibility. Those duties are clear and long established. What the national guidance does not clearly address is the business established in another member state selling directly to Lithuanian consumers — and from **12 August 2026** the PPWR closes that gap by defining you as the producer regardless.

You ship to Lithuanian consumers, no Lithuanian establishment

Yes under the PPWR. Register, appoint a representative, arrange the recycling obligation, keep the accounting.

You're established elsewhere in the EU

Caught by `Art. 45(3)` first sentence, no threshold.

You're established outside the EU

Assume caught. Whether Lithuania took the `Art. 45(3)` second-sentence option is **not published** as far as we can find.

You place under 0.5 tonnes per tax period

Possible relief from the environmental **pollution tax** — but only if packaging accounting is still maintained, and it is not relief from registration or from anything the PPWR imposes. See below.

Someone told you a VAT-status exemption covers you

Read that section carefully. There is a real national provision behind the claim, and it does not do what it is being used to do.

> **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?

GPAIS

Since **2018**, producers and importers register in the **Register of Producers and Importers** using **GPAIS** — the unified product, packaging and waste records system, sometimes rendered in English as PPWIS. The **Environmental Protection Agency** lists registration, amendment and deregistration as official services, and public producer data is available through the system.

GPAIS is more than a register. It is where packaging **accounting** lives — the continuous record of what you placed on the market, by material and weight. In Lithuania the accounting and the registration are the same system, which means a gap in one is visible in the other.

> **The accounting is the evidential spine.** Whatever else is uncertain about the Lithuanian route for a foreign seller, the record of what you shipped is yours to keep from the first order. Start it before the registration question is resolved, not after.

The unpublished route

We want to be exact about what is missing, because Lithuania is the thinnest of these eight desks and vagueness here would be worse than an admission.

Question	Answer
Is there a producer register?	**Yes.** GPAIS, since 2018
Is there an authority?	**Yes.** The Environmental Protection Agency (AAA)
Are there licensed organisations to join?	**Yes.** Two of them
Is there a published step-by-step route for a foreign micro-business?	**Not in the sources we reviewed**
Did Lithuania take the Art. 44(3) delegation option?	**Not published**

So the first action in Lithuania is not a filing. It is obtaining **written confirmation** from GPAIS or the Environmental Protection Agency of how a producer with no Lithuanian establishment registers, and whether a representative may do it. Ask by email. Keep the reply. In a country where the procedure is unpublished, a dated answer from the authority is the strongest evidence available that you acted properly.

None of which is a defence. `Art. 44(4)` forbids making packaging available before registration, and it does not pause while a member state catches up with its own paperwork.

The two organisations

Producers and importers are responsible for organising or financing packaging-waste management and meeting the recovery and recycling obligations. That can be done collectively through a licensed organisation or, where legally available, individually — the second being theoretical for a small seller.

Organisation	Note
VšĮ Žaliasis taškas	Licensed packaging organisation
Gamtos ateitis	Producers and Importers Association. Licensed packaging organisation

> **Check the Agency's current licence list before you sign.** Two is a small number and licences change. The Environmental Protection Agency's list is the source of truth — not a vendor page, and not this desk.

Charges are contractual and based on material and weight. No universal official minimum was identified, so ask for a written quotation on your actual packaging mix rather than a headline rate.

The 0.5-tonne relief

Lithuania operates an **environmental pollution tax** alongside the EPR duties, and there is a genuine relief from it at low volumes.

> **Up to 0.5 tonnes per tax period** may qualify for exemption from the environmental pollution tax — **provided packaging accounting is still maintained**.

Read the proviso as part of the rule rather than as a footnote. The relief is conditional on the accounting continuing, which means the way to lose it is to treat it as permission to stop recording. And like every national relief in these desks, it does not touch:

- the registration and accounting duties where those apply;
- `Art. 44` registration under the PPWR;
- the `Art. 45(3)` representative, which has no threshold anywhere in the Union.

Half a tonne is a meaningful amount of packaging for a small maker — comfortably more than most will ship to a market of Lithuania's size. So this relief is likely to apply to you, and likely to be worth less than it sounds.

The VAT-status exemption

This one deserves its own section because it is the Lithuanian claim most likely to be quoted at you, and because it is **half true** — which is worse than being simply wrong.

> **The provision is real. The conclusion drawn from it is not.**
> Current Lithuanian law does contain a **VAT-status-linked exemption** from GPAIS registration and accounting in certain cases. That is national relief from national duties, and within its own scope it is genuine.

What it cannot do is disapply an EU regulation. From 12 August 2026, `Art. 44` registration and the `Art. 45(3)` representative apply to a cross-border distance seller with no threshold and no national override. A Lithuanian exemption from a Lithuanian register is not an exemption from the European one.

This is the same structural error we flag in Czechia's 300 kg rule, the Netherlands' 50,000 kg figure and Slovakia's 100 kg claim — national relief being reported as an EU exemption. It is the single most common way these guides go wrong, and it goes wrong in the direction that costs you a market. See the library for the pattern.

The representative

From 12 August 2026 `Art. 45(3)` requires a producer established in another member state selling packaging or packaged products directly to Lithuanian end users to appoint an EPR authorised representative established in Lithuania, by written mandate.

No official public directory of Lithuanian packaging representatives was identified when we checked. Given that GPAIS access and the language are both practical obstacles for a foreign seller, the representative here is doing real work rather than holding a title — choose on capability.

> **Ask a candidate two things.** Whether it can operate GPAIS on your behalf, and whether either licensed organisation will contract with a company established outside Lithuania. If it cannot answer both, it is not the right provider.

Accounting and reporting

Packaging accounting is maintained in GPAIS. Official guidance refers to **quarterly packaging journals** and **annual reporting**, and your chosen organisation may impose additional declaration deadlines under its contract.

We have deliberately not printed a single national date. The quarterly and annual rhythm is what the guidance describes; the dates that will actually be enforced against a foreign producer depend on the registration route that has not been published and on the organisation contract you sign. Take them from those two documents.

Record by material and weight, covering sales, grouped and transport packaging. Keep the derivation alongside the totals.

What it costs

Item	What we have
GPAIS registration	No fee identified
Licensed organisation	Contractual, by material and weight. No universal official minimum identified
Environmental pollution tax	Statutory, where no relief applies

Item	What we have
Authorised representative	Not published. Commercial, quoted per provider

Lithuania is not an expensive market on any figure we have found. It is an **opaque** one for a foreign seller, and the cost is time rather than money.

Labelling

No Lithuania-only recycling mark was identified for ordinary e-commerce packaging.

The EU harmonised sorting label under `Art. 12(1)` applies from **12 August 2028** at the earliest, or 24 months after the implementing acts, whichever is later. The artwork will be fixed by those acts — do not design for it yet.

Known traps

Relying on the VAT-status exemption

Real national provision, wrong conclusion. It cannot disapply `Art. 44` registration or the `Art. 45(3)` representative after 12 August 2026.

Treating the 0.5-tonne relief as permission to stop recording

The relief is expressly conditional on packaging accounting still being maintained. Stopping the accounting is how you lose it.

Waiting for the route to be published

`Art. 44(4)` does not pause. Ask the Agency in writing, keep the reply, and keep the accounting running in the meantime.

Picking an organisation from a list rather than the licence register

Two licensed organisations is a small field and licences change. The Agency's current list governs.

Appointing a representative who cannot operate GPAIS

The system and the language are the two practical obstacles. A mandate that does not solve them has not solved anything.

Sources

The Agency and the register carry this page. Where we could not find a published answer we have said so rather than inferring one.

1. GPAIS — unified product, packaging and waste records system (https://www.gpais.eu/)
   Official. The Register of Producers and Importers, in operation since 2018, and the system where packaging accounting is maintained. Public producer data is available through it

2. Environmental Protection Agency (AAA) (https://aaa.lrv.lt/)
   Official. Lists registration, amendment and deregistration in the Register of Producers and Importers as official services, and publishes the current licence list identifying the two active packaging organisations, VšĮ Žaliasis taškas and Gamtos ateitis

3. Lithuanian legislation — Register of Legal Acts (https://www.e-tar.lt/)
   The national provisions behind the environmental pollution tax, the up-to-0.5-tonne relief conditional on packaging accounting being maintained, and the VAT-status-linked exemption from GPAIS registration and accounting

4. Regulation (EU) 2025/40 (PPWR) — EUR-Lex (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 — several circulated profiles cite "Article 46" for this and are wrong — 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)
   DG ENV Unit B01, August 2026 (KH-01-26-068-EN-N). Read in full

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