REPORT OF LITHUANIA ON THE IMPLEMENTATION OF DIRECTIVE 2009/33/EC

1. Institutional Setup And Transposition

1.1. *Authority responsible for transposing and implementing the Directive*

The Ministry of Transport and Communications of the Republic of Lithuania was responsible for the transposition of the Directive 2009/33/EC into national law (including the setting of minimum public procurement targets) and is responsible for the application and, where necessary, amendment of the legal acts implementing the provisions of the Directive 2009/33/EC, namely the Law on Alternative Fuels of the Republic of Lithuania[1] and the description of the procedure for determining energy efficiency and environmental protection requirements for the acquisition of road transport vehicles and the cases in which they must be applied, approved by Order No. 3-358 of 20 July 2021 of the Minister of Transport and Communications of the Republic of Lithuania (amending Order No. 3-100 of 21 February 2011[2]).

The Public Procurement Office of the Republic of Lithuania, in accordance with Article 14 of the Law on Alternative Fuels of the Republic of Lithuania, is responsible for collecting, aggregating and managing data on public procurement procedures related to road transport vehicles and related services, as well as for submitting implementation reports.

1.2. *Minimum procurement targets and effort sharing within the Member State*

The minimum public procurement targets are set out in Article 15(3), (4) and (5) of the Law on Alternative Fuels of the Republic of Lithuania, which establishes binding requirements for the procurement of clean and zero-emission road transport vehicles. It should be noted that Lithuania applies more ambitious minimum public procurement targets than those established by Directive 2009/33/EC.

In accordance with Article 15 of the Law on Alternative Fuels, contracting authorities and contracting entities, when carrying out public procurement of road transport vehicles in the cases defined in Article 15(1), must ensure that the following minimum shares are achieved in annual procurements. These targets are applied uniformly to all contracting authorities and contracting entities falling within the scope of the Directive.

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[1] The Law on Alternative Fuels of the Republic of Lithuania: https://e-tar.lt/portal/lt/legalAct/b5c313d0986d11eb9fecb5ecd3bd711c/asr

[2] Order No. 3-100 of 21 February 2011: https://www.e-tar.lt/portal/lt/legalAct/TAR.DB730F3AA49A/asr

- for N1, M1 and M2 category vehicles: from 2 August 2021, at least 60% of vehicles (50 g CO_2/km), and from 2026, 100% of vehicles (0 g CO_2/km).
- for N2 and N3 category vehicles: at least 8%, and from 2026, at least 16% of vehicles powered by alternative fuels.
- for M3 category vehicles: at least 80% of vehicles (of which at least 50% must be 0 g CO_2/km), and from 2026, 100% of vehicles powered by alternative fuels (of which at least 50% must be 0 g CO_2/km).

1.3. *National exemptions*

Exemptions are set out in Article 15(7) of the Law on Alternative Fuels of the Republic of Lithuania. It should be noted that Lithuania has established additional exemptions in the following cases:

- for vehicles with manual transmission intended for the assessment of practical driving skills and abilities.
- in cases of public procurement of vehicles or services provided by such vehicles, as referred to in Article 15(1), where oral procurement contracts are concluded.
- in cases of public procurement of vehicles or services provided by such vehicles, as referred to in Article 15(1), where, following market consultations, it is determined that there are no available solutions on the market to procure vehicles as defined in Article 2(16) and (23) of the Law on Alternative Fuels of the Republic of Lithuania, without infringing the requirements set out in Article 37(3) of the Law on Public Procurement of the Republic of Lithuania[3], which are necessary for the performance of the functions of the contracting authority or contracting entity.

[3] The Law on Public Procurement of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalAct/TAR.C54AFFAA7622/asr

2. Quantitative data from the Tender Electronic Daily (TED) database and eForms

Table 1

Aggregated data from the TED database and eForms, covering the entire reference period

Vehicle type	N. of notices	Share of notices providing full information (if available)	Total number of vehicles	Number of clean vehicles	Share of clean vehicles	(for buses only) Number of zero-emission vehicles	(for buses only) Share of zero-emission vehicles
Light-duty vehicles						n.a.	n.a.
Trucks						n.a.	n.a.
Buses							
Additional information	For the monitoring of the implementation of Directive 2009/33/EC, Lithuania uses a report titled "*Transporto priemonių pirkimai pagal ADĮ*" (report on road vehicle procurement under the Alternative Fuels Law) available on the procurement monitoring dashboard "*Pirkimų vykdytojų žemėlapis – Švieslentė*"[4], developed by the Public Procurement Office. The dashboard is based on data from reports submitted to the Public Procurement Office by contracting authorities, contracting entities and central purchasing bodies; **data from the TED database and eForms is not integrated.**						

[4] Procurement monitoring dashboard "Pirkimų vykdytojų žemėlapis – Švieslentė": https://vpt.lrv.lt/lt/statistika-ir-analize/pirkimu-vykdytoju-zemelapis-svieslente-1/

Table 1a

Data extracted from the TED database (period from 2 August 2021 to 31 December 2023)

Vehicle type	**N. of notices**	**Share of notices providing full information (if available)**	**Total number of vehicles**	**Number of clean vehicles**	**Share of clean vehicles**	**(for buses only) Number of zero-emission vehicles**	**(for buses only) Share of zero-emission vehicles**
Light-duty vehicles						n.a.	n.a.
Trucks						n.a.	n.a.
Buses							
Additional information	For the monitoring of the implementation of Directive 2009/33/EC, Lithuania uses a report titled "*Transporto priemonių pirkimai pagal ADĮ*" (report on road vehicle procurement under the Alternative Fuels Law) available on the procurement monitoring dashboard "*Pirkimų vykdytojų žemėlapis – Švieslentė*"[5], developed by the Public Procurement Office. The dashboard is based on data from reports submitted to the Public Procurement Office by contracting authorities, contracting entities and central purchasing bodies; **data from the TED database is not integrated.**						

[5] Procurement monitoring dashboard "Pirkimų vykdytojų žemėlapis – Švieslentė": https://vpt.lrv.lt/lt/statistika-ir-analize/pirkimu-vykdytoju-zemelapis-svieslente-1/

Table 1b

Data extracted from eForms (period from 1 January 2024 to 31 December 2025)

Vehicle type	**N. of notices**	**Share of notices providing full information (if available)**	**Total number of vehicles**	**Number of clean vehicles**	**Share of clean vehicles**	**(for buses only) Number of zero-emission vehicles**	**(for buses only) Share of zero-emission vehicles**
Light-duty vehicles						n.a.	n.a.
Trucks						n.a.	n.a.
Buses							
Additional information	For the monitoring of the implementation of Directive 2009/33/EC, Lithuania uses a report titled "*Transporto priemonių pirkimai pagal ADĮ*" (report on vehicle procurement under the Alternative Fuels Law) available on the procurement monitoring dashboard "*Pirkimų vykdytojų žemėlapis – Švieslentė*"[6], developed by the Public Procurement Office. The dashboard is based on data from reports submitted to the Public Procurement Office by contracting authorities, contracting entities and central purchasing bodies; **data from the eForms is not integrated.**						

[6] Procurement monitoring dashboard "Pirkimų vykdytojų žemėlapis – Švieslentė": https://vpt.lrv.lt/lt/statistika-ir-analize/pirkimu-vykdytoju-zemelapis-svieslente-1/

3. Quantitative data from national sources

Table 2

National monitoring – aggregated data covering the entire reference period

Vehicle type	Number of contracts, monetary value, or other measure of the procurement size (if available)	Total number of vehicles	Number of clean vehicles [2]	Share of clean vehicles	(for buses only) Number of zero-emission vehicles	(for buses only) Percentage of zero-emission vehicles
Light-duty vehicles	n.a.	10,381	4,137	39.9%	n.a.	n.a.
Trucks	n.a.	507	147	29.0%	n.a.	n.a.
Buses	n.a.	1,731	1,186	68.5%	255	21.5%
Description of the data collection approach	To enable the monitoring of the implementation of Directive 2009/33/EC, the Public Procurement Office has been collecting data since August 2021 on public procurement procedures in which contracting authorities and contracting entities acquire road vehicles or enter into leasing, rental, or hire-purchase agreements for the use of road vehicles and/or provide, under contracts or other legal arrangements, services such as public road transport, special-purpose road passenger-transport, non-scheduled passenger transport, refuse collection, mail transport by road, parcel transport, mail delivery, and parcel delivery services in procurement procedure reports (reports submitted following procurement above and below EU thresholds procedures, excluding low-value procurement procedures) and calendar year reports (reports submitted once per year on contracts concluded in low-value procurement procedures). Central contracting bodies began collecting this information in the reports submitted to the Public Procurement Office starting January 1, 2022. Start of data collection: August 2021.					

	Data coverage: Data on public procurement targets, as established in the Law on Alternative Fuels of the Republic of Lithuania (transposing and strengthening the requirements of Directive 2009/33/EC), cover procurements above and below EU thresholds (including low-value procurements). Monitoring: The dashboard developed by the Public Procurement Office enables real-time monitoring of progress towards achieving the national public procurement targets established under the Law on Alternative Fuels of the Republic of Lithuania. Date of data export from the Public Procurement Office database: 9 April 2026 Vehicle Classification: • Light vehicles – categories M1, M2, and N1 • Trucks – categories N2 and N3 • Buses – category M3
Additional information	No additional information

4. Qualitative information on the implementation of the Directive

4.1. *Additional information on quantitative data*

In August 2024, the Public Procurement Office introduced new features in the procurement monitoring dashboard "*Pirkimų vykdytojų žemėlapis – Švieslentė*"[7], enabling the analysis of procurements of road transport vehicles and services provided by such vehicles falling within the scope of the Law on Alternative Fuels of the Republic of Lithuania, as well as the monitoring of target indicators set out in Article 15 of the Law on Alternative Fuels of the Republic of Lithuania. A dedicated report titled "*Transporto priemonių pirkimai pagal ADĮ*" (report

[7]Procurement monitoring dashboard "*Pirkimų vykdytojų žemėlapis – Švieslentė*" https://vpt.lrv.lt/lt/statistika-ir-analize/pirkimu-vykdytoju-zemelapis-svieslente-1/

on vehicle procurement under the Alternative Fuels Law) has been developed for monitoring these indicators. Detailed information on procurements of road transport vehicle and related services is available in the reports "*Tarptautinių ir supaprastintų pirkimų paieška*" (search of above and below threshold procurements) and "*Mažos vertės pirkimų paieška*" (search of low-value procurements).

The reports enabling monitoring and analysis of both achieved and target values of the indicators set out in Article 15 of the Law on Alternative Fuels of the Republic of Lithuania, including breakdowns by individual contracting authorities, by type of contracting entity, central purchasing bodies, and procurement sector (classical or utilities).

4.2. *Measures taken to implement the Directive during the current reference period*

In addition to the transposition of minimum procurement targets into national law, Lithuania has implemented a range of supporting measures to facilitate the practical application of Directive 2009/33/EC.
It should be noted that the measure "clean public procurement", included in the National Energy and Climate Action Plan 2021–2030[8], is one of the comprehensive measures contributing to the reduction of greenhouse gas emissions, the increased use of renewable energy sources and alternative fuels, and the improvement of energy efficiency. It is also closely linked to reducing air pollution and the use of fossil fuels.
The "clean public procurement" measure creates synergies with broader policies promoting the use of alternative fuels, including the deployment of vehicles powered by alternative fuels across all categories, the development of the necessary refuelling and recharging infrastructure (electricity, hydrogen, biomethane), the renewal of public transport fleets, increasing the attractiveness of public transport, and the implementation of sustainable urban mobility plans and related measures (e.g. low-emission zones in cities).
The Ministry of Transport and Communications has implemented and planned the following measures:

- Under EU funding (RRF, 2022–2026), five different calls have been launched to promote the installation of publicly accessible charging infrastructure:
    - in 42 municipalities, based on municipal plans for the development of public charging infrastructure up to 2030.
    - charging parks along the TEN-T road network.

[8] National Energy and Climate Action Plan 2021–2030: https://www.e-tar.lt/portal/lt/legalAct/dabeaf52b7b811ef88c08519262548c4?csrt=15985259605946113108

    - locations selected by charging operators (within 42 municipalities), including sites along main and national roads, fuel stations, railway and bus stations, airports, inland waterways and seaports.
    - locations selected by charging operators in 18 municipalities.
    - charging infrastructure for heavy-duty electric vehicles (along TEN-T corridors, dedicated rest areas and urban nodes).
- In parallel with the development of charging infrastructure, financial incentives for the acquisition of electric vehicles have been implemented (2022–2026) and are planned (2026–2028) through subsidies funded by the RRF and the Modernisation Fund, targeting private individuals, legal entities and the public sector.
- Since 1 January 2023, taxable persons (legal and natural persons engaged in economic activity and registered for VAT) have been allowed to deduct VAT on the purchase or import of M1 category electric vehicles, provided that the value of the vehicle does not exceed EUR 50,000 (including VAT).
- According to amendments to the Corporate Income Tax Law of the Republic of Lithuania[9], as of 1 January 2025, part of the acquisition cost of passenger cars may be treated as deductible expenses, within limits depending on CO_2 emissions. For zero-emission vehicles (0 g CO_2/km), up to EUR 75,000 of acquisition costs may be treated as deductible expenses.
- Since 1 July 2020, a registration tax has been applied to M1 and N1 category vehicles depending on the type of fuel and its combinations, where CO_2 emissions exceed 130 g/km.
- Between 2022 and 2025 (RRF funding), financial support has been provided for the purchase and installation of private charging points.
- In addition to financial incentives, electromobility is promoted through regulatory, educational (e.g. awareness-raising campaigns encouraging the use of electric vehicles), and other soft measures at both national and municipal levels. These include:
    - allowing electric vehicles to use dedicated public transport lanes.
    - providing incentives for parking and access to cities and designated zones.
    - the development of low-emission zones in cities, which are a key measure for reducing air pollution and promoting fleet renewal, including in passenger transport services. Within these zones, the circulation of polluting vehicles is restricted or fully prohibited, except for zero-emission vehicles.

[9] Corporate Income Tax Law of the Republic of Lithuania: https://www.e-tar.lt/portal/lt/legalAct/TAR.A5ACBDA529A9/asr?csrt=15985259605946113108

- To encourage the business sector to transition to the use of more environmentally friendly transport, a 75% reduction in road tolls applies, from 2026, to commercial vehicles powered by electricity or hydrogen (N1 category) and to heavy-duty vehicles (N2 and N3 categories).
- Financial support was provided during 2023–2025 (RRF and Climate Change Programme funding) for the acquisition of zero-emission heavy-duty vehicles (M2, M3, N2, N3). To ensure continued support, an application for funding from the Modernisation Fund for the period 2027–2030 is under preparation, and a separate application has already been approved for the further development of charging infrastructure for heavy-duty vehicles.
- From 1 January 2027, the introduction of an electronic road tolling system (e-tolling) is planned, replacing the current road user charge. The draft methodology prepared by the Ministry proposes a 50% reduction in tolls for heavy-duty vehicles powered by electricity or hydrogen.

The Public Procurement Office of the Republic of Lithuania provides methodological support to contracting authorities and contracting entities on the application of national requirements related to clean vehicle procurement. This includes:

- preparation and publication of methodological guidance and explanatory materials[10].
- provision of consultations in writing and by phone (via a centralised call centre) on the application of the Law on Alternative Fuels of the Republic of Lithuania in procurement procedures related to M and N category clean vehicles and related services.
- development and publication of training materials, including a dedicated training video for contracting authorities on green procurement of M and N category clean vehicles and related services [11].
- maintenance of a dedicated FAQ section providing practical guidance on the procurement of M and N category clean vehicles and related services[12].
- dissemination of good practice examples, such as the procurement of electric buses by Tauragė municipality[13].

[10] Explanatory materials: https://vpt.lrv.lt/lt/darnieji-pirkimai/pirkimu-vykdytojams_4/zalieji-pirkimai-1/aktualijos-ir-geroji-praktika/pranesimai/
[11] Training video: https://www.youtube.com/watch?v=Y3FXYiZM3xU
[12] FAQ section: https://klausk.vpt.lt/hc/lt/sections/9669411192476-10-11-M-ir-N-kategorij%C5%B3-keli%C5%B3-transporto-priemon%C4%97s
[13] Case study of Tauragė municipality: https://vpt.lrv.lt/uploads/vpt/documents/files/Interviu_Taurag%C4%97s%20rajono%20savivaldyb%C4%97_%202022-07.pdf

- regular disseminated of relevant information through a quarterly newsletter[14] (initially focused on green procurement and, since 2024, broader sustainable procurement), including updates and practical guidance on the procurement of M and N category clean vehicles and the application of the Law on Alternative Fuels of the Republic of Lithuania.

These measures contribute to increasing awareness, improving compliance and reducing administrative uncertainty for contracting authorities and contracting entities.

In addition, the central purchasing body CPO LT has developed electronic catalogue modules for buses and heavy and special-purpose vehicles, enabling contracting authorities to procure electric vehicles more efficiently.

4.3. *Identified barriers*

The main barrier relates to the financial capacity of contracting authorities and contracting entities. Even where support schemes are in place (e.g. for the acquisition of heavy-duty vehicles powered by electricity or hydrogen), such measures are not sufficiently attractive due to the relatively low level of financial support (e.g. in line with GBER or *de minimis* conditions) and the limited budgetary capacity of contracting authorities or contracting entities to procure such vehicles. The cost of low-emission and zero-emission vehicles remains significantly higher compared to vehicles powered by fossil fuels, with price differences ranging from several tens of thousands of euros (e.g. biomethane-powered vehicles) to several hundreds of thousands of euros (e.g. electric or hydrogen-powered vehicles).

A significant challenge in Lithuania, as in many EU Member States, is the development of charging infrastructure for heavy-duty electric vehicles. Currently, such infrastructure (dedicated specifically to heavy-duty transport) is not yet in place; however, the first charging park is expected to be operational by mid-2026. One of the main reasons is the very limited number of electric heavy-duty vehicles in the country (approximately 17 registered in total). In addition, charging infrastructure for heavy-duty vehicles requires significantly higher power capacity, which increases both installation and maintenance costs (including capacity-related charges).

[14] Public Procurement Office newsletters: Green Public Procurement Newsletter (2022–2023): https://vpt.lrv.lt/lt/darnieji-pirkimai/pirkimu-vykdytojams_4/zalieji-pirkimai-1/aktualijos-ir-geroji-praktika/naujienlaiskiai/ and Sustainable Public Procurement Newsletter (since 2024): https://vpt.lrv.lt/lt/darnieji-pirkimai/darniuju-pirkimu-naujienlaiskis/

Although the number of electric vehicles is steadily increasing, it is already evident that the growth of electric vehicles is lagging behind the deployment of charging infrastructure. Lithuania has successfully expanded publicly accessible charging infrastructure for light-duty vehicles, with more than 5,300 charging points installed. However, the number of electric vehicles has grown more slowly, with approximately 47,600 vehicles registered to date (with a target of reaching 50,000 by the end of 2025). Currently, one publicly accessible charging point serves around 9 electric vehicles, compared to the EU average of 12 vehicles per charging point. Due to the relatively slow growth in the number of electric vehicles, the charging infrastructure is not used optimally and operates at only around 5% of its capacity, which creates a risk that some charging stations may be closed.

In addition, from a public procurement perspective, a practical challenge relates to uncertainty among contracting authorities and contracting entities in assessing whether exemptions provided under national legislation can be applied in practice.
To address this challenge, the Public Procurement Office of the Republic of Lithuania provides continuous methodological support, including consultations, guidance materials and practical examples.

4.4. *Future implementation activities*

The main objectives for the decarbonisation of the Lithuanian transport sector are as follows: by 2030, to reduce greenhouse gas (GHG) emissions by 14% compared to 2005 levels; to increase the share of renewable energy in the transport sector to 15%; to ensure that electric and zero-emission vehicles account for at least 15% of the vehicle fleet; to ensure that all public transport is powered by alternative fuels; and to electrify approximately 40% of railway lines. By 2035, the use of fossil fuels in road transport is to be reduced by 50%, with a complete phase-out by 2045, and by 2050, GHG emissions in the transport sector are to be reduced by 90% compared to 1990 levels.

The targets and measures necessary to achieve GHG reduction in the transport sector are set out in the National Energy and Climate Action Plan 2021–2030. Although the Plan is primarily aimed at reducing GHG emissions (including in the transport sector), the measures

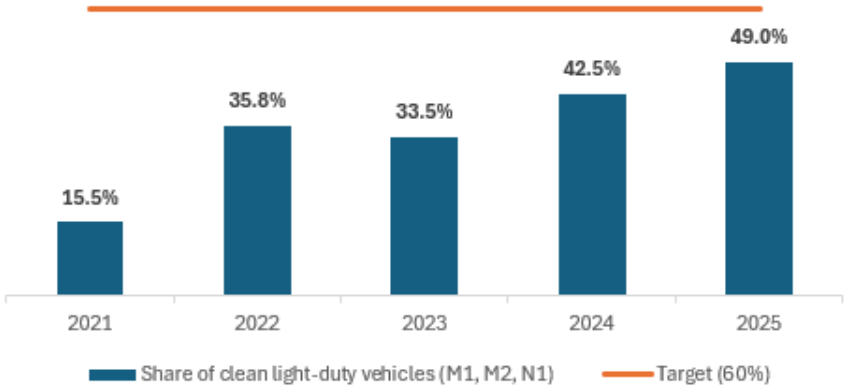
it includes also contribute, in most cases, to increasing the use of renewable energy sources and alternative fuels, improving energy efficiency, and reducing the use of fossil fuels.

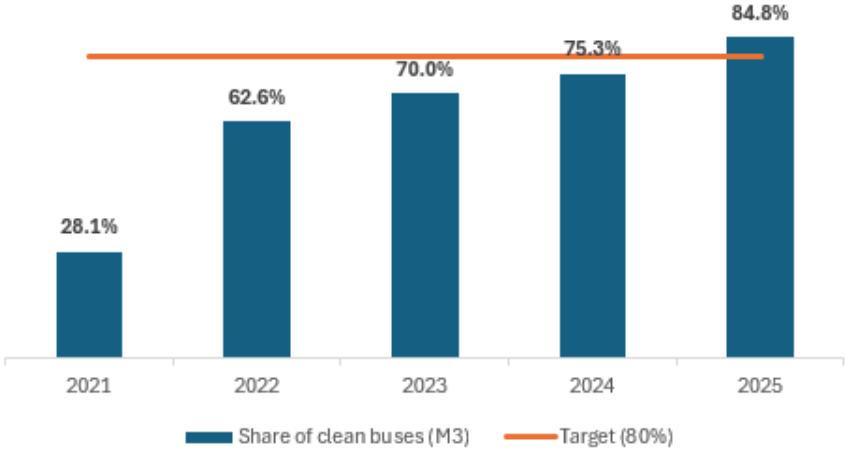
The key measures under the updated Plan up to 2030 focus on the broader use of alternative fuels, the promotion of vehicles powered by such fuels across all categories (through financial, regulatory and other measures), the development of the necessary recharging and refuelling infrastructure (electricity, hydrogen, biomethane), the renewal of public transport fleets (through financial and regulatory measures), increasing the attractiveness of public transport (including infrastructure improvements), the implementation of sustainable urban mobility plans and related measures (e.g. low-emission zones in cities), as well as awareness-raising measures targeting both the public and businesses (e.g. promoting changes in travel behaviour and eco-driving).

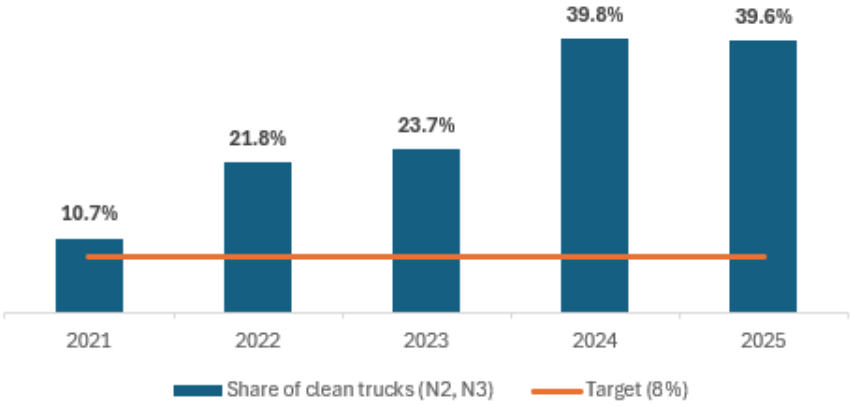
The National Energy and Climate Action Plan also includes the “clean public procurement” measure. It should be noted that the minimum public procurement targets set by Directive 2009/33/EC for Lithuania are significantly lower than those established in national legislation (the Law on Alternative Fuels of the Republic of Lithuania). Lithuania has therefore set considerably more ambitious minimum public procurement targets for all categories of road transport vehicles.

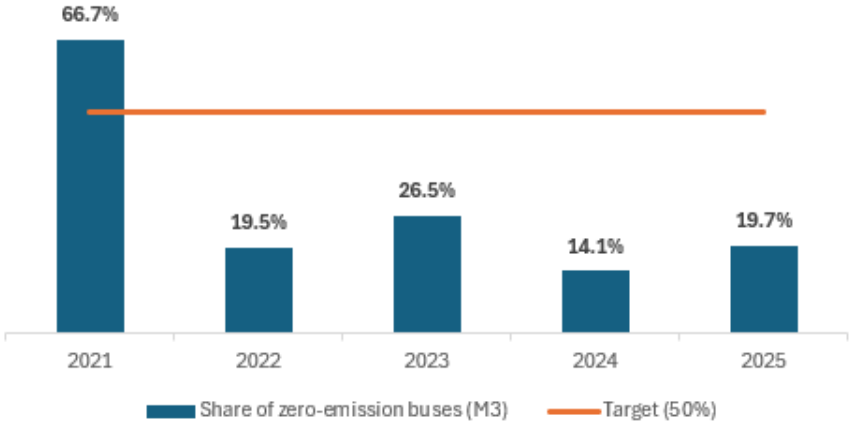
Considering all commitments related to achieving GHG reduction targets and implementing the measures set out in the National Energy and Climate Action Plan, it can be expected that both the number of clean vehicles and the development of infrastructure will continue to increase and accelerate. Trends in the share of clean vehicles during the reporting period are presented in the charts below (these indicators are monitored through the procurement monitoring dashboard). The share of clean light-duty vehicles increased during the reporting period, although the target of 60% has not yet been achieved. The share of clean trucks also increased and the target of 8% was met and exceeded throughout the reporting period. The share of clean buses grew steadily, and the target of 80% was achieved in 2025. However, the share of zero-emission buses in the total number of clean buses fluctuated during the reporting period but does not show consistent upward trend.

Trends in clean vehicle procurement (2021–2025):









From a public procurement perspective, further efforts will focus on strengthening support for contracting authorities and contracting entities in the application of clean vehicle procurement requirements. The Public Procurement Office of the Republic of Lithuania will continue to provide methodological support, including consultations, training activities and the development of guidance materials related to the procurement of M and N category vehicles and related services. Additional efforts will focus on enhancing awareness and practical understanding of applicable requirements through communication activities and the dissemination of good practice examples.

4.5. *Additional information*

No additional information.

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(1) This information may have been provided in the notices by indicating whether the vehicles being procured are clean, or by including sufficient information about the vehicles involved to assess this.

(2) This is the total number of clean vehicles (including zero-emission vehicles).