



Portugal – packaging EPR

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THE SHORT VERSION

Portugal is one of the better-prepared countries for a foreign seller, because **SILiAmb already has an authorised-representative classification** — the route exists, it is named, and APA says it is mandatory where applicable. A foreign tax number goes through that classification rather than through the domestic one. Two things to plan for: there is **no small-volume exemption of any kind**, and Portugal files **two declarations in one round** — you correct last year and estimate this one, by 31 March.

Does it apply to me?

Portugal's framework is principally **Decree-Law No. 152-D/2017**, as amended. Responsibility for packaging waste is assigned to the party responsible for the **first placing** of packaged products on the national market.

The duty covers the product packaging AND the transport or postal packaging used to deliver it. Portugal states that explicitly, which removes the most common way of under-counting: the box, the tape, the labels, the filler and the protective materials are all in scope, not just what the product came in.

You ship to Portuguese consumers, no Portuguese establishment

Yes. You can be the responsible producer/packager. Register in SILiAmb under the authorised-representative classification, join a SIGRE, declare annually.

You're established elsewhere in the EU

Caught by [Art. 45\(3\)](#) first sentence, no threshold — and possibly by the national authorised-representative rules already.

You're established outside the EU

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

You only send a few parcels a year

No exemption. Portugal publishes no general small-volume relief for ordinary packaged goods. A low number of parcels does not remove the obligation.

You ship non-reusable industrial packaging

In scope since **1 January 2025** — see [below](#).

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?](#)

SILiAmb and the classification

The register is **SILiAmb**, the electronic Producer/Packager Register operated by **APA** — the Agência Portuguesa do Ambiente. Producers, packagers and service-packaging suppliers communicate to APA through it: the type and quantity of packaging placed on the Portuguese market, and the management system chosen.

Portugal already has a route for you, and it has a name

SILiAmb carries an **authorised-representative classification** for packaging and other product streams, and APA states that this classification is **mandatory where applicable**. Foreign-tax-number registrations are handled through that route. Compare Bulgaria, Cyprus, Ireland, Latvia, Lithuania and Romania, where no comparable national mechanism was identified at all.

The practical consequence is a warning: **a foreign producer using a non-Portuguese tax number should not assume it can simply register as a domestic business.** There is a correct classification and a wrong one, and choosing the wrong one produces a registration that does not describe you.

The workflow APA sets out is: obtain SILiAmb credentials, complete the producer/packager or authorised-representative classification, then submit the required declarations. Get the classification right at step two and the rest follows.

The SIGRE organisations

Packaging responsibility can be transferred to a licensed **integrated packaging management system (SIGRE)** or met through an individually authorised system. For an overseas maker the second is not a route.

Organisation	Note
Sociedade Ponto Verde	The long-established Portuguese packaging system
Novo Verde	Listed by APA as a SIGRE management organisation
Electrão	Listed by APA as a SIGRE management organisation

Three organisations is a genuine choice, which is more than most of the smaller member states offer. APA lists them — take the current list from APA rather than from a comparison site, because licences change.

Two declarations, one round

This is the Portuguese shape that catches people used to a single annual filing.

Declaration	What it covers
Correction declaration	The previous year — what you actually placed on the market
Estimate declaration	The current year — what you expect to place

Both are submitted in SILiAmb, normally by **31 March**. So every year you look backwards and forwards in the same sitting: you settle what actually happened and commit to a forecast you will be corrected against twelve months later.

Estimate honestly. The correction mechanism means an inflated estimate is not a way of buying goodwill — it is a number you will have to walk back, having possibly paid against it in the meantime. An understated one produces the opposite problem.

Record packaging by material, category and weight **throughout the year**. These declarations are not reconstructable at the deadline, and Portugal's own guidance says so.

One historical note that is not a precedent: APA exceptionally extended the 2026 filing period to **30 April** because of a system migration. Treat 31 March as the date.

Industrial packaging joined in 2025

Since 1 January 2025, non-reusable industrial packaging must also be covered by an integrated or individual management system.

If you set up Portuguese compliance before that date and have not revisited it, check whether any of what you ship is industrial rather than household packaging — bulk outers to trade customers, pallets, transit packaging that becomes waste at a business rather than in a home.

For a seller shipping parcels to consumers this will usually change nothing. For one with a mixed book it may mean a scope change on an existing SIGRE contract rather than a new registration, which is the cheaper kind of problem — but only if you notice it.

What it costs

Item	What we have
SIGRE contribution	By organisation, material, quantity, category and contract terms. APA publishes no universal price
Authorised-representative service	Commercial, quoted per provider
Packaging-data administration	Your own or bought in
Audit or advisory work	Where the SIGRE contract requires it
General fee exemption for very small foreign sellers	None identified

With three organisations to approach, Portugal is one of the markets where it is worth getting more than one quotation. Ask each to separate the contribution from the representative service and from any

audit requirement — those three lines behave very differently at small volumes.

Labelling

Registration and payment to a scheme do not by themselves create a requirement to print any particular EPR logo on packaging. A **Green Dot or scheme logo is not a substitute** for SILiAmb registration and declarations — and printing one changes nothing about whether you are registered.

Any material codes, sorting information, deposit markings or product-specific symbols must be used **accurately** and assessed against your packaging type and the rules in force. Inaccurate environmental marking is its own problem, separate from EPR.

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

If you don't

Enforcement sits with APA within Portugal's waste-law framework. We do not have a verified headline figure and will not invent one.

The point to internalise is the absence of a floor. Portugal publishes **no general micro-business exemption**, which means the reasoning that works in the Netherlands — "we are far too small for this to matter" — has no purchase here. Small sellers should not assume that a low number of parcels removes the obligation, because nothing in the Portuguese framework says it does.

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

Known traps

Registering as a domestic business with a foreign tax number

SILiAmb has a specific authorised-representative classification and APA says it is mandatory where applicable. Choosing the domestic classification produces a registration that does not describe you.

Filing one declaration instead of two

A correction declaration for last year and an estimate declaration for this one, both normally by 31 March.

Counting only the product packaging

Portugal states expressly that the duty covers the transport and postal packaging used to deliver the goods. Box, tape, labels, filler, protective materials.

Looking for a micro-business exemption

There isn't one. This is the country in the final eight where that reasoning fails most cleanly.

Treating 30 April as the deadline

That was a one-off extension for the 2026 filing period because of a system migration. The date is 31 March.

Missing the 2025 industrial-packaging change

Non-reusable industrial packaging has needed cover since 1 January 2025. A setup from before then may have a scope gap.

Sources

APA and the national decree carry this page. The SIGRE organisations are the practical route and are not treated as evidence of the legal obligation.

1 APA — SILiAmb (<https://siliamb.apambiente.pt/>)

Official. The electronic Producer/Packager Register. Source for the registration workflow — credentials, then the producer/packager or authorised-representative classification, then the declarations — for that classification being mandatory where applicable, for foreign-tax-number registrations being handled through the authorised-representative route, and for the annual correction and estimate declarations normally due 31 March

2 Agência Portuguesa do Ambiente (APA) (<https://apambiente.pt/>)

Official. The competent authority. Source for the list of SIGRE management organisations — Sociedade Ponto Verde, Novo Verde and Electrão — for the exceptional extension of the 2026 filing period to 30 April because of a system migration, and for non-reusable industrial packaging requiring cover since 1 January 2025

3 Decree-Law No. 152-D/2017 (Unilex), as amended (<https://diariodarepublica.pt/>)

The national framework. Source for responsibility attaching to the party responsible for the first placing of packaged products on the national market, covering the product packaging and the transport or postal packaging used to deliver it

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) 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



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