



Malta – packaging EPR

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

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Malta is **better prepared** than most of the countries in this group. ERA runs a National Register of Producers with numbered forms — G to register, H to renew, I to deregister — and already publishes a **written-mandate form for authorised representatives**, which is more than several larger member states manage. The Maltese distinguishing feature is verification: reported information generally has to be certified by an **ERA-approved auditor**. And the under-100 kg declaration is a simplified route, **not** an exemption.

Does it apply to me?

Malta requires businesses that **manufacture or import** packaging or packaged goods for the Maltese market to register with the **Environment and Resources Authority (ERA)** and finance the management of the resulting packaging waste. A person that places packaging or packaging material on the Maltese market must register **when first placing it**.

You ship to Maltese consumers, no Maltese establishment

Yes from 12 August 2026 under the PPWR — and you must appoint a representative. ERA has a form for exactly that.

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 Malta took the [Art. 45\(3\)](#) second-sentence option is **not published** as far as we can find — though the way Malta describes the representative duty for e-commerce sellers does not distinguish EU from non-EU.

You place under 100 kg a year

There is a dedicated ERA declaration form. It is **not described as a complete exemption**. See [below](#) before you rely on it.

You're established in Malta

No representative needed. Register with ERA and arrange compliance 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?](#)

ERA and the forms

ERA maintains Malta's **National Register of Producers of Packaging or Packaging Material**, and — unusually for a small member state — it runs on named electronic forms rather than on correspondence.

Form	Purpose
Form G	Initial registration
Form H	Renewal
Form I	Deregistration

ERA also publishes its online packaging register, which means a marketplace, a customer or a competitor can check whether you are on it. That cuts both ways and is worth knowing before you assume nobody is looking.

Note Form H. Malta is one of the few countries in these desks where registration is explicitly a thing you **renew** rather than a thing you do once. Put the renewal in the calendar at the same moment you complete the initial registration — a lapsed registration and no registration look identical from outside.

The representative – and the form

From 12 August 2026 Art . 45 (3) requires a producer established outside Malta that sells packaged products directly to Maltese end users to appoint an EPR authorised representative established in Malta, by written mandate.

Malta already has the form

ERA publishes a **written-mandate declaration form** for authorised representatives. Compare Bulgaria, Cyprus, Ireland, Latvia and Lithuania, where no national form was identified at all and the mandate is whatever you and your provider draft. Use Malta's — a document the authority already recognises is worth more than a better-drafted one it does not.

What Malta does not publish is a directory of representative service providers. So the form exists; finding someone to name on it is still your problem, and in a market of roughly half a million people the field is thin.

The role, as Malta describes it for e-commerce sellers without a registered office in Malta, is broad: the representative acts on the company's behalf and is responsible before ERA for all formalities — registration, reporting and any financial settlements. That is a full-service mandate, not a postbox.

GreenPak and Green MT

A producer must fulfil its packaging-waste recovery obligations either through an **ERA-authorised Producer Responsibility Organisation** or through an approved **self-compliance** route. ERA currently lists two authorised packaging waste recovery organisations:

Organisation	Note
GreenPak Co-op Society Ltd	Malta's longest-running packaging compliance scheme, established 2004. Also authorised for WEEE and batteries. States that membership transfers the producer's packaging recovery and recycling obligations to the organisation
Green MT Ltd	The alternative authorised scheme

Check current permit status on ERA's packaging page before signing.

Authorisations are granted and withdrawn, and with only two organisations in the market a change affects half of it. ERA's page governs, not a scheme's own marketing and not this desk.

Self-compliance exists in law. For an ordinary small seller it is not a route — it means obtaining approval for your own system, which is a project rather than a form.

The under-100 kg declaration

ERA publishes a declaration form for a producer placing **less than 100 kg** of packaging or packaging material on the Maltese market. This is the Maltese number you will see quoted, and it deserves care.

ERA does not describe it as a complete exemption — and neither will we. It appears to provide a **simplified route**. What it removes, and what it leaves in place, is not spelled out in the official page.

So ask ERA directly, in writing, whether under that route you must still:

- register on the National Register;
- join a Producer Responsibility Organisation;
- report quantities;
- have reported information certified by an approved auditor;
- appoint an authorised representative.

On the last of those the answer is already known: Art . 45 (3) has **no threshold** in any member state, and a national simplified route cannot introduce one. Whatever the 100 kg form does, it does not reach the representative.

This is the same shape as Slovakia's supposed "under 100 kg, no representative" claim, which is flatly wrong — see the [library](#). The Maltese form is real; the inference some guides draw from it is the problem.

The approved auditor

Malta builds verification into reporting rather than relying on inspection

Registered producers and organisations are generally required to use an **ERA-approved auditor** to certify reported information, subject to limited environmental-management-system exemptions for self-compliers.

This is genuinely unusual and it changes the economics. In most member states an audit is a **risk** — something that might happen to a fraction of producers in a given year, as in Cyprus where about twenty members are audited. In Malta certification is closer to a **standing cost of reporting**.

Two consequences for a small foreign seller. Budget for it as a line item rather than a contingency — and ask, before you commit, whether your PRO's fee includes or excludes the auditor, because on small volumes that cost can exceed the contribution itself. And keep records that a third party can actually verify: weight derivations per material, not a spreadsheet of totals whose origin you would have to reconstruct.

What it costs

Item	What we have
ERA registration fee	No universal official fee identified
PRO membership	Commercial, by material and quantity. Contractual quotation from GreenPak or Green MT
ERA-approved auditor	Additional. The Maltese cost line that other countries do not have
Authorised representative	Not published. Commercial, quoted per provider

ERA does not publish a single minimum annual packaging contribution, so Malta cannot be budgeted from published figures the way Luxembourg or Finland can. Get three numbers in writing before you commit: the PRO quotation, the auditor's fee, and the representative's fee. On low volumes the second and third will dominate.

Reporting and renewal

Producer registration is **renewed** — Form H — and packaging information is reported to ERA. Reported information generally requires certification by an ERA-approved auditor, as above.

We have deliberately not printed a Maltese reporting deadline. We could not verify a single national date that applies to a foreign producer, and a plausible-looking date is worse than none. Take it from ERA and from your PRO contract, and diarise both the reporting date and the registration renewal at the same time.

Keep records that distinguish material and weight. In a country where a third party has to certify them, the derivation matters more than the total.

Labelling

No Malta-only recycling mark was identified as mandatory 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, with the reusable-packaging label under Art . 12 (2) following on 12 February 2029. The artwork will be fixed by those acts — do not design for either yet.

If you don't

Enforcement is by ERA, which authorises the recovery organisations, maintains the register and publishes it. We do not have a verified penalty figure and will not invent one.

Note the structural point instead. Because Malta requires certified reporting and publishes its register, non-participation is **visible** and misreporting is **checked at source** rather than sampled later. That is a different enforcement model from most of these desks and, on the whole, a harder one to drift through.

And underneath, Art . 44 (4): until the register entry exists you may not make packaging available on the Maltese market at all.

Known traps

Reading the under-100 kg form as an exemption

ERA does not describe it as one. And whatever it does simplify, it cannot reach Art . 45 (3), which has no threshold in any member state. Ask ERA in writing what it actually removes.

Forgetting the auditor when you budget

Certification by an ERA-approved auditor is generally required. On small volumes it can cost more than the PRO contribution. Ask whether your scheme's fee includes it.

Registering once and never renewing

Form H exists for a reason. A lapsed registration is indistinguishable from none, and ERA's register is public.

Drafting your own mandate when ERA publishes one

Malta is one of the few countries with an official written-mandate form. Use the document the authority already recognises.

Signing with a PRO without checking ERA's current permit list

There are two organisations. A lapsed authorisation affects half the market.

Assuming a small island means light-touch

Malta has a public register, numbered forms, a mandate form and certified reporting. It is one of the more procedurally complete systems in these desks.

Sources

ERA carries this page. The two organisations are used for the practical membership route and are not treated as evidence of the legal obligation.

- 1** [ERA — Environment and Resources Authority](https://era.org.mt/) (https://era.org.mt/)
Official. Source for the National Register of Producers of Packaging or Packaging Material, the requirement to register when first placing packaging on the Maltese market, electronic Form G for registration, Form H for renewal and Form I for deregistration, the declaration form for producers placing less than 100 kg, the written-mandate declaration form for authorised representatives, the two authorised packaging waste recovery organisations, and the requirement for reported information to be certified by an ERA-approved auditor subject to limited environmental-management-system exemptions for self-compliers
 - 2** [ERA — quick guide for producers of packaging or packaging material](https://era.org.mt/wp-content/uploads/2022/05/Quick-Guide-for-Producers-of-PACK-Final-002.pdf) (https://era.org.mt/wp-content/uploads/2022/05/Quick-Guide-for-Producers-of-PACK-Final-002.pdf)
Official. The producer-facing summary of the registration and compliance duties
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3 **GreenPak Co-op Society Ltd** (<https://www.greenpak.com.mt/>)

Scheme source. Established 2004, authorised by ERA for packaging as well as WEEE and batteries. States that membership transfers the producer's packaging recovery and recycling obligations to the organisation

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. 45(3)** on the representative — several circulated profiles cite "Article 46" for this and are wrong — and Art. 12(1)–(2) on the 2028 and 2029 labels

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



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