



Concept of the EU-wide EPR register

Co-creation Scenarios - Survey sent on the 22nd of May 2026

May 2026



Co-funded by
the European Union

INTRODUCTION

The following slides represent the scenarios included in Section 3 of the survey “**Survey on Requirements for an EU-wide EPR Registration & Reporting System**” sent by ENT in May 2026.

Each of the following slides summarises one possible approach for EU-wide EPR registration or reporting.

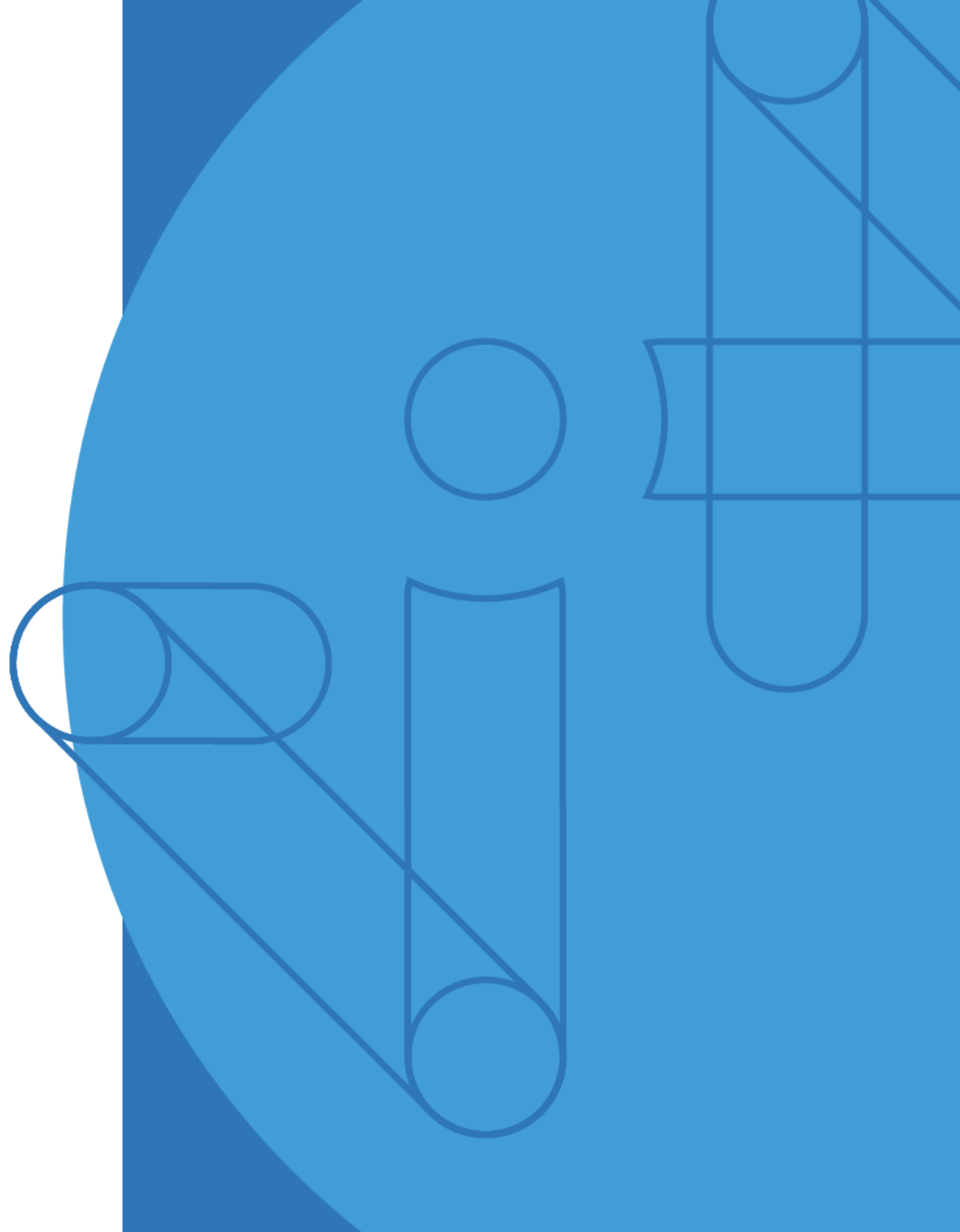
The scenarios reflect different combinations of:

- Business as Usual,
- simplified or detailed harmonized EU forms,
- Member State data entry,
- Single-Entry data submission,
- and hybrid approaches.

The purpose of this document is to support respondents in understanding and comparing the proposed options before selecting their preferred approach in the survey.

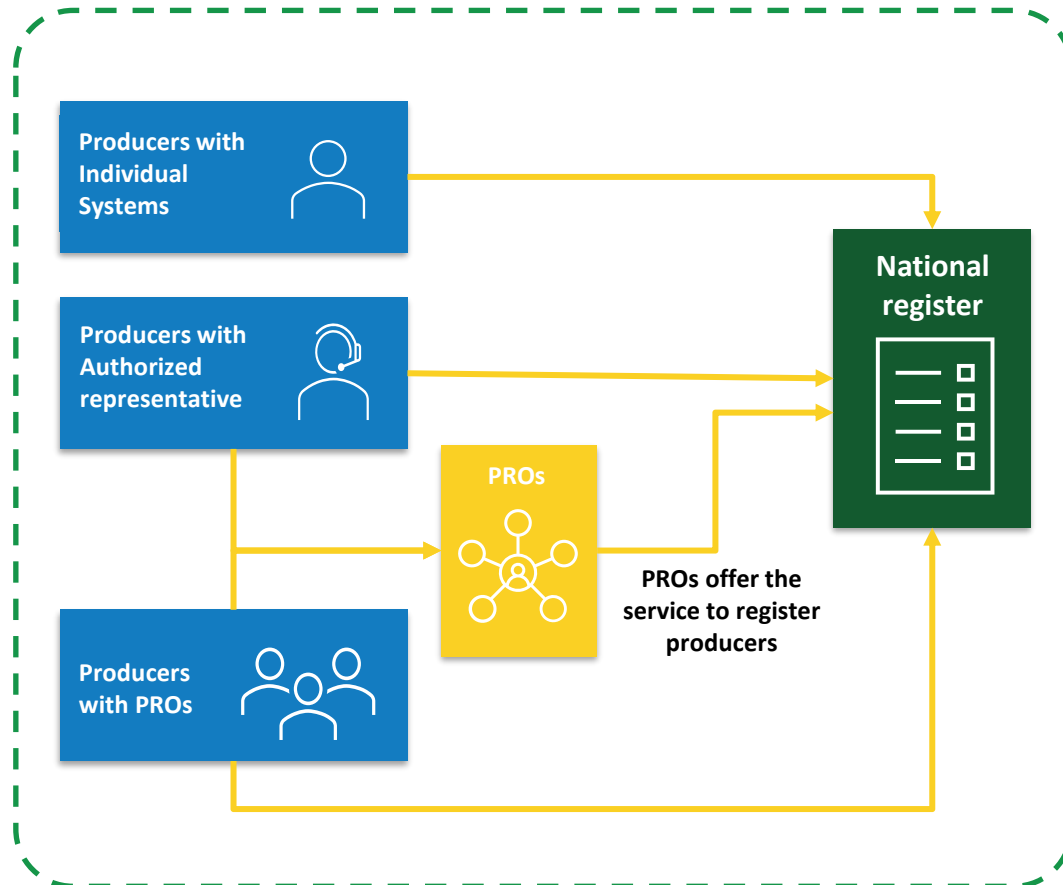
These scenarios are presented for consultation purposes and do not represent final policy recommendations.

HARMONIZATION OF REGISTRATION



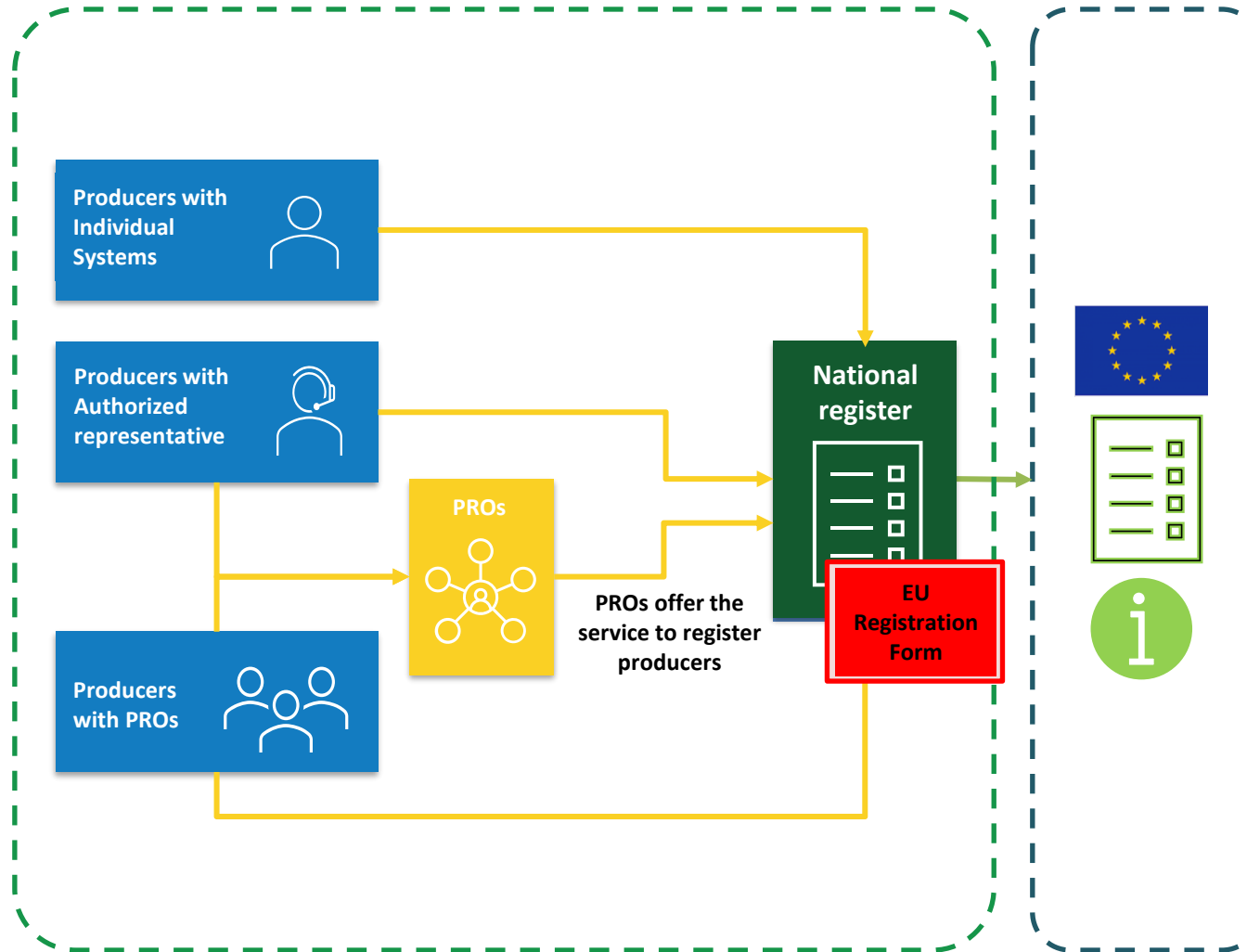


1. REGISTRATION BaU (current DATA FLOWS)



- Producer registration takes place at national level.
- Producers register:
 - directly
 - via Producer Responsibility Organizations (PROs).
 - via Authorized Representatives (AR)
- Data verification is carried out nationally (by NRs and PROs)
- No EU-level registration system currently exists.

2. REGISTRATION A1



Option A

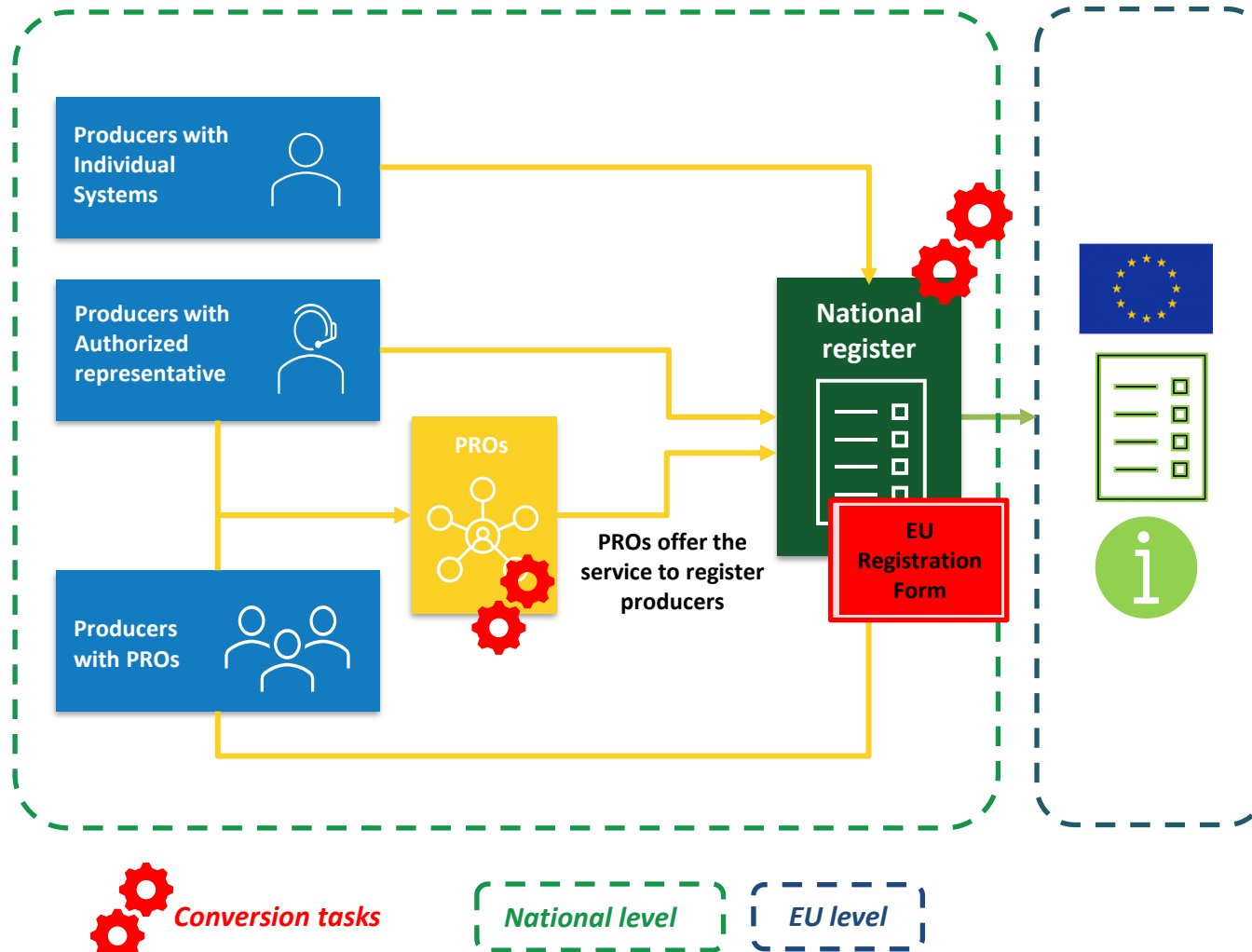
- Introduction of a **harmonised EU Registration Form** (+ EU Information Hub)
- Same data format across all Member States
- **Producers still register in each NR** (no single registration channel across MS)

Consumers,
Producers,
Enforcers,
Etc.

Approach 1

- **Simplified harmonised EU Registration Form** proposed at EU level, including minimum and harmonized fields.
- NRs and PROs will have to adapt their procedures to it.

3. REGISTRATION A2



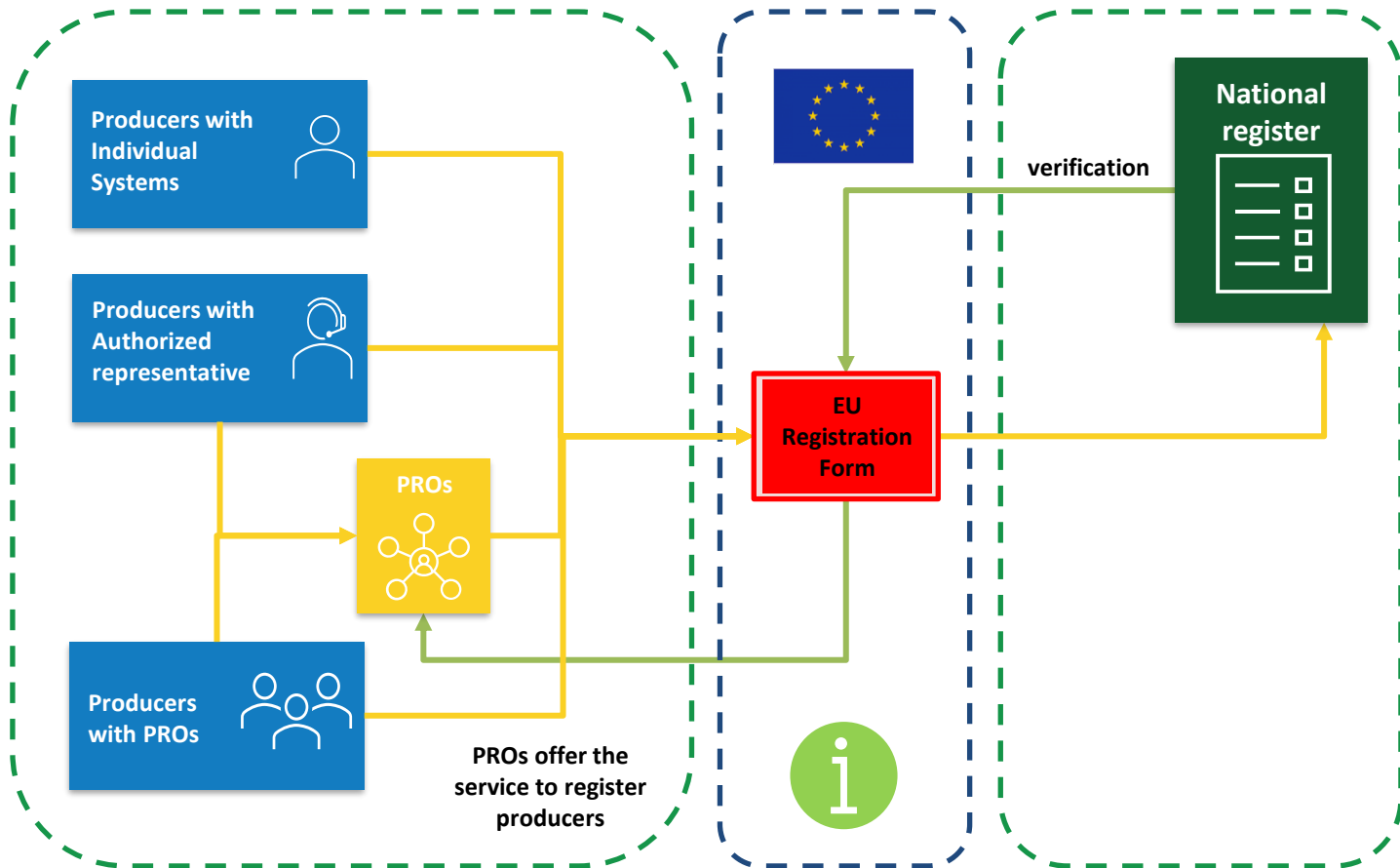
Option A

- Introduction of a **harmonised EU Registration Form** (+ EU Information Hub)
- Same data format across all Member States
- **Producers still register in each NR** (no single registration channel across MS)

Approach 2

- **Detailed harmonised EU Registration Form** (with respect to the product coding) that could be converted into NRs & PRO systems using conversion codes.
- NRs & PROs keep existing data structures (no full system redesign) but need to do some conversion tasks.

4. REGISTRATION B1



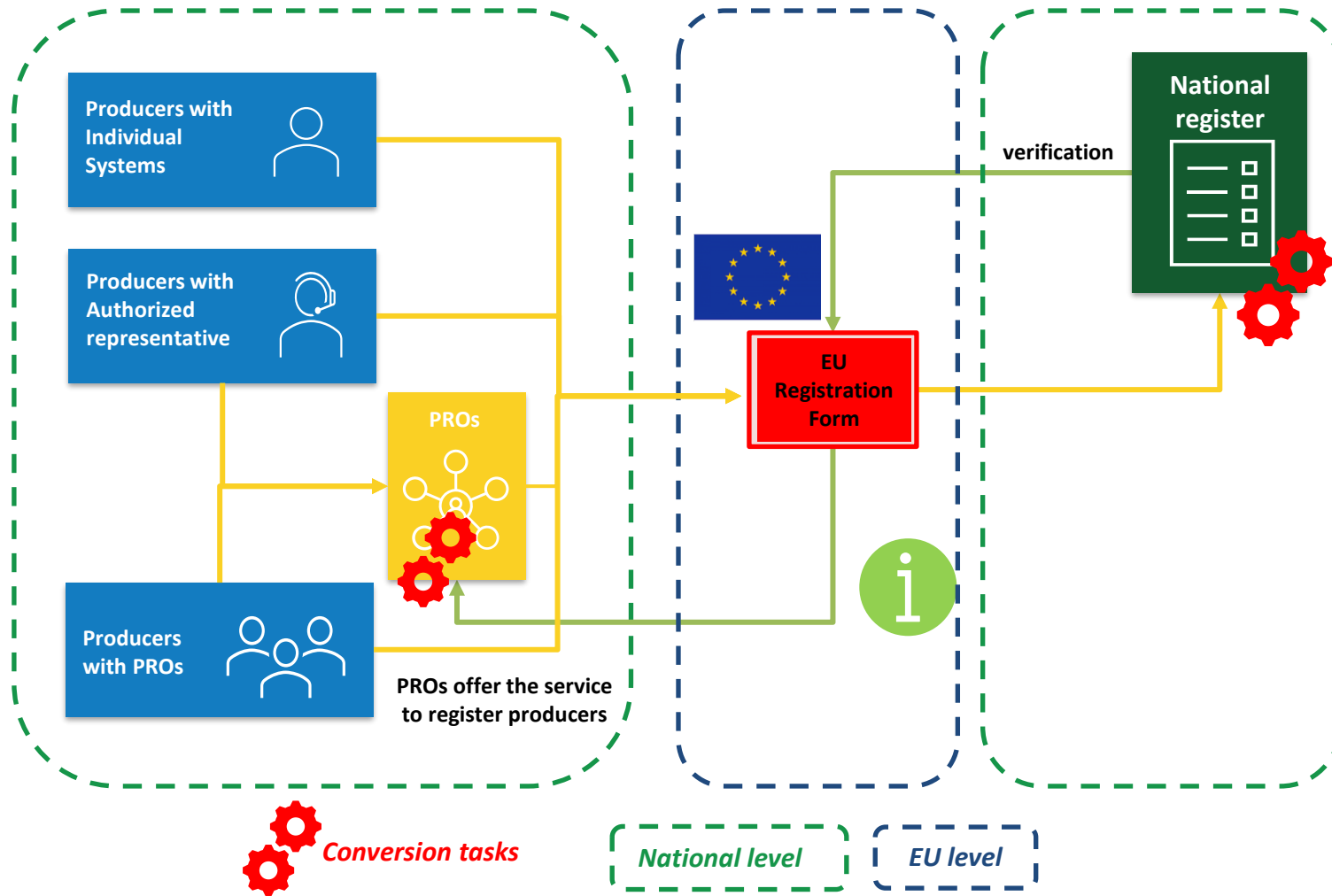
Option B

- **Single-entry point** (channel) for registration data, which is then sent to NRs and PROs for verification
- **EU harmonised Registration Form**
- NRs retain their authority for verification and validation.
- PROs continue to provide registration services to producers and verify information submitted from them in the register.
- Producers remain responsible for complying with national obligations. Contracts with PROs remain.

Approach 1

- **Simplified harmonised EU Registration Form** proposed at EU level, including minimum and harmonized fields.
- NRs and PROs will have to adapt their procedures to it.

5. REGISTRATION B2



Option B

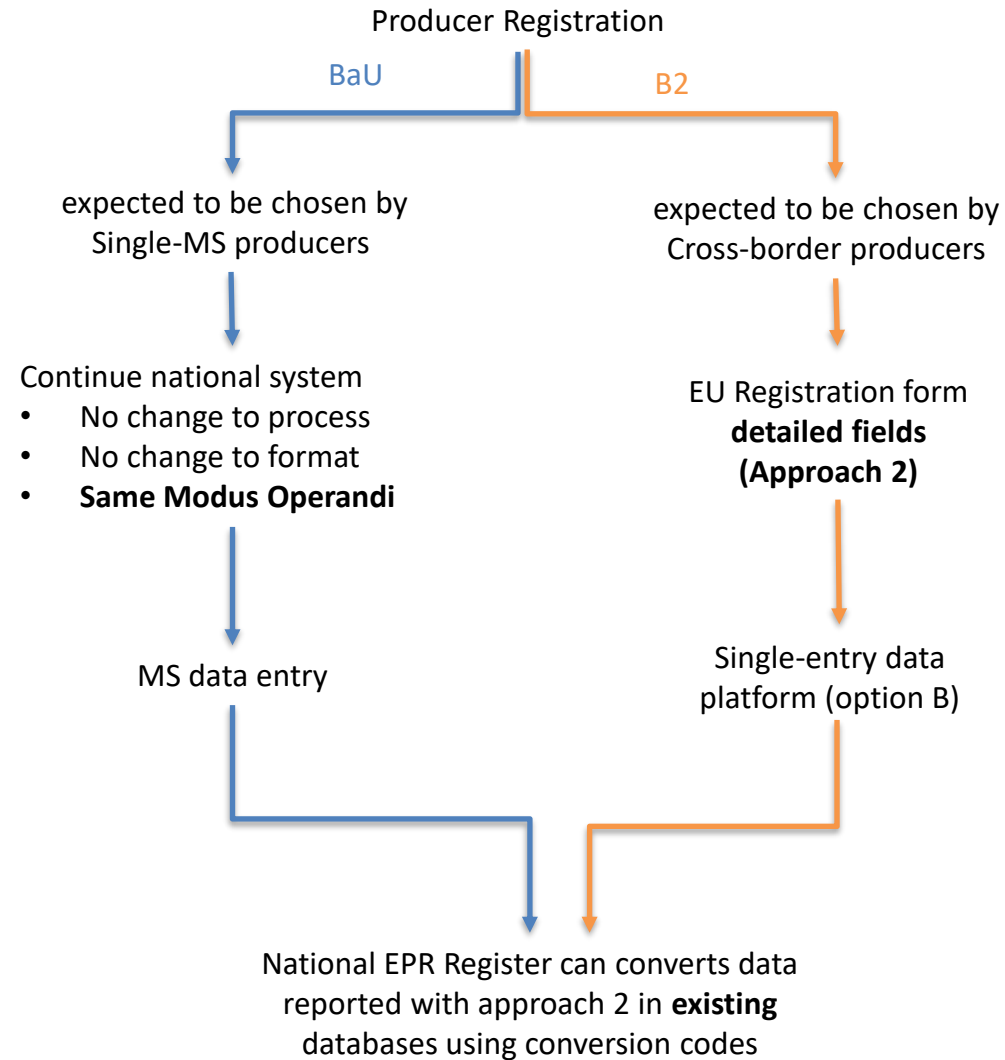
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- NRs retain their authority for verification and validation.
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- Producers remain responsible for complying with national obligations. Contracts with PROs remain.

Approach 2

- **Detailed harmonised EU Registration Form**, with respect to the product coding, that could be converted into NRs & PRO systems using conversion codes.
- NRs & PROs keep existing data structures (no full system redesign) but need to do some conversion tasks.



6. HYBRID REGISTRATION BAU + B2



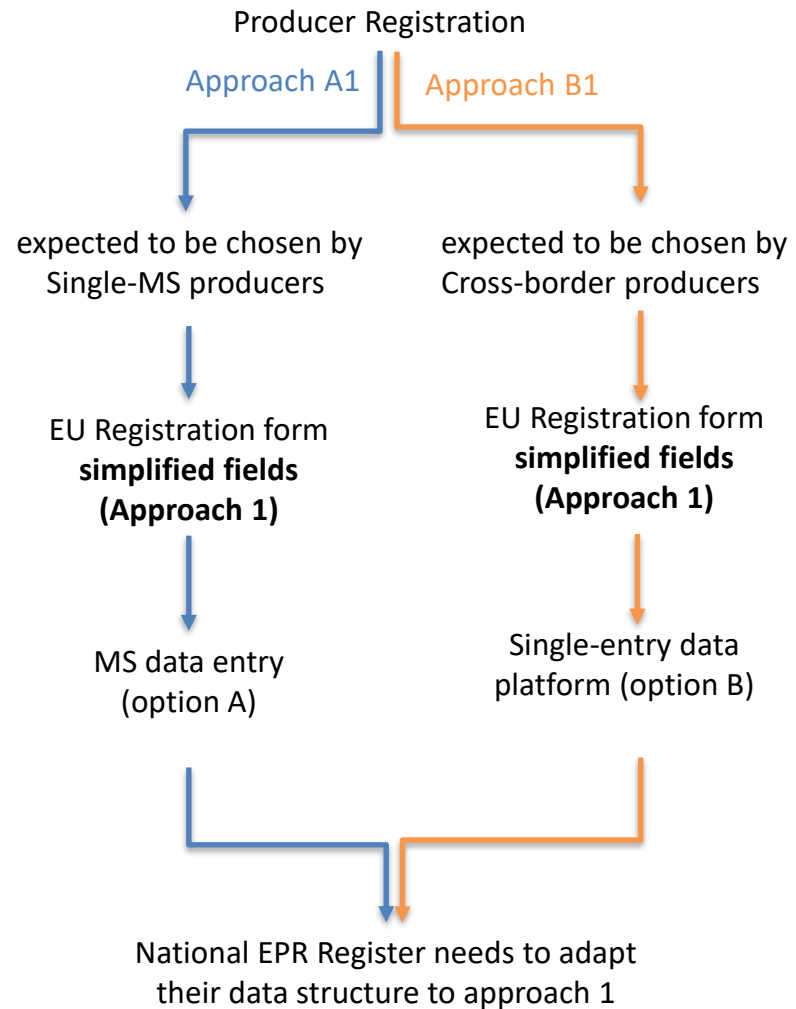
Hybrid registration BaU-B2:

Producers can choose between:

- register through NR (as currently) or
- through a single-entry data EU platform with detailed fields EU forms (Approach 2).



7. HYBRID REGISTRATION A1 + B1



Hybrid registration A1-B1:

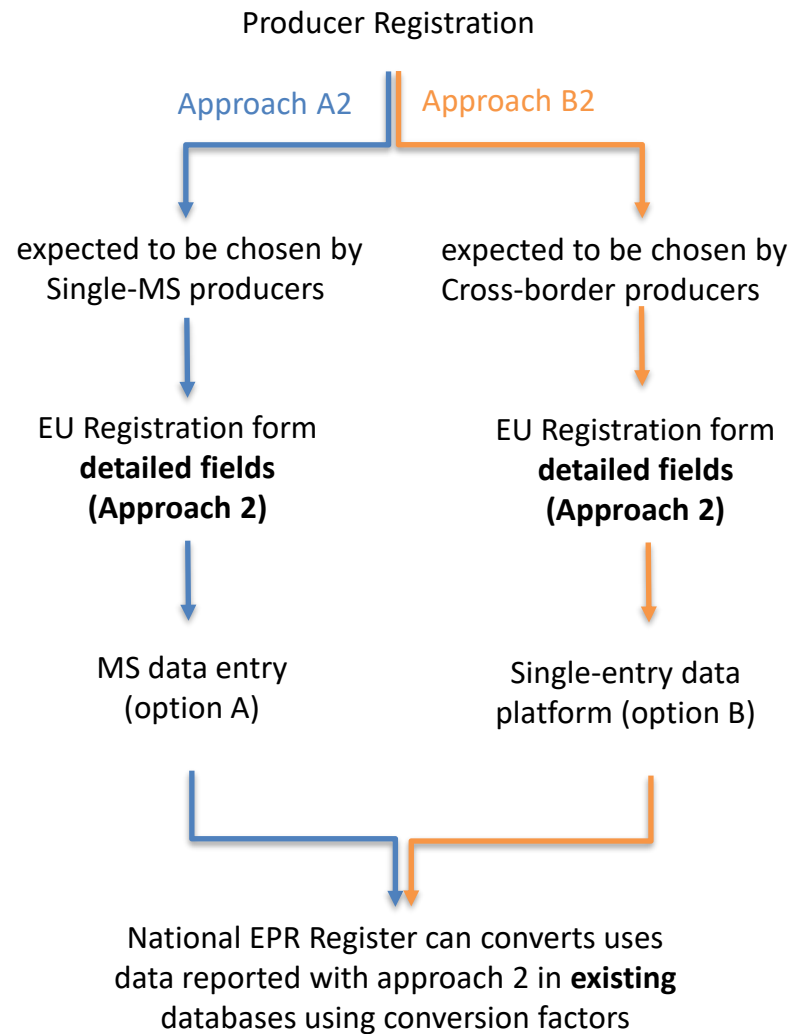
A common harmonised simplified Registration Form is applied to all NRs, using **simplified** fields (Approach 1) for both pathways.

Producers can choose between:

- register through NR or
- through a single-entry data EU platform.



8. HYBRID REGISTRATION A2 + B2



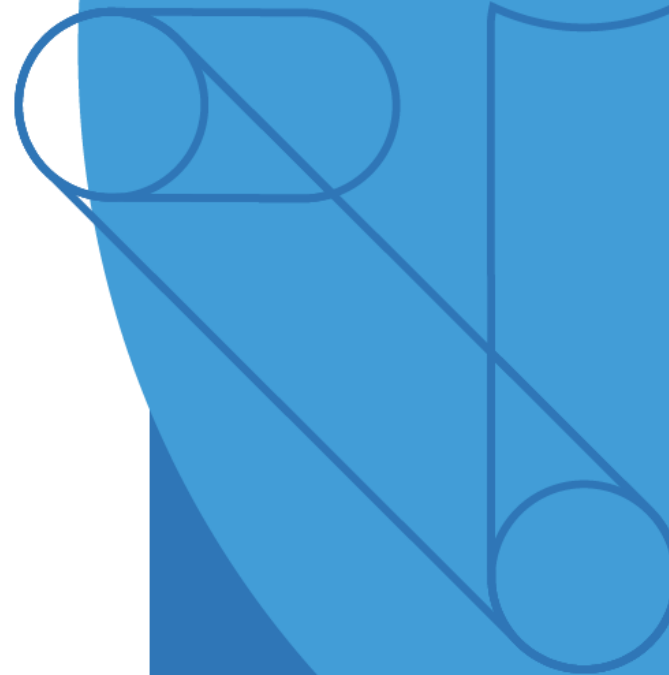
Hybrid registration A2-B2:

A common harmonised detailed Registration Form is applied to all NRs, using **detailed** fields (Approach 2) for both pathways.

Producers can choose between:

- register through NR or
- through a single-entry data EU platform.

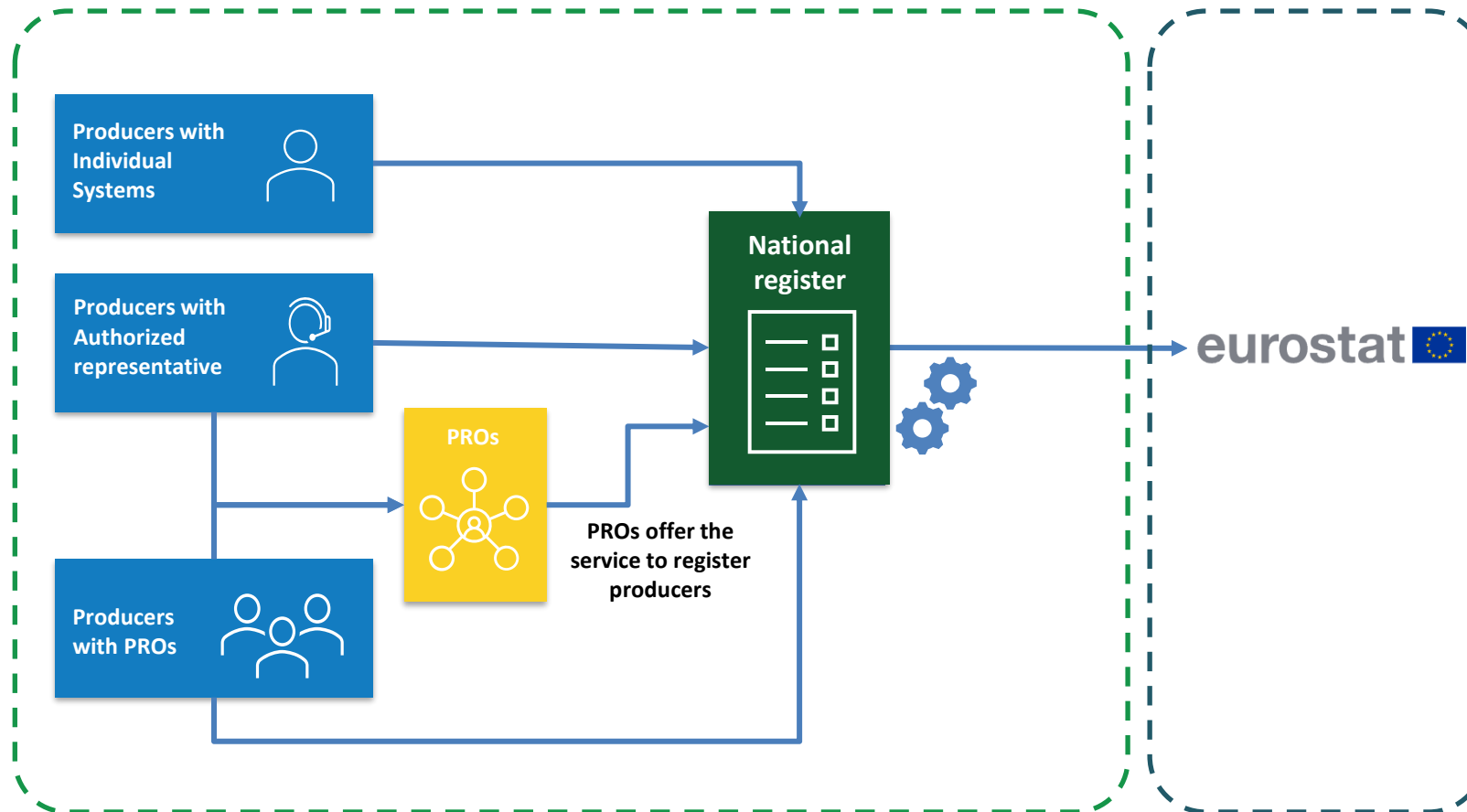
HARMONIZATION OF REPORTING





1. REPORTING BaU (CURRENT DATA FLOWS)

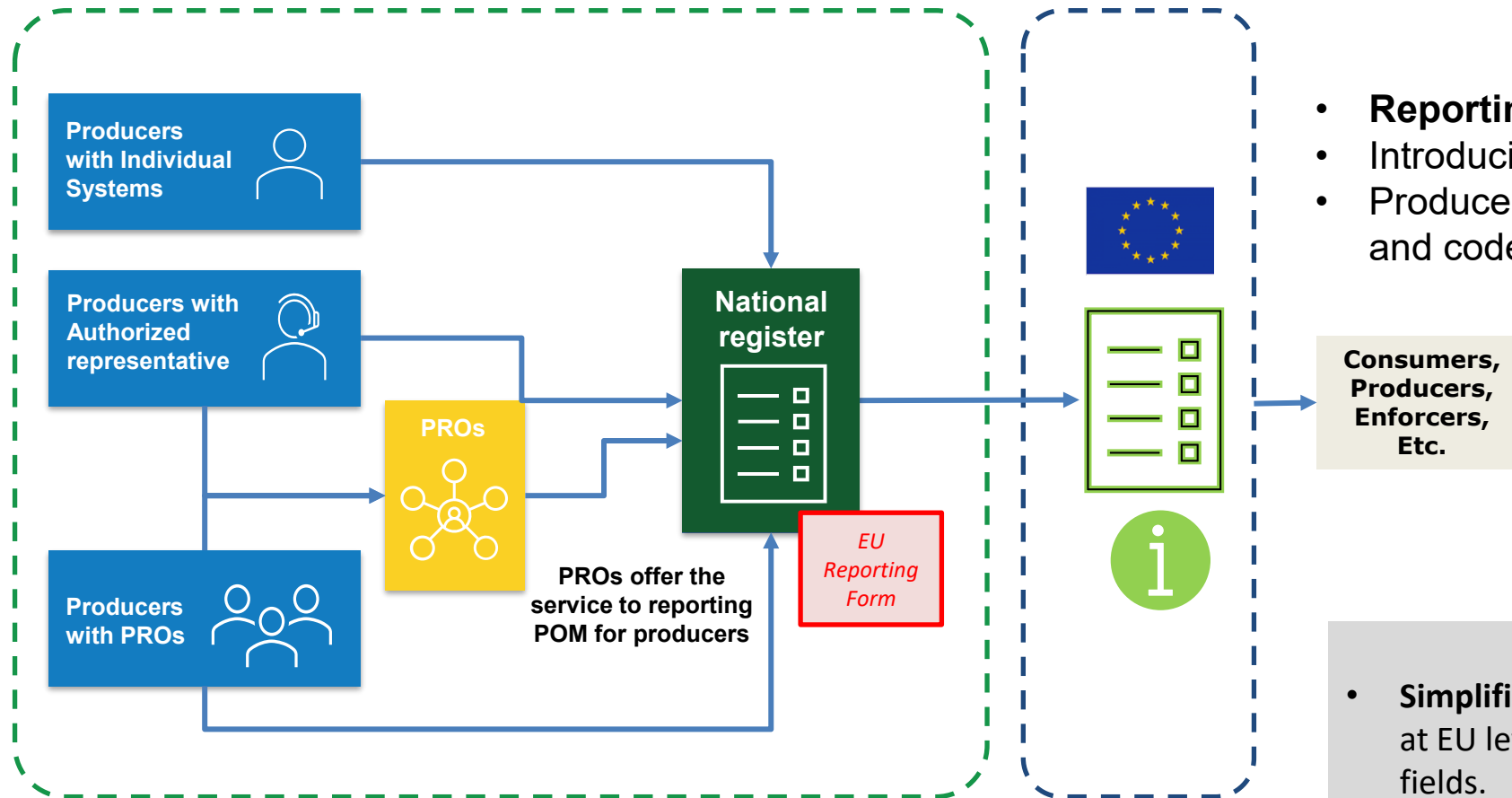
Reporting of Products Placed on the Market



- Currently producer reporting occurs at national level.
- Producers report:
 - directly to NR
 - through PRO
 - via AR
- Most producers report figures to PRO for the calculation of fees, the PRO compiles data and reports to NR.
- National authorities convert the data into the format requested by Eurostat.
- Data Verification is at national level (NRs & PROs)



2. REPORTING A1



Option A

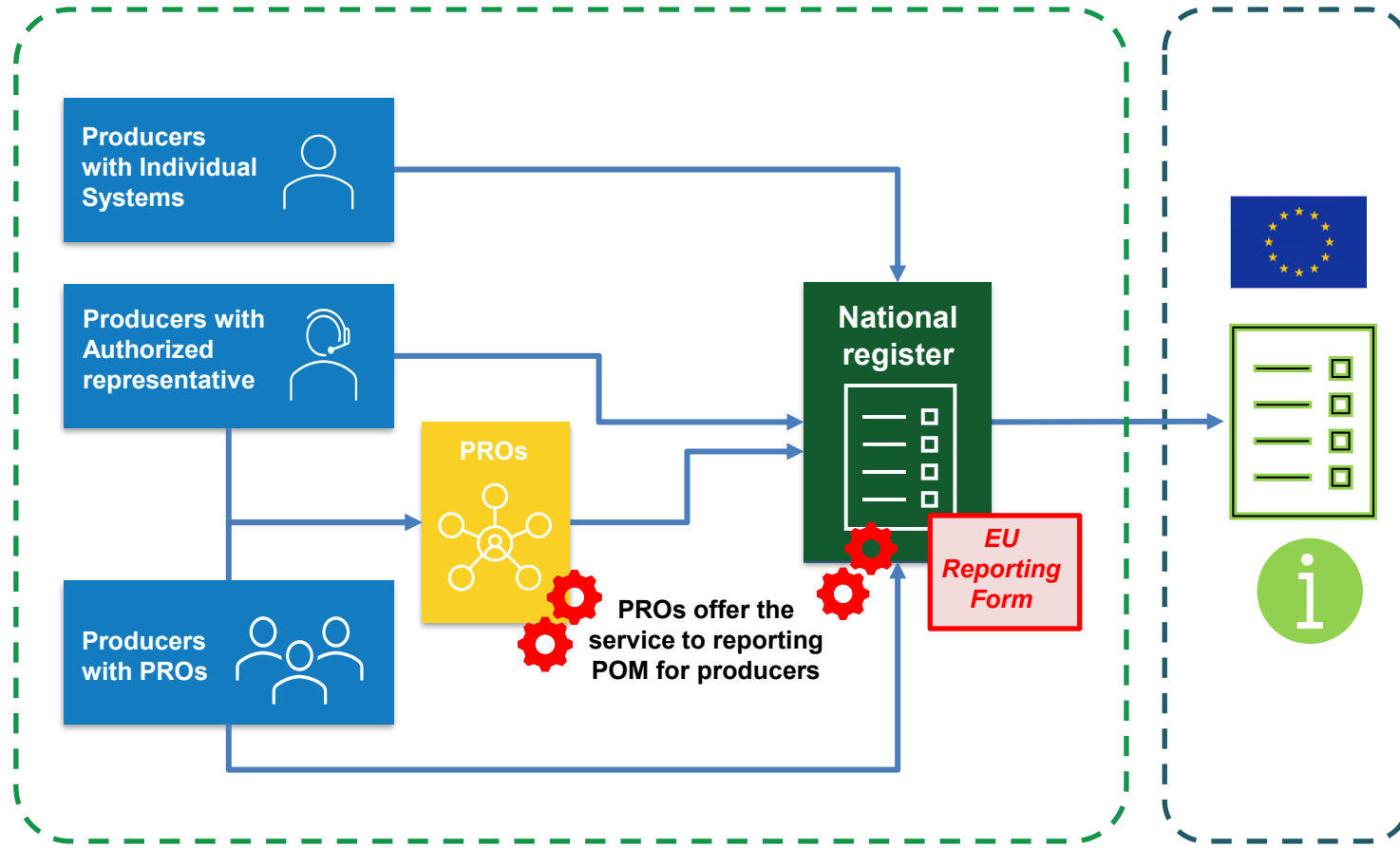
- Reporting of products POM at national level.
- Introducing a **harmonised EU reporting form**
- Producers would use the same reporting form and codes in all MS.

Approach 1

- **Simplified harmonised EU Reporting Form** proposed at EU level, including minimum and harmonized fields.
- NRs and PROs will have to adapt their procedures to it.



3. REPORTING A2



Option A

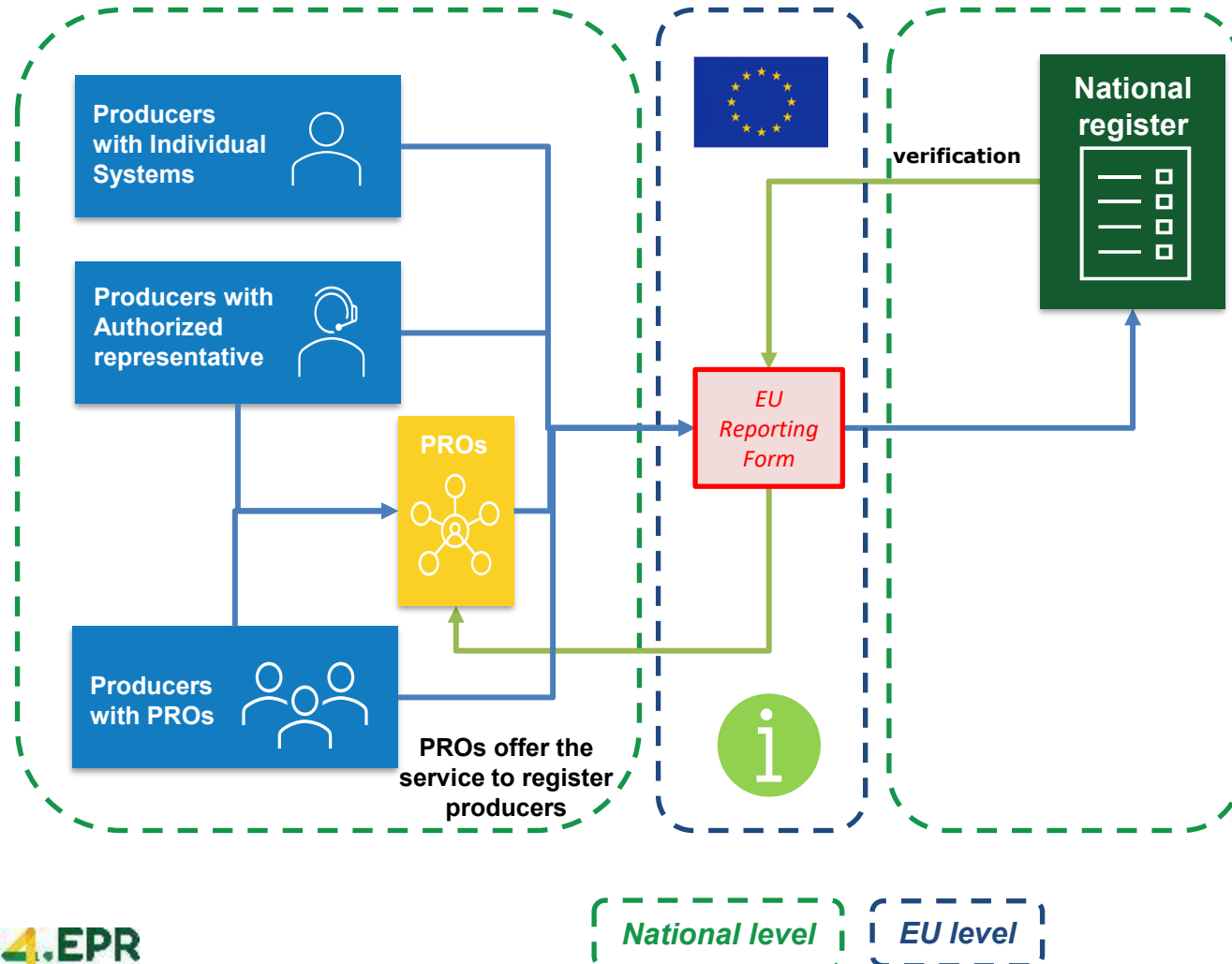
- Reporting of products POM at national level
- Introducing a harmonized EU reporting form
- Producers would use the same reporting form and codes in all MS.

Approach 2

- Detailed EU Reporting Form, with conversion codes.
- NRs & PROs keep existing data structures (no full system redesign) but need to do some conversion tasks.



4. REPORTING B1



Option B

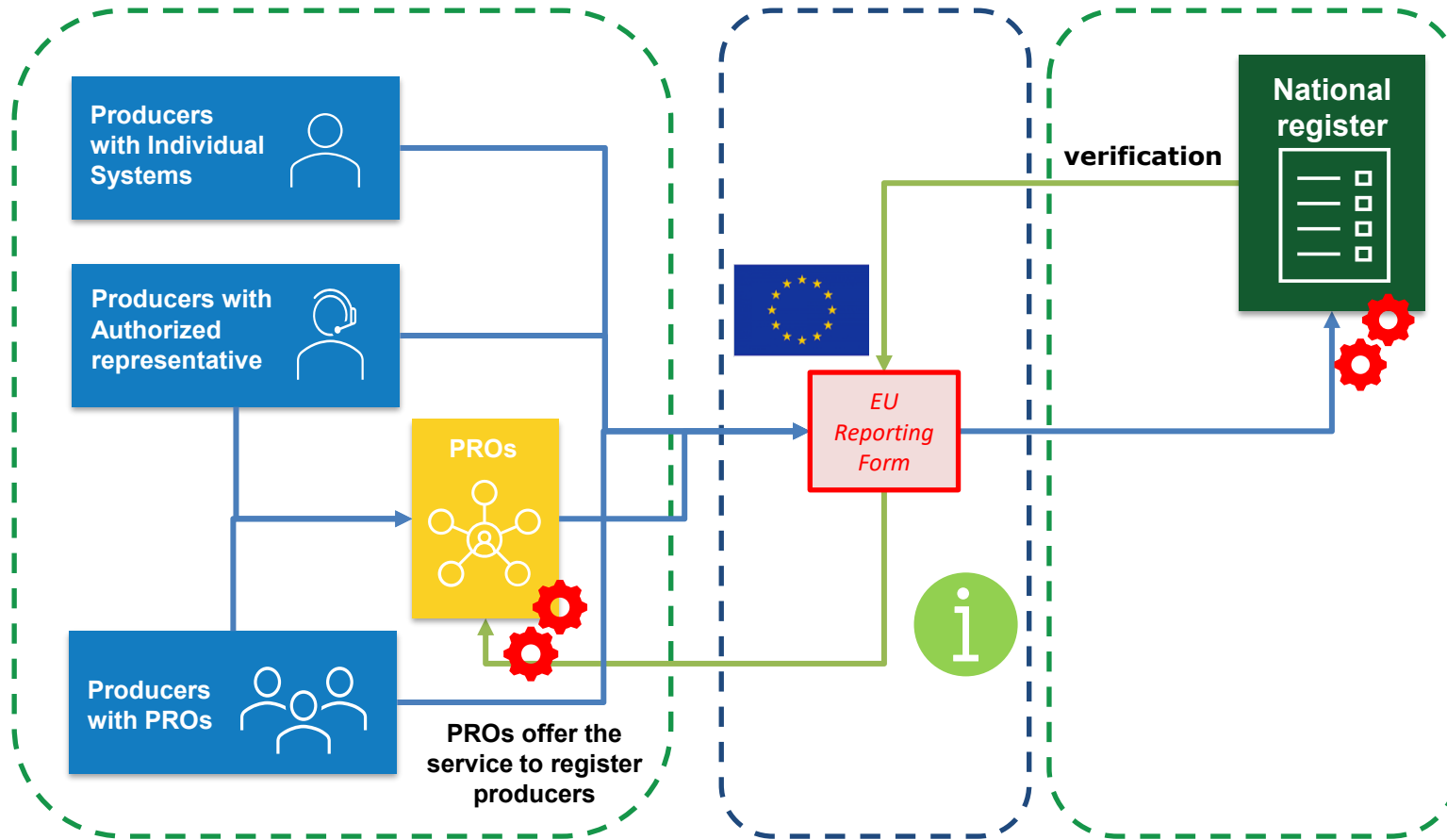
- **Single-entry point** (channel) at EU level for reporting data, which is then sent to NRs and PROs for verification
- **EU harmonised Reporting Form**
- NRs retain their authority for verification and validation.
- PROs continue to provide registration services and verify information.
- Contracts remains PRO-specific at national level
- Producers remain responsible for complying with national obligations.

Approach 1

- **Simplified harmonised EU Reporting Form** proposed at EU level, including minimum and harmonized fields.
- NRs and PROs will have to adapt their procedures to it.



5. REPORTING B2



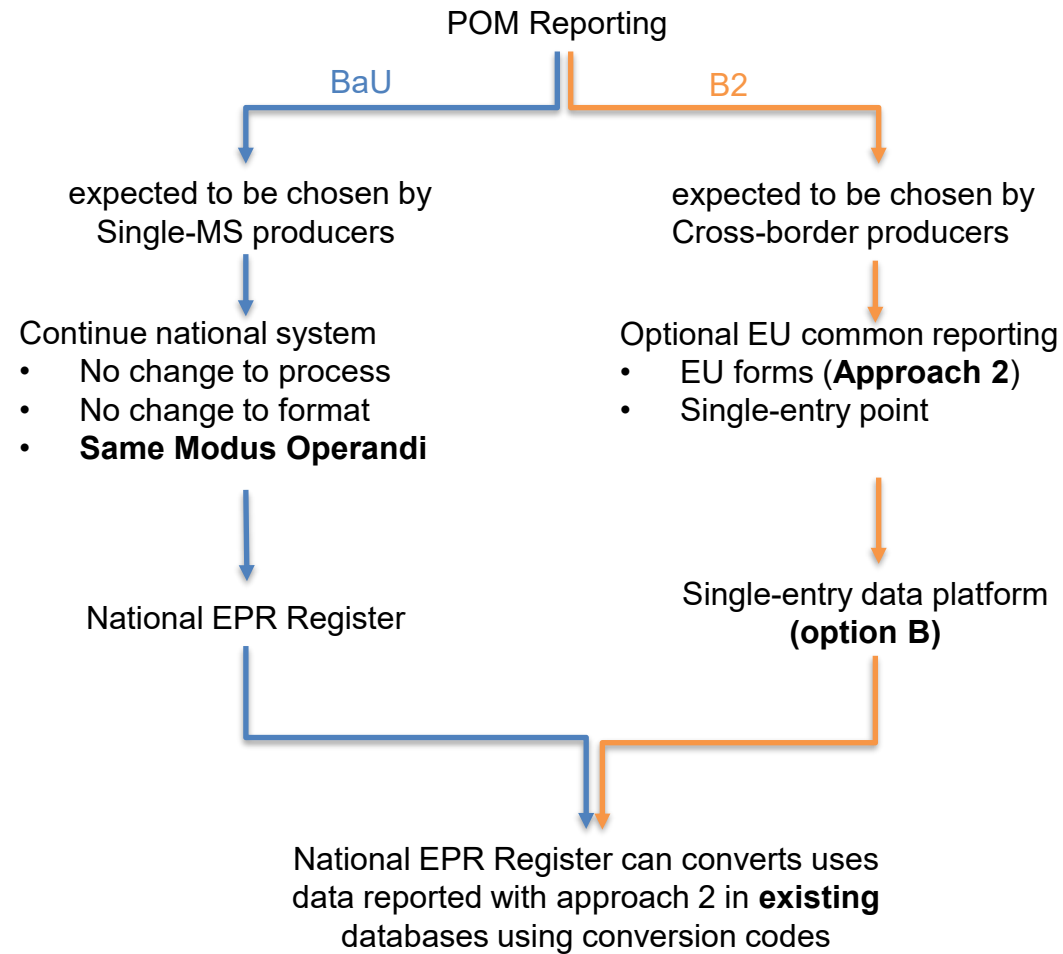
- Option B**
- **Single-entry point** (channel) at EU level for reporting data, which is then sent to NRs and PROs for verification
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Approach 2

- **Detailed harmonised EU Reporting Form**, with conversion codes.
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6. HYBRID REPORTING BaU+B2



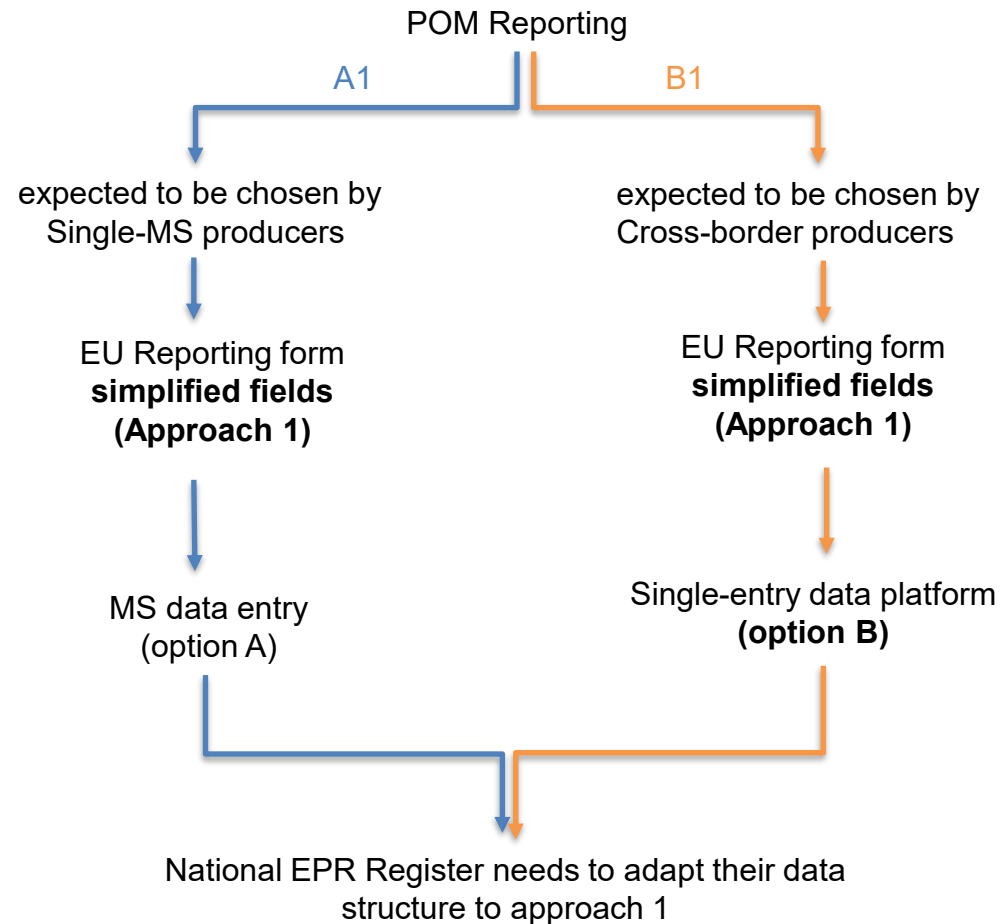
Hybrid reporting BaU-B2:

Producers can choose between:

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7. HYBRID REPORTING A1 + B1



Hybrid reporting A1-B1:

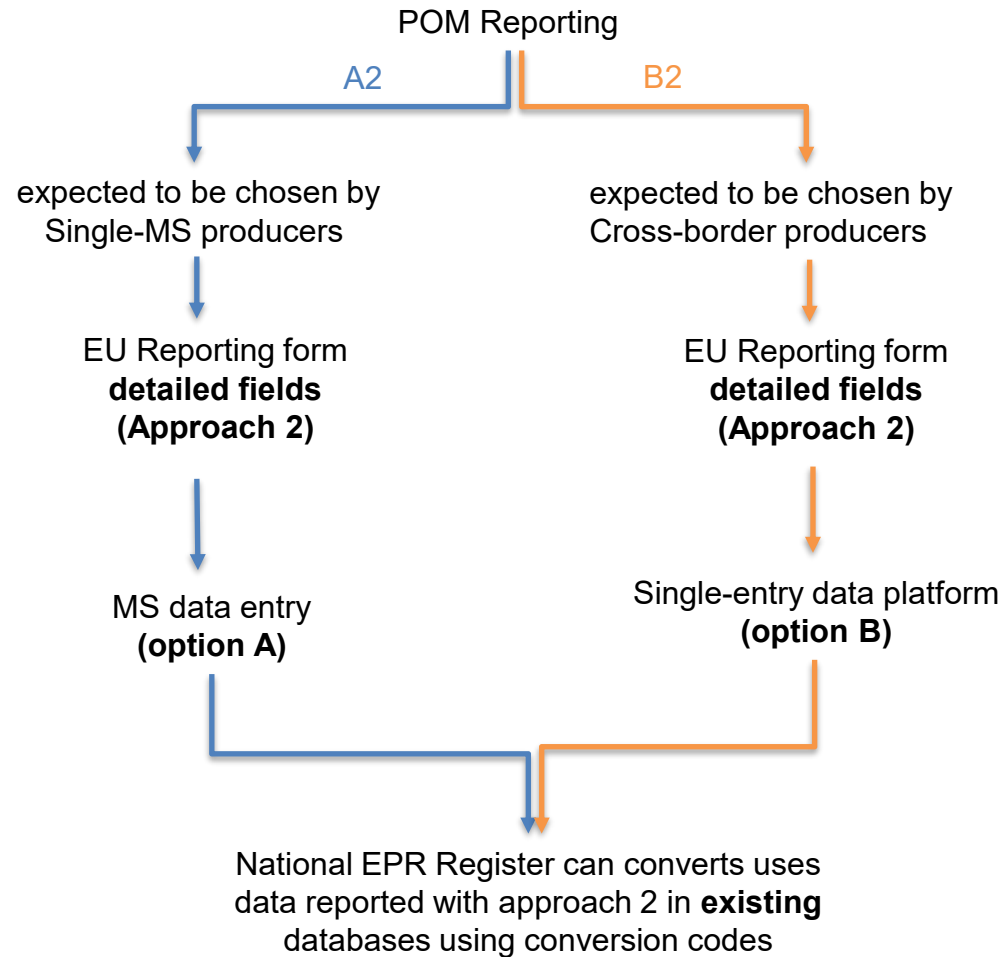
A common harmonised simplified Reporting Form is applied to all NRs, using **simplified** fields (Approach 1) for both pathways.

Producers can choose between:

- report through NR or
- through a single-entry data EU platform.



8. HYBRID REPORTING A2 + B2



Hybrid reporting A2-B2:

A common harmonised detailed Reporting Form is applied to all NRs, using **detailed** fields (Approach 2) for both pathways.

Producers can choose between:

- report through NR or
- through a single-entry data EU platform.

Thank you for your attention

LIFE4.EPR

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