



LIFE4EPR

Towards harmonized Extended Producer Responsibility schemes across the EU

Background information for co-creation workshops

Document for attendees

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This document is a background document for the LIFE4EPR co-creation workshop on the co-design of an EU-wide EPR register. It does not contain LIFE4EPR project conclusions. Options presented are exploratory and not final recommendations. Their feasibility varies and depends on legislative, technical, and governance factors.

The session will be recorded and transcribed for further analysis and writing of results.

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1 LIFE4EPR introduction

The project [LIFE4EPR](#) (Towards harmonized Extended Producer Responsibility schemes across the EU) has been designed in response to three main knowledge gaps in the European Union:

- The lack of an EU-wide overview of EPR schemes at Member State (MS) level
- Limited knowledge on the degree and forms of harmonisation among existing EPR producer/product registers
- Limited evidence on the environmental effectiveness of EPR systems

In this context, the project aims to generate knowledge to enhance the effectiveness, governance, and cost-efficiency of EPR schemes.

The project includes:

- Stakeholder engagement
- Mapping of EPR schemes and PROs
- Benchmarking of selected EPR systems
- Developing and testing of a **pilot harmonised EU-wide EPR register**
- Providing policy recommendations and best practices for EPR schemes in the EU

The results will support policymaking for national EPR schemes. Long-term impact will be fostered through the creation of a knowledge-sharing community (the ExPeRt Community) bringing together academia, practitioners, and stakeholders working on EPR.

The LIFE4EPR consortium includes ENT (project coordinator), together with ACR+, WEEE Forum, Zero Waste Europe, ECO, SOTELO, and VUB.

This document focuses specifically on the **design of the concept of the EU-wide EPR producer register**.

2 Objective of the co-creation session and of the present document

A series of co-creation workshops have been scheduled within the LIFE4EPR project to design an EU-wide EPR register. The objective of the co-creation sessions is to bring together stakeholders' perspectives and support the identification of the most feasible approach for developing an EU-wide EPR register pilot, enabling the project to move into the next phase, where the selected approach will be further developed, programmed, and tested.

This document provides background information for such sessions in which different options addressing the harmonisation of EPR registers will be presented. **It is important to underline that the options presented are exploratory and do not constitute final recommendations.** Their feasibility varies and depends on legislative, technical, and governance factors. Participants will be invited to share their views on each option, identify advantages and disadvantages and highlight implementation challenges. Participation will take place through open discussion and online questions during the sessions as well as through an online questionnaire that will be shared after the sessions

To support preparation, some of the questions that will be discussed during the session are provided in the following sections.

3 Current EPR Registers

Producers fulfil their EPR obligations individually (individual systems), or collectively (via a PRO). With respect to the EPR producer registration and reporting of products placed on the market (POM), producers fulfil their obligations directly, through an authorised representative (AR), or through a PRO, where this service is offered. Enforcement is carried out at national level. Data validation is typically performed by national registers, PROs, or a combination of both.

National EPR registers typically consist of two main components: 1) A **registration** module, where producers placing products on the market in a Member State (MS) are registered. This may be a one-time exercise for the producer or require regular registration. 2) A **reporting** module, where the registered producers declare the quantities of products placed on market. This is a regular exercise carried out by producers with a frequency that differs from one MS to another (for example once a year, twice a year).

It is also important to note that most EPR registers are **stream specific**. This means that a producer placing a product on the market that falls under multiple EPR streams (e.g., batteries, packaging etc.) must register and report separately in each relevant EPR register. As a result, the same producer may need to complete multiple registrations and reporting within a single MS, and this requirement is replicated in each additional MS where the product is placed on the market.

Illustrative Example: A producer based in Spain that manufactures and places on the market a mobile phone (Item A). This product falls under multiple EPR streams, as it includes electrical and electronic equipment (EEE), an embedded battery, and packaging. The producer sells this product in both Spain and Italy. As a result, it must comply with EPR obligations in each country where the product is placed on the market and for the three streams

In Spain, the producer is required to register separately in three different EPR registers corresponding to each product stream: 1) EEE register, 2) Batteries register and 3) Packaging register. Similarly, in Italy, the producer must also register in the equivalent three EPR registers for these streams. In total, for just two Member States, the producer is required to complete six separate registrations.

Each of these national registers may require a) Different data formats, b) Different product classification codes, c) Different registration procedures, and d) Different reporting frequencies and deadlines. As a result, the producer must adapt the same underlying product information to multiple national systems, often requiring reclassification of products and duplication of administrative efforts.

If the producer expands to additional Member States, this complexity increases proportionally, as the same process must be repeated for each country and for each relevant EPR stream.

3.1. Registration

Producer registration currently takes place at national level. In most cases, producers may register directly to national registers or through PROs (as a service offered by PROs). Data verification is also at national level by national registers and PROs. There is currently no EU-wide system for EPR producer registration, see Figure 1.

Figure 1: Current data flow in the producer registration step of the National EPR registers.

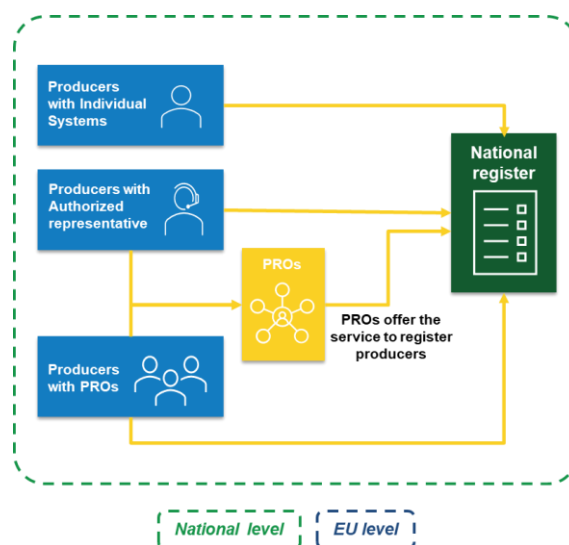


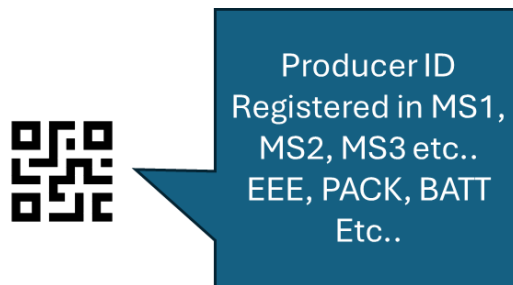
Table 15 of [Deliverable 3.1](#) provides a complete analysis of the different parameters requested in the different EPR registers analysed within the Deliverable. The parameters can be seen in Figure 2.

Figure 2: List of parameters requested in the different EPR registers analysed in Deliverable 3.1

ROLE SELECTION	PRODUCER	PRODUCTS	PRO affiliation
PRODUCER OR REPRESENTATIVE (AR or PRO)	LEGAL ENTITY TYPE	PRODUCT CATEGORY (MATERIAL FOR PACKAGING)	COMPANY NAME
NATIONAL OR FOREIGN PRODUCER	PRODUCER ID/TAX NUMBER	PRODUCT SUBCATEGORY	AUTHORISED REPRESENTATIVE ID/TAX CODE
CONTACT PERSON (natural person)	COMMERCIAL REGISTER NUMBER/chamber of commerce ID	PRODUCT TYPE	COMMERCIAL REGISTER NUMBER/chamber of commerce ID
SALUTATION	ACTIVITY CLASSIFICATION	PRODUCT BRAND (or and trademark)	PHONE NUMBER
ACADEMIC TITLE	COMPANY NAME (Trading name) (Natural person: First+Last Name)	SINGLE-USE/REUSABLE	EMAIL
OFFICIAL ID	COMPANY REGISTERED NAME (full legal name)	DEPOSIT/NON DEPOSIT	ADDRESS
NAME/FIRST NAME	COUNTRY	LAW APPLIED	WEB
SURNAME/LAST NAME	POSTAL CODE	AFFILIATION: INDIVIDUAL OR COLLECTIVE PRO? (check)	REPRESENTATION AGREEMENT
POSTAL CODE	PROVINCE/REGION	APPOINTED PRO NAME	VERACITY STATEMENT (check)
SAME DATA AS AR? (check)	CITY/MUNICIPALITY	PRO CONTRACT DURATION	PAYMENT DETAILS
CITY/MUNICIPALITY	POSTAL ADDRESS	PRO CONTRACT (FILE ATTACHMENT)	TAX ID
POSTAL ADDRESS	EMAIL	DATE OF PRODUCT AVAILABILITY ON THE MARKET	ACCOUNT HOLDER
REGION/PROVINCE	PHONE NUMBER	PLANNED QUANTITY TO BE SUPPLIED (DOMESTIC MARKET)	IBAN
COUNTRY	WEBSITE	PRODUCT SECTOR USE (HOUSEHOLD/DOMESTIC MARKET, COMMERCIAL, NOT HOUSEHOLD)	BIC
EMAIL	DEPARTMENT NAME	AUTHORISED REPRESENTATIVE (or PRO DELEGATION)	PAYMENT METHOD
POSITION	CEO ID	LEGAL ENTITY TYPE	BILLING REFERENCE NUMBER
FAX	CEO NAME	ORGANIZATION/DELEGATION TYPE (PRO, online marketplace, AR, other)	FINANCIAL GUARANTEE DETAILS
PHONE NUMBER	NATURAL PERSON CERTIFICATE (business or individual activity certificate)	COMPANY NAME (Natural person: First+Last Name)	BLOCKED BANK ACCOUNT
REPRESENTED COMPANY ID (in case of representative role)	TYPE OF ACTIVITY / PRODUCT DESTINATION (OWN NEEDS, PLACED IN MARKET, EXPORT)	AUTHORISED REPRESENTATIVE ID/TAX CODE	GUARANTEE INSURANCE
REPRESENTED COMPANY NAME (in case of representative role)	PRODUCT SALES TECHNIQUE (distance, retail, wholesale, others...)	COMMERCIAL REGISTER NUMBER/chamber of commerce ID	BANK GUARANTEE
	INDIVIDUAL PRODUCER COMMUNICATION TO REGION AND DATE (file attach)	PHONE NUMBER	OTHER GUARANTEE
	TURNOVER CATEGORY (DD)	FAX	
	COMMENTARIES	EMAIL	
	Initial waste producer of hazardous or non-hazardous waste	ADDRESS	
	Declaration on EPR responsibility compliance (including PROs certificate)	REGISTER ADMINISTRATION ROLE	
WASTE MANAGEMENT PLAN (DESCRIPTION)		CITY	
Distance selling		PROVINCE/REGION	
producer uses distance selling to sell EEE directly to private households or to users other than private households in another Member State.		COUNTRY	
List of Member State(s) in which the producer sells EEE by distance selling		WEB	
Name of the authorised representative in the Member State(s) in which the producer sells EEE by distance selling		EPR STREAM/SECTOR REPRESENTED	
		REPRESENTATION/DELEGATION PERIOD (or START DATE)	
		LINK TO EXTERNAL ACCREDITATION PLATFORM	
		REPRESENTATION AGREEMENT	

Question:

- Could a common European Identifier be implemented in the registration process to consistently identify producers, authorised representatives and PROs across Member States (e.g. by reusing existing business identifiers)?
- Could we remove product codes from the registration phase (to reduce complexity at entry stage), but keep them in the reporting phase? Would this approach cause enforcement issues?
- Could a harmonised EU EPR registration number be assigned after the registration process, providing producers with a consistent registration reference across Member States and product categories? A QR code type of registration certificate, updatable with information provided by National registers in each MS live. Then producers could put all these numbers in a QR code (see image below) showing all the EU EPR registration number for different MSs and EPR streams related to each product.



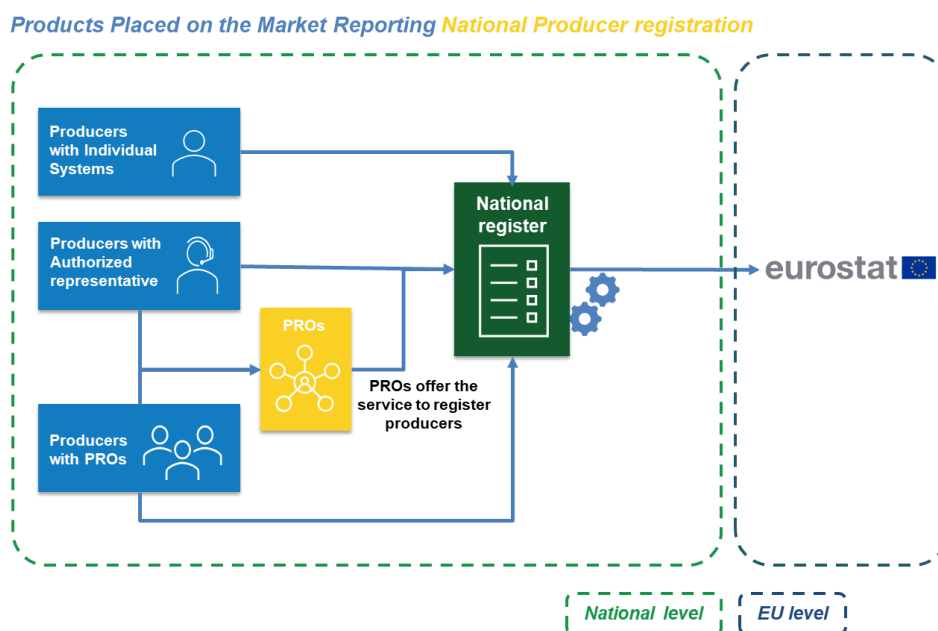
3.2. Reporting

Figure 3 illustrates a simplified overview of the current reporting framework in most Member States. In most cases, producers are required to report the quantities of products placed on the market to both: PROs contracted and NRs. Reporting requirements vary across countries. NRs use different product codes and reporting formats across MS. PROs apply their own coding systems, typically aligned with their fee structure, which also differ across Member States.

In practice, producers often report their sales data primarily to PROs. PROs calculate fees based on this data and aggregate, validate and submit the information to NRs on behalf of producers. As a result, PROs frequently act as the main data entry and validation point for producers, and NRs rely on PRO-submitted data. Reporting obligations may still exist towards both PROs and NRs.

For producers placing products on the market in multiple Member States, this results in: 1) Multiple reporting obligations (one per country and stream), and 2) The need to use different coding systems and formats. In addition, as PROs typically operate at national level, producers (or their authorised representatives) must establish separate contractual arrangements in each MS where they place products on the market.

Figure 3: Current data flow for Reporting at National level



4 Key Challenges in EPR Registration & Reporting

With the current systems introduced in section 3, producers face several challenges in complying with EPR obligations related to the registration and reporting of products placed on the market. LIFE4EPR partners have identified the following ones:

- 1) Lack of clear and accessible compliance information for producers
- 2) Difficulty in identifying the appropriate registration platform
- 3) Uncertainty regarding what needs to be registered
- 4) Uncertainty regarding the definition of “producer” (i.e. who is responsible for compliance)
- 5) Language barriers due to national language requirements
- 6) Multiple registration channels across different Member States
- 7) Multiple registration and reporting formats across EPR streams
- 8) Different reporting codes and PRO classification systems
- 9) Challenges in appointing and managing authorised representatives

4.1. Scope and Magnitude of the Problem

Producers may face different combinations of EPR registration and reporting challenges depending on their size, organisational structure, sector, and the number of MS in which they place products on the market. As a result, the overall impact of fragmentation is unevenly distributed across market actors.

Available evidence suggests that **cross-border producers** (i.e. those placing products in >1MS) are the most affected by the lack of harmonisation, as they must navigate multiple national systems, requirements, and procedures. This burden is particularly relevant for companies operating without established legal entities in each MS. In contrast, larger companies with subsidiaries at national level may be less exposed to these challenges, as they can rely on local structures to manage compliance. For clarity, in the context of this document, cross-border producers are considered those that place products in >1 MS and do not have a established legal subsidiary in every country where they place products on, therefore they have to rely on Authorised Representatives to register and report in the countries where their legal entity is not based.

It should be noted that the **overall size and scale of the problem remain uncertain**. There is currently no comprehensive data on the number or proportion of producers operating across multiple MS, nor on the extent to which they are affected by regulatory fragmentation. Estimating the share of cross-border producers in the EU market (and assessing the intensity of the burden they face) falls outside the scope of the LIFE4EPR project but represents a critical knowledge gap for policy design and evaluation of the impact of the solutions proposed.

This uncertainty has several important implications. First, it makes it **difficult to assess the scale and urgency** of the problem, and therefore to determine the appropriate level of intervention. Second, it remains **unclear how many producers would benefit most from harmonisation measures**, and whether these benefits would justify the associated costs. Finally, any systemic changes, particularly those involving harmonisation or restructuring of existing systems, would likely **affect all actors**, including those who may not currently experience significant challenges (the ones putting their product in a single country's market).

In this context, improving the evidence base on the scale and distribution of the problem would be essential to support informed decision-making and ensure that future measures are proportionate and targeted.

4.2. Relation between EPR registers and PROs reporting

The practical burden on producers can vary significantly based on how they fulfil their EPR obligations. In many cases, producers join PROs to collectively meet these obligations, while individual systems are exceptions.

When producers fulfil their EPR obligations collectively through a PRO, they are required to report the quantities of products placed on the market (POM) to the PRO, which uses this information to calculate the applicable fees. As previously mentioned, producers are also obliged to register and report to the national EPR registers. National Registers and PROs use EPR reporting information for different purposes, resulting in often different datasets. While national registers focus on compliance monitoring and enforcement, PRO reporting is typically linked to fee calculation and operational management.

In practice, producers often provide products placed on the market (POM) data primarily to PROs, which may also offer registration and reporting services on their behalf. In these cases, producers

may only submit data once to the PRO, while the PRO performs the data conversion and reporting required at national level. This can already mitigate some of the fragmentation challenges identified.

However, since PROs operate at national level and producers typically establish contractual relationships with one or more PROs in each country where they place products on the market, harmonisation of national registers alone is unlikely to eliminate the need for country-specific compliance arrangements. While such harmonisation may reduce certain administrative burdens, some level of national reporting would likely remain necessary to support interactions with PROs. This was identified as an important contextual factor when assessing both the opportunities and limitations of EPR registration harmonisation.

Figure 4 Scheme of the EPR reporting done by producers when dealing collectively with EPR obligation through PROs



5 EU-wide EPR Register design options

Before considering any harmonisation of registration and reporting systems, it is important to recognise that the initial challenges listed (primarily the ones related to access to information) can also be addressed without legislative harmonisation of the registers. Efforts could focus on improving transparency and accessibility of EPR-related information across Member States, while maintaining existing national registration frameworks. To this end, the establishment of an **EU EPR Information Hub** (described in A1.1. EU Information hub) could improve the situation significantly, hence it is a piece included in all scenarios under discussion.

Figure 5 provides an overview of the main design options for an EU-wide EPR register presented in the previous co-creation sessions. Each option is explained in detail in Annex 1. Overall, there are two alternative options with respect to the data entry:

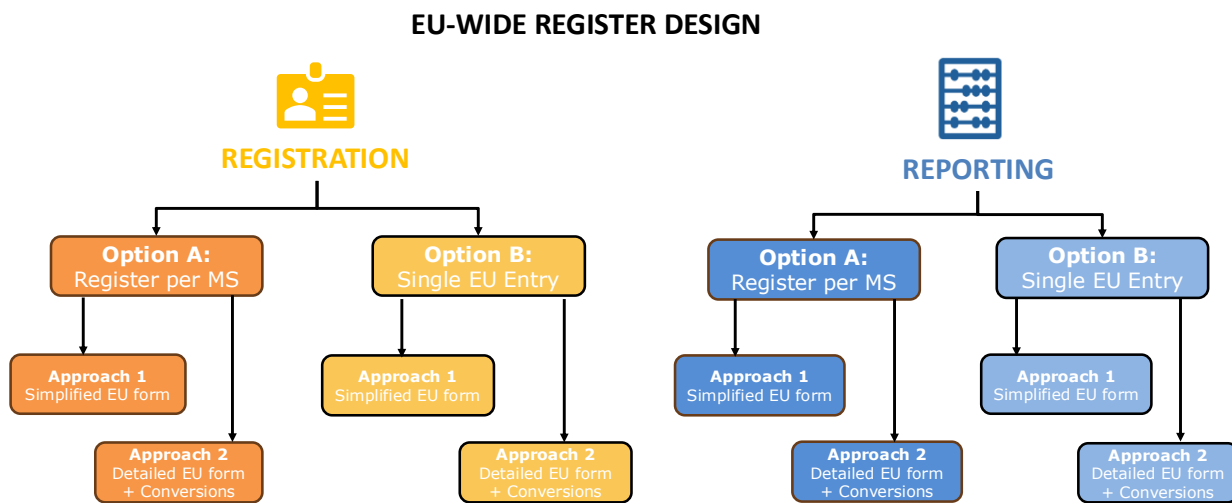
- A. at MS level, and
- B. at a single EU entry point.

For each option, two alternative approaches are considered:

1. a common simplified EU form, based on more aggregated and higher-level product categories, aimed at reducing administrative burden through standardization, and
2. a common more detailed EU form with finer product subcategories and conversion mechanisms, allowing for greater data granularity while ensuring interoperability with national systems.

All the design options incorporate the EU Information hub to address the EPR information gaps.

Figure 5: Overview of EU-wide EPR Register Design Options



Within the two options for data entry (registration and reporting managed at MS level or through a single EU entry point) both alternative approaches can be applied, resulting in different possible combinations (Figure 5). Table 1 shows key differences between both approaches.

Approach 1 consists of introducing a fully standardised EU data model. Under this option, existing national data structures would be replaced by a new, common format used uniformly across all national registers. While this approach is conceptually straightforward, it would require significant changes to existing national systems.

Approach 2 introduces the concept of conversion factors and seeks to balance harmonisation with flexibility. Instead of replacing national systems, it builds on a common registering and reporting format with a high level of granularity. Producers would report their data using a detailed and standardised set of categories (i.e. highly disaggregated product codes), identical across all MS. This harmonised input dataset would then be processed by national registers (NRs) and Producer Responsibility Organisations (PROs), which would apply conversion factors or aggregation rules to translate the detailed data into their respective reporting structures.

In practical terms, a producer placing products (e.g. cooling equipment) on multiple national markets would only need to compile and submit one dataset structured according to the harmonised, granular format. This dataset would be shared with the relevant national registers and PROs in each country of operation. Each receiving entity would then map and aggregate the data according to its own categories and reporting requirements, ensuring compatibility with existing databases without requiring changes to their internal structures (see Figure 6).

It is important to mention, that with Approach 1 (without convertible product codes between EU-level classifications and national or PRO-specific Systems) parallel PRO coding systems may persist. In practice, this would mean that:

1. National Registers (NRs) across MS will use the same coding system and forms for each stream (e.g. common EU form for EEE, common EU form for batteries etc.),
2. PROs will continue to operate with distinct coding systems at national level (i.e. each PRO using their own fee system),
3. Producers affiliated with a PRO would most likely continue reporting using the PRO’s specific codes, and
4. The PRO would then process and translate this information for submission to the National Register.

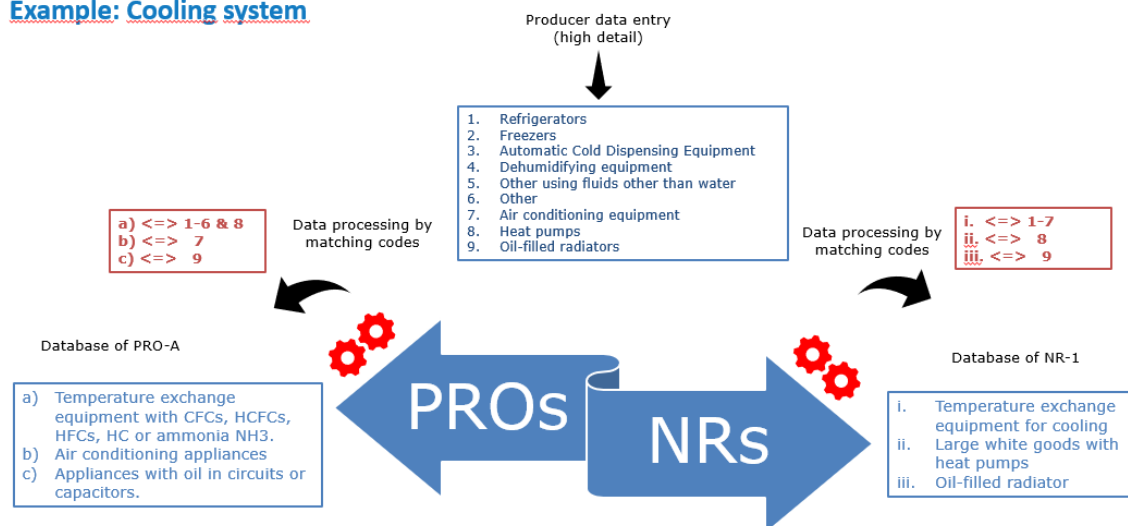
As a result, the current operational model would largely remain unchanged, with the EU harmonised format adding an additional layer rather than fully replacing existing structures.

Table 1: key differences between both approaches

	Approach 1	Approach 2
System Adaptation	Requires NRs to redesign their systems to a common EU structure	Allows NRs and PROs to maintain existing systems, but requires the development of conversion tools
Data Structure	Relies on a simplified and harmonised set of product categories	Introduces more granular EU-level product data, increasing detail and precision
Complexity and burden	Higher implementation effort for national systems, but simpler for producers	Lower structural impact on national systems, but increased complexity for producers and data processing

Figure 6: Example of the conversion factors and the higher level of granularity applied in Approach 2 with a cooling system

Example: Cooling system



The key advantage of Approach 2 lies in reducing the administrative burden for producers, who would no longer need to reclassify and adapt their data to multiple national coding systems. At the same time, it preserves the autonomy of national registers and PROs, allowing them to maintain their established data models and historical datasets. However, an important limitation must be acknowledged. The identification of a sufficiently detailed and universally compatible set of reporting categories remains uncertain. **Defining a level of granularity that can accommodate all**

existing national and PRO data structures across the EU would require a complex mapping exercise. This task falls outside the scope of the LIFE4EPR project. While the approach 2 is considered conceptually feasible, its practical implementation would depend on further technical work to assess whether such a universally compatible classification system can be achieved. The use of other existing product codes is also to be explored e.g. customs codes, codes for commodities etc.

6 Key learnings up to date

Stakeholders consulted in the previous co-creation sessions (covering NRs and market stakeholders) widely **welcomed the concept of an EU EPR Information Hub**, acknowledging its potential to reduce compliance burden by improving access to information. This measure was also supported by similar initiatives observed in other areas.

Both, national registers and market actors expressed a clear preference for keeping registration and reporting at national level (Option A). Enforcement at national level is already challenging and expanding it to an EU-wide register would introduce even greater complexity. Additionally, most PROs (Producer Responsibility Organisations) operate at national level, further reinforcing the preference for registration systems at MS level. However, Marketplaces attending co-creation sessions and some producer association showed interest in Option B, which advocates for a single EU entry point.

Stakeholders expressed reluctance to provide more granular details in their reporting. However, it remains unclear what exactly "higher detail" would entail. Despite this, participants favoured Approach 1 (simplified EU forms) over Approach 2, which would allow national registers and PROs to retain their current data structures. It's important to note that just because Approach 1 (simplified EU forms) is used in EPR registers, this does not imply that the reporting process to PROs will be similarly simplified.

The uncertainties regarding the number of producers affected by fragmentation, and the scale of the problem (see section 4.1), make it challenging to assess the urgency of harmonisation efforts. Additionally, system changes to address these issues will have a broad impact, not only on those producers facing the most significant challenges but also on actors who are currently not experiencing these issues. This highlights the need for a well-balanced approach that considers both, the immediate needs of cross-border producers and the wider ecosystem of actors involved in EPR registration and reporting.

It should also be noted, that often, registration is a one-off process, only required again if there is a change in the situation of the producer. This differs from reporting, which is typically required on an annual or semi-annual basis. This distinction should be considered when evaluating the need for harmonisation.

7 Hybrid approach

In addition to the standalone options of maintaining national systems or introducing a fully harmonised EU approach, a hybrid solution could combine elements of both.

This approach aims to balance the need for harmonization and simplification (particularly for cross-border producers) with the need to preserve existing national systems for producers that are not significantly affected by current fragmentation (the latter, mostly 'local producers').

A hybrid approach would allow producers to choose between:

- Currently existing national routes, and
- a harmonized route.

Producers placing products in only one MS (also called 'local producers'), or those satisfied with existing registers, could continue using the current national registration process and data structures without changes in their modus operandi or reporting formats. By contrast, cross-border producers,

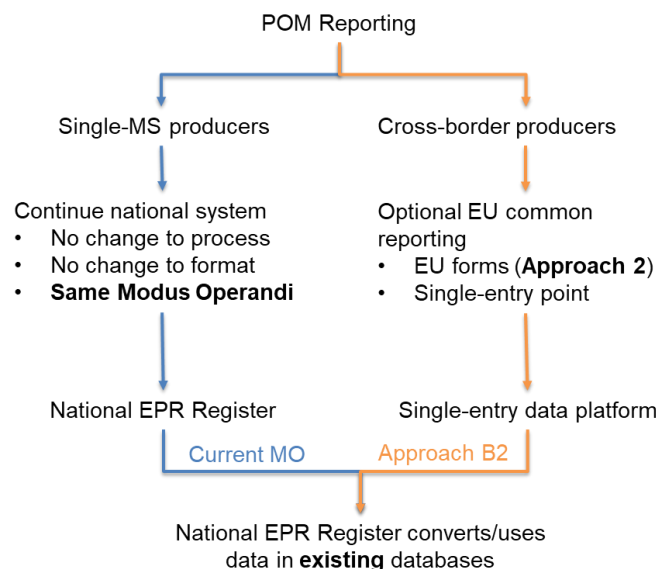
placing products on the market in more than one MS, could opt to report through a single-entry point using a more detailed EU format, corresponding to Approach B2.

This would create a dual system in which National Registers would need to manage two data pathways: existing national formats and the harmonised EU format (the latter convertible into their existing structure).

While this solution for reporting has been discussed in depth within the consortium to identify all potential technical and management issues, other proposed solutions are still under discussion for registration. The hybrid approach for POM Reporting is illustrated in Figure 8.

The harmonised data submitted by cross-border producers could then be processed, before or after distributed to the relevant National Registers and, where appropriate, used by PROs according to national requirements.

Figure 7: Scheme of the hybrid approach for Reporting of products POM



This model would provide a targeted response to the problem by focusing simplification efforts on the actors most affected by fragmentation, while avoiding unnecessary disruption for others. It also recognises that the scale of the problem is not yet fully quantified. For this reason, the hybrid approach could function as a flexible and transitional solution, allowing time to assess whether deeper harmonisation is necessary.

If future evidence confirms that fragmented registration and reporting systems creates significant inefficiencies, the system could progressively evolve towards greater standardisation. Conversely, if

the problem proves limited, national systems could continue to operate with incremental improvements.

The hybrid approach would be most relevant for EPR streams with long-established national registers, such as EEE, packaging and batteries. For new registers, however, the harmonised route should be considered from the outset, avoiding the creation of additional fragmented systems.

It should also be clarified that this hybrid approach would only apply to reporting to National Registers. It would not cover registration with PROs or contractual arrangements between producers and PROs, which are beyond the scope of LIFE4EPR project.

Finally, this hybrid approach can be complemented by non-structural measures, such as an EU EPR information hub and other supporting actions (e.g. harmonised definitions, multilingual support, aligned procedures), which further ease compliance without requiring fundamental system changes.

7.1. Reporting Harmonized route under the hybrid approach

This route would allow cross-border producers to upload data in bulk for all relevant products and markets, rather than submitting separate datasets through multiple national systems.

A key feature of this route would be the use of a common EU data format, based on the higher level of granularity foreseen under Approach B2. The required data fields, data granularity and convertible codes would need to be defined at EU level to ensure that information submitted through the harmonised route can be interpreted and used by all relevant National Registers and PROs. This development is expected to require time, as it would involve agreement on common data structures, code lists and conversion rules.

The system should also include clear procedures for data validation and correction. National Registers should be able to contact the producer, or the authorised representative that submitted the data, where clarification or correction is needed. Producers should also be able to correct submitted data following verification by National Registers or PROs. To support this process, the platform would need to include different data statuses, for example to distinguish between submitted, under review, validated, rejected or corrected data.

Data access and confidentiality would be central elements of the harmonised route. Access rights should be defined at the registration stage, specifying which National Registers and PROs are entitled to access which data. Strong restrictions would be needed to ensure that each authority or organisation can only access the information required for its legal or operational role. In particular, PROs should only have access to data relating to producers affiliated with them.

The conversion of EU-level data into national datasets would be another essential component. One possible model would be for each National Register and PRO to carry out its own conversion. However, a more efficient approach would be to provide an EU-level solution through the single-entry platform or EU cloud. Under this model, National Registers would provide the relevant national

conversion tables, which would then be incorporated into the EU cloud to convert Approach 2 data into the corresponding national formats.

Where National Registers provide conversion factors, the EU platform could automatically convert harmonised data into national datasets. Where no conversion factors are provided, the data could still be made available at Approach 2 granularity. National Registers would then access the data through the EU cloud and integrate the converted information into their own databases.

A similar process could apply to PROs as a potential extension of the platform. PROs would access the data in the EU cloud only for producers affiliated with them. The data could then be converted into the PRO's own dataset and used to calculate fees outside the EU platform, before being integrated into the PRO's internal database.

This approach may also require clarification of data ownership rules, particularly regarding who owns the data submitted through the EU platform, who is responsible for maintaining it, and under which conditions it can be accessed, corrected, transferred or reused.

For new producer registrations, the harmonised route could become the default or only available option. This would avoid creating additional fragmentation and would support the gradual transition towards more standardised registration and reporting practices across Member States. Existing producers could continue using national routes where appropriate, while new entrants would progressively feed into the harmonised system.

This system would allow to incorporate reporting of eco-modulation criteria into the scope of the reporting template of producers. Provided that such criteria are harmonised and the same for all MS.

7.2. Registration options within the hybrid approach

LIFE4EPR partners have evaluated the possibility of a hybrid approach for the registration process. However some key aspects such as different needs of users and integration of the data into the NRs delivered different alternatives still under discussion:

- **Hybrid registration A1-B1**, in this scenario, a common format of registration is applied to all NRs. Producers will be given the choice to register:
 - Through the currently available registers in place using simplified harmonised format, or
 - Through a single data entry point mirroring the hybrid approach of reporting described in the previous section.
- **Hybrid registration B1**, in this case all producers will register through a single data entry point using a harmonised simplified template for the registration in all MS.
- **Hybrid registration B2**, in this approach, all producers will register through a single data entry point using a harmonised template but with a higher level of detail, allowing NRs maintain a data structure closer to their current national structures.

Question:

- The audience will be asked about their thoughts on the options for registration above

8 Complementary options

In parallel to the exploration of an EU-wide harmonised EPR register, the LIFE4EPR project has identified a set of complementary measures that could improve the current system without requiring structural changes to national registers. These measures emerge directly from stakeholder input gathered through co-creation workshops and related discussions, reflecting practical challenges experienced by producers, national authorities, and Producer Responsibility Organisations (PROs).

A first area for improvement concerns the **harmonisation of key definitions and roles**. Currently, the definition of “producer” and the identification of the entity responsible for registration and reporting (e.g. importer, distributor, or distance seller) vary across MS. Aligning these definitions at EU level would reduce ambiguity and ensure a more consistent application of EPR obligations.

Another important measure relates to **accessibility and usability of compliance information and reporting systems**. Stakeholders highlighted the need for reporting forms and **guidance to be available in multiple languages**, as in many cases information is only provided in national languages. Improving linguistic accessibility would significantly facilitate compliance, particularly for cross-border producers.

Several stakeholders also suggested the introduction of a **common or mutually recognised producer registration number**, sometimes referred to as a “producer passport” (or producer “certificate”). Under current systems, producers receive and must display different registration numbers in each country, which complicates administrative processes. A shared identifier could streamline registration, improve traceability, and support enforcement activities. (This relates to the 3rd question posed at the end of section 3.1)

Further improvements could be achieved through the **harmonisation of product scope**. Differences in which products fall under EPR obligations across MS create additional complexity for producers operating in multiple markets. Greater alignment of scope would contribute to a more predictable and transparent regulatory environment.

In addition, there is a clear need to **align reporting requirements**, including reporting frequencies, deadlines, and data validation procedures. At present, these elements differ significantly between countries, increasing the administrative burden for producers. Greater coordination or compatibility in these aspects would simplify compliance without requiring full harmonisation.

The **framework for authorised representatives (ARs)** also presents opportunities for improvement. Stakeholders pointed to differences in the procedures for appointing ARs across Member States, as well as a lack of transparency regarding available representatives. Possible measures include aligning appointment procedures, establishing public registers of authorised representatives, and allowing PROs to act as ARs where appropriate (without making this mandatory).

Align **data validation procedures (e.g. audits)**, often the timings and data validation procedures mandated in MS differ, what increases administrative burden for producers that must submit multiple supporting documents, sometimes certified by different accredited entities etc...

Emerging practices in some countries suggest additional avenues for facilitating compliance and enforcement. For example, **“pay-on-behalf” systems for online marketplaces**, where platforms fulfil EPR obligations on behalf of sellers, are gaining traction and could help address challenges related to free-riding and non-compliance, particularly in cross-border e-commerce.

To further support producers, stakeholders recommended the establishment of **national EPR helpdesks or hotlines**, ideally providing assistance in English in addition to local languages. Such services could be linked to a broader EU-level information hub, improving access to reliable and consistent information.

Finally, from an enforcement perspective, the **enhanced sharing of registration data between MS and enforcement networks** was identified as a key measure. Improved data exchange would facilitate the identification of unregistered producers operating across borders and support coordinated actions against free-riders.

Overall, these complementary measures represent practical, incremental improvements that could significantly enhance the functioning of the current EPR system. While they do not replace the potential benefits of a harmonised EU register, they offer a realistic pathway to address existing challenges in the short to medium term.

Eco-modulation criteria and information to be submitted by producers to show compliance with them should be harmonized at EU level.

Question: Are there any additional complementary measures?

5. Next steps

Some follow up calls may be scheduled with different participants for further discussing points raised during the session. In addition, some questionnaires will be shared to gather your opinion on different aspects of the EU-wide EPR register.

6. Contact information

For any question related to the LIFE4EPR project, please contact:

- LIFE4EPR Project Coordinator: Rosaria Chifari, PhD (rchifari@ent.cat)

For any question related to this document and the associated co-creation session on the EU-wide EPR register, please contact:

- LIFE4EPR WP3 Coordinator: Veronica Martinez Sanchez, PhD (vmartinez@ent.cat)

Annex 1: EPR wide design options

A1.1. EU Information hub

The EU EPR Information hub (Figure 8) would act as a centralised entry point for EPR-related information across the EU, without replacing or modifying national registers. A model like Eurostat could be envisaged, whereby National Registers provide selected, standardised data to the EU-level information platform.

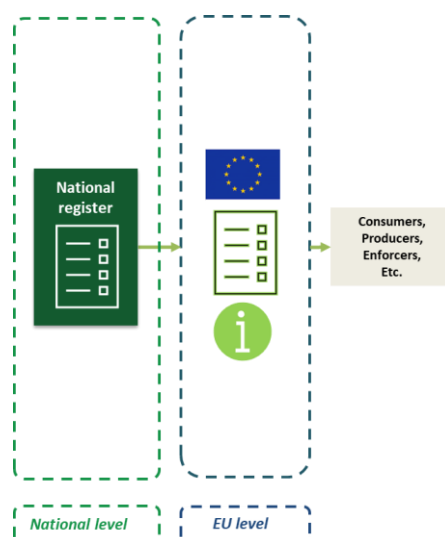
Such platform would:

- Enable checks on producer compliance, verify whether producers are registered in specific MS, with differentiated access levels for enforcement authorities.
- Provide a **single access point of information for producers**, facilitating compliance by offering structured and user-friendly access to:
 - National register websites.
 - PROs operating in each MS.
 - Applicable national legislation and key requirements.
 - **Information on EPR compliance obligations**, outlining the specific responsibilities and obligations for producers in each MS and EPR stream.
- Include support tools, such as:
 - Decision trees or guided tools to clarify the definition of “producer” across different Member States.
 - A helpdesk or contact point to respond to queries, particularly from SMEs and distance sellers.
 - **Producer Guidance** on producer definitions specific to each combination of MS and EPR stream, to clarify responsibilities based on local legislation and compliance requirements.
 - **Access to lists of PROs, NRs, and ARs** operating in each MS-EPR stream, providing detailed contact information and operational scope.
 - **Access to FAQs and hotlines** to provide quick answers and direct contact options for producers or other stakeholders.
- Public consultation of registered producers, offering transparency and the opportunity for public input on the registration process and compliance monitoring.
- EPR information for the wider public, ensuring that general information about EPR initiatives, producer roles, and compliance can be easily accessed and understood by all stakeholders.
- Circular initiatives for the wider public, promoting engagement and understanding of circular economy practices and encouraging broader participation in EPR schemes.
- In addition, the hub could improve transparency and cross-border cooperation by enabling the structured exchange of information between national authorities, thereby contributing to more effective identification of free-riders.

- Extended access for enforcement, providing enforcement authorities with detailed information about producer registrations and reported POM (Placed on Market) per country and stream, enabling them to effectively monitor and enforce compliance across the EU.

In addition, the hub could improve **transparency and cross-border cooperation** by enabling the structured exchange of information between national authorities, thereby contributing to more effective identification of free-riders.

Figure 8: EU EPR Information hub



A1.2. Registration options

Registration Option A (MS data entry with EU Registration form)

An initial option to harmonise the registration component builds on the concept of the EU EPR Information Hub and aims to address the challenges arising from differing registration formats across national registers.

Under this option, producers placing products on the market in multiple MSs would be required to submit the same type of information in a harmonised format, named **EU Register Form**, irrespective of the country of registration. However, producers would still be required to register separately in each MS using national platforms.

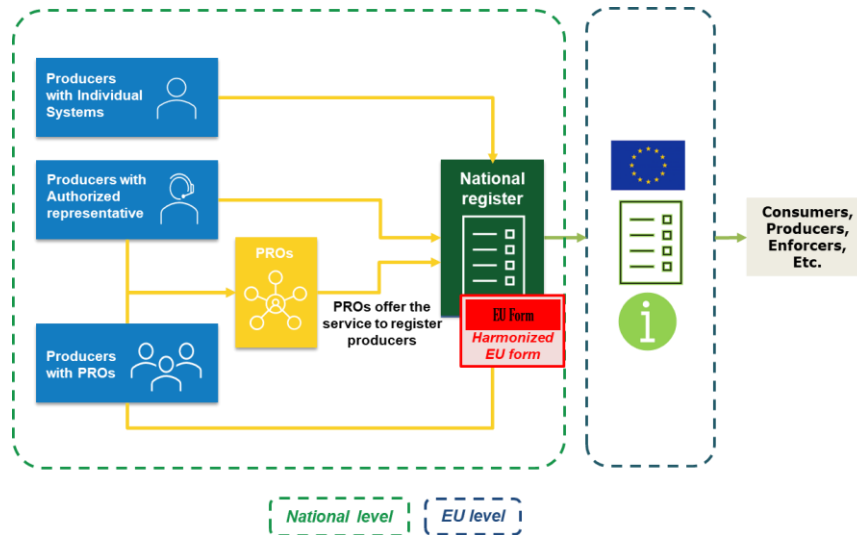
While maintaining national registration systems, this approach would introduce a common EU registration format, which could be implemented through two alternative approaches: Approach 1 and Approach 2

- **Approach 1: Simplified EU Registration Form**

A standardised EU registration form would be defined at EU level, including a set of minimum common harmonised data fields. National Registers (NRs) and Producer Responsibility Organisations (PROs) would be required to **adapt their registration procedures and systems** to align with this

common structure. Product categories would be **harmonised and simplified at EU level**. This approach would require **structural adjustments** to national systems but would ensure greater consistency and comparability of data.

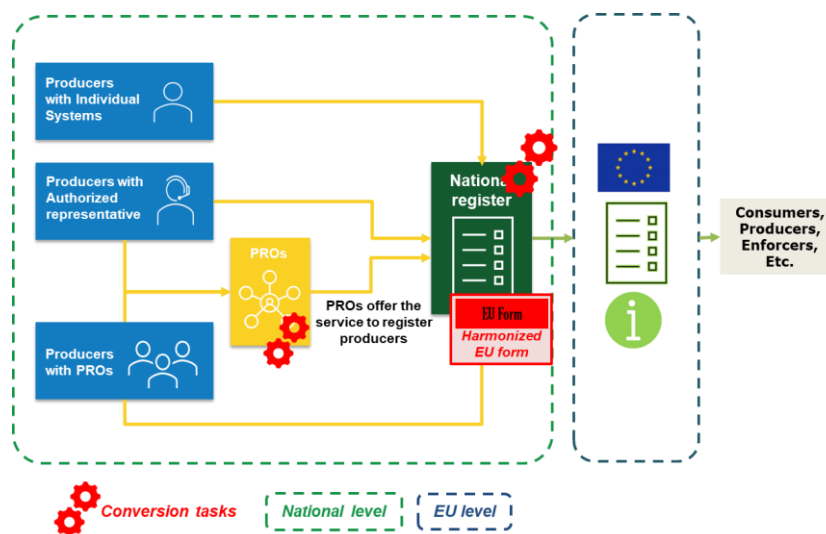
Figure 9: Registering data flow in Option A and Approach 1



- **Approach 2: Detailed EU Registration Form with conversion mechanism**

A more detailed EU registration form would be introduced, particularly with respect to product classification, based on a harmonised coding system. Producers would register in each MS using the same harmonised EU format, including more granular product data. Product categories would be defined at a higher level of detail at EU level. National Registers and PROs would retain their existing data structures, but would need to implement conversion mechanisms to translate EU-level data into their national systems (a “Rosetta stone” approach)

Figure 10: Registering data flow in Option A and Approach 2



Registration Option B (Single EU data entry with EU Registration form)

The following options (illustrated in Figure 11 and Figure 12 respectively) represent the centralised versions of Option B.1 and B.2.

In both cases, the EU information hub is maintained and complemented by a single EU data entry point through which all producers would register. Information submitted via this central platform would then be distributed to the relevant National Registers (NRs).

As enforcement remains a national responsibility, NRs would be responsible for data verification and validation and would transmit validated data back to the EU platform.

These options address a key challenge of the current system: producers placing products on the market in multiple Member States must currently register multiple times across different national platforms. Under this approach, producers would be able to register via the EU entry point, either directly or through an authorised representative (AR) or a Producer Responsibility Organisations (PRO).

The registration process would include common information, provided once and applicable across all Member States (e.g. legal entity details) and country-specific information (e.g. info related to AR, PRO, product scope), submitted per MS but using a harmonised format.

Figure 11: Registering data flow in Option B Approach 1

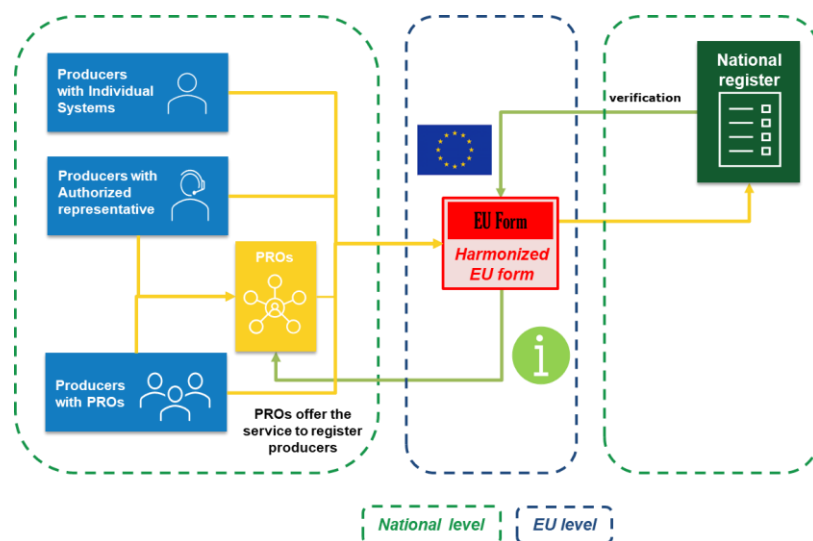
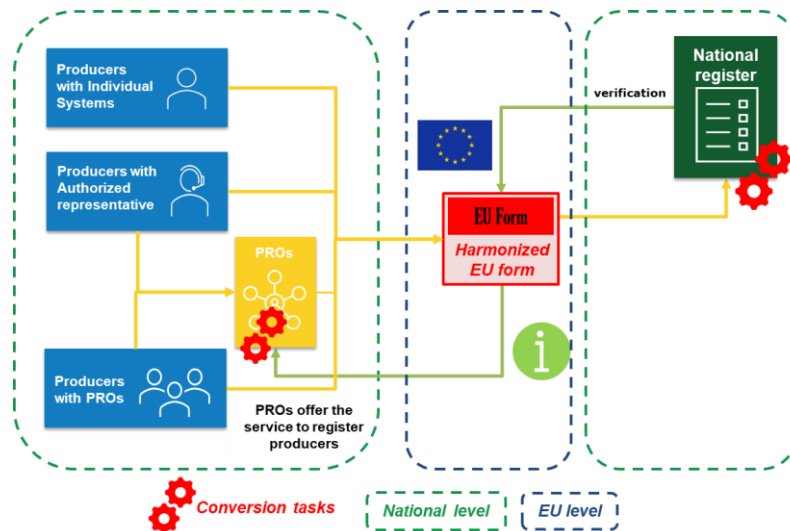


Figure 12: Registering data flow in Option B Approach 2



A1.3. Harmonization of the products POM Reporting

Reporting Option A (MS data entry with EU Reporting form)

Under Option A, producers would continue to report through national register systems, maintaining existing data flows (i.e. via National Registers (NRs), Authorised Representatives (ARs), and Producer Responsibility Organisations (PROs)), while using a harmonised EU reporting format applied across all Member States.

National Registers would retain responsibility for data validation and enforcement, and the data collected at national level would be transmitted to an EU platform (Eurostat-type approach) to generate aggregated statistics and insights for policymakers, enforcement authorities, and the public. Ensuring data quality, validation, and confidentiality at both national and EU levels would be essential.

Within this framework, two approaches can be distinguished:

- **Approach 1 – Simplified EU reporting format**

A common EU reporting form with harmonised data fields is introduced. National Registers would adopt a standardised reporting structure across all MS, requiring PROs to adapt their IT systems accordingly. Producers reporting directly to NRs would use the same format in all MS, while those working through PROs would likely continue using PRO-specific coding systems, with PROs responsible for translating the data into the EU harmonised reporting format requested by NRs

- **Approach 2 – Detailed EU reporting format with conversion**

Reporting is based on a more granular EU data structure, including detailed product information. Producers would report using this detailed EU format regardless of the MS. National Registers and PROs would retain their existing coding systems, relying on conversion tools to map EU-level data

into national categories. Existing reporting flows would remain unchanged, with reporting continuing via PROs, ARs, or directly to NRs.

Figure 13: Data flow for Option A and Approach 1 aiming at harmonizing reporting with an EU (simplified) Reporting Form

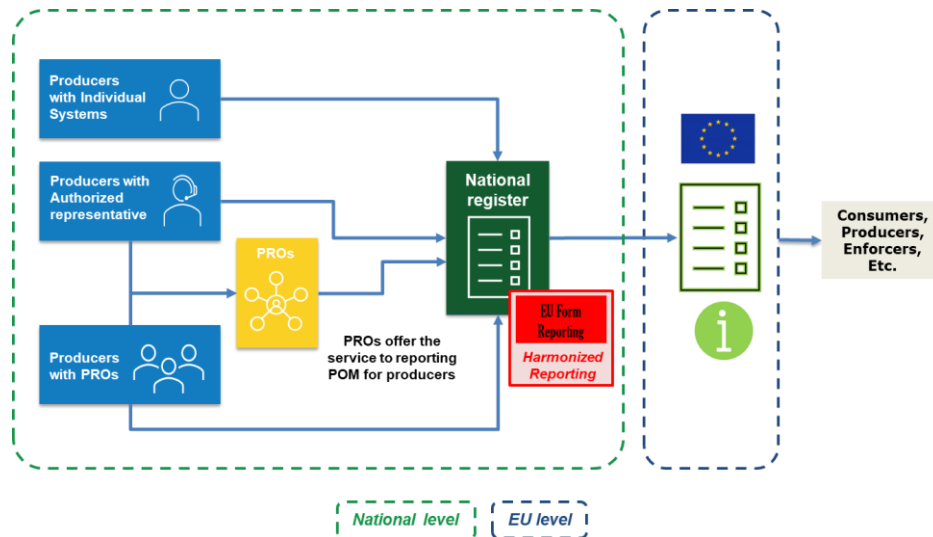
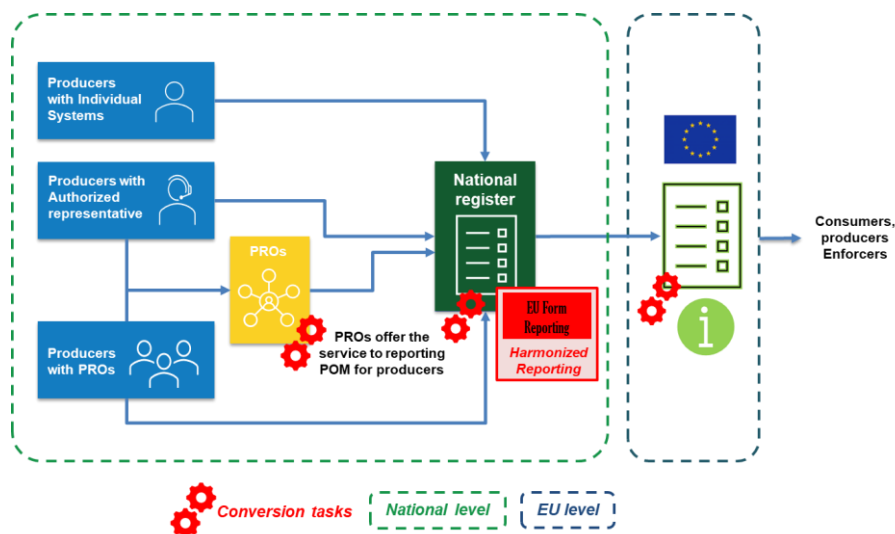


Figure 14: Data flow for Option A and Approach 2 aiming at harmonizing reporting with an EU (detailed) Reporting Form with conversion codes



Reporting Option B (Single EU data entry with EU Reporting form)

Figure 15 and Figure 16 show very similar centralized approaches. In both cases, a single EU data entry point is used by producers (or their representatives) to provide POM data regularly.

While in Approach 1 figures of products POM must be reported using a harmonized and simplified coding system, Approach 2 requires producers to report POM data with a harmonized coding system and higher level of granularity that is compatible with the existing national and PRO codification systems.

Data collected through the EU single data entry point is distributed to the corresponding NRs for use and verification. As enforcement remains a national responsibility, NRs would be responsible for data verification and validation and would transmit validated data back to an EU platform.

Producers will still be able to report through their contracted ARs and PROs (therefore, the current validation process carried out by PROs remains in this approach).

Figure 15: Data flows for Option B and Approach 1 with harmonized reporting and single-data-entry point

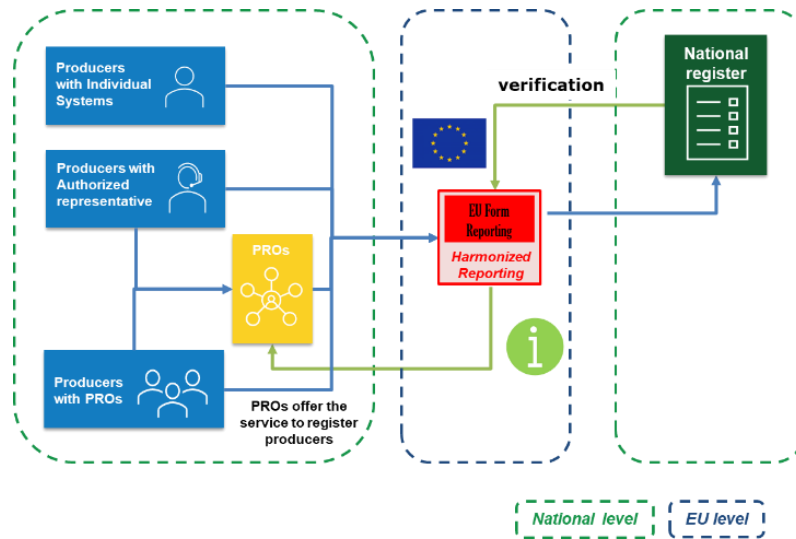
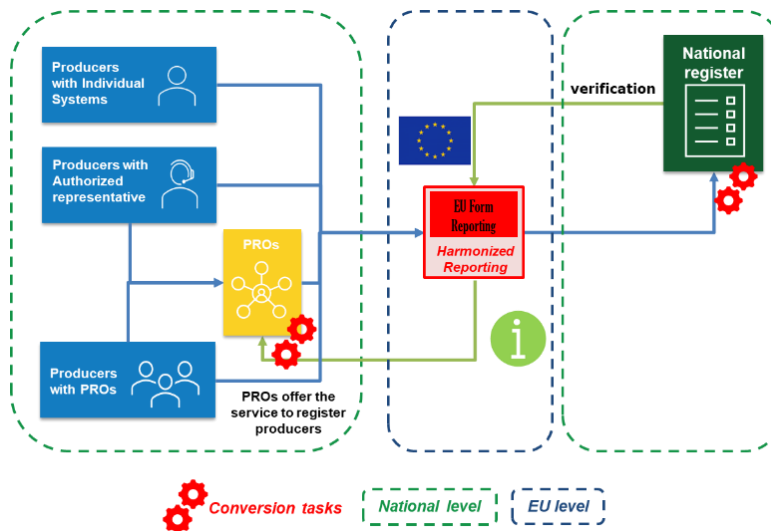


Figure 16: Data flows for Option B and Approach 2 with harmonized reporting, single entry point and conversion factors.



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