

CIRCULAR No. 01/2022/DFEMR

Obligations related to placing on the market, in Portugal, of products from other countries

Recipients: Producers and Authorized Representatives

Legal Framework: Decree-Law No. 152-D/2017, of December 11, in its current wording

Obligations - extended producer/packer responsibility

Companies/individuals that place products from other countries on the market [\[Circular n.º 05/2021\]](#) in Portugal may have the following obligations:

- Registry and data submission;
- Join of a Producers Responsibility Organisation (PRO) - see list in Annex- or set up an individual system.

These obligations aim to ensure that the producer¹/packer is responsible for managing the waste resulting from its products.

¹ According to article 3 of Decree-Law no. 152-D/2017, of December 11 (UNILEX)

Specific flows to which obligations apply

- Packaging (includes those related to any product, even if not on this list, and service packaging²)
- Batteries
- Electrical and electronic equipment
- Fishing gear
- Lubricating oils
- Plastic cups
- Tobacco products
- Tyres
- Vehicles

Responsibility for compliance with obligations

The obligations related to placing on the market in Portugal of these products, **originating from countries outside the UE**, apply:

- To the distributor in Portugal when the distributor makes the product available in Portugal;
- To the foreign supplier, through an Authorized Representative³, when the product is made available to the end-user (individual or company).

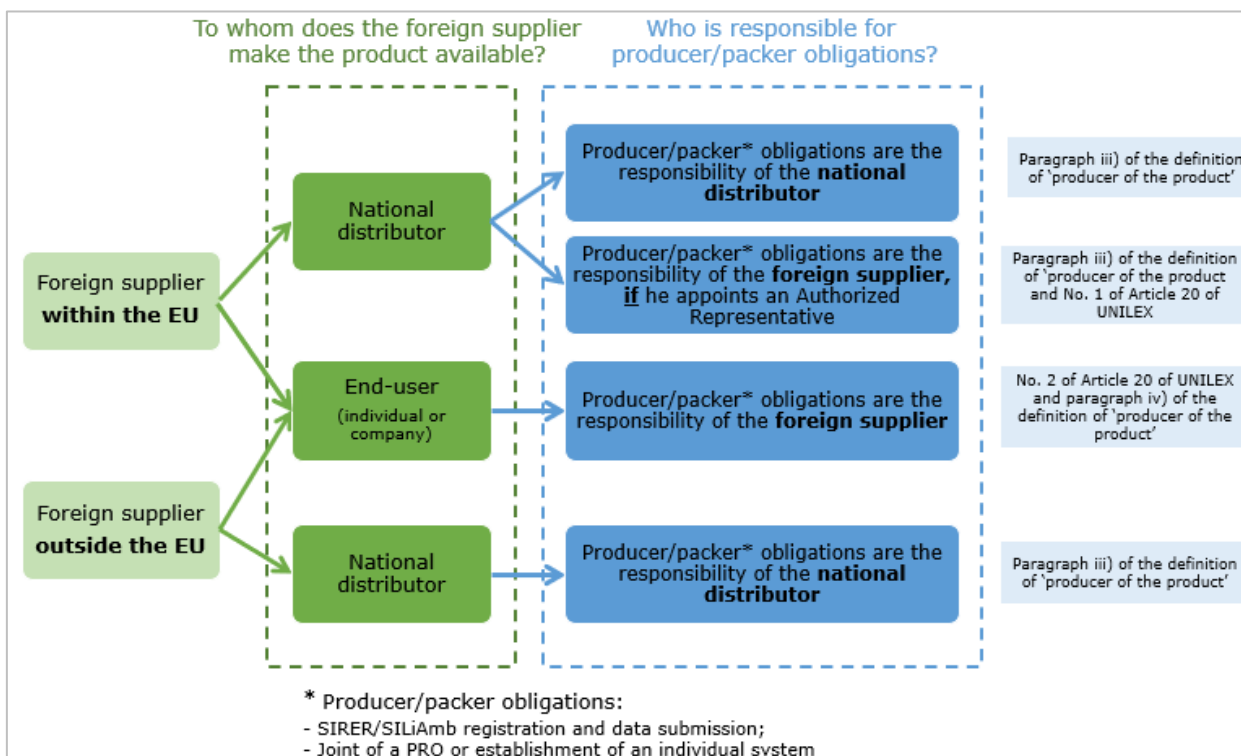
The obligations related to the placing on the market in Portugal of these products, **originating from countries within the EU**, apply:

- To the distributor in Portugal when the distributor makes the product available in Portugal. The distributor is exempt from this responsibility if the foreign supplier appoints an Authorized Representative.
- To the foreign supplier, through an Authorized Representative³, when the product is made available to the end-user (individual or company).

² Packaging filled at attended points of sale for transportation of products to or by the consumer.

³ According to article 3 of Decree-Law no. 152-D/2017, of December 11 (UNILEX).
To see list of Authorizes Representatives in Portugal click [here](#).

The following diagram summarizes the responsibility for fulfilling obligations.



Procedure for compliance with obligations

Data registration and submission

Those responsible for fulfilling the obligations must register, which involves the following steps:

- Step 1 - Registry on [SILiAmb](https://siliamb.apambiente.pt)⁴ (only for users who do not have access credentials) - <https://siliamb.apambiente.pt>.
- Step 2 - Registration form of [producer/packer](#) (distributor) or of [authorized representative](#) (foreign supplier) identifying the products and the contracted management entity, if applicable.
- Step 3 - Submission of annual declarations (correction and estimate), relating to eligible products, until March 31st.

⁴ SILiAmb (Integrated Environmental Licensing System) is the platform that supports SIRER (Integrated Electronic Waste Registration System)

Note: In the Registration form (Step 2), all waste streams products incorporated into the product must be declared.

Example 1: In the case of Vehicles registration, Lubricating Oils, Batteries, and Tires must also be included.

Example 2: In the case of Electrical and Electronic Equipment with built-in batteries, Packaging, Electrical and Electronic Equipment, and Batteries must be classified.

Joining a PRO or set up an individual system

Those responsible for fulfilling the obligations must:

- Join of a PRO or;
- Set up an individual system.

Joining a PRO involves paying a financial fee (environmental fee). This fee is determined based on the quantity and characteristics of the products or packaging placed on the market. See the attached list of PRO.

The setting up of an individual system is subject to authorization and payment of a fee of €6,940.04 in 2025. The application is submitted, in a dematerialized form, to the Portuguese Environment Agency (APA) and the Directorate-General for Economic Activities (DGAE), accompanied by specifications containing the information set out in paragraph 15 of article 9 of Decree-Law no. 152-D/2017, of 11 December, in its current wording.

Annex

List of PRO

Plastic cups (including their covers and lids not packaging - plastic cups)	Electrão Novo Verde Sociedade Ponto Verde
General-purpose packaging	Electrão Novo Verde Sociedade Ponto Verde
General-purpose packaging – Deposit and Return System	SDR Portugal
Packaging for medicinal products for human use and Packaging for medicinal products for veterinary use	VALORMED
Plant products, biocide and seeds, feed and fertilizers packaging	SIGERU
Electrical and electronic equipment	Electrão ERP Portugal
Lubricating oils	Sogilub
Portable Batteries	Electrão ERP Portugal
Industrial batteries, Light Means of Transport batteries (LMT) and Electric Vehicle batteries (EV)	Electrão ERP Portugal EGMais Valorcar
Starting, Lighting and Ignition battery (SLI)	EGMais Valorcar
Tyres	Valorpneu
Tobacco Products (with filters and filters marketed for use in combination with tobacco products, which contain plastic)	Único/AGPUU
Vehicles	Valorcar