



## LIFE4EPR

Towards harmonized Extended Producer Responsibility schemes across the EU

### D3.1 Stocktake assessment of existing national EPR registers

WP3 EU-wide harmonized register of producers/products subject to EPR obligations

T3.1 - Stocktake analysis of a set of national EPR producers/products registers across EU

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**Public Report**



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# 1 Document attributes

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## 1.1 Document Management Control Sheet

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## 1.2 Document Revision History

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0.3	26/01/2026	2 <sup>nd</sup> Draft	Document created as 2 <sup>nd</sup> version to be distributed	ENT – Gemma Nohales
0.4	29/01/2026	3 <sup>rd</sup> Draft	Document after peer review revision	ENT, WF, ZWE
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0.9	02/03/2026		Changes applied. Version for final revision by Project Coordinator	ENT – Veronica Martinez
0.10	03/03/2026	Final version	Final version submitted	ENT – Rosaria Chifari

## 1.3 Document Overview

This report presents the results of a comprehensive analysis of a set of national Extended Producer Responsibility (EPR) producer and product registers across the European Union (EU). It covers several interconnected dimensions relevant to the current EPR registration landscape.

The analysis includes an examination of the underlying legal frameworks; a detailed review of national EPR register information flows; an assessment of registration and reporting parameters and functionalities; and an initial evaluation of the key programming and system components that

support these platforms. In addition, the report integrates qualitative insights gathered through an extensive user-focused survey, as well as meetings and interviews with sector experts and EPR register administrations.

The conclusion section presents, for each thematic area, a set of focused findings that summarise the main observations, highlight emerging patterns, and identify specific gaps, challenges, and potential improvement measures.

The insights presented in this report provide a consolidated understanding of the EU EPR registration ecosystem, including the key streams analysed and the selected national registration platforms. Together, these findings offer an evidence-based foundation for the next phases of the project, supporting the definition of the concept (mock-up) of a potential EU-wide EPR register system and informing the design and testing of a pilot EU-wide EPR register.

## 1.4 Table of Acronyms

Acronym	Term
AR(s)	Authorised Representative(s)
D	Deliverable
EEE	Electrical and Electronic Equipment
EPR	Extended Producer Responsibility
EC	European Commission
EU	European Union
GDPR	General Data Protection Regulation
MS	Member States
PoM	Placed on the Market (product quantity reporting)
PRO(s)	Producer Responsibility Organisation(s)
T	Task
WEEE	Waste Electrical & Electronic Equipment
WFD	Waste Framework Directive
WP	Work Package

## 1.5 LIFE4EPR Project Summary

Extended Producer Responsibility (EPR) builds on the ‘polluter pays’ principle, holding producers accountable for the entire lifecycle of their products. While EPR is mandated in EU laws including the Waste Framework Directive (Article 8a), its implementation varies across the Member States (MS).

Currently, a comprehensive overview of EPR schemes at the national level is lacking, creating a gap for policymakers as well as EPR stakeholders from producers and recyclers to consumers.

The project LIFE4EPR – towards harmonized Extended Producer Responsibility schemes across the EU – is designed in response to three main knowledge gaps regarding EPR schemes in the EU: the absence of (a) an EU-wide overview of EPR schemes at MS level, (b) knowledge on the level and forms of harmonization among existing EPR producers/products' registers, and (c) the knowledge on the environmental effectiveness of EPR systems. In view of this, the project aims to create knowledge to enhance the effectiveness, governance, and cost efficiency of EPR schemes.

The project will study current practices, develop a technical tool, and deliver policy recommendations for EPR systems in the EU. The methods deployed in LIFE4EPR include stakeholder engagement, a mapping of EPR schemes, a benchmarking of selected EPR systems, and the development and testing of a pilot harmonized EU-wide EPR register. Findings will inform policymaking for national EPR schemes. A lasting impact will be ensured by creating a knowledge-sharing community consisting of academia, practitioners, and stakeholders focused on EPR.

The LIFE4EPR consortium includes ENT, as project coordinator, along with ACR+, WEEE Forum, Zero Waste Europe, ECO, SOTELLO, and VUB. Together, they bring a rich mix of not-for-profit organisations, practitioners, Producer Responsibility Organisations (PROs), and academic expertise in EPR systems, circular economy, and digital solutions. Their collaborative efforts will map existing schemes, test a pilot EU-wide EPR register, and engage stakeholders to ensure policy improvements and long-term knowledge sharing.

## 1.6 Disclaimer

This report presents information compiled by the authors to the best of their knowledge and belief at the time of publication. Neither the authors nor the EC can be held responsible for any use that may be made of the content of this report.

The assessment of EPR producer registration and complementary elements systems faced several inherent and contextual limitations. Public availability of information, as well as the possibility of accessing national registration systems, were key factors shaping the results. In many cases, the analysis required combining multiple sources and performing additional validation and translation from original MS languages. Furthermore, limited access to key contacts and varying levels of cooperation from MS and relevant authorities constrained the depth of the analysis in certain instances.

## 1.7 Acknowledgements

The authors gratefully acknowledge the contribution of Gerard Marina (Fundació ENT) to the preparation of Section 8: EPR Register Analysis, Data Search and Consolidation. His work in

supporting data search and consolidation activities has been instrumental to the development of this deliverable.

## 2 Preface

Within LIFE4EPR WP3 – EU-wide harmonised register of producers/products subject to EPR obligations, the necessary steps will be undertaken to design, develop and test a pilot EU-wide harmonised EPR register of producers and products. This pilot will serve as a proof of concept to explore the feasibility of a potential future EU wide EPR register.

WP3 focuses specifically on analysing the key elements relevant to producer and product registration systems and on progressively translating the findings into structured proposals for improvement and possible harmonisation. This includes identifying core parameters, harmonised data requirements and complementary functionalities necessary to enhance interoperability, efficiency, transparency and streamlined information flows across MS.

The specific objectives of WP3 are to:

- **Carry out a stocktake analysis of a set of national EPR producer/product registers across the EU**, covering different waste streams and MS, in order to compare their structure, scope, data requirements, governance features and operational characteristics. This analysis will identify commonalities and differences and define the key elements and core components that a robust and efficient producer/product register should include.
- **Develop, through a structured co-creation process with relevant stakeholders, the concept (mock-up) of a potential EU-wide EPR register system.** This will include defining its objectives, scope, governance model, harmonised core data requirements, interoperability principles and minimum functional specifications. In parallel, this phase will formulate best practices, recommendations and standard procedures aimed at improving the accuracy, efficiency and transparency of registration and inventory management practices in the national systems analysed.
- **Design and develop a pilot EU-wide EPR register**, based on the mock up concept defined as a milestone in the co-creation phase and drawing on the experience and operational knowledge of existing national EPR register systems. The pilot will translate the agreed conceptual architecture into a functional web-based prototype that operationalises the core and technically implementable components and priority functionalities of the proposed EU-wide EPR register.
- **Programme and deploy the pilot EU-wide EPR register as a web-based tool and test it** with users of existing MS registration systems in order to deliver a validated and user-tested pilot EU-level prototype. The testing phase will assess usability, technical performance, data handling processes, interoperability aspects and overall practical relevance. It will also evaluate the extent to which the conceptual elements defined during the co-creation phase can be effectively operationalised, identifying limitations, necessary adjustments and areas requiring further development beyond the pilot scope.

The stocktake analysis (**T3.1 – Stocktake analysis of a set of national EPR producer/product registers across the EU**), described in this report, constitutes the analytical foundation of WP3. It provides a structured comparative assessment of existing national systems and informs the subsequent co-creation phase by supporting the definition of the concept (mock-up) of a potential EU-wide EPR register system, the development of recommendations for the systems analysed, and the design and testing of the pilot register.

### 3 Introduction

EPR is a core policy instrument within EU waste legislation and is grounded in the ‘polluter pays’ principle, making producers accountable for the environmental impacts of their products throughout their entire life cycle. Under the EU Waste Framework Directive (WFD), producers must fulfil their EPR obligations either individually or collectively through Producer Responsibility Organisations (PROs) and bear financial and/or organisational responsibility for managing the waste stage of a product’s life cycle, including collection, sorting, treatment, recycling and final disposal. Within the EU, EPR schemes are established for several product streams such as Electrical and Electronic Equipment (EEE), packaging, batteries, textiles, etc.

EPR is expected to play an even more central role under the forthcoming Circular Economy Act, which aims to harmonise fragmented EPR rules across MS and drive the digitalisation of compliance systems, reducing administrative burdens, improving data quality and enabling a more coherent, efficient and competitive circular single market.

MS must ensure proper oversight and enforcement of EPR schemes, which requires establishing national producer registers. EPR registers allow authorities to identify all obligated producers, monitor compliance and PROs affiliation, prevent free riding and ensure transparency. Through these registers, producers submit information on their identity, representatives, products inventories and products and quantities Placed on the Market (PoM), among others.

The MS EPR register ecosystem is quite complex, with different product streams governed by distinct legal requirements, each at different stages of regulatory development and implementation which also condition the register design and introduction. Under this legal framework, the implemented national EPR registers vary significantly in terms of parameters, platform architecture, validation mechanisms, and complementary functionalities. Moreover, the complexity of information flows and the involvement of multiple stakeholders further increase the overall demands on the system.

To deeply map and analyse this context, this report presents the results of a stocktake analysis of a set of national producer/product registers across the EU. The report includes an examination of the underlying legal framework, a comprehensive review of national EPR register information flows and functionalities for registration and reporting, and an initial assessment of key programming and system components that support these platforms. The analysis also integrates insights gathered through an extensive register-user-focused survey, as well as from meetings and interviews with sector experts and EPR register administration.

The general objective is to identify common elements, good practices and structural differences among existing systems. The findings of this analysis provide an evidence base to assess the requirements, feasibility and potential added value of an EU-level register for producers and products subject to EPR obligations, including an evaluation of the challenges and limitations linked to harmonisation across MS.

## 4 Objectives

The stocktake analysis of national EPR producer and product registers across the EU aims to provide a detailed and comprehensive review and comparison of existing national systems in MS. This study builds on the existing know-how and operational experience of current Member State EPR register frameworks, complementing it with an analysis of regulatory requirements and insights collected from users and sector experts. The main specific objectives of this analysis include:

- Analysing and comparing the related legal framework governing registration and reporting obligations across different product streams
- Identifying and analysing in detail the information flows, parameters, functioning, and complementary functionalities of a selected group of national EPR registers
- Conducting an initial assessment of the key functionalities of registration and reporting platforms in terms of architecture and system components
- Launching and processing the results of an exhaustive survey to collect users' opinions and usability experiences with existing registration and reporting platforms
- Incorporating the know-how and perspectives of key sector experts, including LIFE4EPR Advisory Board members, national authorities responsible for EPR register systems, and other relevant stakeholders.

The findings of this report provide a robust and comprehensive evidence base to support the definition of the concept of a potential EU-wide EPR register system, as well as the concept design of the pilot EU-level EPR register. They will also help shape discussions and guide the co-creation process aimed at developing a shared concept for such a pilot register.

The specific objectives outlined above provide a structured analytical framework to ensure that all necessary information is compiled in a comparable manner. They aim to address all elements required of EPR producer and product registers across different product streams, while taking into account both evolving regulatory provisions and practical user needs. This approach supports the identification of harmonised data necessary to monitor EPR obligations and outcomes, and to facilitate enforcement activities at national and regional levels.

## 5 Methodology

This section explains the methodology applied to conduct the analysis presented in this report. It outlines the scope of the assessment, the criteria used to select the product and waste streams included, and the analytical steps followed to examine the selected national registration systems together with the related regulatory requirements.

### 5.1 Selection of the Product/Waste Streams in Scope

Across the various product streams subject to EPR obligations in the EU, the study focuses on a limited number of product and waste streams selected to provide a meaningful and representative basis for analysing EPR registration systems across the EU.

The selection is based on the project's scope and practical considerations such as available time and resources, while ensuring sufficient diversity to enable a balanced and informative assessment. The selected streams are: **Electrical and Electronic Equipment (EEE), Packaging, and Textiles.**

Although other streams, such as batteries, were also considered as potential candidates for the analysis, the selected streams were ultimately prioritised because they reflect different levels of regulatory development, market structures and practical implementation across MS, based on the following specific justifications:

- EEE was selected due to the extensive availability of national EPR registers across MS and the relatively higher level of harmonisation in reporting practices supported by an Implementing Regulation, despite ongoing divergences in data formats and procedures at the MS level. This stream benefits from long-standing operational experience, a mature legal framework, and well-documented procedures, making it highly suitable for identifying established best practices. Additionally, consortium members hold significant expertise and have facilitated easy access to relevant systems and stakeholders.
- Packaging was included because it represents one of the most widely implemented and regulated EPR streams in the EU. National EPR registers are broadly available, and the stream is supported by an advanced and evolving legislative framework, including recently adopted provisions that move towards greater harmonisation. Packaging provides an essential reference case for assessing commonalities and divergences in EPR register parameters and reporting requirements.
- Textiles, as a complementary stream, were added to ensure that the analysis also captures a stream at an early stage of regulatory development, where only a limited number of national EPR registers currently exist (e.g., France, Hungary, Latvia, and the Netherlands, among others currently in preparation). With new EU-level legislation introduced through the amendments to the WFD and the emergence of national EPR schemes, the textile stream represents a complex sector with a highly fragmented market structure. It offers valuable insights into the challenges associated with setting up new registers, designing parameters from the ground up, and anticipating future harmonised requirements. Including Textiles

therefore enriches the analysis by incorporating a forward-looking perspective that complements the more established EEE and Packaging systems.

Overall, the selection of EEE, packaging and textiles provides a balanced basis for assessing the diversity of EPR registration practices across the EU. This combination enables the stocktake analysis to capture both well-established operational models and the evolving needs of newer product streams, thereby offering a robust foundation for the conceptualisation of a potential EU-wide EPR register system and the concept design of the pilot EU-level EPR register.

## 5.2 Methodological framework

The study methodology aims to capture the complexity of national producer registers across the three selected EPR streams. It combines legal, operational, technical and user-oriented analyses, alongside expert input, to develop a robust, evidence-based understanding of current registration practices, harmonisation needs and challenges within MS.

The method is structured around six complementary components, see Figure 1. The details of each component are described in the following sections: the Legal framework analysis (Section 6), the Mapping of Registers (Section 7), the Analysis of registers (Section 8), the Architecture and components analysis (Section 9), Register user survey (Section 10), and the Expert consultation (Section 11).



Figure 1. Methodology steps and actions

## 6 EU Legal framework analysis on EPR registration

This section examines the regulatory framework governing the establishment and management of EPR producer registers for the three key product streams (i.e. EEE, packaging and textiles), namely:

- Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE), amended by Directive (EU) 2018/849 and Directive (EU) 2024/884
- Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC
- Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, amended on 16 October 2025

These legislative instruments define the requirements for producer registration, reporting, and compliance monitoring, aiming to ensure transparency, traceability, and accountability within EPR schemes.

The legal framework analysis presented below begins with an examination of the general legal requirements (subsection 6.1), then focuses on registration parameters (subsection 6.2), and ends with the reporting requirements (subsection 6.3).

### 6.1 General legal requirements

Table 1 provides a comparative overview of the general requirements governing the national EPR producer registers for EEE, packaging and textile products under the respective EU legislative frameworks.

EPR Register Requirements	EEE	Packaging	Textile
<b>Regulation</b>	Directive 2012/19/EU, amended by Directive (EU) 2018/849 and by Directive (EU) 2024/884	Regulation (EU) 2025/40	Directive 2008/98/EC, amended on 16 October 2025 by Directive (EU) 2025/1892
<b>In force date</b>	In force on 9 October 2024, latest amendment Commission Implementing Regulation 2019/290, in force on 1 January 2020.	In force on 11 February 2025. Applies from 12 August 2026.	National transposition deadline on 17 April 2028. From 17 April 2029, Articles 22a, 22b, 22c and 22d shall apply to enterprises which employ <10 persons & annual turnover and annual balance sheet < EUR 2 million.
<b>Register creation</b>	Set up a national register of producers, including those selling EEE online.	Set up a national register within 18 months of the	Establish a register of producers of textile, textile-related or footwear products

EPR Register Requirements	EEE	Packaging	Textile
		adoption of the first implementing act.	listed in Annex IVc of revised directive
<b>Deadline to inform Commission</b>	-	-	Submit register link to the Commission within 30 days from the launch of the national register.
<b>Register accessibility</b>	Not explicitly stated as public. Producers or authorised representatives must be able to enter all relevant information online.	List of registered producers easily accessible, publicly available, and free of charge.	Information must be easily accessible, publicly available, free of charge, machine-readable, sortable, searchable, and compliant with open standards. Ensure access for online platforms if info is not public; respect confidentiality of sensitive commercial and industrial information.
<b>Interconnection between registers</b>	National registers must include links to other MS' registers.	Include links to other national registers in the national register platform.	A Commission website must provide links to all national producer registers.
<b>Roles for data provision</b>	a) Producers b) Delegations: AR for foreign producer (appointment by writing mandate) PROs not explicitly mentioned.	a) Producers b) Delegations: AR for foreign producer (appointment by writing mandate) PROs (unless the MS specifies otherwise).	a) Producers b) Delegations: AR for foreign producer (appointment by writing mandate) PROs (appointment by writing mandate).
<b>AR suspension</b>	Article 17(2) (AR for distance communication directly to private households or to users other) shall be suspended until 1 January by 2035 by 2025/0396 (COD) Proposal for a Directive.	Article 45(3) shall be suspended until 1 January 2035 by COM (2025) 982 Proposal for a Regulation.	Article 22a (3) shall be suspended until 1 January 2035 by 2025/0396 (COD) Proposal for a Directive. MS may either provide AR for distance contracts directly to end-users or use alternative enforcement means.
<b>Data to collect</b>	Registration and reporting information required under Annex X. Commission Implementing Regulation (EU) 2019/290 provides harmonised templates for registration and reporting under annex I and II. MS may require additional information elements identified as such in the format in Annex II.	Registration and reporting information required under Annex IX (registration and reporting). Producers placing/unpacking less than 10 tonnes of packaging per year must submit simplified data (Annex IX, Part B, point 2) MS may request additional information or documents if needed for compliance monitoring	Registration information required under Art 22b.4. Reporting obligation via PROs.
<b>Reporting Frequency</b>	Regulation (EU) 2019/290: submit quarterly reports (to be made available to the register	Submit reporting annual data by 1 June for the previous calendar year. MS may require	See Table 3 on Inventory parameters, related to PROs information requested

EPR Register Requirements	EEE	Packaging	Textile
	within 20 days of the end of each three-month period).	submitting reporting data on a quarterly basis.	
<b>Format and implementing acts</b>	Commission adopted an implementing act establishing the format and frequency of reporting. Commission Implementing Regulation (EU) 2019/290.	Commission shall adopt implementing acts establishing the format for registration and reporting. Deadline by 12 February 2026. Format shall be interoperable, shall be based on open standards and machine-readable data, and shall be transferable through an interoperable data exchange network without vendor lock-in.	Commission shall adopt implementing acts establishing the harmonised format for registration. Deadline by 17 April 2027.
<b>Registration procedure</b>	-	Grant registration and number within 12 weeks after receiving required info (Annex IX).	Applications via electronic system; grant registration and number within 12 weeks; procedures without adding substantive requirements beyond paragraph 4.
<b>Fees</b>	-	Charge producers cost-based and proportionate fees for processing the application.	Charge cost-based, proportionate fees for processing applications.
<b>Monitoring and control</b>	Require and monitor submitted information for compliance; apply penalties for non-compliance.	Monitor information submitted pursuant to Annex IX. MS may require reporting data (to be audited and certified by independent auditors).	Information on producers to monitor compliance with Article 22a and 22c. Competent authority may refuse or withdraw registration if info is missing or insufficient. Adequate self-control mechanism, supported, where relevant, by regular independent audits regarding reporting data.
<b>Removal from register</b>	-	Remove producers three years after registration ends if the producer has ceased to exist.	Remove producer when it ceases to exist.

Table 1. Comparison of regulations for EPR registration and reporting

As can be seen in Table 1, the three streams share an EU-level legal basis, but differ in maturity and timelines, with packaging governed by a new regulation, EEE by an established directive with amendments an implementing regulation, and textile by recent amendments introducing longer transition periods (April 2028).

All streams require MS to establish national EPR producer registers, but their timelines differ:

- EEE registers are already in place following the completed [WEEE Directive](#) transposition.

- [Textiles register](#) is also subject to a transposition period with strict obligation to notify the Commission of the register link shortly after launch.
- [Packaging regulation](#) sets explicit deadlines for establishing the EPR register.

Packaging regulation and EEE directive require national EPR registers to include links to registers of other MS, while textile centralises interconnection at EU level through a Commission managed platform.

While all systems enable online submission, packaging and especially textile mandate higher public transparency and open data accessibility, whereas EEE does not explicitly require public availability of EPR register information.

Packaging and textile legislation considers PROs as official data providers, whereas for EEE, producers are designated as the primary data providers, with PRO participation being voluntary.

In all three streams, specific Authorised Representative (AR) obligations will be temporarily suspended until 2035, subject to the adoption of the current legislative proposals (see

Annex I for further details).

Each stream requires similar core EPR registration and reporting information, but EEE already uses harmonised templates as established by the Implementing Regulation in 2019, packaging will adopt them under upcoming implementing acts early 2026, and textile foresees harmonised formats by 2027. In addition, reporting frequencies differ across streams: packaging reporting is annual, EEE reporting is quarterly, and textile reporting is linked to PRO-based annual reporting requirements.

Packaging and textile include harmonised rules for EPR registration processing timelines and cost-based fees, while EEE leaves these procedural aspects more open to MS discretion.

Finally, all systems include monitoring and enforcement obligations, but packaging and textile specify clearer audit mechanisms and removal rules, whereas EEE provides less detailed compliance provisions.

## 6.2 EPR Registration parameters requirements

Table 2 presents a comparative summary of the key parameters required for producer registration under the EU’s EPR schemes for EEE, packaging, and textiles. Each regulatory framework defines the specific information that producers must submit upon entry into the national EPR register, including company identification details, the product categories PoM, and any delegation to PROs or appointed ARs, where applicable, particularly for foreign producers placing products on a MS’s market without a local establishment.

The three streams differ significantly in their EPR registration requirements. EEE has the most extensive set because its implementing regulation is already in force, requiring detailed producer and AR identification (including an AR appointment declaration), product categorisation, compliance and financing information, and, where relevant, distance selling. Packaging requires a more limited dataset, focused mainly on producer and AR identification, a compliance declaration, and PRO information when registration is delegated. Textile has the simplest requirements, requesting only basic producer identification, NC product codes, and PRO details where applicable, without additional financing, AR, or distance selling obligations. All three streams also require a final declaration confirming the accuracy of the information provided.

EPR Registration Parameters	EEE	Packaging	Textile
<b>Regulatory references</b>	Commission Implementing Regulation (EU) 2019/290 provides harmonised templates for registration and reporting under annex I.	Registration information required under Annex IX – Part A, Regulation (EU) 2025/40.	Registration information required under Art 22b.4 of WFD.
<b>Producer Identification</b>	Name (company or natural person - 1 <sup>st</sup> +last name-); Trading name; Legal address (street, postal code, location, province, municipality); Website; Contact person details (name, phone, email, address);	Name and brand names; Address (street, postal code, city, country); Telephone; Web address; Email; Single contact point; National ID code; Trade register number; EU/national tax ID.	Name, trademark, brand names; Address (street, postal code, city, country); Telephone; Website; Email; Single contact point.

EPR Registration Parameters	EEE	Packaging	Textile
<b>Product Information</b>	National ID code/business code; National Tax number; Other ID info.  Category/categories of EEE; Sub-categories; Type (household or other); Brand name. Producer responsibility: Set up Individual compliance scheme (Yes/No); If Yes, additional information about the individual compliance scheme. Joined Collective compliance scheme (s) (Yes/No). Financing responsibility, Yes/No for: "The producer..."	-	National ID code; Trade register number; EU/national tax ID. NC codes for textile, textile-related or footwear products listed in Annex IVc.
<b>Compliance Information</b>	– participates in one or more collective compliance schemes. – provides a recycling insurance. – provides a blocked bank account other (specify)	Declaration on how producer meets EPR responsibilities; Certificate from PRO if applicable.	-
<b>Financing responsibility</b>	Distance selling details: Producer uses distance selling to sell EEE directly to private households or to users other than private households in another MS (Yes/No) List of MS where EEE sold; Name of authorized representative in each MS. Name (company or natural person - 1 <sup>st</sup> +last name-); Legal address (street, postal code, location, province, municipality); Website; Contact person details (name, phone, email, address); National ID code/business code; National Tax number. Name of represented producer(s) (company or natural person - 1 <sup>st</sup> +last name-); Contact details (phone, email, detailed address, website).	-	-
<b>Distance selling</b>			
<b>AR information</b>		Name; Address (including postal code and place, street and number, country); Telephone; Email.	-
<b>PRO Information</b>	-	For delegated registration to PROs: Name; Contact details (including postal code and place, street and number, country); Telephone; Web address; Email; National ID code; Trade register number; Tax ID; Mandate for each represented producer.	Name; Address (postal code, city, street name and number, country); Phone number (if applicable); Website; Email address; National identification code; Trade register or equivalent number; EU or national tax identification number;

EPR Registration Parameters	EEE	Packaging	Textile
<b>Declaration</b>	Declaration confirming accuracy of information provided and an accurate reflection of the type of electrical and electronic equipment PoM.	Statement of truth (see row "Declaration"). Statement by producer/authorized representative/PRO confirming accuracy of information.	Mandate of the represented producer.  Declaration confirming accuracy of information provided.
<b>Additional Requirements</b>	In case of AR, declaration confirming the appointment with a written mandate by the represented producer (s).	Where PRO represents more than one producer, a separate indication of how each one of them meets the responsibilities set out in Article 45 on EPR.	-

Table 2. Comparison of registration parameters

## 6.3 EPR Reporting parameters requirements

Table 3 provides a comparative overview of the reporting parameters required for products PoM under the EPR frameworks for EEE, packaging and textiles. The comparison is based on the specific legal requirements applicable to each stream, noting in particular the advanced regulatory stage of EEE, which benefits from detailed templates set out in the dedicated Implementing Regulation.

Although all three frameworks share the common objective of ensuring information on products made available for the first time on the market of a MS, the current reporting structures and channels differ significantly.

In textiles, annual reporting to competent authorities is directly assigned to PROs under the legal framework. In contrast, packaging and EEE require producers (or AR) to submit reports, although MS may allow such reporting to be delegated to PROs.

EEE reporting is considerably more granular, incorporating mandatory elements (M), filter-triggered elements (F), and additional mandatory elements (M\*) (see Annex I.I - WEEE legal framework analysis). It also requires detailed breakdowns by category, sub-category (where introduced by MS), and equipment type, making EEE the most detailed of the three streams.

For packaging and textiles, the respective regulations do not currently require an explicit distinction between household and non-household flows. EEE, however, explicitly requires reporting "per type," distinguishing between household and other-than-household equipment.

Packaging EPR includes simplified PoM reporting parameters based on a threshold of PoM tonnes and a reduced set of material categories. Textile EPR also includes a simplified reporting requirement for micro-enterprises.

EPR Reporting Parameters	EEE	Packaging	Textile
<b>Regulatory references</b>	Commission Implementing Regulation (EU) 2019/290 provides harmonised templates for registration and reporting under annex II.	Registration information required under Annex IX Part B of Regulation (EU) 2025/40.	Registration information required under (Art. 22c. 20) of WFD. Reporting obligation via PROs.
<b>Producer / Organisation name</b>	Name of the producer or authorised representative or organisation implementing EPR on behalf of producers: legal person name or natural person first/last name. PRO name and list of represented producers/ARs where allowed/applicable.	Not explicitly listed in Part B(a). Typically captured at registration stage.	Typically reported by PROs on behalf of producers; the PRO identifies the producers it represents as per national setup.
<b>National identification code of the producer</b>	National identification code/business registration code, National tax number.	National identification code of the producer.	-
<b>AR information</b>	Included within name/role fields (producer or AR or PRO) and identification numbers.	-	-
<b>Contact person for reporting</b>	Contact person first name, last name, phone, email	-	-
<b>Reporting period</b>	Reporting period.	Reporting period.	MS must ensure annual provision by PROs to authorities (data drawn from producers annually).
<b>Quantities by weight of categories PoM</b>	Weight (in tonnes) of EEE PoM: a) Per category (Annex III to Dir. 2012/19/EU); photovoltaic panels reported separately. b) Per sub-category (if applied nationally). c) Per type (household vs other than household).	Quantities by weight of packaging categories that the producer first makes available on the MS territory or unpacks without being end user. (no details about the specific units, in kg or tonnes). 22 categories per materials in Table 1 Annex II.	PROs must submit, by weight, the quantities of textile, textile-related and footwear products first made available on the market (Annex IVc scope).
<b>Units (number of items)</b>	Not required. Sometimes requested in addition to weight at national level.	Not required (weight only). Sometimes requested in addition to weight at national level.	Not specified; emphasis on weight annually.
<b>Business-to-Consumer / Business-to-Business split</b>	Split by household vs other than household (info “per type”).	Not specified in Part B.	Not specified.
<b>Simplified reporting</b>	-	Producers placing/unpacking less than 10 tonnes of packaging per year must submit simplified data: information on packaging types set out in Table 1 of this point (Annex IX, Part B, point 2) including 6 categories per material.	Micro-enterprises: For producers with <10 employees and <€2M turnover/balance sheet, PROs may request only the information under Article 22c(18)(a)(i) (only the amount, including the quantity by weight, of products made

EPR Reporting Parameters	EEE	Packaging	Textile
			available on the market for the first time, no waste management parameters and results).
<b>Arrangements to ensure producer responsibility</b>	-	Arrangements to ensure producer responsibility (e.g., PRO contract / individual compliance / DRS participation where applicable).	-
<b>Declaration of accuracy</b>	Mandatory declaration (checkbox in electronic forms) attesting truth and accuracy of data (reflection of the type and quantity of electrical and electronic equipment PoM in the MS).	-	-
<b>Other requirements</b>	Where the MS allows for an organisation implementing extended producer responsibility obligations on behalf of producers to provide this information, it is to be specified whether this information shall be reported for each represented producer and authorised representative individually or in total, for all represented producers and authorised representatives.	-	-

Table 3. Comparative of EPR reporting parameters for products PoM

## 7 Mapping of EPR registers across the EU

The mapping of operational EPR registers constitutes a foundational step toward understanding the current landscape of register management across EU Member States. In Deliverable [D2.1](#), the project carried out a comprehensive mapping of the different EPR schemes. In parallel, and in coordination with this exercise, the identification of national EPR registers was initiated. While preliminary register-related information was incorporated into D2.1 during its preparation, the exercise was subsequently refined, completed and further detailed under the present activities, including the development of a dedicated database of EPR registers.

This database compiles register webpages, key characteristics, technical documentation, and contact details. For each EPR register, the information includes the country, the register name and responsible authority name, the relevant waste stream(s), the official web link, and additional attributes such as English-language availability, contact email address, partner responsible, reliability of the mapping, and complementary comments. The process combined desk research with targeted outreach to register administrations to obtain supporting materials, such as manuals and forms, and to verify the type of user access available (standard or test/visitor access).

The consolidated results are presented in Table 4, which provides an overview of the EPR registers identified across the 27 Member States. Systems covering the selected streams: EEE, packaging, and/or textile are highlighted in blue in the “Stream(s)” column. This work served as the baseline for selecting the national registers to be examined in greater depth (see section 8). Figure 2 provides an overview of the main steps followed in the EPR register mapping process across the 27 MS.

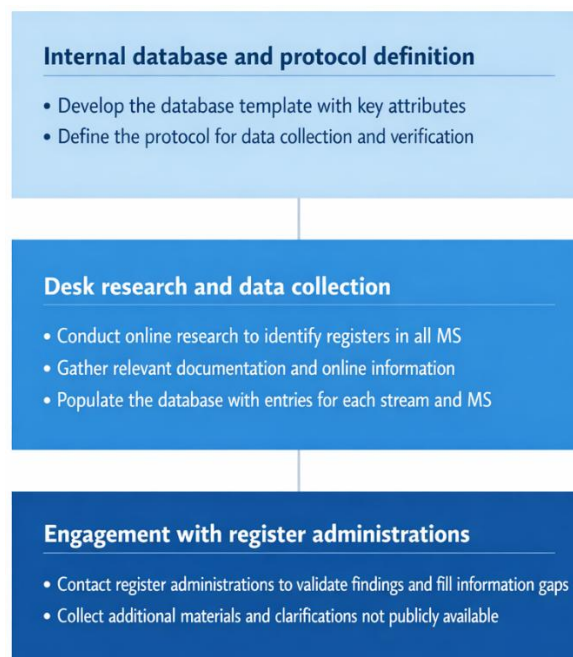


Figure 2. Summary of the EU EPR register mapping steps across the 27 MS

Country	Register name/Authority name	Stream (s)	Web Link
AT	Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology	Multiple: <b>Packaging, EEE</b> , Batteries, Single-use plastics, Plastic fishing gear, Single-use sanitary products	<a href="https://edm.gv.at/edm_portal/cms.do?get=/portal/informationen/antwortungen/themen.main">https://edm.gv.at/edm_portal/cms.do?get=/portal/informationen/antwortungen/themen.main</a>
BE	Beweee (supported but not managed by the government)	WEEE	<a href="https://beweee.be/">https://beweee.be/</a>
BG	Executive Environment Agency	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Oils, Single-use plastics	<a href="https://nwms.eea.government.bg/app/registers">https://nwms.eea.government.bg/app/registers</a>
CY	Department of environment, Ministry of Agriculture, Rural Development and Environment of Cyprus	Batteries	<a href="https://www.moa.gov.cy/moa/environment/environmentnew.nsf/page21_gr/page21_gr?OpenDocument">https://www.moa.gov.cy/moa/environment/environmentnew.nsf/page21_gr/page21_gr?OpenDocument</a>
CZ	Ministerstvo životního prostředí	Multiple: <b>Packaging, EEE</b> , Batteries, Tyres	<a href="https://visoh2.mzp.cz/">https://visoh2.mzp.cz/</a>
DE	DIVID	Single-use plastics	<a href="https://www.einwegkunststofffonds.de/en/oeffentliche-register/herstellerregister">https://www.einwegkunststofffonds.de/en/oeffentliche-register/herstellerregister</a>
DE	Local authorities operating registries	Plastic fishing gear	-
DE	Stiftung Ear Register	Multiple: <b>EEE</b> , Batteries	<a href="https://www.ear-system.de/ear-verzeichnis/hersteller.jsf;jsessionid=OpTweWKxYN+gXlEqEjMFU5wi.tomcat7#no-back">https://www.ear-system.de/ear-verzeichnis/hersteller.jsf;jsessionid=OpTweWKxYN+gXlEqEjMFU5wi.tomcat7#no-back</a>
DE	ZSVR LUCID Packaging Register	<b>Packaging</b>	<a href="https://oeffentliche-register.verpackungsregister.org/Producer">https://oeffentliche-register.verpackungsregister.org/Producer</a>
DK	Dansk Producent Ansvar	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Single-use plastics	<a href="https://producentansvar.dk/en/">https://producentansvar.dk/en/</a>
DK	DPA -Danish Producer Responsibility	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Single-use plastics, Plastic fishing gear	<a href="https://virk.dk/myndigheder/stat/DPA/selvbetjening/The_Danish_producer_register/">https://virk.dk/myndigheder/stat/DPA/selvbetjening/The_Danish_producer_register/</a>
EE	Pakendiregistri (packaging register)	Multiple: <b>Packaging</b> , Single-use plastics	<a href="https://pakis.envir.ee/pakis/main/welcome?request_locale=en">https://pakis.envir.ee/pakis/main/welcome?request_locale=en</a>
EE	Probleemtooteregistri (Register of Products of Concern)	Multiple: <b>EEE</b> , Batteries, ELVs, Tyres, Single-use plastics, Plastic fishing gear, Other	<a href="https://proto.envir.ee/proto/main/welcome?messageKey=error.sessionExpired&amp;request_locale=en">https://proto.envir.ee/proto/main/welcome?messageKey=error.sessionExpired&amp;request_locale=en</a>
EE	Register of products of concern (PROTO)	Multiple: <b>EEE</b> , Batteries, ELVs, Tyres, Single-use plastics, Plastic fishing gear, Other	<a href="https://proto.envir.ee/proto/registration/publicList?request_locale=en">https://proto.envir.ee/proto/registration/publicList?request_locale=en</a>
ES	Ministerio de Industria y Turismo	Multiple: <b>EEE</b> , Batteries	<a href="https://industria.gob.es/registros-industriales/pilas/Paginas/Inicio.aspx">https://industria.gob.es/registros-industriales/pilas/Paginas/Inicio.aspx</a>
ES	Ministerio para la Transición Ecológica y el Reto Demográfico	Multiple: <b>Packaging</b> , Tyres, Single-use plastics	<a href="https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/prevencion-y-gestion-residuos.html">https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/prevencion-y-gestion-residuos.html</a>
FI	Jätehuoltokompassi	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Single-use plastics, Paper, Plastic fishing gear	<a href="https://jatehuoltokompassi.fi/haetietoja/turre/">https://jatehuoltokompassi.fi/haetietoja/turre/</a>
FR	SYDEREP	Multiple: <b>Packaging, EEE</b> , Batteries, <b>Textiles</b> , ELVs, Tyres, Oils, Single-use plastics, Paper, Construction - Demolition, Mattresses, Medicines/pharmaceuticals, Puncture medical	<a href="https://syderep.ademe.fr/public/acteur/recherche">https://syderep.ademe.fr/public/acteur/recherche</a>

Country	Register name/Authority name	Stream (s)	Web Link
		devices, Gardening and homeware supplies, Sports equipment (not EEE), Toys (non EEE), Chemical products, Furniture, Single-use sanitary products, Recreational or sports vessels	
GR	National Registry of Producers	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Oils, Sports equipment (not EEE)	<a href="https://empa.eoan.gr/">https://empa.eoan.gr/</a>
HR	Fond za zaštitu okoliša i energetska učinkovitost - FZOEU	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Oils, Single-use plastics, Plastic fishing gear	<a href="https://www.fzoeu.hr/en/digitalni-rppo-obrazac">https://www.fzoeu.hr/en/digitalni-rppo-obrazac</a>
HU	MOHU MOL Hulladékgazdálkodási Zrt.	<b>Packaging</b>	<a href="#">LINK</a>
HU	OKIR - Országos Környezetvédelmi Információs Rendszer	Multiple: <b>Packaging, EEE</b> , Batteries, <b>Textiles</b> , ELVs, Tyres, Oils, Single-use plastics, Paper, Plastic fishing gear, Furniture	<a href="https://kapu.okir.hu/okirkapuugyf/">https://kapu.okir.hu/okirkapuugyf/</a>
IE	Local authority (individual EPR) or with ELVES CLG (PRO)	ELVs	See each local authority's website
IE	The Producer Register Limited	Multiple: <b>EEE</b> , Batteries, Tyres	<a href="https://www.producerregister.ie/">https://www.producerregister.ie/</a>
IT	Ministerio del l'ambiente e della sicurezza energetica (RENAP)	Multiple: <b>EEE</b> , Batteries, Tyres	<a href="https://www.registroaee.it/RicercaProduttori">https://www.registroaee.it/RicercaProduttori</a>
IT	REGISTRO AEE	<b>EEE</b>	<a href="#">Registro AEE :: Home</a>
IT	REGISTRO PILE	Batteries	<a href="#">Registro PILE :: Home</a>
IT	Registro Pneumatici	Tyres	<a href="#">Registro Pneumatici - RENAP</a>
IT	RENAP	Multiple: <b>EEE</b> , Batteries, Tyres	<a href="#">RENAP</a>
LT	GPAIS	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Oils	<a href="https://www.gpais.eu/en/viesi-savado-duomenys">https://www.gpais.eu/en/viesi-savado-duomenys</a>
LT	Unified Product, Packaging and Waste Record Keeping Information System	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Oils, Single-use plastics	<a href="https://www.gpais.eu/en/">https://www.gpais.eu/en/</a>
LU	Environment Agency Luxembourg	Multiple: <b>Packaging, EEE</b> , Batteries	<a href="https://environnement.public.lu/fr/emweltprozeduren/Autorisations/Gestion%20des%20dechets%20et%20ressources/Rapports%20annuels%20RA.html">https://environnement.public.lu/fr/emweltprozeduren/Autorisations/Gestion des dechets et ressources/Rapports annuels RA.html</a>
LV	GPAIS	Multiple: <b>Packaging, EEE</b> , Batteries, <b>Textiles</b> , ELVs, Single-use plastics, Plastic fishing gear	<a href="https://registri.vvd.gov.lv/izsniestas-atlajas-un-licences/razotaju-atbildibas-sistema-ras-ras-iesaititie-razotaji/">https://registri.vvd.gov.lv/izsniestas-atlajas-un-licences/razotaju-atbildibas-sistema-ras-ras-iesaititie-razotaji/</a>
MT	Environment & Resources Authority	Multiple: <b>Packaging, EEE</b> , Batteries, Single-use plastics, Plastic fishing gear	<a href="https://era.org.mt/era-topic-categories/producer-responsibility/">https://era.org.mt/era-topic-categories/producer-responsibility/</a>
NL	National (W)EEE Register	<b>EEE</b>	<a href="https://nationaalweeeregister.nl/en/production-of-eee/">https://nationaalweeeregister.nl/en/production-of-eee/</a>
NL	Netherlands Vehicle Authority (RDW)	ELVs	<a href="https://www.rdw.nl/en">https://www.rdw.nl/en</a>
NL	PRN Register	Paper	<a href="https://prn.nl/beoordelingsformulier/">https://prn.nl/beoordelingsformulier/</a>
NL	Rijkswaterstaat Ministry for infrastructure and waste management	Plastic fishing gear	<a href="#">LINK</a>
NL	Rijkswaterstaat nationaal batterijenregister	Batteries	<a href="https://batbase.stibat.nl/">https://batbase.stibat.nl/</a>

Country	Register name/Authority name	Stream (s)	Web Link
PL	Baza Danych o Produktach i Opakowaniach ordaz o Gospodarce Odpadami	Multiple: <b>Packaging, EEE</b> , Batteries, Single-use plastics	<a href="https://bdo.mos.gov.pl/">https://bdo.mos.gov.pl/</a>
PT	Registration System - Integrated Environmental Licensing System	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Oils, Single-use plastics, Plastic fishing gear	<a href="https://siliamb.apambiente.pt/pages/public/login.xhtml">https://siliamb.apambiente.pt/pages/public/login.xhtml</a>
RO	Environmental Fund Administration	Multiple: <b>Packaging, EEE</b> , Batteries, Tyres, Oils, Single-use plastics	<a href="https://online.afm.ro/">https://online.afm.ro/</a>
SE	SWEDISH ENVIRONMENT AGENCY -E-Service Portal for Producer Responsibility	Multiple: Single-use plastics, Plastic fishing gear, <b>Packaging, EEE</b> , batteries, Tires	<a href="https://producentansvar.naturvardsverket.se/login?returnUrl=https://producentansvar.naturvardsverket.se/">https://producentansvar.naturvardsverket.se/login?returnUrl=https://producentansvar.naturvardsverket.se/</a>
SI	ARSO Producer Registry for packaging	Packaging	<a href="https://gea.arso.gov.si/embalaza/javno/vpogledjavno.xhtml">https://gea.arso.gov.si/embalaza/javno/vpogledjavno.xhtml</a>
SI	ARSO Producer Registry for SUP	Multiple: Single-use plastics, Plastic fishing gear	<a href="https://gea.arso.gov.si/plastika/javno/vpogledjavno.xhtml">https://gea.arso.gov.si/plastika/javno/vpogledjavno.xhtml</a>
SI	Ministry of the Environment, Climate and Energy (MOPE)	Candles	<a href="https://www.gov.si/assets/ministrstva/MOPE/Okolje/Odpadki/Podatki/Evidenca-proizvajalcev-privobiteljev-in-uvoznikov-nagrobnih-svec.pdf">https://www.gov.si/assets/ministrstva/MOPE/Okolje/Odpadki/Podatki/Evidenca-proizvajalcev-privobiteljev-in-uvoznikov-nagrobnih-svec.pdf</a>
SI	Ministry of the Environment, Climate and Energy (MOPE)	Batteries	<a href="https://spot.gov.si/sl/dejavnosti-in-poklici/dovoljenja/vpis-v-evidenco-proizvajalcev-baterij-in-akumulatorjev/">https://spot.gov.si/sl/dejavnosti-in-poklici/dovoljenja/vpis-v-evidenco-proizvajalcev-baterij-in-akumulatorjev/</a>
SK	ISOH - Ministerstvo Zivotneho Prostredia Slovenskej Republiky	Multiple: <b>Packaging, EEE</b> , Batteries, ELVs, Tyres, Single-use plastics, Paper, Other	<a href="https://www.minzp.sk/odpady/registre-zoznamy/register-vyrobcov-vyhradenych-vyrobkov/">https://www.minzp.sk/odpady/registre-zoznamy/register-vyrobcov-vyhradenych-vyrobkov/</a>

Table 4. Mapping of EPR registers across the 27 MS

## 8 National EPR Register Overview and Analysis

This section presents a detailed analysis of national producer and product registers across a selected group of MS, with a focus on EPR registration and reporting processes for the three selected streams. The objective is to compare the selected systems and identify commonalities and discrepancies.

The results of this analysis will serve as a basis for identifying potential best practices that an EPR register should incorporate, as well as for formulating recommendations to improve the analysed national registers and enhance their performance. The definition and refinement of these best practices will be further developed with the support of relevant stakeholders during the co-creation process foreseen at a later stage of the project.

A representative set of EPR register systems was selected, prioritising diversity, geographical coverage, market relevance (in terms of country size and share), advanced functionalities, and, when possible, active engagement from register administration or access to operational data and user account creation. Figure 3 provides a summary of the main analytical steps followed in the assessment of the selected EPR registers.

Register selection	Desk research and data collection	Complementary input / expert contributions	Data analysis and comparison
<ul style="list-style-type: none"> <li>Selection of 16 registers for detailed analysis:</li> <li>EEE registers: AT, DE, EE, ES, FI, FR, FI, IT, NL</li> <li>Packaging registers: AT, DE, ES, FI, FR, LT</li> <li>Textile register: FR</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of online information, including guides/manuals, forms, FAQs, and others</li> <li>Access to certain registers via user accounts or test/visitor accounts provided by register administrators</li> <li>Compilation of all collected information into a database</li> </ul>	<ul style="list-style-type: none"> <li>Meetings with key stakeholders and authorities</li> <li>Email exchanges with register administrations to obtain clarifications or non-public documentation</li> </ul>	<ul style="list-style-type: none"> <li>Information flows, system architecture, parameters, and other functional components</li> <li>Comparative parameter tables, process diagrams, information flow charts, and AR requirements sums</li> <li>Identification of common issues, unique challenges, and practices across systems</li> </ul>

Figure 3. Summary of the analysis steps for the selected EPR registers

The study covers 9 MS and 16 different EPR register systems (9 for EEE, 6 for packaging, and 1 for textiles) to ensure broad representation across waste streams and regions, as detailed in Table 5. It should be noted that the limited number of operational textile registers reflects the early stage of implementation in most MS.

Key information has been gathered through desk research, direct email contacts, and targeted bilateral meetings with competent authorities and PROs, allowing the project to leverage their practical experience and to complement publicly available information.

Country	EEE registers	Packaging registers	Textile registers
AT	Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology		-
DE	Stiftung EAR Register	ZSVR LUCID Packaging Register	-

Country	EEE registers	Packaging registers	Textile registers
EE	Probleemtooteregistri (Register of Products of Concern). Register of products of concern (PROTO)	-	-
ES	Ministerio de Industria y Turismo & Ministerio para la Transición Ecológica y el Reto Demográfico	Ministerio para la Transición Ecológica y el Reto Demográfico	-
FI	Jätehuoltokompassi		-
FR	SYDEREP		
IT	Ministero dell'Ambiente e della Sicurezza Energetica (RENAP) REGISTRO AEE RENAP	-	-
LT	GPAIS Unified Product, Packaging and Waste Record Keeping Information System		-
NL	National (W)EEE Register Stichting OPEN (PRO) register	-	-

Table 5. Overview of the selected registers for EEE, packaging and textiles across the 27 MS covered by the detailed analysis

Table 6 summarises the key information sources used to analyse the selected national EPR registers. It indicates the level of access to each register’s platform, the supporting materials obtained through desk research or provided by authorities and PROs, and any direct exchanges with register administrations. Relevant links to the main online sources are also provided in the subsection 14.1 of the References section to facilitate a clear overview of the scope and depth of the analysis.

Several limitations regarding information availability should be noted. Publicly accessible information varies significantly across MS in terms of detail, reliability, update frequency, accessibility, and format. In many cases, documentation is available only in national languages, requiring additional effort for interpretation and validation, and potentially leading to minor gaps or inconsistencies. Furthermore, the level of cooperation differed among MS. Responses from competent authorities were uneven and, in some instances, limited access to key contacts constrained the depth of the assessment.

The mapping process involved various forms of interaction, including written exchanges, the provision of test user accounts to access register platforms, the review of register interfaces and documentation, and bilateral meetings. In some cases, meetings were scheduled after the closure of this report or could not be arranged within the reporting timeframe.

To address these constraints, additional efforts will be made to engage the authorities that could not be fully consulted during the preparation of this report, in the forthcoming co-creation phase. Information gathered through these ongoing and planned exchanges will be incorporated into the subsequent stages of the project.

Country	Steams	Tested/ Accessed Register (as user)"	Official register forms to be uploaded	Official register guides or tutorials	PROs webpage info and/or manuals	Individual meeting with register admin.
AT	EEE & PACKAGING	X		X	X	
DE	EEE & PACKAGING	X		X		X
EE	EEE			X		
ES	EEE & PACKAGING	X		X		X
FI	EEE & PACKAGING		X	X		
FR	EEE & PACKAGING & TEXTILE		X	X	X	X
IT	EEE			X	X	
LT	EEE & PACKAGING	X		X		
NL	EEE	X			X	X

Table 6. Information sources for the analysis of selected EPR registers

## 8.1 Information flows and stakeholders involved

Figure 4 illustrates the current information flows that underpin producer registration and the reporting of products PoM. These flows are essential for ensuring that data moves efficiently and accurately between producers, PROs, national EPR registers, and EUROSTAT (who receives PoM reporting data from MS to create EU statistics). Producers are responsible for data generation and oversight (blue flow lines). They must ensure the accuracy of information transmitted through various channels, whether directly or via Authorized Representatives (ARs) or Producer Responsibility Organizations (PROs).

PROs play a key role in managing and transmitting information flows (green flow lines), particularly in certain MS and for specific waste streams, especially with regard to reporting obligations. Producers may supervise the information processed by PROs and submitted to the EPR register, as illustrated by the dashed green line.

Building on this, several MS formally allow data flows to be channelled through PROs, thereby reinforcing their central role in the system regarding registration and/or reporting. Examples include EEE in Austria (for reporting only), as well as Estonia, Spain, Finland, France and the Netherlands. In addition, this approach also applies to other waste streams, such as packaging in Finland and packaging and textiles in France. In the Netherlands, this function is performed through the single PRO, Stichting OPEN.

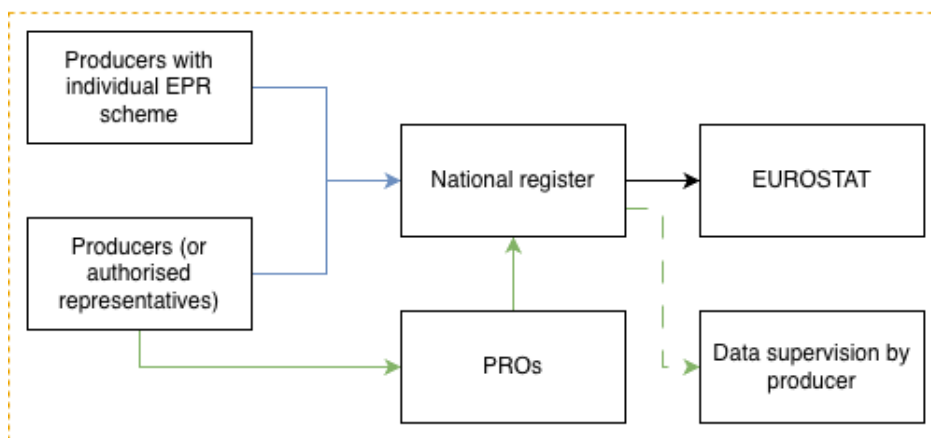


Figure 4. Information flows for EPR registration and reporting

Regarding the appointment of an AR by a producer established in a foreign country, several diverse prescriptions can be identified that determine how the appointment must be formalised and under which conditions it becomes mandatory in the relevant EPR registers and MS studied. Notably, these conditions vary significantly between MS and even in across different streams, as further detailed in Table 7.

Country		Legal representative appointment	
	EEE	Packaging	Textile
<b>AT</b>	Persons having their registered office in another MS and placing packaging or EEE on the market in Austria for distribution to parties other than private final consumers may appoint an AR. The AR must be a natural or legal person with its registered office in Austria. The appointment of an authorized representative must be made through a notarized power of attorney (signature of the grantor certified), in German or English.		
<b>DE</b>	Producers cannot enter the registration if they are a foreign producer, they need an appointed AR, who must be a natural or legal person (or partnership) with a branch in Germany.	International companies without a branch in Germany can appoint an AR located in Germany to fulfil their obligations (doing so is optional). An AR can discharge all obligations, except for registering with the LUCID Packaging Register since producers have to register themselves. The AR must meet the following requirements be a natural or legal person with a registered office in Germany, have entered into a written agreement in German with an obligated producer regarding the appointment, and hold an authorised representative login for the LUCID Packaging Register.	
<b>EE</b>	Only producers permanently established in Estonia can register directly, because foreign producers do not have an Estonian business registry code. Foreign producers have two options: 1) establish a branch in Estonia; or 2) appoint an AR (who must be a person permanently based in Estonia). This ensures producers from other EU countries can register while avoiding the need to litigate in the producer's home country in case of violations. Supervisory authorities cannot directly control companies located outside Estonia that should fulfil EPR obligations in Estonia. The AR can be a PRO.		
<b>ES</b>	Producers of EEE who are not established in Spain and place products on the market in the country must designate an AR in Spanish territory. In addition, this requirement is mandatory in cases of distance selling from another MS or from a third country. The	Producers established in another MS or in third countries who place products on the market in Spain must designate a natural or legal person located in the Spanish territory as an AR for the purpose of fulfilling the producer's obligations. The natural or legal persons	

Country		Legal representative appointment		
	EEE	Packaging	Textile	
	appointment of the AR must be formalised through a valid notarised power of attorney.	designated as AR must hold the documentation that proves their authorised representation (producer register that interfaces with an external platform requiring the prior granting of a power of attorney) If producers have NOT designated an AR in Spain, the first distributor or retailer of the packaged product established in Spain will, subsidiarily, be the party responsible for complying with the obligations established for product producers.		
<b>FI</b>	AR is mandatory only for distance sellers (in and out). A producer established in another EU MS that sells EEE by distance selling directly to users in Finland must appoint an AR in Finland to fulfil its obligations. A distance seller established in Finland that sells EEE by distance selling directly to users in another MS must appoint an AR in that other MS, according to that country's law. Other foreign operators (non-distance) placing EEE on the Finnish market may either join a Finnish PRO directly or voluntarily appoint an AR in Finland. AR for Finland must be established in Finland and may join a PRO on behalf of the producer (in exceptional cases apply directly to the producer register as an individual producer).	AR is mandatory for foreign distance sellers to Finnish consumers. Foreign companies selling B2B into Finland can usually either join a Finnish packaging PRO directly or appoint an AR who does this for them. AR for Finland must be established in Finland.		
<b>FR</b>	Importers (outside the EU) must join an PRO, obtain an IDU ( <i>Identifiant Unique</i> = ID), appoint an AR, and fulfil EPR obligations (reporting, collection, waste treatment).	Producers and importers outside the EU must appoint an AR in the EU to manage EPR obligations (registration, reporting, payment, labelling, inspections).	Non-EU producers must join TLC (state-authorized PRO responsible for managing the EPR scheme for Clothing Textiles, Household Linen and Footwear). The PRO currently approved for the TLC scheme in FR is Refashion or an individual scheme and appoint an AR in the EU to ensure compliance with EPR obligations.	



Country	Legal representative appointment		
	EEE	Packaging	Textile
IT	A producer with registered office in another MS that supplies EEE to end users in Italy must fulfil all EEE obligations via an AR resident in Italy. A foreign producer selling only to Italian distributors can appoint an AR in Italy to “take over” obligations and relieve the distributors; this is not an obligation.		
LT	AR are required for foreign companies in the Lithuanian EEE system. If producer sells via a Lithuanian importer/distributor only, it can let the Lithuanian importer be the “producer” and fulfil EEE EPR in its own name or agree that original producer stay the producer and appoint a Lithuanian AR/PRO to handle obligations for you. Formally, the law still allows direct registration by foreign producers, but market practice and guidance treat the AR route as the normal and safest way for foreign companies, especially distance sellers.	In Lithuania, a foreign packaging supplier is not obligated to appoint a local representative and can independently fulfil its responsibilities.	
NL	A foreign producer or importer can authorize a legal entity in the Netherlands to be an AR. The AR can carry out the registration, indicating how he meets his collection obligation and the annual reporting. The producer or importer must join PRO Stichting OPEN. Foreign distance sellers into NL must have an AR (or otherwise ensure compliance via a local party designated as producer). For other cross-border supply chains (e.g. selling only to Dutch importers), appointment of an AR is optional; if the foreign producer doesn’t appoint one, the Dutch importer becomes the producer in NL.		

Table 7. Specific requirements and conditions for legal representatives in the EPR registration

NOTE: The explanatory text for each MS and stream is reproduced verbatim from publicly available sources.

## 8.2 Process and architecture of the EPR registers

Table 8 compares key steps identified across the EEE and packaging registration and reporting processes analysed for the selected MS. A similar analysis could not be carried out for the textile stream, as the corresponding registers are still under development.

Core process steps such as producer/company data, contact person data, inventory of products and periodic reporting are common to almost all systems, indicating a broadly shared structural backbone. Other steps, such as initial PoM estimations, export declarations and mass upload functionalities, are present only in a limited number of MS. Financial and administrative steps display greater variation, with the financial guarantee step appearing only in one case (EEE) and billing or fee payment steps embedded in the process in only three MS. Complementary information, such as waste management or self-monitoring plans, public information plans and the submission of collection or agreement data, appear only in specific national systems.

Process steps		AT	DE	EE	ES	FI	FR	IT	LT	NL
Initial steps	<b>Producer data:</b> Company information (AR if needed)	✓	✓	✓	✓	✓	✓	✓	✓	✓
	<b>Contact person data:</b> Administrative/operational contact information	✓	✓	✓	✓	✓	✓	✓	✓	✓
	<b>Inventory of products:</b> Product/packaging types, categories, brands, sales methods	✓	✓ <sup>1</sup>	✓	✓	✓	✓	✓*	✓	✓
	<b>Initial PoM estimation:</b> Estimation of the quantities place on the market		✓ <sup>3</sup>			✓			✓	
	<b>Periodic reporting:</b> PoM quantities (and units)	✓	✓ <sup>2</sup>	✓	✓	✓	✓	✓	✓ <sup>2</sup>	✓
	<b>Exports to other MS:</b> Information on products exports					✓				
Financial steps	<b>Financial guarantee:</b> Bank/insurance guarantee			✓						
	<b>Billing/Fees payment step:</b> Billing data/payment procedure		✓ <sup>3</sup>			✓		✓		
Administrative steps	<b>Documentation:</b> Upload/download documents				✓ <sup>4</sup>			✓	✓	
	<b>Signature / validation:</b> Signature/data validation				✓ <sup>4</sup>	✓	✓	✓	✓	✓
	<b>Multi-authority validation:</b> More than one entity validates the process	✓			✓ <sup>5</sup>					✓
	<b>Mass upload (XML/Excel):</b> Bulk data upload by default	✓	✓ <sup>4</sup>				✓			
Complementary steps	<b>Waste mgmt. / self-monitoring plans:</b> Reuse, collection, reception, monitoring obligations			✓		✓				
	<b>Public information plan:</b> Producer's communication plan on obligations			✓						
	<b>Management and reuse info, collection data, agreements:</b> Agreements with waste operators or PRO(s)					✓		✓ <sup>6</sup>	✓	

Table 8. Comparative of the EPR registration/reporting processes

NOTE: <sup>1</sup>Inventory in the EPR registration module; <sup>2</sup>DE monthly reports for WEEE, LT quarter & annual reports; <sup>3</sup>Only for EEE; <sup>4</sup>Only for packaging; <sup>5</sup>AR verification via external platform and Only for packaging; <sup>6</sup>WEEE collection data.

The figures below illustrate the EPR registration and reporting workflows for the selected MS and streams. Each figure represents the sequence of steps required from register users and distinguish between registration and reporting phases.

In Austria, EPR registration and reporting are organised through separate procedures and dedicated platforms for EEE and for packaging, with PROs playing a central role in compiling producer information and submitting this data to the registers (Figure 5).

**AT**

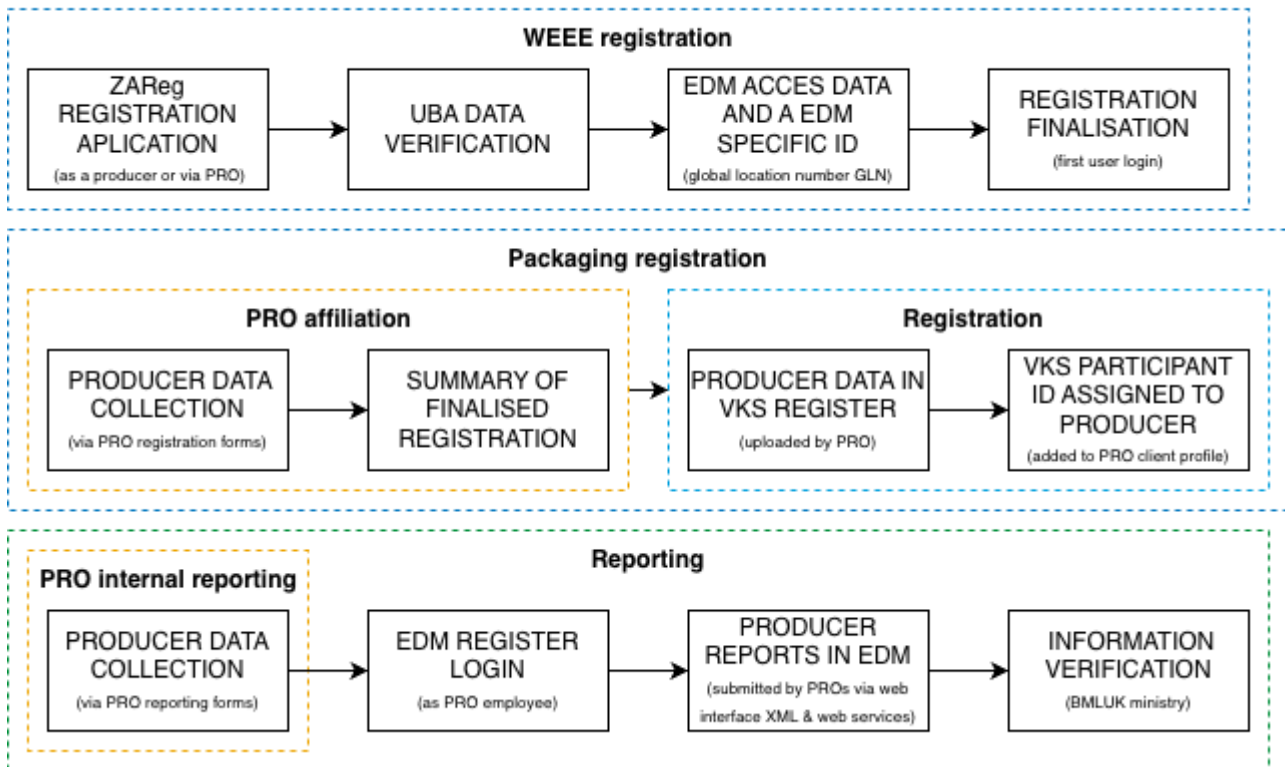


Figure 5. Step-by-step process for EPR registration and reporting in Austria for EEE & packaging

NOTE: UBA=Austrian Environmental Agency, VKS=Packaging Coordination Office, EDM= Electronic Data Management system, GLN=Global Location Number

In Germany, EPR registration for EEE follows a linear process starting with the identification of the company’s location (national or foreign), followed by the submission of company or AR data and main contact details, and concluding with a summary step to review the information provided (Figure 6). Additional administrative steps include defining system users and providing payment details. Annual reporting is organised in two stages, with an initial estimation of PoM quantities followed by final reporting. Regarding packaging, the registration begins with the creation of a register account, where producers provide basic producer data and identify a designated person and a contact person (Figure 7). This is followed by the submission of detailed company data, including address and tax identification information. Producers must then specify the types of packaging used and the brand names associated with that packaging, with the option to upload this information via

an XML file. Reporting is carried out by entering data on packaging quantities and periods, either manually or through an XML file.

**DE WEEE**

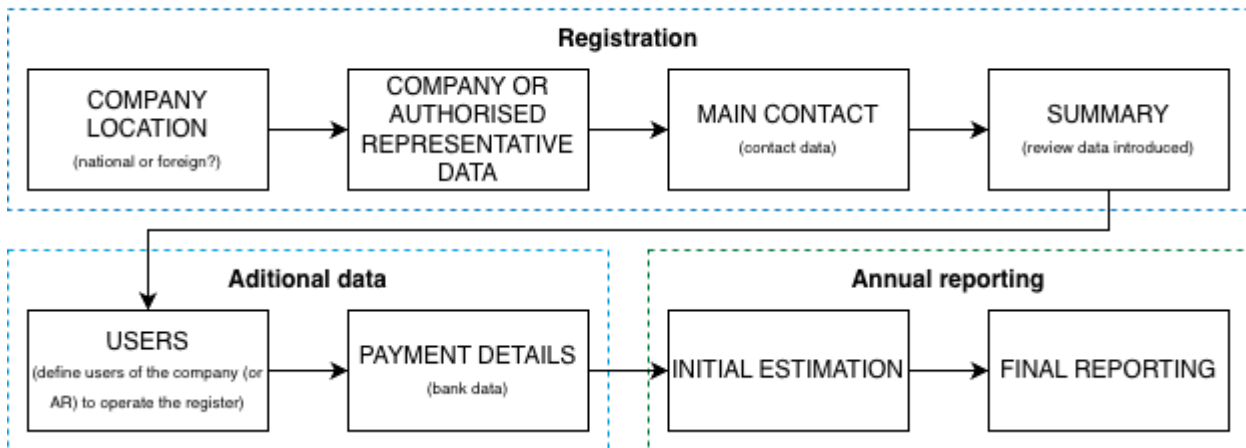


Figure 6. Step-by-step process for EPR registration and reporting in Germany for EEE

**DE PACKAGING**

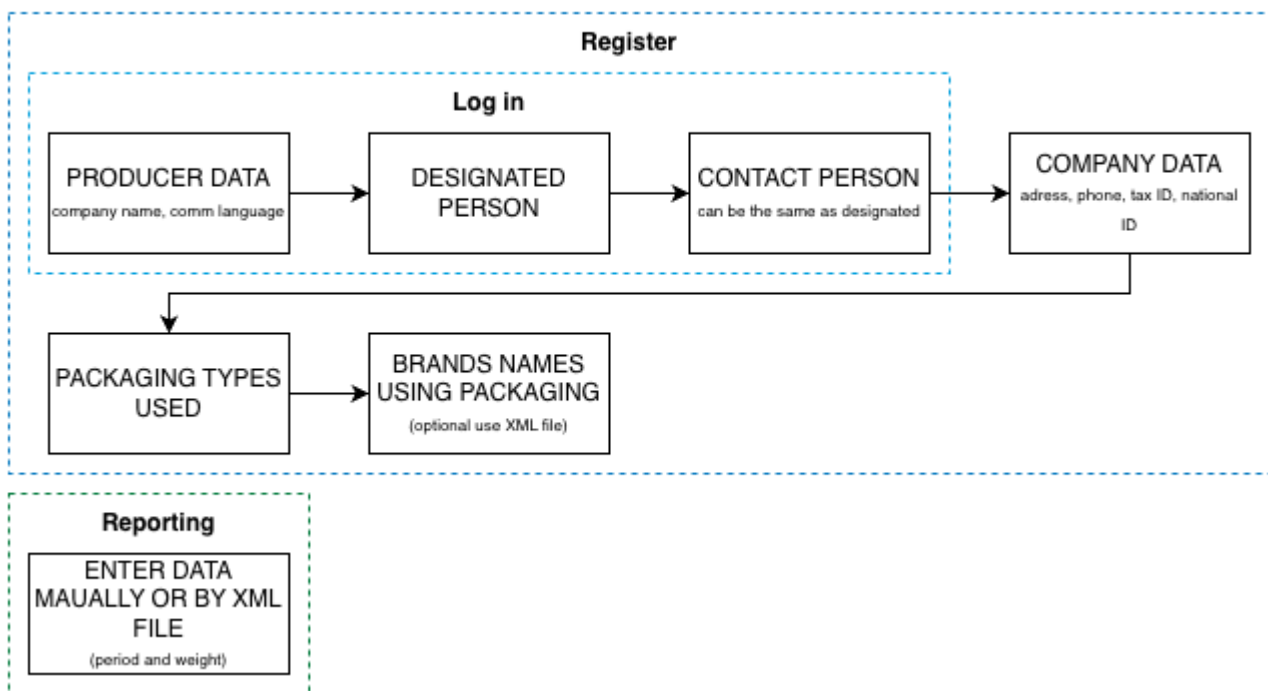


Figure 7. Step-by-step process for registration and reporting in Germany for packaging

In Estonia registration for EEE starts with the selection of the type of registration actor (i.e. producer, PRO or AR), Figure 8. Producers then provide producer data and detailed product data, including inventory, product type and sales method. The process also requires the submission of a financial guarantee, a waste management plan and a public information plan describing how obligations will be met. Reporting consists of submitting a report on quantities PoM, distinguishing between

household and non-household equipment and by category, with the possibility to add final comments.

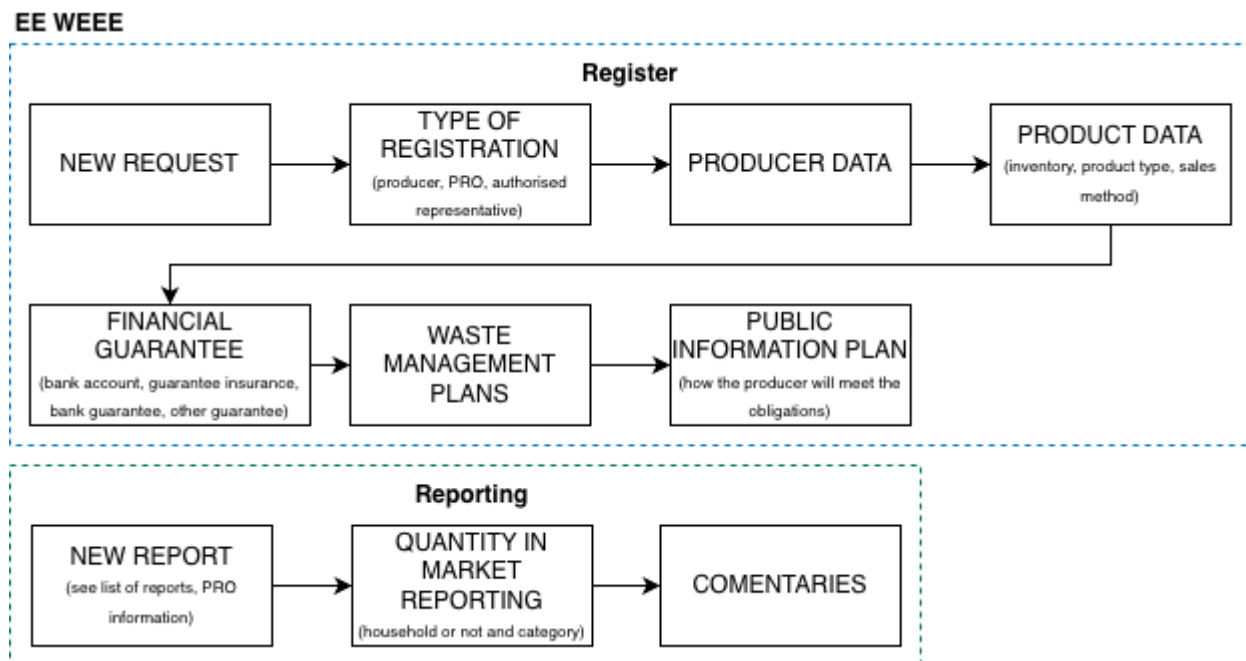


Figure 8. Step-by-step process for registration and reporting in Estonia for EEE

In Spain, registration for EEE begins with accessing the system through official electronic identification and providing the applicant’s basic information (Figure 9). Producers then complete their registration by entering producer details, including contracts with PROs, and adding the contact person’s data. Within the same system, producers can also declare their product information and submit PoM data to fulfil reporting obligations. Additional steps are included for assigning interventors (responsible for administrative and data-related roles), and extra user permissions may be added to support the process.

Regarding packaging, its registration begins with logging into the system using an electronic identification method (Figure 10). The applicant then provides information on the type of representation and the relevant data for the represented producer or representative, including contact and notification details. A registration request is submitted specifying the applicable stream, producer information and PRO affiliation data for each sub-stream, followed by a summary step.

The process continues with the assignment of a producer code and the upload of supporting documentation, notably the PRO affiliation certificate. Registration is completed through a signature step and the finalization of the procedure, after which registration documents are generated and access to the user area is granted for further actions.

The Spanish packaging reporting is included in a separate procedure and begins with the applicant providing representation and contact details, after which the producer submits the required annual data by packaging type, material, and PRO, including several sub-categories such as beverage vs. non-beverage, reusable vs. single use and the percentage of recycled content. This information is

then consolidated into a summary and supported with the necessary documentation. Finally, the producer signs the submission and completes the process by generating and exporting the final justificatory documents. Simplified reporting applies to producers established in Spain that place less than 15 tonnes (15,000 kg) of packaging on the market per year. It also applies to the first distributor or trader established in Spain of a product packaged outside Spain where no AR has been appointed. In such cases, the first distributor or trader established in Spain is required to submit a simplified declaration, as they are considered the first entity placing the packaged product on the Spanish market.

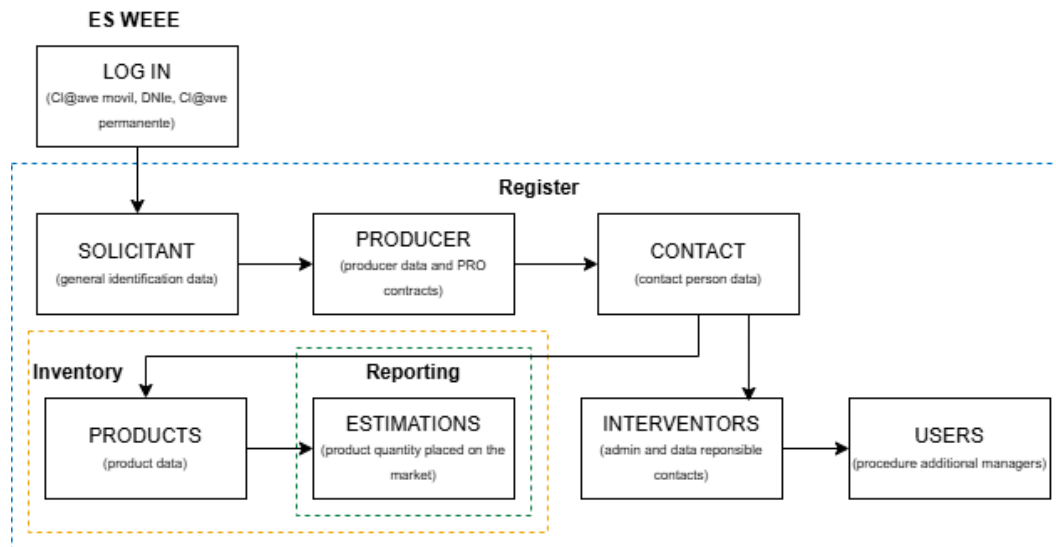


Figure 9. Step-by-step process for registration and reporting in Spain for EEE

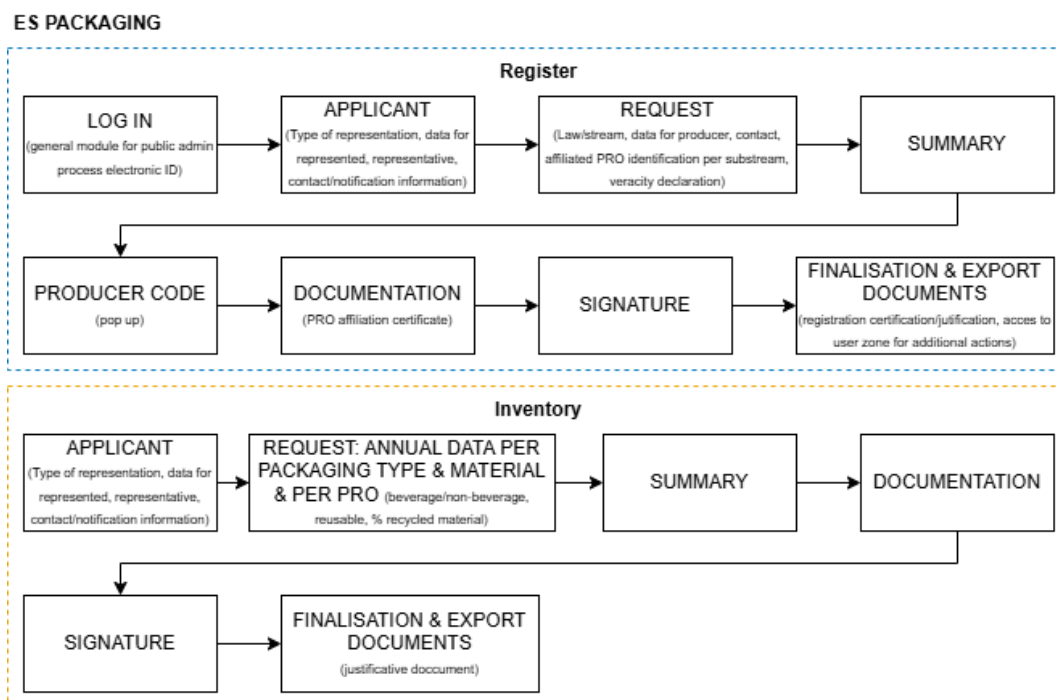


Figure 10. Step-by-step process for registration and reporting in Spain for packaging

In Finland, the registration for EEE is carried out through a detailed registration form requiring producers to provide producer data, describe their business activity, and specify the product inventory together with the sales method, see Figure 11. The process also includes complementary information on collection and recycling arrangements, estimates of quantities to be collected, agreements for reuse and waste management, a plan for providing information on waste reception, and a self-monitoring plan. Registration is completed with a signature, followed by the provision of billing information and contact person details.

Reporting consists of submitting a new report for a given period, indicating the products PoM by category and weight and the quantities of WEEE collected, after which the report is finalised and validated.

Regarding packaging registration is carried out through a detailed registration form requiring producers to provide producer data and estimates of materials PoM, including single-use plastic products, see Figure 12. Producers must also describe their packaging waste management arrangements, provide information on agreements for reuse and waste management, submit a statement on packaging and used packaging, indicate the MS where they sell packaged products, and submit a self-monitoring plan. Registration is completed with a signature, followed by the provision of billing data and contact person details.

Reporting consists of submitting a new report for each reporting period, indicating the products PoM by category and weight and the quantities of packaging waste collected, after which the report is finalised and validated.

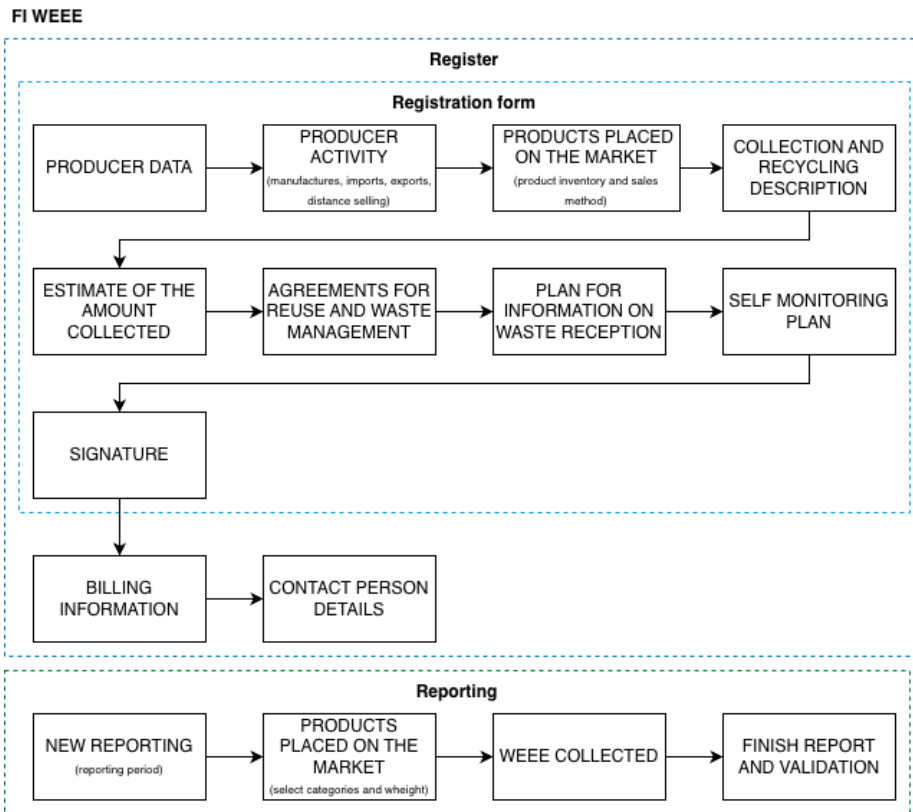


Figure 11. Step-by-step process for registration and reporting in Finland for EEE

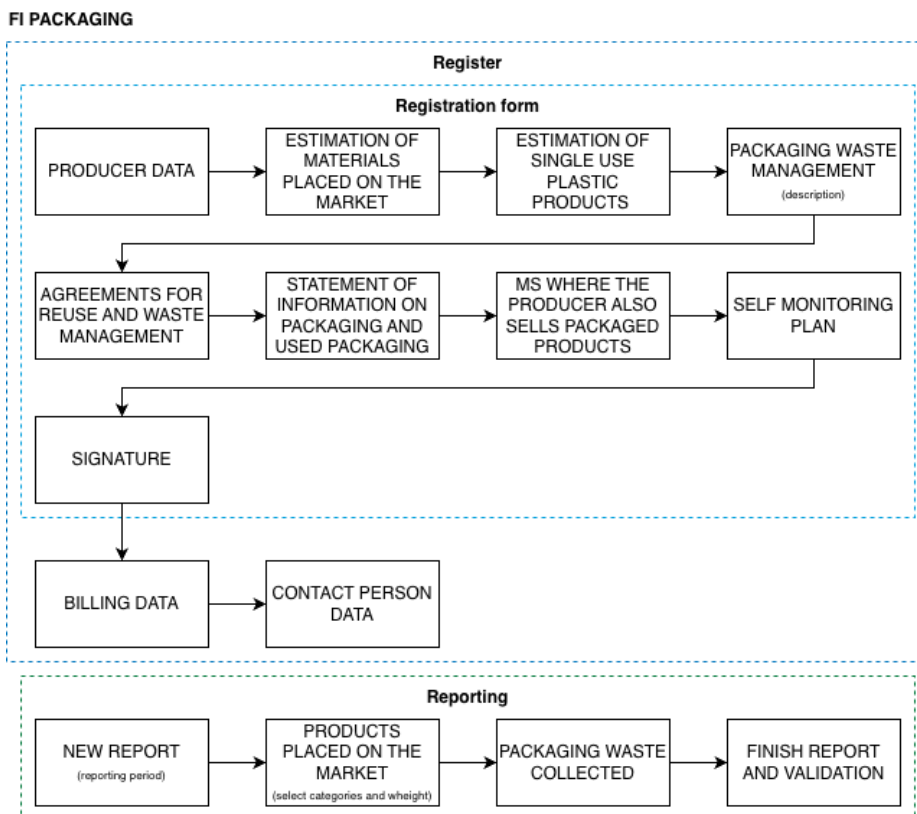


Figure 12. Step-by-step process for registration and reporting in Finland for packaging

In France, as shown in Figure 13; registration and reporting are organised around affiliation with a PRO and the SYDEREP system. Registration starts with the collection of producer data through the PRO, leading to the assignment of a unique producer user affiliation code. The PRO then logs into SYDEREP to submit producer data and delegation data, either manually or in bulk via Excel models. The process concludes with a final summary and the assignment of an identification number used by the PRO for reporting purposes.

Reporting is carried out by PROs on behalf of affiliated producers. Producer data are collected through PRO declaration forms and submitted in SYDEREP via Excel import models, after which the data are verified by ADEME.

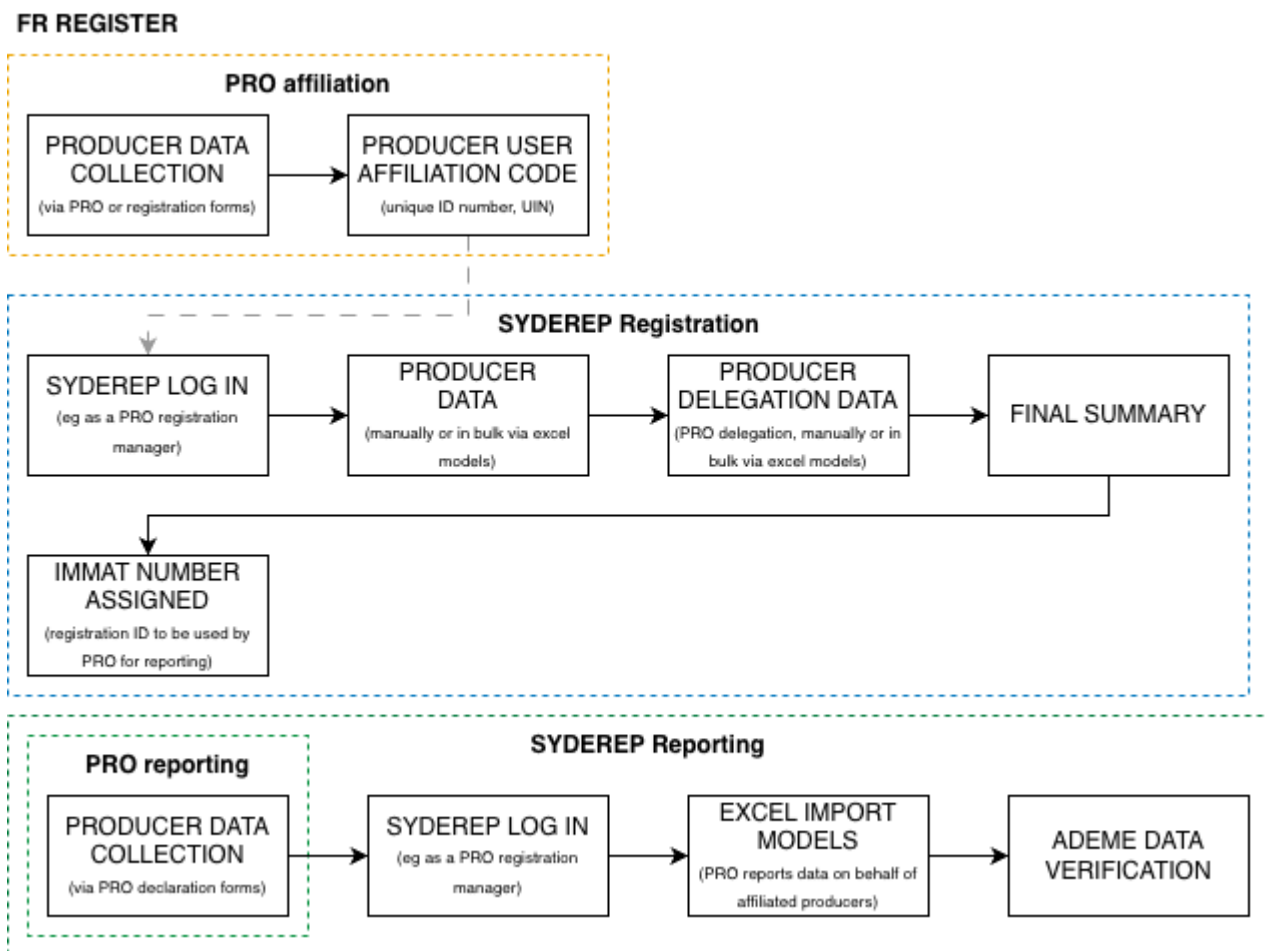


Figure 13. Step-by-step process for registration and reporting in France for EEE, packaging & Textile

In Italy, as can be seen in Figure 14, registration for EEE starts with the submission of company data, including AR information where applicable, followed by the definition of the activity profile and the declaration of PoM equipment inventory through a product inventory. The process includes a summary step and is completed through the payment of fees and the printing, signing and submission of the registration.

Reporting requires producers to declare the quantities PoM in the previous year by product category and weight, as well as the quantities of WEEE collected, using the dedicated reporting forms.

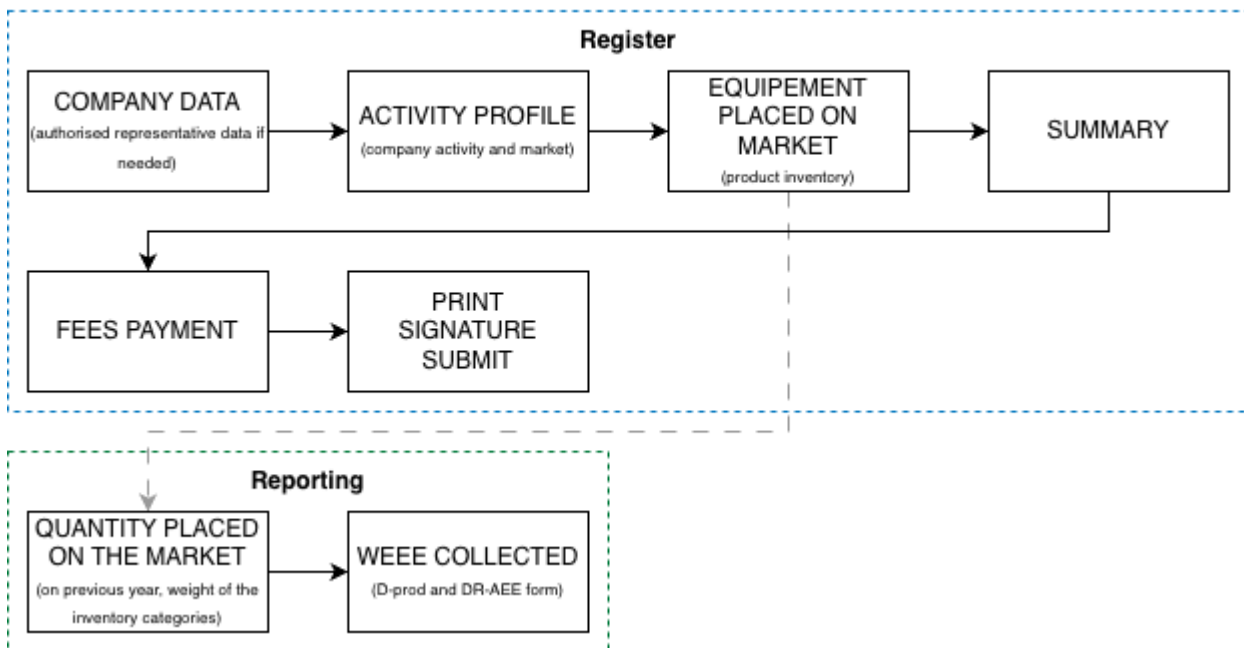
**IT WEEE**


Figure 14. Step-by-step process for registration and reporting in Italy for EEE

In Lithuania, as can be seen in Figure 15, registration for both EEE and packaging begins with user login and the definition of user data and permissions, followed by the selection of the entity to be registered and the submission of basic entity and contact data. Applicants then update their contact information, select the relevant product flow (EEE or packaging) and complete stream-specific registration steps. For both streams, this includes the provision of detailed product data and the selection of the applicable EPR liability (individual or collective, indicating the PRO name), after which a registration data summary is generated.

For WEEE and packaging reporting, users submit detailed product lists and then the related quarterly inventories indicating quantities PoM, which are consolidated into a final annual inventory. The initial product lists include information on product type, origin, sales method, unit weight, and supply period among others.

**LT WEEE and PACKAGING**

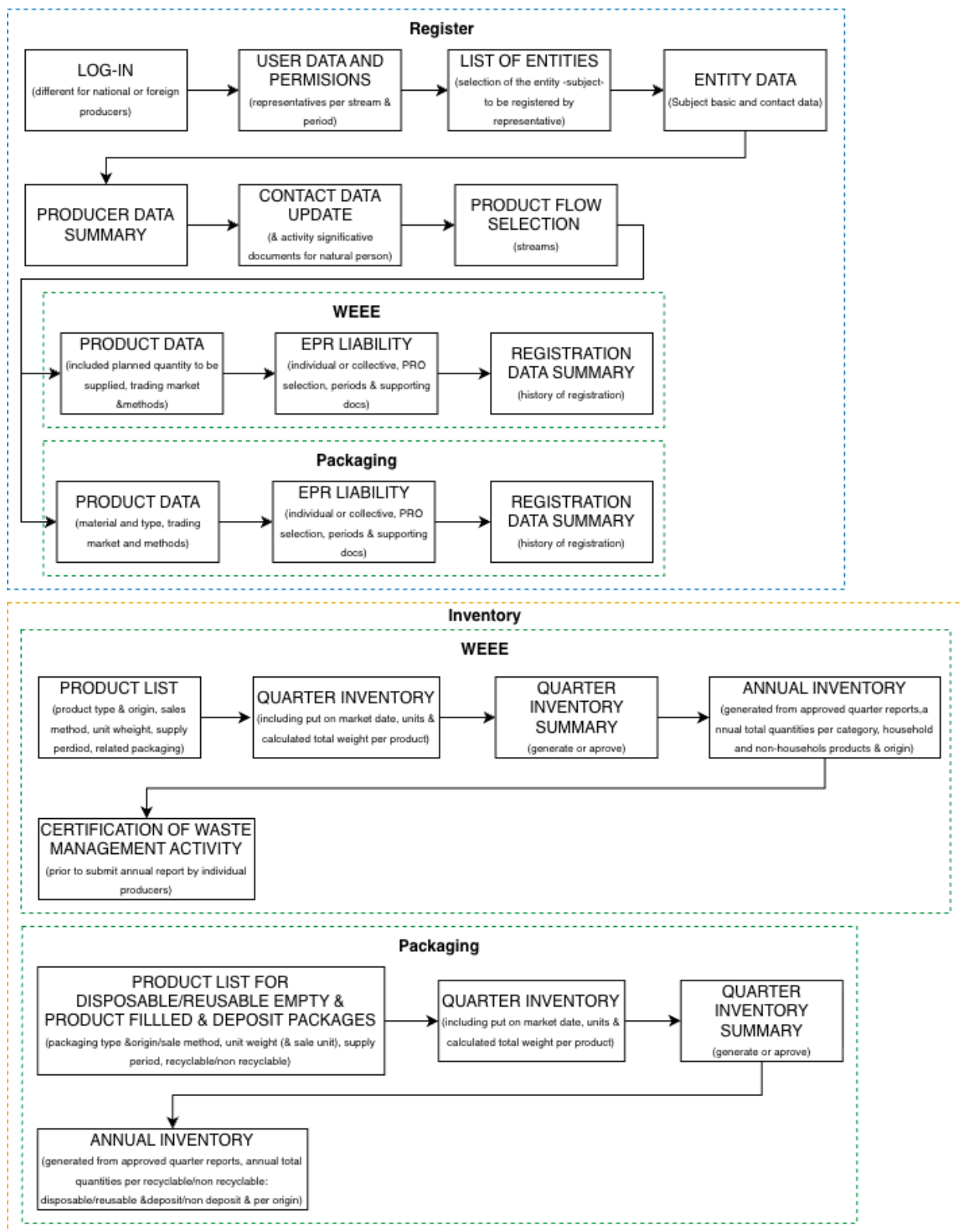


Figure 15. Step-by-step process for registration and reporting in Lithuania for EEE & packaging

NOTE: EEE reporting module is connected to the packaging reporting module to coordinate the declarations of packaged products.

In the Netherlands registration for EEE is carried out through two linked systems: the NWR register and the PRO Stichting OPEN register (see Figure 16). Part of the affiliation with Stichting OPEN is registration with the NWR. It is not possible for a producer to register directly with the NWR unless the producer has obtained an exemption from the General Binding Declaration from the State Secretary. All the information collected from Stichting OPEN is transferred to the NWR administration. In the NWR register, allowed producers first provide account data and specify their activities (such as importer or exporter), followed by the submission of company and legal address details, contact data and the selection of reporting categories.

Registration with Stichting OPEN starts with a registration necessity check after which company data, financial data and contact data for signature delegation are provided. The process concludes with a summary and a signature step.

Reporting is only conducted through the Stichting OPEN system. Producers review their EEE statements and company data, select the relevant reporting categories and enter units and weight data for each subcategory. The reporting process ends with a final check and submission of the data.

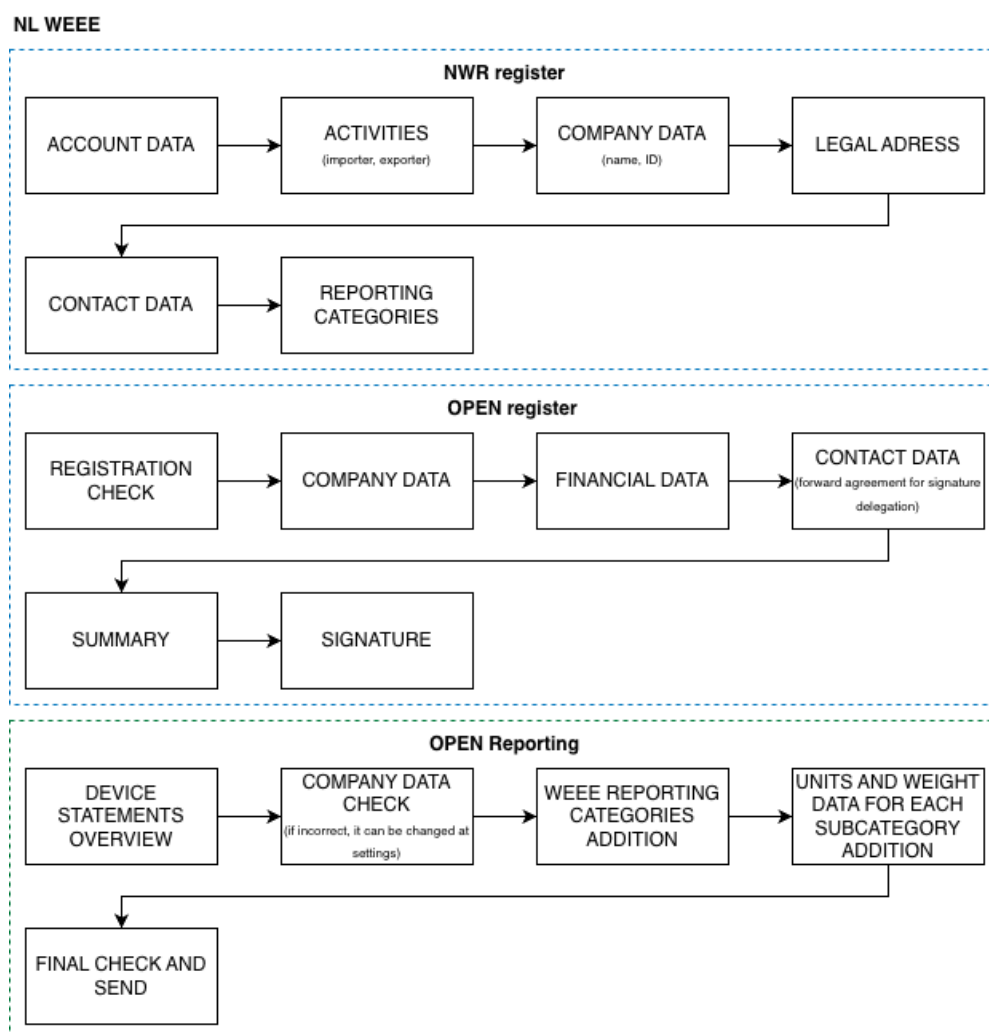


Figure 16. Step-by-step process for registration and reporting in Lithuania for EEE (NWR+OPEN registers)

As a final complementary conclusion, focusing on the technical implementation of the different national EPR registers analysed so far, significant differences can be observed in data submission methods. Some systems rely primarily on manual data entry, while others offer or mandate structured file uploads (e.g. XML or Excel), and some adopt a hybrid approach. These variations reflect national administrative traditions and differing levels of digital maturity, leading to increased fragmentation in the technological tools used across systems.

## 8.3 Parameters and data of the EPR registers

### 8.3.1 Products categories

Product classification is essential for the effective functioning of producer registers, as consistent categories underpin registration, reporting, fee modulation, and EPR compliance across the EU. While the [WEEE Directive](#) has established six harmonised categories for EEE (Annex III), and the new [Packaging Regulation](#) introduces EU-wide material categories for packaging reporting (Annex II, Table 1), the [recent targeted revision of the WFD](#) introduces the use of NC codes for textile, textile related, and footwear products (Annex IVc). Together, these harmonised frameworks are intended to reduce fragmentation and improve data comparability across MS. However, many MS currently apply different approaches with greater granularity in their categories and subcategories and particularly for packaging, where national classification structures can differ significantly, as illustrated in the following subsections. On the other hand, adding further complexity to the system, PROs often use their own classification structures. These are generally aligned with their fee-setting methodologies and operational needs, which contributes to additional fragmentation. This is particularly evident in the use of broad material categories for packaging reporting and in the categorisation of textile and footwear products.

#### 8.3.1.1 EEE categories

The table below (Table 9) provides a comprehensive comparison of how the EU EEE six categories are interpreted and implemented, including the additional subcategories developed at national level across the selected MS. While countries formally adhere to the EU's six category structure, introduced with the 2018 open scope revision of the [WEEE Directive](#), the detailed classification of equipment within these categories varies significantly. Some countries classify subcategories extensively (e.g., FI, ES, IT), while others limit themselves to broader groupings more closely aligned with the EU level (e.g., LT, AT).

Some countries apply a specific category and subcategories for photovoltaic (PV) modules to manage the [Commission Implementing Regulation 2019/290](#) requirements more accurately, but all report them separately especially when distinguishing between Business-to-Business and Business-to-Consumer responsibilities and financing schemes for end-of-life treatment. The EU [WEEE Directive](#), however, does not define a separate category for PV modules, since PV panels are included under Category 4 (Large equipment).

Some MS use additional EEE categories and subcategories taken from previous legislative status according to Annex I & II of the [WEEE Directive](#), such as "Consumer equipment", "Toys & leisure",

which include further subcategories such as musical instruments, video cameras/recorders, generic E&E tools, domestic E&E tools, garden tools, gaming consoles, and electronic sports equipment. These additional subcategories originate from the previous category scheme and are still applied by some registers and PROs for several reasons, mainly to ensure better traceability of the various subflows.

Complementarily, France has created an additional dedicated category for “electrically assisted bicycles and motorized personal mobility devices” to better align electric mobility regulation with its EEE obligations, given the technical particularities and the rapidly growing market volume of these products.

This comparative overview (Table 9) highlights the heterogeneity of national approaches, which affects data granularity, reporting requirements and complexity, and overall interoperability.

Category/Sub-category	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL
<b>Category 1</b>										
<b>Temperature exchange equipment</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Heat or cold exchange equipment										✓
Refrigeration/freezing				✓	✓	✓		✓		
Air conditioning / dehumidifiers				✓	✓	✓		✓		
Heat pumps				✓	✓	✓		✓		
Temperature exchange equipment with CFC/HCFC/etc. (classified as hazardous, not EEE)					✓					
Equipment containing oil					✓			✓		
Equipment containing other than water					✓			✓		
<b>Category 2</b>										
<b>Screens &amp; monitors</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
CRT (Cathode Ray Tube) screens				✓		✓				✓
FPD (Flat Panel Display) screens				✓	✓	✓		✓		✓
TVs Televisions				✓		✓		✓		
Laptops/tablets			✓	✓	✓	✓		✓		✓
Professional screens										✓
<b>Category 3</b>										
<b>Lamps</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mercury discharge					✓					
Gas-discharge lamps (general)			✓	✓	✓	✓		✓		✓
Fluorescent lamps				✓	✓	✓		✓		✓
Compact fluorescent				✓		✓		✓		
High intensity discharge						✓		✓		
Low pressure sodium						✓		✓		
LED lamps				✓	✓			✓		✓
Luminaires for fluorescent						✓				
<b>Category 4</b>										
<b>Large equipment</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Large household/professional			✓							✓

Category/Sub-category	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL
Large household appliances				✓	✓	✓		✓	✓	
Large office/Information Tech.			✓	✓		✓		✓		
Large medical				✓		✓		✓	✓	
Large monitoring/control			✓	✓	✓	✓		✓		
Large vending/ATMs				✓	✓	✓		✓		
Large sports/musical				✓				✓		
Large garden tools				✓				✓		
<b>Category 5</b>										
<b>Small equipment</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Small household/professional			✓							✓
Small household appliances				✓	✓	✓		✓	✓	
Small medical			✓	✓				✓	✓	
Small monitoring/control			✓	✓	✓	✓		✓		
Small devices with PV				✓	✓			✓		
Small automatic dispensers				✓	✓			✓	✓	
Small garden tools				✓				✓		
<b>Category 6</b>										
<b>Small Information Tech. &amp; telecom</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Small Information Tech. household/professional			✓							✓
Computers			✓	✓	✓	✓		✓		
Printers/copiers/scanners			✓	✓		✓		✓		
Phones			✓	✓		✓		✓		
Telecom terminals			✓	✓		✓		✓		✓
<b>Consumer equipment</b>			✓	✓	✓	✓		✓	✓	
Radios			✓	✓		✓		✓		
TVs (non-screen)			✓	✓		✓		✓		
Audio & hi-fi			✓	✓		✓		✓		
Musical instruments			✓	✓		✓		✓		
Video cameras/recorders			✓	✓		✓		✓		
E&E tools (generic)				✓		✓		✓	✓	
Domestic E&E tools				✓		✓		✓		
Garden tools (tools category)				✓		✓		✓		
<b>Toys &amp; leisure</b>				✓		✓		✓	✓	
Gaming consoles				✓				✓		
Sports equipment (electronic)				✓		✓		✓	✓	
<b>Photovoltaic (PV)</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Large PV			✓							
Small PV			✓		✓					
Hazardous /Non-hazardous containing substances PV					✓					
Integrated PV equipment				✓	✓			✓		
Solar thermal systems				✓		✓				
<b>Electrically assisted bicycles</b>							✓			✓

Category/Sub-category	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL
and motorized personal mobility devices										(1)

Table 9. Comparison of EEE categories and subcategories across selected MS

NOTE: Because subcategory definitions and the terminology (including translations) used vary significantly across MS, consolidating and comparing the data has been complex. It should be considered that certain residual gaps or inconsistencies may persist. (1) Electric bicycles.

### 8.3.1.2 Packaging categories

The new [Regulation \(EU\) 2025/40](#) standardises packaging reporting through Annex II, Table 1, which defines 22 harmonised material categories such as plastics (further differentiated by material type and by flexible/rigid formats), paper and cardboard, glass, metals (aluminium and ferrous), wood, textiles, ceramics, and composites (for more details see Annex I.II – Packaging legal framework analysis).

However, national registers often apply their own structures and levels of granularity, approaches that, in some cases, are not fully aligned with the [Packaging Regulation](#)'s classification framework, making comparisons more complex and highlighting the need for a revision of registration practices in the coming period.

To illustrate the current situation, key and diverse examples from Austria, Germany, France, and Spain (the latter applying additional layers of data, such as distinctions between beverage/non-beverage packaging and the intended use of the packaging) are presented in Table 10, Table 11, Table 12 and Table 13.

Packaging classification scheme in the Austrian register	
Household	Commercial
Paper Household: Paper, Cardboard, Paperboard, and Corrugated Board	Paper Commercial: Paper, Cardboard, Paperboard, and Corrugated Board
Glass	Glass
Ferrous Metals Household	Ferrous Metals Commercial
Aluminium Household	Aluminium Commercial
Plastic Household	Plastic Hollow Bodies Commercial
Beverage Carton	
Composite Packaging Household, excluding Beverage Carton	Composite Packaging Commercial
Ceramics Household	Ceramics Commercial
Wood Household	Wood Commercial
Textile Fibers Household	Textile Fibers Commercial
Biogenic Packaging Household	Biogenic Packaging Commercial
	EPS Commercial

Packaging classification scheme in the Austrian register	
Household	Commercial
	Plastic film: Foils Commercial, Plastic Strapping and Adhesive Tapes

Table 10. Packaging classification in Austria

Packaging classification scheme in the German EPR register
Glass
Aluminium
PPC
Tinplate
Ferrous metals
Plastics
Beverage carton packaging
Composite materials
Other composite packaging
Other materials

Table 11. Packaging classification in Germany

Packaging classification scheme in the French EPR register
Bottle and flask in dark/coloured PET
Bottle and flask in PE
Bottle and flask in PP
Complex packaging or other resins excluding PVC
Complex packaging or other resins excluding PVC_Flexible packaging
Complex packaging or other resins excluding PVC_PET
Complex packaging or other resins excluding PVC_Rigid packaging
Flexible packaging in PE
Flexible packaging in PP
Packaging containing PVC
Rigid packaging (excluding BF) in PE
Rigid packaging (excluding BF) in PET
Rigid packaging (excluding BF) in PP
Rigid packaging in PS
Bottle and flask in clear PET
Laminated paper-cardboard
Non-laminated paper-cardboard discounted
Non-laminated paper-cardboard not discounted
Aluminium
Steel
Glass

Table 12. Packaging classification in France

Packaging classification scheme in the Spanish EPR register
Single-use household packaging

## Packaging classification scheme in the Spanish EPR register

NON Beverage> Type (Plastic cups for beverages, Other primary packaging or sales packaging, Plastic containers for holding food intended for immediate consumption, Medicine packaging, Service packaging, Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Other packaging)>Materials (24 subcategories)

Beverage Water> Type (Plastic bottles for beverages up to 3l Cans for beverages, Carton packaging for beverages, Plastic cups for beverages, Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) > Materials (24 subcategories)

Beverage Beer> Type (Plastic bottles for beverages up to 3l Cans for beverages, Carton packaging for beverages, Plastic cups for beverages, Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) > Materials (24 subcategories)

Beverage Soft Drinks> Type (Plastic bottles for beverages up to 3l Cans for beverages, Carton packaging for beverages, Plastic cups for beverages, Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) > Materials (24 subcategories)

Beverage Other> Type (Plastic bottles for beverages up to 3l Cans for beverages, Carton packaging for beverages, Plastic cups for beverages, Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) > Materials (24 subcategories)

### Reusable household packaging

NON Beverage> Type (Other primary packaging or sales packaging, Service packaging, Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Plastic cups for beverages, including their lids and caps, Plastic containers for holding food intended for immediate consumption and/or normally consumed in the same container and/or ready-to-eat without further preparation, Other packaging) >Materials (24 subcategories)

Beverage Water>Type (Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) >Materials (24 subcategories)

Beverage Beer>Type (Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) >Materials (24 subcategories)

Beverage Soft Drink>Type (Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) >Materials (24 subcategories)

Beverage Other>Type (Other primary packaging or sales packaging, Equivalent beverage packaging unit: 0.5 l, Other packaging) >Materials (24 subcategories)

### Single-use HORECA beverage packaging

Beverage Water> Type (Plastic bottles for beverages up to 3l, Beverage cans, Carton packaging for beverages, Plastic cups for beverages, Equivalent beverage packaging unit: 0.5 l, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Beer> Type (Plastic bottles for beverages up to 3l, Beverage cans, Carton packaging for beverages, Plastic cups for beverages, Equivalent beverage packaging unit: 0.5 l, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Soft Drink> Type (Plastic bottles for beverages up to 3l, Beverage cans, Carton packaging for beverages, Plastic cups for beverages, Equivalent beverage packaging unit: 0.5 l, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Other> Type (Plastic bottles for beverages up to 3l, Beverage cans, Carton packaging for beverages, Plastic cups for beverages, Equivalent beverage packaging unit: 0.5 l, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

### Reusable HORECA beverage packaging

Beverage Water> Type (Equivalent beverage packaging unit: 0.5 l, Keg/tank, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Beer> Type (Equivalent beverage packaging unit: 0.5 l, Keg/tank, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Soft Drink> Type (Equivalent beverage packaging unit: 0.5 l, Keg/tank, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

Beverage Other> Type (Equivalent beverage packaging unit: 0.5 l, Keg/tank, Other primary beverage packaging, Other packaging) >Materials (24 subcategories)

### Packaging classification scheme in the Spanish EPR register

#### Single-use industrial packaging

NON Beverage> Type (Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Diffusers and capture and monitoring traps that use insecticides, pheromones, and other products for pest control in the agroforestry sector, Primary packaging or sales packaging, Other packaging) >Materials (24 subcategories)

#### Reusable industrial packaging

NON Beverage> Type (Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Diffusers and capture and monitoring traps that use insecticides, pheromones, and other products for pest control in the agroforestry sector, Primary packaging or sales packaging, Other packaging) >Materials (24 subcategories)

#### Single-use commercial packaging

NON Beverage> Type (Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Primary packaging or sales packaging, Other packaging) >Materials (24 subcategories)

#### Reusable commercial packaging

NON Beverage> Type (Grouped packaging or secondary packaging, Transport packaging or tertiary packaging, Primary packaging or sales packaging, Other packaging) >Materials (24 subcategories)

Table 13. Packaging classification in Spain

### 8.3.1.3 Textile categories

The [revised WFD](#) introduces the scope of textile products covered by the EPR, which is defined in Annex IVc. This annex lists the types of textile and footwear items that fall under the new obligations. These categories, presented in the format of CN codes, are divided into 9 groups of textile products and textile articles of apparel and clothing accessories for household or other uses, and 6 groups of footwear and apparel/clothing accessories for household or other uses (for more details see Annex I.III – Textile legal framework analysis).

For producers' registration purposes, the CN codes listed in Annex IVc must be used to declare the inventory of textile, textile related and footwear products that the producer intends to make available on the market for the first time.

Regarding reporting obligations assigned to PROs, the [WFD](#) only includes the following specific requirement without prescribing any reporting format or classification system (and therefore without referencing CN codes): “the amount, including the quantity by weight, of products made available on the market for the first time”.

However, for waste management reporting obligations, the [WFD](#) does explicitly require the use of CN codes. At least once a year, and subject to commercial and industrial confidentiality, PROs must report: “the quantity by weight of separately collected used and waste textile, textile related and footwear products listed in Annex IVc, specifying separately such unsold products.” At least once a year, and subject to commercial and industrial confidentiality, PROs must report: “the quantity by weight of separately collected used and waste textile, textile-related and footwear products listed in Annex IVc, specifying separately such unsold products.”

The CN codes focus on the general grouping of product types, whereas in the French textile EPR system, the SYDEREP registration platform uses a more detailed structure, incorporating three levels

of information: “Product Family”, “Department”, and “Product Line”, each of which includes specific categories and subcategories, as presented in the table below (Table 14).

Levels	Categories level 1/Subcategories level 2 and 3
1-Product family	Footwear, household linen, mixed products, clothing.
2-Department	Type of department (men, women, baby...). Accessories, cleaning items, specific items, baby 0–36 months, baby 19–26 months, footwear, indoor shoes, child 27–36 months, child 4–14 years, women, women size 37 and above, men, men size 37 and above, bath linen, baby linen, bed linen, table linen, fabrics by the meter
3-Product line	Product line (t-shirt, trousers, etc.). Other, sneakers, low shoes, baby shoes, boots, ankle boots, summer shoes, indoor shoes, shirt, jumpsuit, suit, pajama set, sports outfit, raincoat, skirt, lingerie, swimsuit, coats, trousers excluding jeans, trousers, sports pants, small garment, sweater, pajamas, dress, shorts, underwear, T-shirt, jacket, quilted clothing

Table 14. SYDEREP register products classification scheme

## 8.3.2 EPR Registration and reporting parameters

### 8.3.2.1 EPR Registration parameters

Table 15 provides an overview of all parameters required in the producer registration processes across the selected MS for EEE, packaging, and textiles.

The table captures the repeated fields (marked with “X”) that appear across EEE, packaging, and textile registers, allowing for direct comparison of the information required in each case studied. The table also includes the parameters requested in the corresponding EU legal frameworks for each stream (columns shown in light blue). For each field, the table also includes summaries showing how many times a given parameter is requested across the registration systems examined, and a final total that highlights the overall level of data requirements and repetition across the streams and MS (displayed in light and dark grey columns, respectively).

This structure enables a clear understanding of the degree of convergence or divergence between national registration systems and in relation to the EU-required registration parameters and provides an evidence-based foundation for assessing harmonisation needs across MS and across the three streams.

	EEE registers											Packaging registers							Textile registers			TOTAL		
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>	EU		FR	FREQ <sup>3</sup>
<b>INITIAL ROLE SELECTION</b>																								
PRODUCER OR REPRESENTATIVE (AR or PRO)				x				x				2				x		x		2		x	1	5
NATIONAL OR FOREGIN PRODUCER			x					x	x	x	x	5				x			x	2			0	7
<b>PRODUCER</b>																								
LEGAL ENTITY TYPE		x								x		3		x		x		x		3		x	1	7
PRODUCER ID/TAX NUMBER	x			x	x	x	x	x	x			6	x		x	x	x	x	x	5	x	x	1	12
COMERCIAL REGISTER/CHAMBER OF COMMERCE ID	x	x	x	x							x	4	x	x					1	x		0	5	
ACTIVITY CLASSIFICATION		x						x	x			3		x		x		x	3		x	1	7	
COMPANY NAME (Trading name) (Natural person: First+Last Name)	x	x	x	x	x	x			x	x		7	x	x			x		3	x		0	10	
COMPANY REGISTERED NAME (full legal name)	x	x	x		x	x	x	x	x	x	x	9	x	x	x	x	x	x	6	x	x	1	16	
COUNTRY		x			x	x	x		x	x	x	7	x	x		x	x	x	5	x	x	1	13	
POSTAL CODE	x	x	x		x	x	x	x	x	x	x	9	x	x		x	x	x	5	x	x	1	15	
PROVINCE/REGION	x		x		x	x			x	x		5				x	x		3			0	8	
CITY/MUNICIPALITY	x	x	x		x	x	x	x	x	x		8	x	x		x	x	x	5	x	x	1	14	
POSTAL ADDRESS	x	x	x	x	x	x	x	x	x	x	x	10	x	x	x	x	x	x	6	x	x	1	17	
EMAIL		x	x	x	x	x			x			6	x	x		x	x		3	x		0	9	
PHONE NUMBER		x	x		x	x	x	x			x	7	x	x	x	x	x	x	5	x	x	1	13	
WEBSITE	x	x	x	x	x			x	x	x		8	x	x				x	3	x	x	1	12	
DEPARTMENT NAME			x									1							0			0	1	

	EEE registers											Packaging registers							Textile registers			TOTAL		
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>	EU		FR	FREQ <sup>3</sup>
CEO ID							x				1									0			0	1
CEO NAME							x				1									0			0	1
NATURAL PERSON CERTIFICATE (business or individual activity certificate)								x			1							x	1			0	2	
TYPE OF ACTIVITY / PRODUCT DESTINATION (own needs, placed in market, export)						x		x			2					x		x	2			0	4	
PRODUCT SALES TECHNIQUE (distance, retail, wholesale, others...)	x (1)			x	x	x		x	x		5					x		x	2			0	7	
INDIVIDUAL PRODUCER COMMUNICATION TO REGION AND DATE (file attach)					x						1								0			0	1	
TURNOVER CATEGORY	x					x					1								0			0	1	
COMMENTARIES					x					x	2							x	1		x	1	4	
INITIAL WASTE PRODUCER OF HAZARDOUS OR NON-HAZARDOUS WASTE		x									1								0			0	1	
DECLARATION ON EPR RESPONSIBILITY COMPLIANCE (including PROs certificate)											0	x							0			0	0	
<b>CONTACT PERSON (natural person)</b>	<b>x</b>																							
SALUTATION		x	x								2		x	x					2			0	4	
ACADEMIC TITLE		x									1		x	x					2			0	3	
OFFICIAL ID					x	x		x	x	x	5				x	x		x	3			0	8	
NAME/FIRST NAME	x	x	x	x	x	x		x	x	x	8		x	x	x	x		x	5			0	13	
SURNAME/LAST NAME	x	x	x	x	x	x		x	x	x	8		x	x	x	x		x	5			0	13	
POSTAL CODE	x	x	x		x	x			x		5		x		x	x		x	4			0	9	
SAME DATA AS AR? (check)					x						1			x					1			0	2	

	EEE registers											Packaging registers							Textile registers			TOTAL		
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>	EU		FR	FREQ <sup>3</sup>
CITY/MUNICIPALITY	x	x	x		x				x			4		x		x			x	3			0	7
POSTAL ADDRESS	x	x	x		x	x			x	x		6		x		x	x		x	4			0	10
REGION/PROVINCE	x	x			x				x			3		x		x			x	3			0	6
COUNTRY		x										1		x		x				2			0	3
EMAIL	x	x	x	x	x	x		x	x	x		8		x	x	x	x		x	5			0	13
POSITION						x						1					x			1			0	2
FAX		x							x			2		x		x			x	3			0	5
PHONE NUMBER	x	x	x	x	x	x		x	x			7		x		x	x		x	4			0	11
REPRESENTED COMPANY ID (in case of representative role)		x									x	2		x		x		x		3		x	1	6
REPRESENTED COMPANY NAME (in case of representative role)		x									x	2		x		x		x		3		x	1	6
<b>PRODUCTS</b>																								
PRODUCT CATEGORY (material for packaging)	x	x			x	x	x	x	x	x		7		x		x	x		x	4	x		0	11
PRODUCT SUBCATEGORY	x			x	x	x			x	x		5				x	x		x	3	x		0	8
PRODUCT TYPE					x				x			2			x					1			0	3
PRODUCT BRAND (or and trademark)	x	x		x	x	x		x	x			6			x		x		x	3			0	9
SINGLE-USE/REUSABLE												0							x	1			0	1
DEPOSIT/NON-DEPOSIT												0							x	1			0	1
LAW APPLIED												0				x				1			0	1
AFFILIATION: INDIVIDUAL OR COLLECTIVE PRO? (check)	x								x			1							x	1			0	2

	EEE registers										Packaging registers							Textile registers			TOTAL			
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>		EU	FR	FREQ <sup>3</sup>
APOINTTED PRO NAME	x	*			x		*		x	*	*	2	x	*		x		*	x	2	x	*	0	4
PRO CONTRACT DURATION								x				1							x	1			0	2
PRO CONTRACT (file attachment)								x				1			x				x	2			0	3
DATE OF PRODUCT AVIABILITY ON THE MARKET				x				x		x		3							x	1			0	4
PLANNED QUANTITY TO BE SUPPLIED (domestic market)			x			x		x				3								0			0	3
PRODUCT SECTOR USE (household/domestic market, commercial, not household, other)	x	x		x			x	x				4		x				x	x	3		x	1	8
<b>AUTHORISED REPRESENTATIVE (or PRO DELEGATION)</b>													AR/PRO											
LEGAL ENTITY TYPE		x					x					2		x				x		2		x	1	5
ORGANIZATION/DELEGATION TYPE (PRO, online marketplace, AR, other)		x					x					2		x				x		2		x	1	5
COMPANY NAME (Natural person: First+Last Name)	x	x	x	x	x			x				5	x/x	x		x			x	3			0	8
AUTHORISED REPRESANTETIVE ID/TAX CODE	x	x	x	x	x		x	x	x			7		x		x		x	x	4		x	1	12
COMERCIAL REGISTER/CHAMBER OF COMMERCE ID												0								0			0	0
PHONE NUMBER			x		x			x				3	x/x							0			0	3
FAX								x				1								0			0	1
EMAIL		x	x		x			x				4	x/x	x						1			0	5
ADRESS	x		x					x				2	x/x							0			0	2
REGISTER ADMINISTRATION ROLE					x			x				2							x	1			0	3
CITY	x		x				x	x				3						x		1		x	1	5

	EEE registers											Packaging registers							Textile registers			TOTAL		
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>	EU		FR	FREQ <sup>3</sup>
PROVINCE/REGION	x		x					x				2								0			0	2
COUNTRY				x				x	x			4						x	x	2		x	1	7
WEB	x		x									1	-/x							0			0	1
EPR STREAM/SECTOR REPRESENTED				x				x	x			3					x	x	2		x	1	6	
REPRESENTATION/DELEGATION PERIOD (or start date)		x						x	x			3		x			x	x	3		x	1	7	
LINK TO EXTERNAL ACREDITATION PLATFORM												0			x				1			0	1	
REPRESENTATION AGREEMENT				x								1	-/x						0			0	1	
<b>PRO AFFILIATION (2)</b>																								
COMPANY NAME	x	*							*	*		1	x	*			*		0	x	*	0	0	
COMPANY ID/TAX CODE	x											0	x						0	x		0	0	
COMERCIAL REGISTER/CHAMBER OF COMMERCE ID												0	x						0	x		0	0	
PHONE NUMBER												0	x						0	x		0	0	
EMAIL												0	x						0	x		0	0	
ADRESS	x											0	x						0	x		0	1	
WEB	x											0	x						0	x		0	0	
REPRESENTATION AGREEMENT												0	x						0	x		0	0	
VERACITY STATEMENT (check)												0	x						0			0	0	
<b>PAYMENT</b>																								
TAX ID			x									1							0			0	1	

	EEE registers											Packaging registers							Textile registers			TOTAL		
	EU	AT	DE	EE	ES	FI	FR	IT	LT	NL NWR	NL OPEN	FREQ <sup>1</sup>	EU	AT	DE	ES	FI	FR	LT	FREQ <sup>2</sup>	EU		FR	FREQ <sup>3</sup>
ACCOUNT HOLDER			x									1								0			0	1
IBAN			x								x	2								0			0	2
BIC			x								x	2								0			0	2
PAYMENT METHOD			x			x						2				x				1			0	3
BILLING REFERENCE NUMBER			x			x					x	3				x				1			0	4
<b>FINANCIAL GUARANTEE</b>																								
BLOCKED BANK ACCOUNT	x			x								1								0			0	1
GUARANTEE INSURANCE	x			x				x				2								0			0	2
BANK GUARANTEE				x				x				2								0			0	2
OTHER GUARANTEE	x			x								1								0			0	1
<b>DISTANCE SELLING-EXPORTS (3)</b>																								
List of MS(s) in which the producer sells EEE by distance selling	x											0				x				1			0	1
Name of the authorised representative in the MS(s) in which the producer sells EEE by distance selling	x											0								0			0	0
<b>OTHERS</b>																								
WASTE MANAGEMENT PLAN (DESCRIPRION)				x		x						2				x				1			0	3

Table 15. Comparison of the registration parameters for the selected registers and streams and the EU required data

NOTE: <sup>1</sup>Frequency values based on a total of 10 records. <sup>2</sup> Frequency values based on a total of 6 records. <sup>3</sup>Frequency values based on a total of 1 record. The fields in the actual forms may be distributed differently from the sections shown in the table, and in some cases the field names may use equivalent terminology. The “Information Accuracy Declaration” parameter was not covered within the scope of the detailed analysis, although it is included among the EU requirements for the register of the three streams. (1) Detailed fields in the section “Distance Selling-Exports”. (2) See also PRO related fields in the section “Product”. (3) Producer uses distance selling to sell EEE directly to private households or to users other than private households in another MS. \*PRO information known by default since the PRO is the data provider to the register.

### 8.3.2.2 EPR Reporting parameters

Following the same approach as in the previous section on reporting parameters Table 16 provides a consolidated overview of all parameters required in the product PoM reporting across the selected MS registers for EEE, packaging, and textiles. Each reporting module of the national register has been examined in detail (including the data fields contained in the respective forms), and the table reflects the full set of information requested from producers (or representatives) during the reporting process.

Within these sections, the table captures the recurring fields (marked with “X”) across EEE, packaging, and textile registers, enabling a direct comparison of the information requirements in each case examined. The table also includes the parameters requested in the corresponding EU legal frameworks for each stream (columns shown in light blue). For each field, summary indicators showing the frequency with which it is requested across the registration systems analysed, together with a final total highlighting the overall level of data fragmentation and repetition across streams and MS (displayed in light and dark grey columns, respectively).

Complementarily to the analysis of the registration parameters, this structure enables a clear understanding of the degree of convergence or divergence between national registration systems and in relation to the EU-required parameters and provides an evidence-based foundation for assessing harmonisation needs across MS and across the three streams.

	EEE registers (Frequency values based on a total of 10 records)										Packaging registers (Frequency values based on a total of 6 records)						Textile registers (Frequency values based on a total of 1 records)						
	EU EEE	AT EEE	DE EEE	EE EEE	ES EEE	FI EEE	FR EEE	IT EEE	LT EEE	NL EEE OPEN	FREQ. EEE	EU PACK	AT PACK	DE PACK	ES PACK	FI PACK	LT PACK	FR PACK	FREQ. PACK	EU TEXT	FR TEXTILE	FREQ. TEXT	FREQ. TOTAL
<b>PRODUCTS (INVENTORY)</b>																							
CATEGORY		x	x	x	x	x	x		x	x	8		x	x	x	x	x	x	6		x	1	15
MATERIALS											0			x	x	x	x		4			0	4
SUBCATEGORY				x	x	x		x		x	5				x	x			2		x	1	8
DESCRIPTION (or NAME)			x			x			x	x	4					x	x		2			0	6
BRAND			x		x						2								0			0	2
TRADEMARK/PRODUCT ID		x	x						x	x	4						x		1			0	5
PRODUCT LINE							x				1								0		x	1	2
LIFE SPAWN (YEARS) (only for reusable products)											0				x				1			0	1
REUSABILITY CYCLE (only for reusable products)											0				x				1			0	1
UNIT WHEIGT									x		1						x		1			0	2
BRAND LOGO			x								1								0			0	1
COMPLEMENTARY DESCRIPTION DOCUMENTS			x			x			x		3					x	x		2			0	5
SALES TECHINQUE (distance, retail, others...)			x						x		2						x		1			0	3
PERIOD OF SYSTEM PARTICIPATION (time in market)						x		x	x		3					x	x		2			0	5
ORIGIN (country or imported, returned)					x				x		2						x		1			0	3
<b>QUANTITY PLACED ON THE MARKET PER PRODUCT (2)</b>																							
REPORT TIMING (option to select: initial planned volume, intra year, year-end volume report)									x		1	x		x			x		2			0	3
INITIAL AND ENDING DATE OF REPORT/YEAR	x			x							1			x					1			0	2
TYPE OF REPORTING (e.g. PoM Annual, Quarterly Reporting)		x							x		2		x				x		2			0	4

	EEE registers (Frequency values based on a total of 10 records)										Packaging registers (Frequency values based on a total of 6 records)						Textile registers (Frequency values based on a total of 1 records)		FREQ. TOTAL													
	EU EEE	AT EEE	DE EEE	EE EEE	ES EEE	FI EEE	FR EEE	IT EEE	LT EEE	NL EEE OPEN	FREQ. EEE	EU PACK	AT PACK	DE PACK	ES PACK	FI PACK	LT PACK	FR PACK		FREQ. PACK	EU TEXT	FR TEXTILE	FREQ. TEXT									
ESTIMATION CRITERIA/METHODOLOGY			x		x	x	x				4					x		x	2		x	1	7									
UNITS (per product (sub-)category, per packaging material)					x			x	x	x	4				x		x		2			0	6									
WEIGHT (per product (sub-)category, per packaging material)	x	(2)	x	x	x	x	(2)	x		x	6	x	(2)	x	x			(2)	2		(2)	0	8									
WEIGHT (simplified reporting method)											0	x							0			0	0									
WEIGHT PRODUCED/PACKED IN THE COUNTRY									x		1					x	x		2			0	3									
WEIGHT IMPORTED									x		1					x	x		2			0	3									
WEIGHT REUSED											0					x	x		2			0	2									
HOUSEHOLD/COMMERCIAL DIFERENCIATION		(2)		x		x		x	x		4		(2)						0			0	4									
PACKAGED PRODUCT									x		1								0			0	1									
RECYCLED MATERIAL IN PACKAGING (%)											0				x				1				0	1								
PRODUCT-FILLED PACKAGING/EMPTY PACKAGING											0									0					x		1				0	1
NUMBER OF SALES ITEMS PER PACKAGE (for product-filled packaging)											0									0					x		1				0	1
DISPOSABLE/REUSABLE											0									0					x		1				0	1
DEPOSIT/NON-DEPOSIT											0									0					x		1				0	1
RECYCLABLE/NON-RECYCLABLE											0									0					x		1				0	1
<b>PRODUCER- REPRESENTATION/DELEGATION</b>																																
PRODUCER OR REPRESENTATIVE (AR or PRO) (select role)		x					x				2		x		x			x	3		x	1	6									
REPRESENTATIVE NAME	x	x		x							2		x		x				2			0	4									
REPRESENTATIVE ID/TAX CODE	x										0	x			x				1			0	1									
REPRESENTATIVE SYSTEM ID		x		x							2		x	x					2			0	4									

	EEE registers (Frequency values based on a total of 10 records)										Packaging registers (Frequency values based on a total of 6 records)						Textile registers (Frequency values based on a total of 1 records)					
	EU EEE	AT EEE	DE EEE	EE EEE	ES EEE	FI EEE	FR EEE	IT EEE	LT EEE	NL EEE OPEN	FREQ. EEE	EU PACK	AT PACK	DE PACK	ES PACK	FI PACK	LT PACK	FR PACK	FREQ. PACK	EU TEXT	FR TEXTILE	FREQ. TEXT
REPRESENTATIVE ADDRESS		x								1		x						1			0	2
REPRESENTED COMPANY ID/TAX CODE								x		1				x				1			0	2
REPRESENTED COMPANY REGISTERED NAME (Natural person: First+Last Name)	x	x								1		x		X				2			0	3
REPRESENTED COMPANY SYSTEM ID		x					x			2		x					x	2		x	1	5
REPRESENTED COMPANY ADDRESS		x								1		x						1			0	2
REPRESENTATION/DELEGATION PERIOD (or start date)		x								1		x						1			0	2
PRODUCER STATUS (manufacturer, importer, retailer, seller from abroad, seller via a marketplace, others.)							x			1							x	1		x	1	3
GEOGRAPHICAL ZONE (administrative zones))										0								0		x	1	1
EPR STREAM/SECTOR							x			1							x	1		x	1	3
AFFILIATED PRO NAME		x			x					2	X <sup>1</sup>	x						1			0	3
AFFILIATED PRO ID		x								1		x						1			0	2
CONTACT PERSON FOR REPORTING	x									0								0			0	0
<b>OTHERS</b>																						
CERTIFICATION OF LAW COMPLIANCE (only for individual producers)									x	1								0			0	1
DECLARATION	x									0								0			0	0
WASTE MANAGEMENT SECTION						x		x		2						x		1			0	3

Table 16. Comparison of EPR Reporting Parameters for the Selected Registers and Streams with EU Required Data

NOTE: The fields in the actual forms may be distributed differently from the sections shown in the table, and in some cases the field names may use equivalent terminology. (1) field name= "Arrangements to ensure the producer responsibility". (2) For AT and FR, refer to the dedicated Table 17 below showing the PoM-specific fields, given the higher level of data granularity required.

Table 17 provides the specific PoM data fields required for AT and FR. It has been included separately because, in these cases, the reporting schemes require a higher level of granularity than the other systems analysed, including data reported both in units and in weight.

	AT EEE	FR EEE	AT PACK	FR PACK	FR TEXT
<b>GENERAL</b>					
UNITS PoM per category/sub-category/product line		X			X
WEIGHT PoM per category/sub-category/product line	X	X			X
WEIGHT PoM TOTAL	X				
HOUSEHOLD/COMMERCIAL DIFERENCIATION	X		X		
<b>PACKAGING</b>					
PACKAGING TYPE (All packaging; Only sales packaging)			X		
PoM PACKAGING - TOTAL, all categories, types incl. imports (weight)			X		
PoM PACKAGING - per CATEGORY (material) and TYPE (weight)			X	X	
PoM PACKAGING UNITS - TOTAL				X	
RECYCLATE USE IN PACKAGING - per category (weight)			X		
PoM REUSABLE PACKAGING -per category and type (weight)			X		
PoM SUP - PER CATEGORY (weight)			X		
LIGHT WEIGHT PLASTIC BAGS - TOTAL (weight)			X		
LIGHT WEIGHT PLASTIC BAGS categories				X	
PoM LIGHT WEIGHT PLASTIC BAGS - per category (weight)				X	
PoM LIGHT WEIGHT PLASTIC BAGS - per category (unit)				X	
SUP PLASTIC BEVERAGE CUPS - categories				X	
PoM SUP PLASTIC BEVERAGE CUPS - per category (unit)				X	
PoM SUP BEVERAGE CUPS - per category - PLASTIC (weight)				X	
PoM SUP BEVERAGE CUPS - per category - NON-PLASTIC (weight)					
SUP PLASTIC BEVERAGE BOTTLES - volume category					
SUP PLASTIC BEVERAGE BOTTLES - material category					
PoM SUP PLASTIC BEVERAGE BOTTLES - by volume and material category (unit)					
PoM SUP BEVERAGE BOTTLES - PLASTIC QUANTITY CONTENT -by volume and material category (weight)					
PoM SUP BEVERAGE BOTTLES - NON-PLASTIC QUANTITY CONTENT- by volume and material category (weight)					
PoM SUP BEVERAGE BOTTLES - RECYCLED PLASTIC QUANTITY CONTENT- by volume and material category (weight)					

Table 17. Detailed specific PoM reporting parameters for AT and FR

## 9 EPR register architecture and system components analysis

This section presents a preliminary review of the main functionalities of national EPR registration and reporting platforms, with respect to their Information Technology architecture and core system features.

The following subsections outline the key Information Technology components and tools that an EPR registration platform (including a potential EU-wide EPR register), may need to incorporate, namely: **User zone configuration, Authentication and electronic signature mechanisms, Declaration of accuracy and compliance statements, Producer identification number generation, Final certification issuance, Interoperability with external systems, Fraud reporting and notification channels, Register publication formats and Internal back-end infrastructure.**

Beyond these core elements, the assessment also considers several cross-cutting dimensions, including cybersecurity requirements, system accessibility, compliance with EU digital standards, data protection considerations, and overall user experience.

### 9.1 User Zone

The User Zone acts as the central control hub for all participants within a register platform. It provides a unified and secure environment where users can manage their personal profiles, organizational data, and access rights, while also enabling the integration of PROs when they are responsible for submitting registration and reporting obligations.

This module is designed to ensure data transparency, regulatory compliance, and secure collaboration among all stakeholders involved in the EPR registration and reporting procedures. By centralizing identity, authorization, and request workflows, the User Zone reduces administrative complexity and enables consistent participation in registration and reporting processes.

Its core functionalities typically include the following components:

- **User Profile Management**

Allows users to create, view, and update their personal and organizational information, including contact details, affiliations, and compliance-related data. This ensures that all interactions within a register are traceable, up to date, and aligned with regulatory requirements.

- **Representative & Delegation Management**

Enables organizations to appoint legal representatives or delegate specific responsibilities to authorized users. Delegations can be scoped by role, organization, or activity, allowing flexible yet controlled participation in operational and administrative processes

- **Roles & Permissions Administration**

Provides fine-grained access control by defining user roles and associated permissions. This ensures that each participant can only access the functionalities and data relevant to their responsibilities, supporting security, accountability, and compliance with data protection standards.

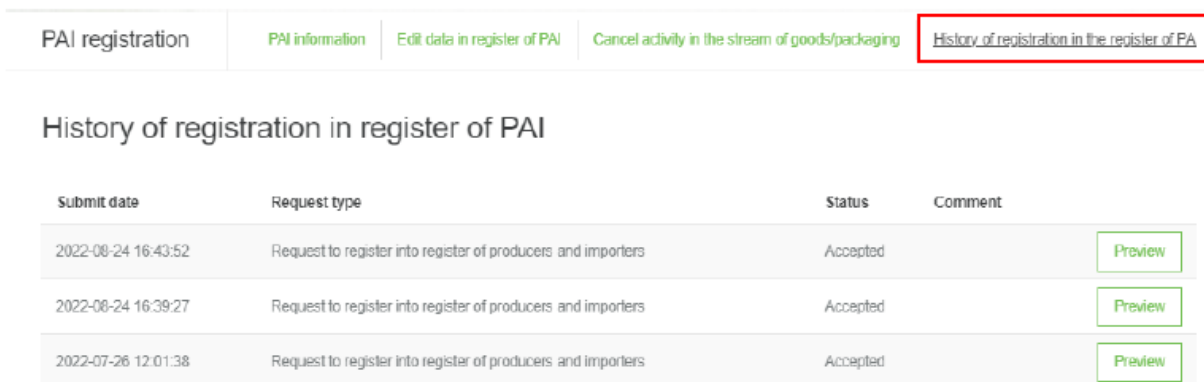
- **Request Review & Modification**

Facilitates the submission, tracking, review, and modification of user-related requests, such as profile updates, role changes, or delegation approvals. This workflow-based approach ensures transparency, auditability, and efficient validation by the appropriate authorities or administrators.

- **Procedures history & documents repository**

Provides users with centralized access to all past and ongoing procedures submitted through the register. It allows users to view status updates, download official documents, and retrieve historical records for compliance and auditing purposes. This functionality ensures a clear and traceable overview of all interactions with the register.

An example of the User Zone interface is presented below. Figure 17 illustrates the history of EPR registration procedures in Lithuania, and Figure 18 displays the assignment of representative permissions per stream within the Lithuanian register.



The screenshot shows a navigation bar with five tabs: "PAI registration", "PAI information", "Edit data in register of PAI", "Cancel activity in the stream of goods/packaging", and "History of registration in the register of PAI". The last tab is highlighted with a red box. Below the navigation bar is the title "History of registration in register of PAI" and a table with the following data:

Submit date	Request type	Status	Comment
2022-08-24 16:43:52	Request to register into register of producers and importers	Accepted	<a href="#">Preview</a>
2022-08-24 16:39:27	Request to register into register of producers and importers	Accepted	<a href="#">Preview</a>
2022-07-26 12:01:38	Request to register into register of producers and importers	Accepted	<a href="#">Preview</a>

Figure 17. User zone - EPR Registration History Procedures in the Lithuanian Register

Figure 18. User zone – Assignment of representative permissions per stream in the Lithuanian EPR register

## 9.2 Authentication and electronic signature mechanisms

The authentication and digital signature mechanisms of an EPR register should rely on established EU digital identity frameworks to ensure interoperability, security, and legal validity across all participating MS.

At EU level, the eIDAS Regulation ([Regulation \(EU\) No 910/2014 and its revision](#)) establishes the legal framework for electronic identification and trust services, ensuring mutual recognition of national eID schemes and electronic signatures across the Union. In support of its implementation, the Connecting Europe Facility (CEF) provides digital building blocks, including the eIDAS node infrastructure, that enable secure cross-border authentication between MS.

By leveraging eIDAS-compliant solutions and CEF digital building blocks, an EPR register platform can guarantee reliable user identification and legally valid electronic signatures. This approach facilitates cross-border recognition of electronic identities, reduces administrative burden, and reinforces trust among all stakeholders. It also enables fully digital, paperless procedures aligned with EU legal and technical standards.

In this context, the following key components, already implemented in some national EPR registers, could be integrated into a future EU-wide EPR register:

- **CEF eIDAS Test Node for Authentication**

An EPR register should integrate the CEF eIDAS Test Node to enable secure authentication through nationally issued electronic identification schemes. This allows users to access the system using their domestic eID, while ensuring mutual recognition and compliance with the eIDAS framework across MS.

- **eIDAS Wallet for Digital Signatures**

The eIDAS Wallet can provide legally valid electronic signatures for documents, declarations, and formal submissions within the register. By linking signatures to verified digital identities, it ensures authenticity, integrity, and non-repudiation of signed content. This solution supports fully digital workflows that are legally recognised throughout the EU.

Examples of authentication tools already implemented in certain national EPR registers are presented below. These existing solutions illustrate functionalities that could also be integrated into a future EU-wide EPR register. Figure 19 shows an authentication tool connected to the official eID systems of different MS (EPR register in Estonia), while Figure 20 presents an authentication tool interoperable with other national digital platforms (EPR register in Finland).

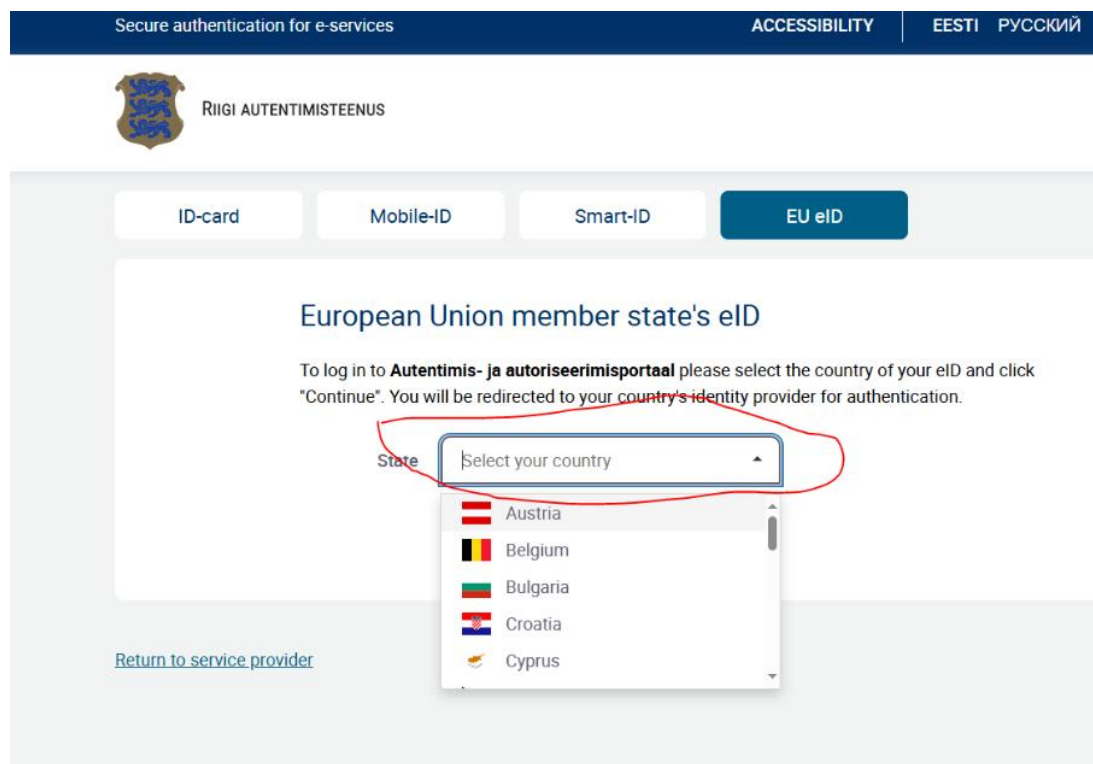


Figure 19. Authentication tool connected to the official eID systems of different MS in the Estonian EPR Register

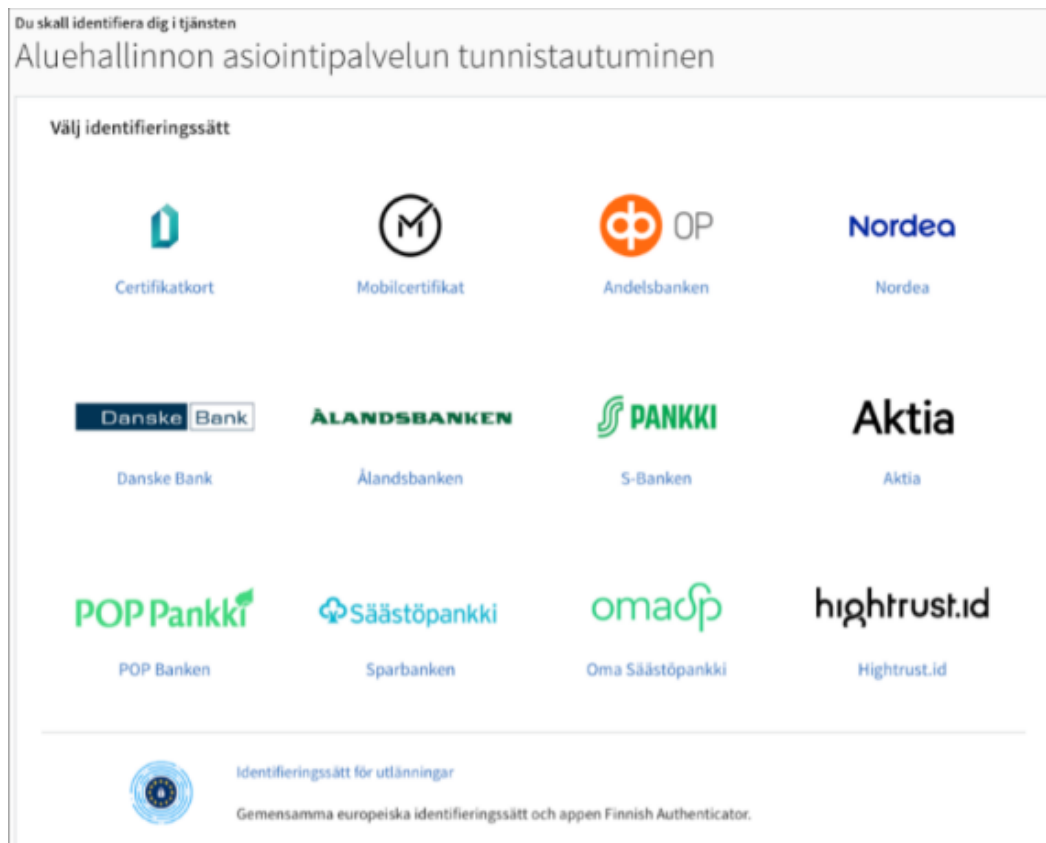


Figure 20. Authentication Tool Connected to Other Platforms in the Finnish EPR Register

## 9.3 Declaration of accuracy and compliance statements

Several national EPR registers already include mechanisms requiring users to formally confirm the accuracy of the information submitted. Incorporating a similar feature into a future EU-wide EPR register would strengthen accountability, enhance data reliability, and reinforce trust across all platform interactions.

This functionality ensures that all information submitted through the register, whether entered via digital forms or uploaded as supporting documentation, is accompanied by an explicit declaration of responsibility by the submitting user. By formally linking each submission to a user acknowledgment, the platform supports compliance with regulatory and audit requirements applicable to EPR schemes and registration procedures.

The core components of this functionality typically include the following elements:

- **Integrated Veracity Checkbox / Statement**

In existing national registers, this feature is typically implemented through an integrated checkbox or mandatory declarative statement that users must acknowledge before final submission. The declaration confirms that the data provided is accurate, complete, and submitted in good faith, and that the user assumes responsibility for its correctness.

- **Audit-Ready Documentation**

Submitted data and associated declarations are stored in a format that ensures traceability and long-term availability for verification purposes. This facilitates validation processes, audits, and compliance reviews by competent authorities, while promoting transparency and legal certainty throughout the lifecycle of the submitted information.

An example of this functionality, as implemented in a national EPR register, is illustrated below in Figure 21.

The screenshot shows a web form for selecting SRAP (Sistema de Responsabilidad Ampliada al Productor) for different categories of products. The categories are:
 

- Industriales reutilizables: SRAP dropdown menu with 'Seleccione un SRAP' and an 'Añadir SRAP' button.
- Comerciales de un solo uso: SRAP dropdown menu with 'ECCOEMBESECOVIDRIO' and an 'Añadir SRAP' button.
- Comerciales reutilizables: SRAP dropdown menu with 'Sistema Individual de Responsabilidad Ampliada' and an 'Añadir SRAP' button.

 At the bottom, there is a section titled 'Declaración de veracidad' with a checked checkbox and the text: 'Declaro que la información aquí introducida es veraz y acepto que puede ser contrastada por las autoridades competentes en sus actividades de inspección y control.'

Figure 21. Data Veracity Declaration Tool (Check Box) – Spanish Packaging EPR Register

## 9.4 Producer identification number generation

The assignment of a unique producer identification number is a core feature already implemented in several national EPR registers. Extending this functionality to a future EU-wide EPR register would enhance traceability, ensure consistent identification across MS, and facilitate cross-border monitoring of producer obligations and product or waste flows.

A dedicated Producer ID system would function as a central reference mechanism within the platform, enabling reliable tracking of producer responsibilities throughout all registration and reporting processes.

The main functional elements of this component typically include:

- **Automated Unique ID Assignment**

In existing national registers, a unique Producer Identification Number is automatically generated upon registration or validation. This automated process reduces manual intervention, minimises the risk of duplication or errors, and ensures the immediate operational use of the identifier for reporting and compliance purposes.

- **EU-Level Consistency**

Where designed in alignment with EU principles, Producer IDs can follow harmonised identification logic and structured formats. Such an approach would enable cross-border recognition of producers and support interoperability between national systems within a future EU-wide framework.

- **Lifecycle Management**

The Producer ID is managed throughout the full lifecycle of a producer’s participation in the register. This includes creation, modification, suspension, and deactivation where applicable, ensuring historical traceability while preserving data integrity and regulatory compliance over time.

An example of a Producer Identification Number assignment module implemented at national level is illustrated below in Figure 22, showing the functionality within the Spanish Packaging EPR Register.

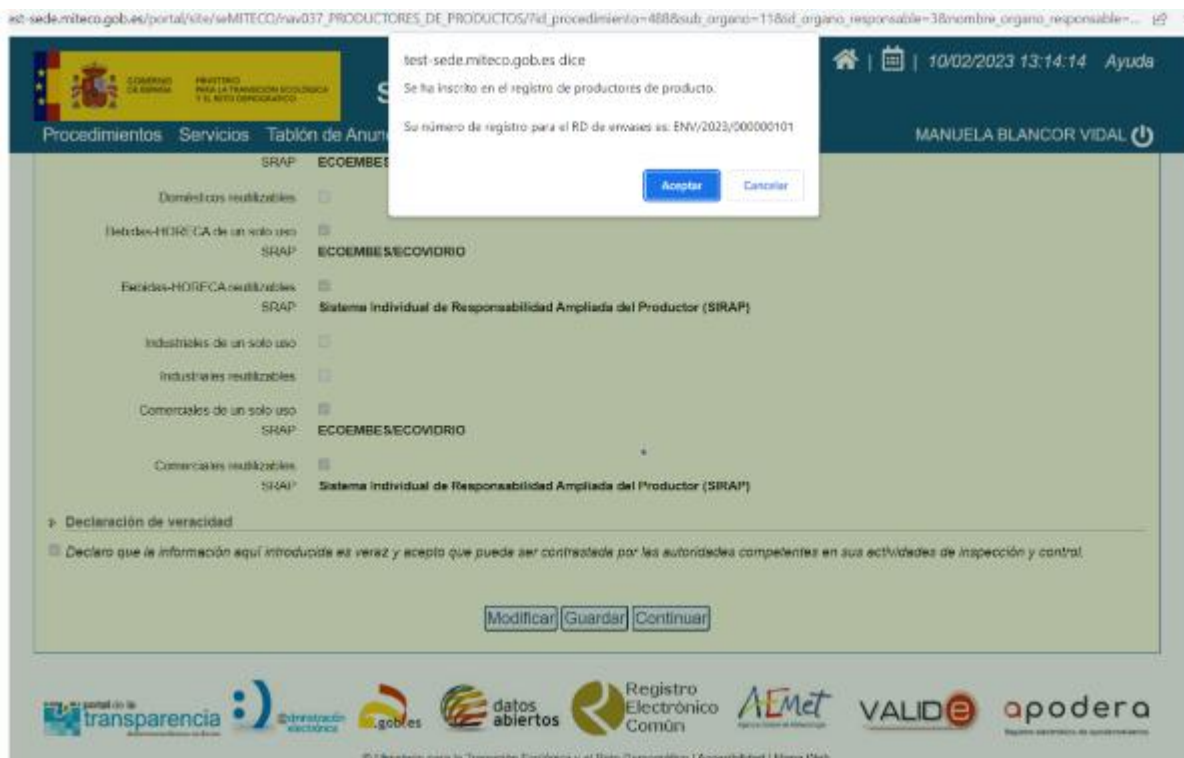


Figure 22. Producer Identification Number Assignment Module – Spanish Packaging EPR Register

## 9.5 Final certification generation

Some national EPR registers complete the registration or reporting procedure with the automatic issuance of an official confirmation document. Replicating this functionality in a future EU-wide EPR register would strengthen procedural transparency and provide economic operators with formal documentary evidence of their registration status and compliance.

This feature compiles the information submitted during the procedure into a single validated output, reflecting the outcome of the process and confirming the fulfilment of the relevant obligations. It transforms the digital workflow into an officially recognisable record.

Key characteristics of this component include:

- **Consolidated Procedural Output**

The system generates a document that aggregates all relevant elements of the procedure, including submitted data, user declarations, validation steps, system checks, and approval decisions. This ensures that the full administrative pathway is captured in a structured and coherent format.

- **Verification & Validation Support**

Because the certificate is generated on the basis of authenticated access, verified datasets, and where applicable, electronic signatures, it supports reliable verification by competent authorities and other authorised stakeholders.

- **Official Confirmation of Compliance**

The document functions as formal proof that the producer has completed the required registration and/or reporting steps in accordance with applicable EU and national EPR legislation. It may be presented during inspections, audits, or administrative reviews

- **Long-Term Record Keeping**

The issued certification is securely retained within the platform, ensuring its availability for future consultation, regulatory follow-up, or dispute resolution, while maintaining the integrity and authenticity of the stored information over time. An example of this type of functionality within an existing national system is provided below in Figure 23.



Figure 23. Final receipt generation and print tool – Italy (EEE)

## 9.6 Interoperability with external platforms or tools

Certain national EPR registers already incorporate connections with external systems to support data exchange, validation processes, and complementary administrative functions. Embedding interoperability features in a future EU-wide EPR register would enhance data reliability, reduce duplication of information, and enable more efficient cross-system workflows.

Although the specific external platforms to be connected should be defined during the full-scale implementation phase of an EU-wide EPR register and therefore fall outside the scope of the project (which focuses on the implementation of a pilot EU-wide EPR register), it is useful to provide an overview of potential future integrations. The pilot platform can be designed with a technical architecture capable of accommodating such future connections. Establishing a forward-compatible structure would ensure preparedness for both manual and automated data exchange mechanisms. This interoperability layer may include the following functional element:

- **Data Import Functionality**

Existing national systems often allow data to be imported from external platforms, either through structured file uploads or automated interfaces (e.g., APIs) where available. This reduces repetitive data entry, limits the risk of inconsistencies, and improves administrative efficiency. Designing the EU-wide register with similar capabilities would facilitate scalable deployment and future alignment with complementary EU or national digital systems.

An example of external system integration within a national EPR register is illustrated below in Figure 24.

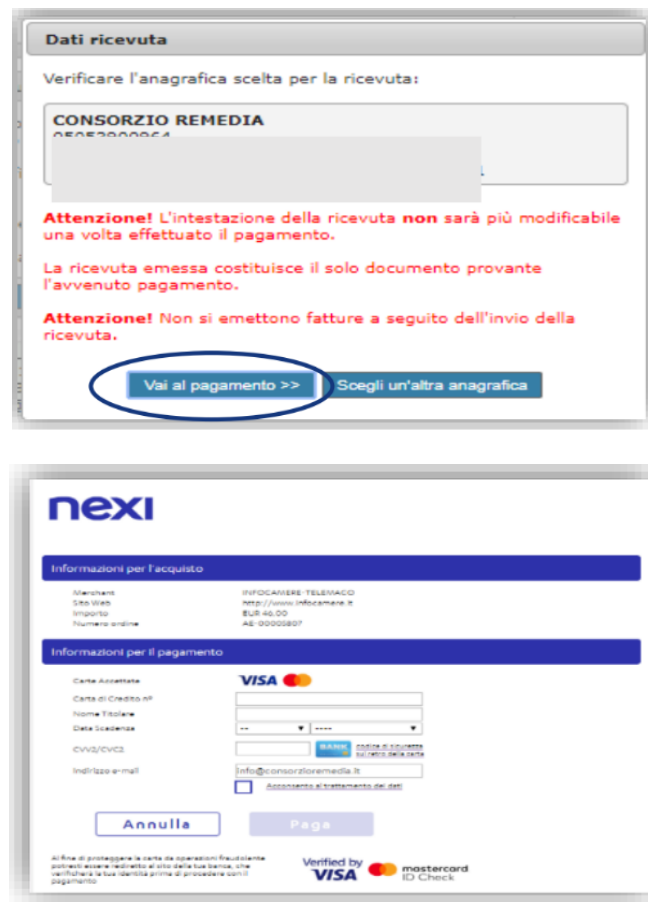


Figure 24. Fee payment tool (external connection) – Italy (EEE)

## 9.7 Fraud notification channel

A Fraud Notification Tool would provide a dedicated channel for users to report suspected fraudulent activities related to companies placing products on the market. Integrating such a feature into a future EU-wide EPR register would enhance transparency, strengthen enforcement mechanisms, and support regulatory compliance by enabling the timely detection of irregular or non-compliant behaviour. This functionality would establish a structured and secure mechanism for submitting, managing, and tracking fraud-related notifications within the system, ensuring that competent authorities can assess and follow up on reported cases in a consistent and accountable manner.

Key characteristics of this component include:

- **Structured Reporting Form**

The system provides a standardised reporting form to guide users in submitting clear, complete, and relevant information. The form captures essential details such as the entity concerned, the nature of the suspected infringement, supporting evidence or contextual information, and any additional

remarks. This structured approach ensures consistency, facilitates efficient case assessment, and improves the quality of the information received.

- **Fraud notification management**

All fraud notifications are handled confidentially and are accessible only to authorised personnel. Appropriate access controls and data protection measures safeguard the identity of the reporting party (where disclosed) and ensure the integrity and security of the submitted information. Each report is traceable throughout its lifecycle, enabling proper case management, monitoring, and resolution, while maintaining accountability and compliance with applicable data protection requirements. An example of this type of functionality within an existing national system is provided below in Figure 25.

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### Anoniem meldpunt freeriders

Voor een eerlijk gedeelde verantwoordelijkheid  
Als producent en of importeur van elektronische apparaten (EEA) en energiezuinige lampen zoals genoemd in de Regeling Afgedankte Elektrische en Elektronische Apparatuur (Regeling AEEA) heeft u een zogenaamde wettelijke producentenverantwoordelijkheid.

Onder deze producentenverantwoordelijkheid valt onder andere:  
\* Jaarlijkse rapportage aan de Nederlandse overheid van wat er aan geproduceerde of geïmporteerde EEA op de Nederlandse markt wordt gezet.

Met uw deelname aan Stichting OPEN voldoet u hieraan. Helaas zijn er bedrijven die niet aan deze verplichting voldoen, ook wel freeriders genoemd. Kent u bedrijven die hier mogelijk niet aan bijdragen? Meld deze via het Anoniem Meldpunt Freeriders. Uw anonimiteit staat hierbij uiteraard centraal. Zo zorgen we samen voor een eerlijk gedeelde verantwoordelijkheid.

Cuando envíe este formulario, no recopilará automáticamente sus detalles, como el nombre y la dirección de correo electrónico, a menos que lo proporcione usted mismo.

\* Obligatorio

1. Naam mogelijke freerider \*  
Escriba su respuesta
2. Plaatsnaam waar het bedrijf gevestigd is  
Escriba su respuesta
3. Wat is de link naar hun website  
Escriba su respuesta

Figure 25. Fraud Notification Tool – Netherlands EPR Register

## 9.8 Register data publication tool

The Register Data Publication Tool would represent a key element of a future EU-wide EPR register, ensuring compliance with legal requirements concerning the public disclosure of producers registered under each product stream. By making verified registration information publicly available, the system would strengthen transparency, facilitate market oversight, and enhance trust in the overall EPR framework. This module would enable structured consultation of data generated through the registration process, allowing stakeholders and the wider public to review relevant information in a clear and user-oriented format. It could also incorporate complementary features,

such as visual dashboards presenting aggregated data on producer categories, product types, and quantities of products placed on the market (PoM), thereby increasing analytical value and data visibility.

Core elements of this feature would include:

- **Public Database Query Interface**

The system would provide a dedicated interface displaying approved data extracted from the register database. An integrated search function would allow users to retrieve entries using predefined criteria, such as producer name, registration number, or product stream, thereby enabling efficient filtering and consultation of records and supporting supervisory activities.

An illustration of this type of functionality within an existing national system is presented below in Figure 26.

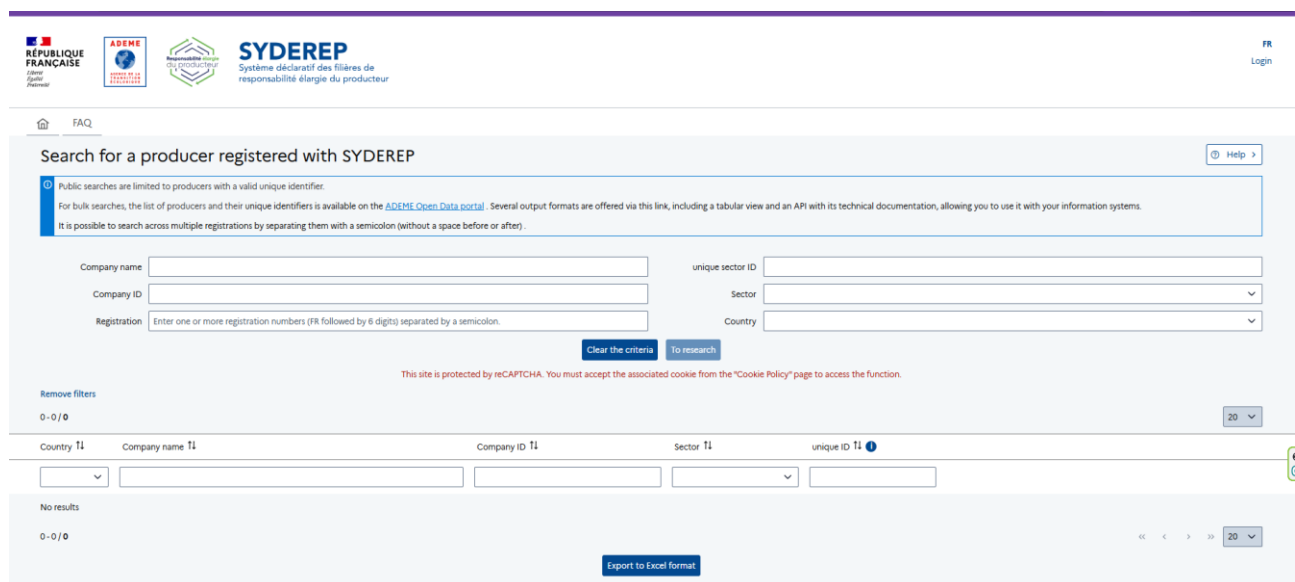


Figure 26. Registered Producer Search Tool – France EPR Register

## 9.9 Platform internal backend

The internal backend would constitute the restricted administrative environment of a future EU-wide EPR register. Accessible exclusively to competent authorities or designated administrators, it would support the review, verification, processing, and supervision of all information submitted through the registration and reporting interface. This environment would function as the operational backbone of the system, safeguarding data reliability, ensuring regulatory compliance, and enabling structured oversight of producer obligations.

Core components to be considered in the design of the EU-wide EPR register include:

- **Data Review and Validation Environment**
  - Centralised overview of producer submissions, including registration forms, periodic reports, and supporting documentation.
  - Automated verification mechanisms (e.g. format checks, completeness controls, identification validation, cross-platform consistency checks).
  - Administrative tools to approve submissions, reject them, or request additional clarification.
  - Version tracking to monitor updates and modifications introduced by producers.
  - Fraud detection and alert mechanisms, including rule-based controls and, where appropriate, AI-supported protocols to identify irregularities or inconsistencies.
  
- **Case Management and Workflow Instruments**
  - Structured procedural flows guiding administrators through defined assessment stages.
  - Individual case files for each producer, containing documentation, correspondence records, and decision logs.
  - Status monitoring (e.g. “submitted”, “under review”, “approved”, “pending clarification”, “rejected”) to ensure traceability and procedural transparency.
  
- **Communication and Notification Functions**
  - Secure messaging tools enabling exchanges between administrators and producers.
  - Standardised templates for formal notifications (e.g. approvals, reminders, compliance notices).
  - Integration with email systems to support automated alerts and deadline reminders.
  
- **Data Analysis and Reporting Capabilities**
  - Internal dashboards providing structured overviews of operational data.
  - Generation of summary statistics to support regulatory monitoring and reporting obligations.
  - Export functionalities in formats such as XLS, CSV, and PDF.
  - Configurable analytical tools to support supervisory activities.
  
- **Interconnection and Interoperability Mechanisms**
  - Application Programming Interfaces (APIs) or secure connectors to enable interoperability with tax administrations, customs authorities, enforcement bodies, or other national and EU registers.
  - Tools allowing manual or automated data exchange and cross-verification.

An illustration of this type of administrative environment within an existing national system is presented below in Figure 27.

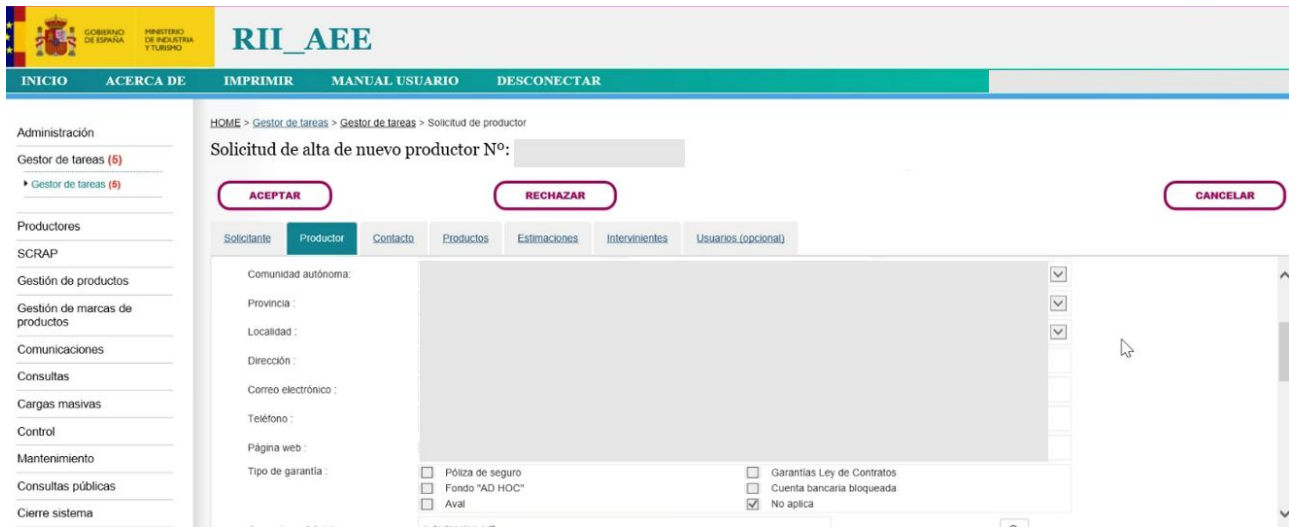


Figure 27. Backend EPR register system – Spain (EEE)

## 9.10 Other transversal elements

A EPR register platform needs to incorporate a set of foundational security measures designed to protect data confidentiality, integrity, and availability throughout all platform operations. These measures can ensure secure access, trusted data exchange, and compliance with applicable EU cybersecurity and data protection principles.

- **Secure Communication (HTTPS & TLS Encryption)**

All communications must be secured using HTTPS (HyperText Transfer Protocol Secure) protocols based on TLS encryption (Transport Layer Security). Valid digital certificates must be used to ensure encrypted data transmission, protect against interception or tampering, and guarantee the authenticity of the platform endpoints.

- **Authentication & Identity Security**

User access to a EPR register platform must be protected through secure authentication mechanisms, including, where applicable, integration with trusted EU-level identity solutions. Authentication processes can prevent unauthorized access and ensure that all actions performed within the system are reliably linked to verified users.

- **Data Encryption at Rest**

Sensitive data stored within the register platform must be encrypted at rest using industry-standard encryption algorithms. This measure protects stored information against unauthorized access, even in the event of infrastructure compromise, and supports compliance with data protection and confidentiality requirements.

- **Role-Based Access Control**

Access to register platform functionalities and data should be governed by role-based access control mechanisms. Users must only be granted permissions corresponding to their assigned roles and responsibilities, ensuring that data exposure is minimized and operational boundaries are respected.

- **Audit Logging & Traceability**

The system needs to record security-relevant events, including user access, data submissions, modifications, and administrative actions. These audit logs support traceability, incident investigation, and accountability, while remaining aligned with data minimization principles.

- **Compliance with Data Protection Principles**

All security measures need to be designed to support compliance with applicable data protection principles, including confidentiality, integrity, and accountability. Personal data handling should be limited to what is necessary for pilot operations and follow established data governance rules.

The implementation and programming of the security measures listed above will be adjusted as necessary, while remaining proportionate to the pilot nature of the EU-wide EPR register and the overall scope of the project. The security approach will follow a “security by design” and “security by default” philosophy, establishing a robust baseline for future system evolution.

## 10 Results of the EPR register user survey

The project collected information on user experiences with existing national EPR registers, focusing on EEE, packaging and Textiles.

The survey was composed of 6 Sections: 1) General information on the survey user, 2) Complementary and administrative items/functionalities of the register, 3) Registration information requested, 4) Put on the market reporting, 5) Final comments and 6) Consents (further contacts and Data Protection).

Here is the link to the survey:

[https://forms.office.com/pages/responsepage.aspx?id=Rpy9JA5pKUKhkUuapUT1I3v73k4OpQtDscH\\_oRbATXhURTM2Q0swUEIXUjhROVhHN1Q4SVJXWDRSVi4u&route=shorturl](https://forms.office.com/pages/responsepage.aspx?id=Rpy9JA5pKUKhkUuapUT1I3v73k4OpQtDscH_oRbATXhURTM2Q0swUEIXUjhROVhHN1Q4SVJXWDRSVi4u&route=shorturl)

### 10.1 Responses scope

The survey on producer registers gathered a total of 32 responses.

The survey results show that most users interacting with the registers are PROs (85%), followed by producers (6%), national representatives (6%) (see Figure 28). Regarding the product streams covered, most comments relate to EEE registers (66%), with packaging representing 25% and textiles the remaining 9% (see Figure 29).

The map (see Figure 30) shows a wide geographical participation in the survey on producer registers, with higher response levels coming from Western and Southern Europe. Italy provided the largest number of responses (5), followed by Portugal (4) as well as Germany, France, and Spain (3 each). Overall, the distribution reflects engagement across diverse MS and zones.

Only one organisation submits its reporting in a MS different from its own, in this case in Portugal.

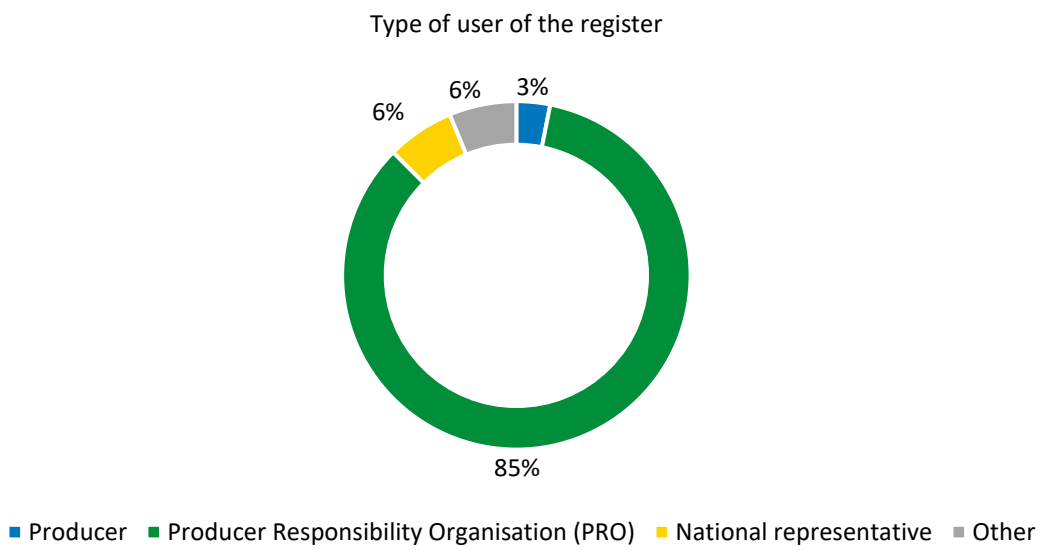


Figure 28. Survey results: Type of user of the register

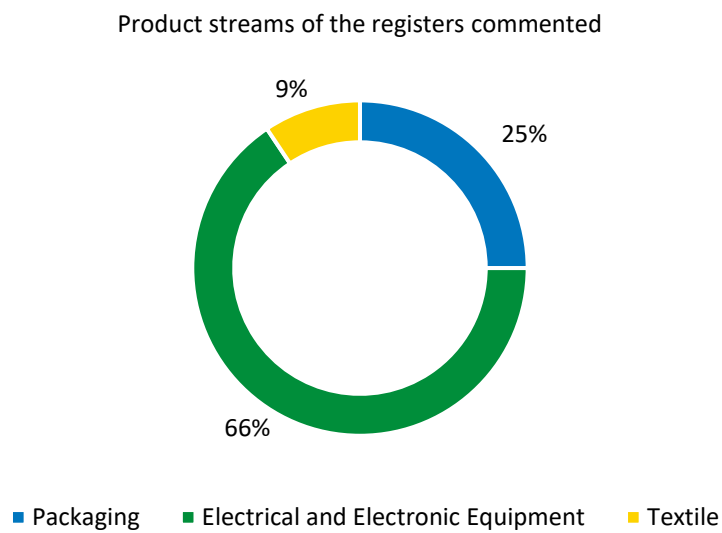


Figure 29. Survey results: Product streams of the registers commented

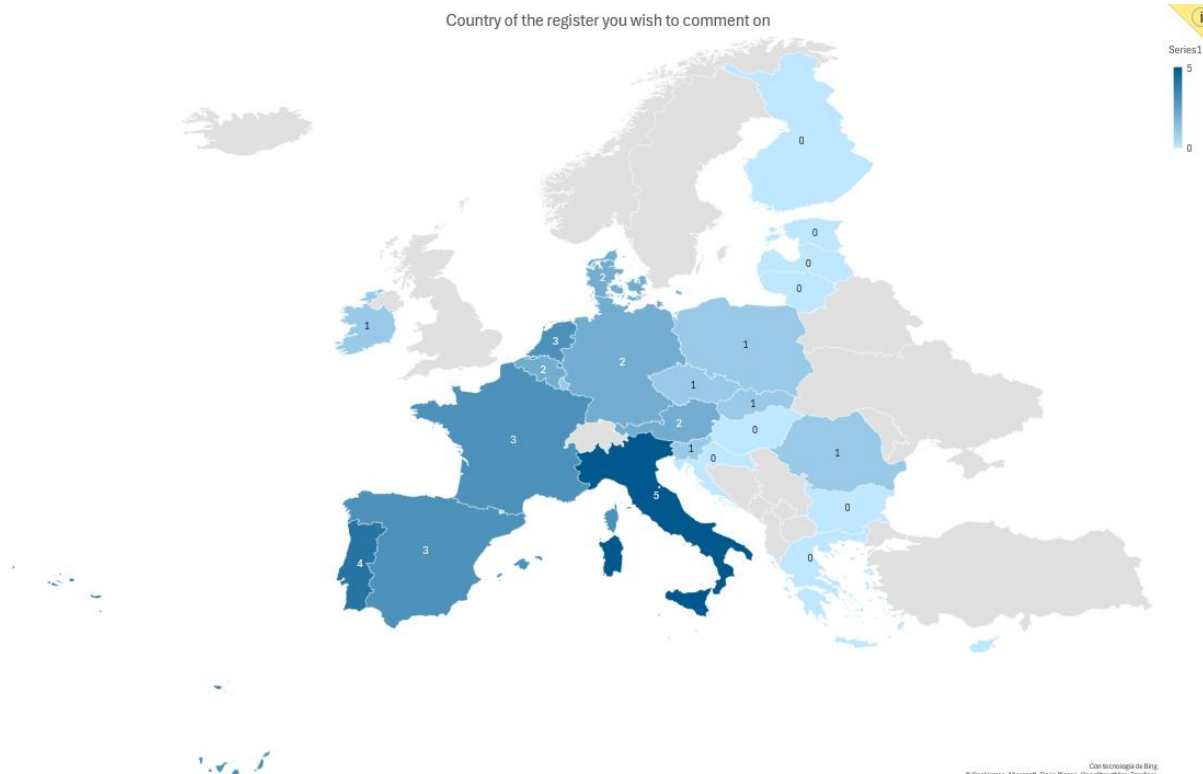


Figure 30. Survey results: MS of the registers commented

## 10.2 General functionalities

Regarding complementary tools (see Figure 31), information on authorised PROs and contact tools features are mostly rated moderately to very user-friendly and contact options work reasonably well. Language/translation, user zone and help-desk functionalities show the biggest gaps, with many cases marked as element not available or not user-friendly.

For administration features (see Figure 32), authentication perform best, while final certification generation is acceptable but not for the majority. The weakest areas are e-signature, product category-selection help tool, admin-role assignment process and data modification functionalities.

Within the open question regarding the key functionalities to be improved, respondents consistently highlight the need for full digitalization and smoother procedures (including errors detection or warnings), simplified reporting, improved usability and interaction with users, flexible data correction/update procedures avoiding mailing channels, and better combined support tools and general information.

Requested certification/accreditation (for AR, PRO affiliation or Chamber of Commerce affiliation) is also a burden when hard-copy (in some cases notarised) documents are required, since the verification process is time-consuming compared to using digital data-import and signature tools, which would streamline verification and help ensure compliance.

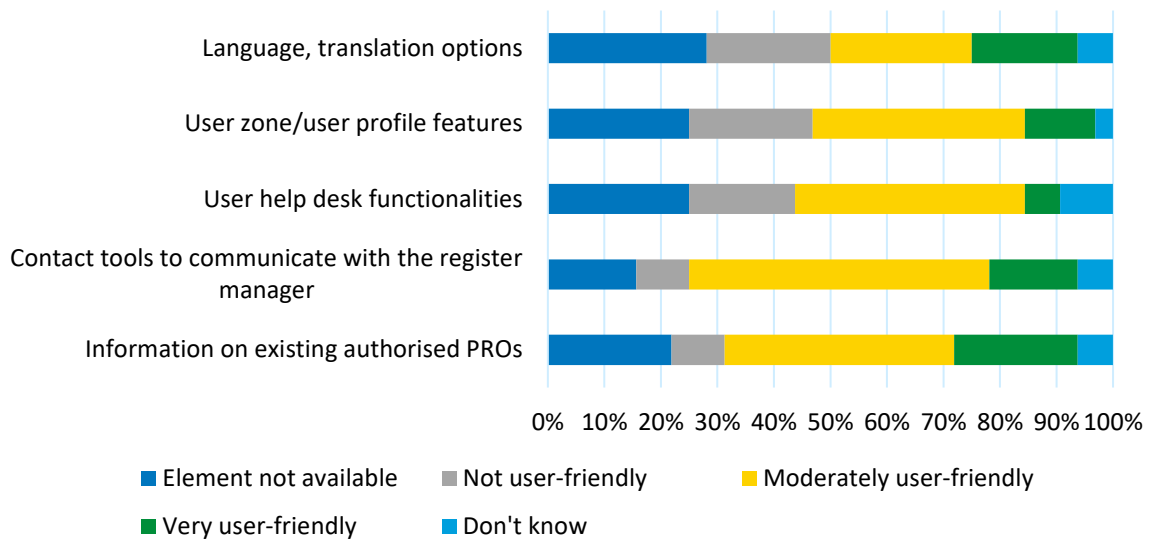


Figure 31. Survey results: Complementary functionalities & tools

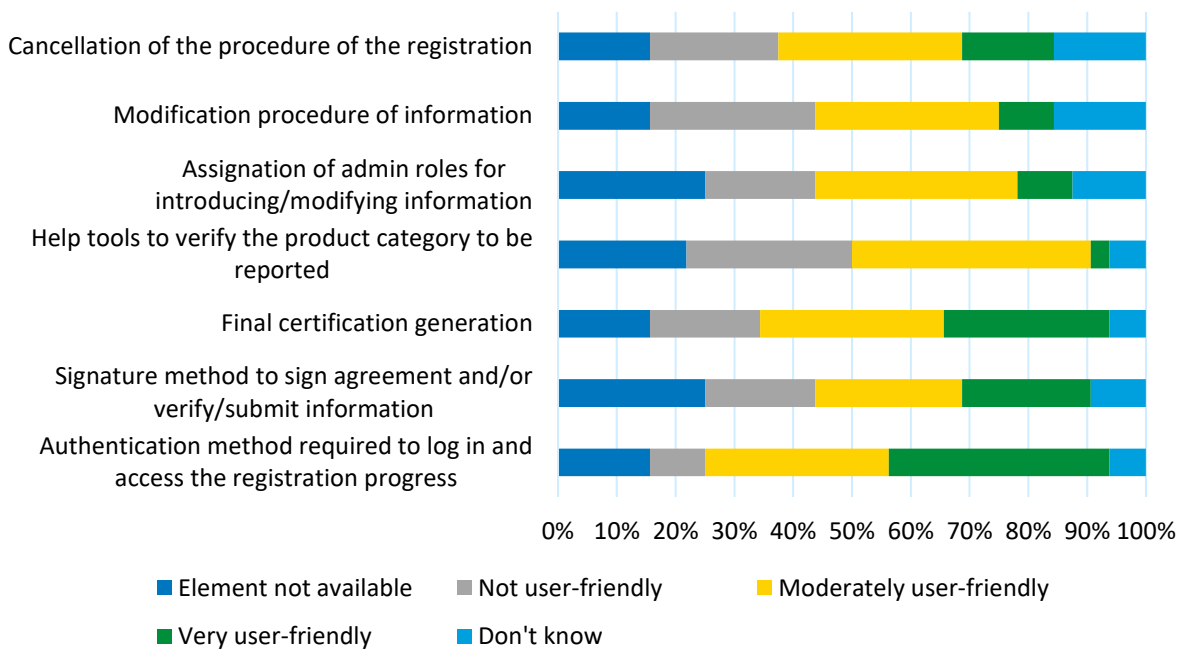


Figure 32. Survey results: Administrative functionalities & tools

### 10.3 Registration information required

Most organisations report no difficulty providing mandatory fields (72%), though 28% find some requirements challenging. Only 9% say there are mandatory fields they are unable to provide, indicating overall feasibility. The results suggest targeted guidance or clarification could help the minority facing difficulties. See Figure 33 and Figure 34.

Within the open question regarding parameters that users find difficult to provide, respondents provide the following cases: economic activity codes (often with different formats across countries), registered trademarks and brand lists, sales estimations, personal data such as telephone and passport number, etc.

Regarding parameters that users find not feasible to provide, respondents indicate that mandatory data fields are in some cases required before they can realistically be obtained, or they have to request them directly from the original source or stakeholder.

Are there any mandatoy fields that are difficult for your organisation to provide?

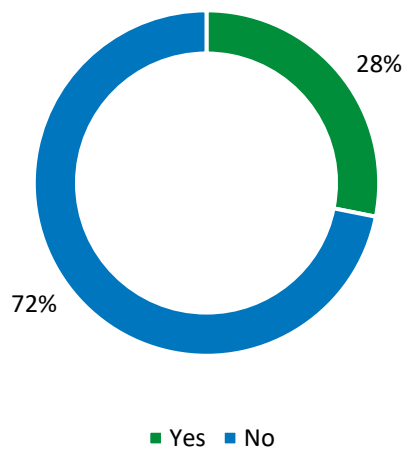


Figure 33. Survey results: Registration mandatory fields difficult to provide

Are there any mandatory data fields that your organisation is unable to provide?

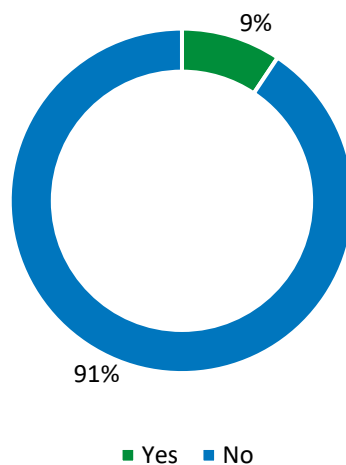


Figure 34. Survey results: Registration mandatory fields unable to provide

The PRO agreement accreditation process is generally perceived as workable, with most ratings in the moderately to very user-friendly range, though a noticeable share report gaps (element not available) or low usability (Figure 35).

By contrast, the assignment of a country AR performs weaker: it is more often unavailable, receives fewer “very user-friendly” ratings, and shows a higher proportion of not user-friendly responses. See Figure 35.

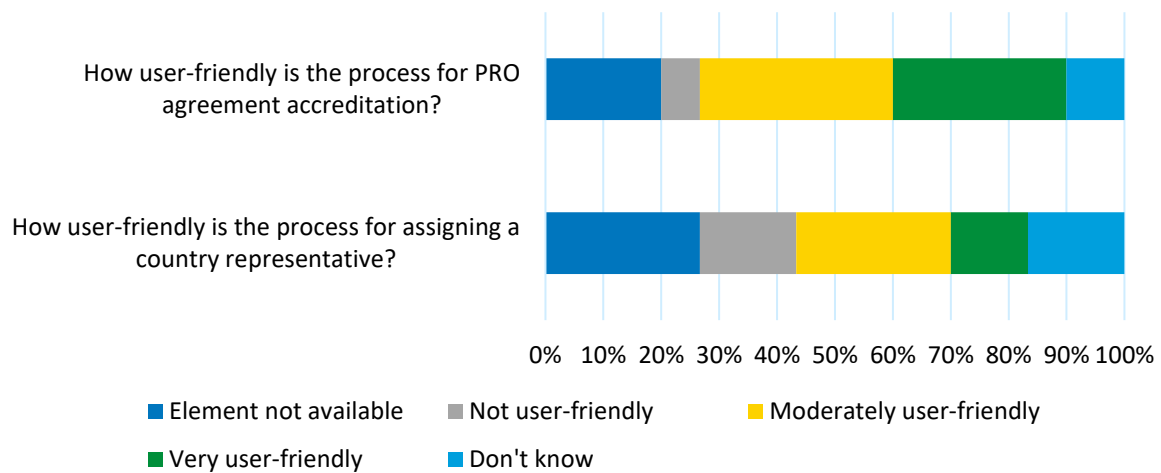


Figure 35. Survey results: PROs and authorized representative reporting

## 10.4 Reporting information required (put on the market data)

The survey results (see Figure 36) indicate that most register systems already support periodic reporting: 72% of respondents confirm the existence of a dedicated module or specific procedure, while 28% report that such functionality is not available. This indicates that periodic reporting is not yet integrated in a considerable number of systems, with the responsibility in some cases being delegated to PROs for collection.

Does the register system include a dedicated module or specific procedure for periodic reporting of products PoM?

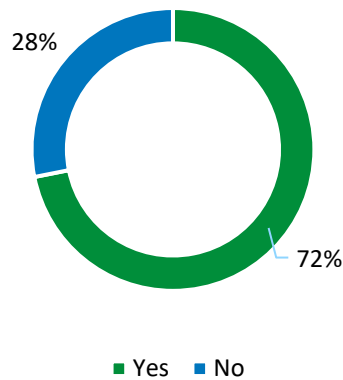


Figure 36. Survey results: Existence of a reporting module

The survey results (see Figure 37 and Figure 38) show that most organisations do not face challenges when providing mandatory reporting data: 85% report no difficulty, while 15% identify certain fields as difficult to provide. When asked whether any mandatory data fields are impossible to provide, a slightly higher share (21%) indicate that this is the case, although the majority (79%) can provide all required information. Overall, the findings suggest that while reporting requirements are generally manageable, a notable minority still encounter obstacles that may require clarification or support.

Within the open question regarding parameters that users find difficult to provide, among the few affirmative responses, the main concern relates to the upcoming ecomodulation reporting requirements, which are expected to be difficult for producers to report accurately. In addition, current reporting processes remain largely manual and aggregated, increasing the administrative burden (PROs must compile and manually enter extensive annual data into national systems for all affiliated producers).

As for the open question regarding parameters that users find unable to provide, a single response indicated that some data must be specified for each region, which is not possible without an “allocation key”.

Are there any mandatory data fields that are difficult for your organisation to provide?

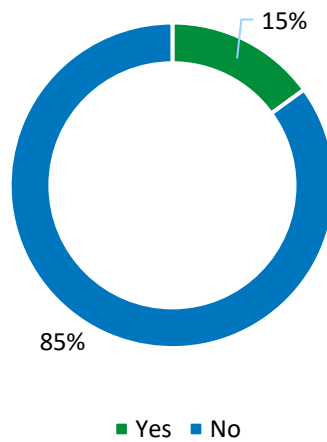


Figure 37. Survey results: Reporting mandatory fields difficult to provide

Are there any mandatory data fields that your organisation is unable to provide?

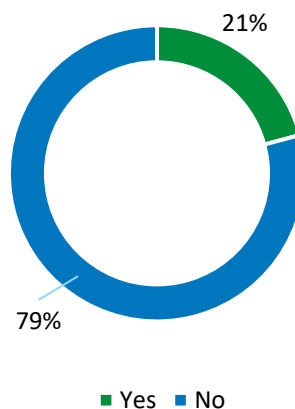


Figure 38. Survey results: Reporting mandatory fields unable to provide

The survey results (see Figure 39) show that in general reporting modules (78%) do not require mandatory data in formats or units that differ from those commonly used by industry. However, 22% indicate discrepancies, suggesting that for a minority of organisations, misalignment in formats or units may create additional effort in converting or restructuring data before submission.

In the complementary open question, respondents provide the following examples of format mismatches: units PoM data (especially for packaging), specific national EEE categories, quantities of waste collected (as complementary data) and material breakdowns that are difficult to report and sometimes show misalignment between Information Technology-system structures and legal reporting requirements.

Are there any mandatory data fields in the reporting that your organisation maintains in different formats or units commonly used by industry?

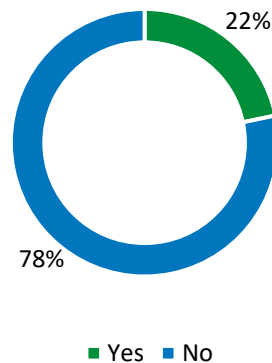


Figure 39. Survey results: Reporting mandatory fields with different formats

The survey results shown in Figure 40 indicate that the vast majority of organisations (87%) consider the current level of data granularity in the national register, such as product categories and subcategories, to be adequate, while a small minority (13%) feel that a different level of detail or categorisation approach would better suit their needs. See also the results separated per stream in Figure 41.

Complementarily, 65% of respondents report no difference between the current level of data granularity and that used in declarations to PROs, whereas 35% point to a clear mismatch in the level of detail.

In the complementary open question, respondents indicated that the number of product categories and subcategories reported varies extremely, ranging from a few to more than 200, depending on the product, national systems, and data structures. This highlights a significant lack of harmonisation in category definitions and reporting requirements. Some specific examples provided: “Around 140 data fields to fulfil with material and type of packaging”, “the categories of EEE are more or less 60”, “6 categories and 85 subcategories” for EEE, “70” (sub)categories for EEE, “135” (sub)categories for textile.

Respondents stress the need for harmonisation, simplification (with a focus on subcategories) and alignment of product categories and subcategories across MS and reporting systems. Excessive granularity, inconsistent classifications in some cases with legal requirements, and systematic mismatches between national registers and PRO data (which pose a reliability risk) complicate the processes, especially for producers reporting in different MS. Other complementary contributions in this respect are the following:

- New or emerging products should be clearly defined in relation to the scope of the current (sub)categories (e.g., vapes, e-cigarettes) to facilitate reporting and avoid responsibility gaps and uncertainty.

- Customs codes (HS codes) are not user-friendly: some are overly specific, others group too many products together, and some product types have too many applicable codes, making categorisation confusing.

Is the current level of data granularity in the national register (e.g. Product categories and subcategories) adequate for your organisation?

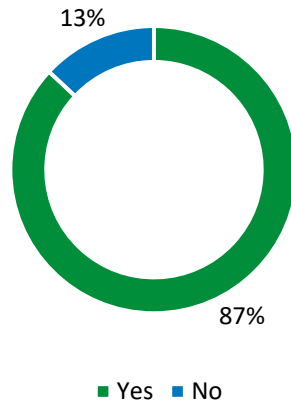


Figure 40. Survey results: Reporting data granularity

Are there any mandatory data fields in the reporting that your organisation maintains in different formats or units commonly used by industry?

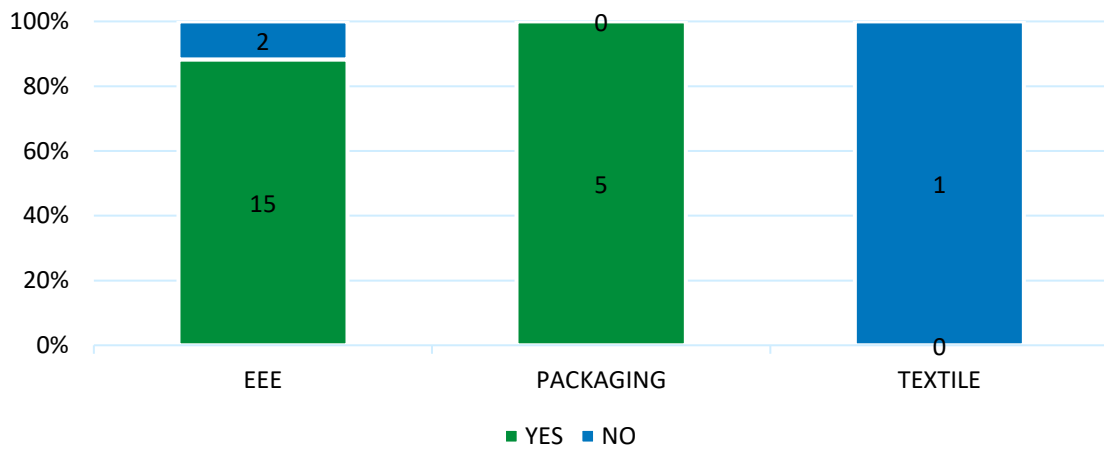


Figure 41. Survey results: Reporting data granularity per stream

Does the current level of data granularity differ from that used in declarations to PROs?

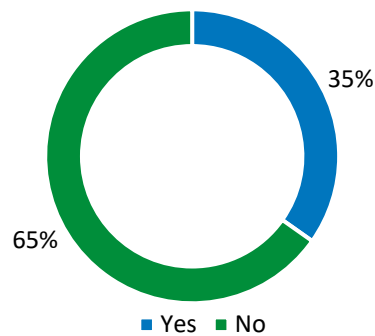


Figure 42. Survey results: Reporting data mismatching

Over half of respondents (52%) report that data cannot be submitted via an API or through alternative formats such as bulk uploads, suggesting limited availability of automated reporting solutions. Meanwhile, 31% confirm that such options are available, and 17% indicate that they “don’t know”. See Figure 43.

Respondents describe the implementation process as moderately difficult. Although XML-based reporting is manageable and remains the most commonly used tool, manual consolidation of producers’ data, the need for format improvements, and system instability generate inefficiencies and operational risks. More advanced alternatives, such as APIs, do not appear to be widely adopted and often require frequent adaptations.

Can the data be reported via an API or through alternative means such as bulk uploads using a predefined file format?

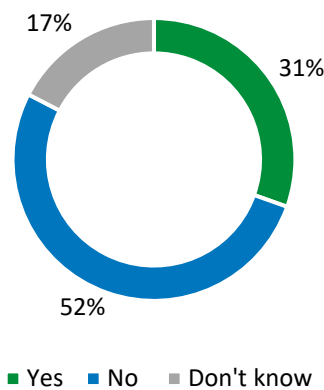


Figure 43. Survey results: APIs and bulk uploads tools

Most respondents (91%) consider the current reporting frequency adequate for their organisation. Only 5% believe it is not appropriate, while 4% are unsure (Figure 44).

Additionally, most respondents (78%) report that the system does not offer a simplified reporting process or reduced data requirements under specific conditions. Only 13% indicate that such options exist, while 9% are unsure (Figure 45).

Respondents recommend that simplified reporting or smoothing should rely on volume thresholds, automation through APIs and file uploads, and the possibility for PROs to report on behalf of producers using already available data. The introduction of new reporting requirements in certain cases (e.g., complete versus partial declarations) has added further complexity.

Other specific suggestions include allowing aggregated declarations for modulation purposes, applying simplified reporting data for producers placing less than 8 tonnes per year on the market, deleting SH4 (product type) codes for EEE, or allowing longer reporting intervals for small producers, such as annual reporting.

Data simplification should focus on reducing unnecessary data fields, although this is sometimes not compatible with the level of detail required for compliance and PRO fee structures.

Is the current frequency for submitting information adequate for your organisation?

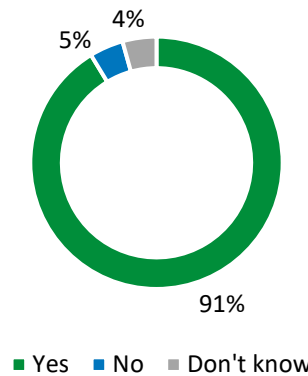


Figure 44. Survey results: reporting frequency

Does the system offer the option of a simplified reporting process or requested data under specific conditions?

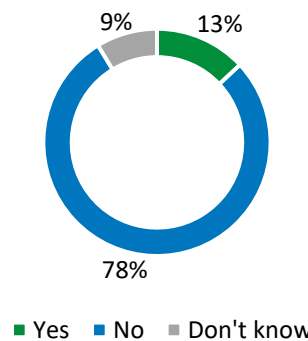


Figure 45. Survey results: simplified reporting options

The respondents provide the following final suggestion to improve the reporting process and data:

- Harmonisation of rules and definitions across MS.
- Early implementation of regulatory requirements to allow PROs’ Information Technology system adaptation.

- Clear and common definition of the moment of “placing on the market”.
- Possibility to use the same unit of measurement for all categories.
- Reduction of excessive data detail through aggregation.
- Allow PROs to report on behalf of producers.
- Reuse of data already reported by producers to PROs.
- Technical integration between systems through APIs.
- Possibility to upload data via Excel instead of manual entry.
- Improvement of XML (import data format) validation and error messages as well as guidelines to complete it.
- Identification of alternatives to customs codes.
- Correct reporting as a condition for access to the European market.

## 10.5 General final opinions on the registration and reporting system

As final suggestions regarding the overall registration and reporting platform, a general need for simpler access, better support, clearer data use, and stronger system integration, with special emphasis on the role of PROs, is highlighted, together with the following detailed actions:

- The platform should be more user-friendly to reduce reliance on and assistance from PRO support.
- PRO-managed reporting models (e.g. France) significantly reduce administrative burden and avoid double reporting.
- API integration between PRO platforms and national registers is essential and already under development in some countries.
- Strong request for responsive support channels:
  - Live chat
  - Email / ticketing systems
  - Clear response time commitments
- Data provided is not visibly used, which creates a perception of low added value for the effort invested in reporting. Some suggestions for improvement:
  - Full dashboards of the annual results
  - Feedback on how submitted data is applied or used
  - Transparency on data such as exported product fee reimbursements or modulated fees
- Use of VAT numbers via VIES to clearly and consistently identify EU producers.

# 11 EPR Register Administration and Expert input

This section consolidates insights from a wide set of expert interviews and working sessions covering EPR registers across multiple streams (EEE, packaging, textiles and batteries) and MS. The perspectives were gathered from national register administrations, PROs, PRO associations, and members of the project's Advisory Board during its first meeting.

After consolidating the various inputs on cross-cutting EPR considerations and national register systems, alongside the potential implementation of an EU-level register, the key ideas to highlight are summarised and divided by topics below:

## 11.1 Main challenges

Across the inputs, a consistent pattern emerges, while EU-level legislation intends to provide a clear and coherent policy framework and requirements, its practical implementation remains highly fragmented at national level and across product streams. MS apply divergent definitions, data requirements, reporting channels (PRO-mediated vs. direct reporting), and enforcement approaches. Consequently, the most critical systemic risks related to registration and reporting identified include growing administrative burdens, significant fragmentation and data non-comparability, persistent free-riding and cross-border and online leakage, all of which weaken oversight, hinder harmonisation, and reduce the overall effectiveness of EPR schemes. The detailed points of view and topics are included in the

### Systemic general challenges:

- Capacity & execution gaps: Shortage of staff and domain expertise at MS; implementing delays; low prioritization in some MS; complex practical implementation of the legal requirements and measures.
- Traceability & targets: data accuracy, comparability and fragmentation hinder EPR stream-target achievement calculation (collection/recycling targets), market share and flow balances.
- AR role complexity: Expanding AR responsibility beyond registration/data raises legal and operational risk, especially for non-EU producers; the [Omnibus regulation simplification](#) can reduce burden but may weaken traceability and enforcement.
- Market dynamics & cost coverage: Multiple PROs can increase competition and pressure fees below full cost recovery, and unpaid fees and free riders (e.g. disappearing sellers, non-EU vendors, and marketplace leakage) shift costs to compliant actors. Both tendencies are persistent vulnerabilities of the system and risk the sustainability.

- Emerging interconnected products/components: Regulatory divergence emerging across interconnected elements, notably with electric vehicles, chemical restrictions, and embedded batteries.

#### Register system challenges:

- Complex and non-comparable datasets: Divergent fields, categories, and calculation methods across PROs and national registers and in some cases, they change year to year.
- Identity assurance: Weak or inconsistent identity verification (producers, ARs and online sellers) is a primary enabler of free riding, fraudulent registrations, and cross-border leakage.
- Reuse/export opacity: Destination-country data and supporting evidence are often missing, risking double counting or under-capture.
- Traceability when producers switch among PROs: Frequent switching between PROs creates gaps in data continuity, auditability and liability, leading to loss of traceability across reporting periods.
- Eco-modulation integration: Eco-modulated fees are difficult to integrate into reporting and registers because definitions and sub-categories vary across PROs and MS, creating non-aligned reporting fields and non-comparable datasets that complicate PoM declarations and cost allocation.
- Data validation methods and protocols: Validation processes remain heterogeneous, manual and resource-intensive, with differing checks across PROs and MS, increasing error propagation in bulk uploads and undermining data reliability.

## 11.2 Opinions on the EU-level EPR register

The following points summarise the main considerations regarding potential EU-level register models:

- EU-level EPR register with high interoperability and MS control: An EU-level register is considered viable only if it fully preserves national authority over registration, validation, supervision, and enforcement, as any centralisation risks creating duplication or confusion over roles.
- EU info hub approach: An EU-level lookup and verification hub that aggregates non-confidential core fields from national registers is widely seen as the most feasible model, as it supports due diligence and enforcement through a federated, interoperable information layer without replacing MS EPR systems.
- EU-level EPR register as long-term harmonisation enabler: Particularly for cross-border stakeholders and online marketplaces, an EU-wide layer could help drive greater harmonisation of fields, definitions, and validation rules over time. However, a fully centralised EU EPR register is widely considered not viable in the near term, given heterogeneous national frameworks and legal mandates.
- Challenges with current improvements addressed via an EU-level register: Some stakeholders question whether an EU-level EPR register would effectively address the core

issues, such as implementation gaps, PRO-register inconsistencies, limited enforcement capacity, and identity assurance weaknesses, arguing that improvements in national enforcement, platform controls, and data standards may have greater impact than an additional EU layer.

## 12 Conclusions

The analysis carried out in this report provides an overview and comparative assessment of the parameters, product categories, register functioning, system architecture, Information Technology requirements, as well as the main challenges and expert opinions associated with existing EPR registers across MS. The main conclusions and key messages from each section of the report are set out here below.

### - Legal framework

The regulatory landscape across product streams is evolving, with multiple complementary and crosscutting EU instruments, each following different transposition and implementation deadlines and related implementing acts. A further challenge is the heterogeneous interpretation and enforcement of EU level obligations, resulting in diverse national practices and uneven compliance conditions. In this sense, it is important to highlight the need to move from directives to directly applicable regulations to ensure greater consistency, legal certainty, and easier implementation across all MS.

Upcoming regulations and specific implementing acts should be harmonised in terms of parameters, data requirements, and procedural rules, making full use of the practical experience accumulated in streams with longer standing registration and reporting obligations. The contribution of PROs and PRO associations will be particularly valuable, as they can provide practical insight into market behaviour and help coordinate information flows and affiliation requirements.

The role and requirements for ARs should also be revisited, especially for non EU producers and online platforms. While the Environmental [Omnibus Regulation's simplification measures](#) may reduce administrative burden, they risk weakening traceability, verification and enforcement, and therefore should be carefully assessed before full implementation.

### - Information flows

Information flows in EPR systems remain fragmented and inconsistent, with a strong dependence on PROs whose roles vary significantly across MS and material streams, with PRO mediated models (even in partial formats) coexisting alongside producerdirectregister models.

PROs act as critical intermediaries, providing first level validation, supporting producers with registration and reporting, and serving as de facto data managers, especially in systems where authorities lack capacity. However, in EPR schemes with multiple PROs, competition often results in divergent methodologies, weak alignment with register requirements, and broken traceability when producers switch schemes.

Online and cross border sales introduce additional vulnerabilities, as non EU sellers and platforms often bypass or inconsistently engage with national EPR schemes, leaving PROs and registers without reliable identity or compliance information.

These challenges should be addressed through harmonised core data fields across MS and streams, clear data validation protocols for each reporting level and model, and complementary standardised PRO switching protocols.

- **Parameters & categories**

MS currently apply different approaches with great granularity in their categories and/or subcategories, particularly for packaging where national classification structures can differ significantly. Adding further complexity to the system, PROs often use their own classification structures, generally aligned with their fee setting methodologies and operational needs, which further contributes to this fragmentation.

Divergent data fields, reporting steps, and calculation methods across national EPR registers (and even among PROs' internal systems) continue to generate significant fragmentation. Data simplification approaches, however, are often difficult to reconcile with the level of detail required for regulatory compliance and PRO fee setting methodologies.

A practical approach can be the use of simplified reporting schemes for specific categories of producers, particularly those below certain thresholds (in tonnes) of products PoM. A blueprint for this mechanism can be found in Article 44(8) of the [Packaging Regulation](#), where producers placing less than 10 tonnes of packaging on the market for the first time in a MS are required to complete a simplified reporting.

Elements such as eco-modulation criteria application and results, and the traceability of exports to other countries are key components of more advanced EPR schemes and reporting systems. These elements should be carefully considered and properly integrated as specific data flow in the evolving EPR reporting systems.

Although the recent EPR regulations in force seek to provide a more harmonised framework, their practical application at national level requires time and resources and is further constrained by the differing implementation deadlines of EU requirements across streams. Learning from the experience gained through the long-standing registration and reporting systems for batteries and EEE, their implementation challenges and practical solutions can serve as a valuable reference for future updates or the development of new regulations in other streams.

Stronger coordination among streams and more synchronised updates of registration requirements, along with increased knowledge exchange (e.g. dedicated EU working group on EPR registration) and greater support to national authorities, will be needed to accelerate the necessary improvements and the effective adaptation of the register system while maintaining the minimum data flows for operational and enforcement needs.

- **Architecture needs & system components**

A registration system for EPR schemes requires a wide set of interconnected Information Technology components, including user-zone, authentication methods, producer code generation, interoperability with external platforms, public register publication formats, and a robust internal

backend, which together illustrate the high complexity of such platforms. Managing these diverse functionalities, along with transversal requirements such as cybersecurity, accessibility, usability, and alignment with EU digital standards, demands sophisticated Information Technology tools and architectures capable of ensuring reliable data management, secure operations, and seamless integration across multiple streams and stakeholders.

Ensuring that registration systems and their associated processes remain user friendly is equally essential for achieving effective compliance and broad stakeholder engagement. Given the complexity of EPR obligations and the diversity of producer profiles, platforms must provide intuitive interfaces, clear guidance, streamlined workflows, and support tools that reduce administrative burden and minimise errors.

In this context, ensuring robust and consistent identity assurance for producers, AR, and online sellers becomes start point of the process, as weak verification mechanisms (IDs, AR appointments, etc.) remain a major enabler of fraudulent or duplicate registrations and free-riding, and cross-border leakage.

#### - **Supporting tools & other transversal tools**

Well-designed user-experience features including step-by-step instructions, automated data checks, helpdesks, FAQs, and multilingual support, significantly enhance accessibility and reduce the risk of non-compliance caused by misinterpretation or procedural difficulties.

Given the diversity of producer profiles and the complexity of reporting obligations, intuitive interfaces and clear guidance are essential to ease the user journey and minimise administrative burden.

Effective help and onboarding are crucial, as tools like test accounts, blank forms, role-specific profiles, and tailored guidance reduce errors, PROs support needs, and unintentional free riding, particularly for small producers and new entrants.

Interoperability gaps hinder the functioning of registration systems, as many platforms are not Software as a Service (SaaS)-ready and lack seamless API integration, while inconsistent category taxonomies across streams or PROs add complexity. Improving interoperability would help create a more coherent and efficient digital ecosystem.

Bulk reporting processes remain another critical pain point. While bulk uploads are necessary to manage large data volumes, they are also prone to error cascades when strong validation and pre-check mechanisms, as well as clear protocols, are lacking.

#### - **Enforcement and data usability**

The data collected and validated through registration and reporting systems must ultimately reach their final users and applications, including market-share calculations, EPR flow-balance and target calculations, national and Eurostat statistical reporting, regional inspections, and customs controls for import verification. Ensuring reliable data and establishing strong connections between registers and all relevant end-users is therefore essential for the effective functioning of the EPR ecosystem.

These challenges are further exacerbated by capacity and execution gaps, as many MS face shortages of staff and technical expertise, implementation delays, and difficulties translating legal requirements into operational and enforcement practices.

PROs are also key beneficiaries of high-quality register and reporting data, as they are responsible for covering EPR cost obligations. Strengthening collaboration and coordination between MS and PROs is therefore critical to jointly monitor and reduce free-riding, preventing cost shifting onto compliant producers.

These limitations weaken monitoring capacity and reduce the effectiveness of actions derived from reported data, potentially compromising the long-term financial sustainability of EPR systems.

Finally, producers often perceive limited added value in registration and reporting because the use of their submitted data is not always visible or communicated back to them. Increasing transparency, through annual dashboards and reports, regular feedback on how data is applied, and clearer communication channels, would help build trust, improve engagement, and reinforce the perceived relevance of EPR reporting obligations.

## 13 Key challenges and next steps

Several structural and contextual factors inherent to current EPR systems, national producer and product registers, and the related legal framework have influenced the findings presented in this report.

- First, the legal frameworks across product streams differ substantially and are at varying stages of regulatory development. MS apply diverse approaches to transposition, interpretation, and enforcement of EU level obligations, resulting in a highly heterogeneous landscape.
- Second, national registration systems exhibit significant variability in parameters, system architecture, data processing logic, validation mechanisms, and complementary functions. This diversity makes strict comparisons challenging and adds complexity to the mapping and analysis efforts.
- Third, the analysis also faced two key limitations related to information availability. Publicly accessible data varies greatly across MS in terms of detail, accuracy, and accessibility. In many cases, documentation is available only in national languages, requiring translation and extensive validation, which may lead to inadvertent gaps. In addition, cooperation from national authorities was uneven, and limited access to key contacts in some MS constrained the depth of the assessment.

For these reasons, the findings presented should be interpreted as a comprehensive and good faith representation of the current state of the selected EPR registration systems, while acknowledging the structural complexities and information limitations inherent to this field.

This report provides an overview of the current landscape, practices and challenges, thereby **establishing the analytical basis for the co-creation phase, the definition of the EU-level register concept, and the subsequent development and testing of the pilot prototype.**

Based on the analysis conducted in this report and the expert input gathered, the establishment of a fully centralised EU level EPR register, replacing national registers, appears challenging in the near term. This is primarily due to the heterogeneous and evolving legal framework, the diversity of national contexts and the existence of national registration and enforcement systems already in operation. In addition, such a system would likely entail significant implementation and Information Technology complexity, particularly in ensuring interoperability across MS, notably regarding validation and enforcement mechanisms. A fully centralised EU-level could also risk duplicating functions and creating overlaps in responsibilities that currently fall under MS competence, especially in areas such as registration, validation, supervision, and enforcement.

In a context marked by significant heterogeneity in registry structures and approaches, this work will explore multiple solution paths toward an EU-wide EPR Register, while preserving Member States' oversight and control. The analysis will consider options ranging from low-interoperability models, such as a "data hub" that receive data from national registries and processes/reworks it (a "bottom-up" approach), to highly interoperable solutions aimed at achieving full harmonisation of European registries.

In parallel, the co-creation process will examine, compare, refine and validate different options with relevant stakeholders. These may include, for example: strengthening interoperability and linking mechanisms between national registers and the EU-level register, exploring the feasibility of an "EU one-stop register" in co-existence with national registers, or assessing variations of a federated model. For each option, particular attention will be given to identifying clearly which actors (e.g. Member States, producers, PROs or EU-level structures) would bear the associated costs, to assess how the burden of change is distributed under each approach.

This comparative assessment will lead to the definition of a conceptual model (mock-up) of a potential EU-level EPR register. The agreed concept would subsequently inform the development and testing of the EU-wide pilot, enabling practical assessment of its usability, technical performance and operational relevance. While the concept will aim to be comprehensive, it will clearly distinguish between functionalities to be developed within the scope of the pilot and those that fall beyond the present study and would therefore not be included in the programming phase.

In parallel with the development of the EU-wide register concept, the insights derived from the stocktake analysis will support the formulation of recommendations aimed at improving the national EPR registers analysed. These recommendations will be refined through stakeholder engagement, including the joint identification of best practices, key parameters and complementary elements to enhance accuracy, efficiency, interoperability and transparency.

## 14 References

Commission Implementing Regulation (EU) 2019/290 of 19 February 2019 establishing the format for registration and reporting of producers of electrical and electronic equipment to the register [http://data.europa.eu/eli/reg\\_impl/2019/290/oj](http://data.europa.eu/eli/reg_impl/2019/290/oj)

D2.1 - Mapping of Existing EPR and PROs across the EU [https://life4epr.ent.cat/wp-content/uploads/2026/02/LIFE4EPR\\_WP2\\_D2.1\\_Mapping-of-Existing-EPR-and-PROs-across-the-EU.pdf](https://life4epr.ent.cat/wp-content/uploads/2026/02/LIFE4EPR_WP2_D2.1_Mapping-of-Existing-EPR-and-PROs-across-the-EU.pdf)

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (amended on 16 October 2025) <http://data.europa.eu/eli/dir/2008/98/2025-10-16>

Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE) (as amended by Directives (EU) 2018/849 and 2024/884) <http://data.europa.eu/eli/dir/2012/19/2024-04-08>

Omnibus Regulation Package: Simplification of administrative burdens in environmental legislation [https://environment.ec.europa.eu/publications/simplification-administrative-burdens-environmental-legislation\\_en](https://environment.ec.europa.eu/publications/simplification-administrative-burdens-environmental-legislation_en)

Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC <http://data.europa.eu/eli/reg/2014/910/2024-10-18>

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC <http://data.europa.eu/eli/reg/2025/40/oj>

### 14.1 National register links

Austria EEE and Packaging Register

- [https://edm.gv.at/edm\\_portal/home.do](https://edm.gv.at/edm_portal/home.do)
- [https://edm.gv.at/edm\\_portal/cms.do?get=/portal/informationen/anwendungenthemen/elektroaltgeraete.main](https://edm.gv.at/edm_portal/cms.do?get=/portal/informationen/anwendungenthemen/elektroaltgeraete.main)
- [https://edm.gv.at/edm\\_portal/cms.do?get=/portal/informationen/anwendungenthemen/verpackung.main](https://edm.gv.at/edm_portal/cms.do?get=/portal/informationen/anwendungenthemen/verpackung.main)
- <https://www.edm.gv.at/erasreg/registration/registration.xhtml>
- <https://www.usp.gv.at/themen/betrieb-und-umwelt/abfallrecht/weitere-informationen-abfallrecht/abfall-und-produktregelungen/elektroaltgeraete.html>

#### Germany EEE and Packaging Register

- <https://test.ear-system.de/ear-portal/>
- <https://www.stiftung-ear.de/>
- <https://oeffentliche-register.verpackungsregister.org/Producer>
- <https://www.verpackungsregister.org/en/>

#### Estonia EEE Register

- <https://proto.envir.ee/proto/main/welcome>

#### Spain EEE and Packaging Register

- <https://industria.gob.es/registros-industriales/RAEE/Paginas/Index.aspx>
- [https://industria.serviciosmin.gob.es/rii\\_aee/ui/productores/altaproductor.aspx](https://industria.serviciosmin.gob.es/rii_aee/ui/productores/altaproductor.aspx)
- <https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/prevencion-y-gestion-residuos/registro-productores-producto-seccion-envases.html>
- [https://sede.miteco.gob.es/portal/site/seMITECO/ficha-procedimiento?procedure\\_suborg\\_responsable=11&procedure\\_etiqueta\\_pdu=null&procedure\\_id=476](https://sede.miteco.gob.es/portal/site/seMITECO/ficha-procedimiento?procedure_suborg_responsable=11&procedure_etiqueta_pdu=null&procedure_id=476)

#### Finland EEE and Packaging Register

- <https://iatehuoltokompassi.fi/>
- <https://sahkoinenasiointi.ahp.fi/fi/palvelut>
- <https://www.ymparisto.fi/fi/luvat-ja-veloitteet/tuottajavastuu>

#### France EEE and Packaging and Textile Register

- <https://syderep.ademe.fr/public/home>
- <https://filieres-rep.ademe.fr/>
- [https://rise.articulate.com/share/co1\\_mrt-sHlyDRe97hZf3BLKOUr7cL\\_#/lessons/ZY4E5gelmYmzLu4U4k9d0a7ZleSL4HW8](https://rise.articulate.com/share/co1_mrt-sHlyDRe97hZf3BLKOUr7cL_#/lessons/ZY4E5gelmYmzLu4U4k9d0a7ZleSL4HW8)

#### Italy EEE Register

- <https://www.registroaee.it/>
- <https://scrivania.registroaee.it/>
- <https://www.renap.gov.it/it/registro-aee>

#### Lithuania EEE and Packaging Register

- <https://www.gpais.eu/en/>

- <https://aaa.lrv.lt/en/extended-producer-responsibility/>

#### Netherlands EEE Register

- <https://nationaalweeeregister.nl/en/>
- <https://my.stichting-open.org/en/registration>

# Annex I: Legal framework analysis

## Annex I.I - WEEE legal framework analysis

**Name of legislation:** Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE), as amended by Directive (EU) 2018/849 and by Directive (EU) 2024/884; Commission Implementing Regulation 2019/290

**Source:**

- Consolidated version (Directive 2012/19/EU - recast):  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02012L0019-20240408>
- Commission Implementing Regulation (EU) 2019/290:  
[https://eur-lex.europa.eu/eli/reg\\_impl/2019/290/oj/eng](https://eur-lex.europa.eu/eli/reg_impl/2019/290/oj/eng)

**Status:** The Directive entered into force on 13 August 2012; the latest amendment entered into force on 9 October 2024. The Implementing Regulation entered into force on 1 January 2020.

**Summary of the contents regarding registration obligations and registers:**

**Section/article:** Article 16: Registration, information and reporting obligations; Annex X - Information for registration and reporting.

**1. General requirements for MS (and/or register competent authorities):**

- Set up a national register of producers, including those selling EEE online.

The register serves to monitor compliance with the Directive's requirements.

- Producers or ARs must be able to enter all relevant information online in the national register.
- National registers must include links to other MS' registers to facilitate registration.
- Collect annual information on quantities and categories of EEE PoM, WEEE collected, prepared for re-use, recycled and recovered within the MS, and on separately collected WEEE exported.
- Require and monitor submitted information for compliance with registration and reporting requirements.
- Apply penalties for non-compliance under national law.
- Report data to the Commission.
- The Commission shall adopt implementing acts establishing the format for registration and reporting and the frequency of reporting to the register.

**2. Roles involved in the registration/reporting data procedure:**

- Producers (meet EPR obligations individually or collectively, if the later, through PROs):
  - Producers selling EEE online must register in the MS where they sell. If they are not registered, they must do so through an AR.
- Delegations of the registration/reporting requirements:

- PROs: Represent one or more producers collectively. Submit registration and reporting data on behalf of their member producers.
- AR: Act on behalf of producers not established in the MS, with written mandate. Must register and submit data in the MS where the producer sells EEE:
  - Each MS shall ensure that a producer as defined in Article 3.1(f)(i) to (iii) established in another MS is allowed, by way of exception to Article 3.1(f)(i) to (iii), to appoint a legal or natural person established on its territory as the AR that is responsible for fulfilling the obligations of that producer, pursuant to this Directive, on its territory (Art. 17.1).
  - Each MS shall ensure that a producer as defined in Article 3.1(f)(iv) (sells EEE by means of distance communication directly to private households or to users other than private households in a MS, and is established in another MS or in a third country) and established on its territory, which sells EEE to another MS in which it is not established, appoints an AR in that MS as the person responsible for fulfilling the obligations of that producer, pursuant to this Directive, on the territory of that MS (Art. 17.2).
  - Appointment of an AR shall be by written mandate (Art. 17.3).
  - The application of the Article 17.2 of Directive 2012/19/EU shall be suspended until 1 January 2035 (2025/0396 (COD) Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL suspending the application of the rules on the appointment of ARs for EPR for waste, WEEE and single use plastic waste).

### 3. Information requirements:

Each producer (or each AR where appointed) must provide the information set out in Annex X undertaking to update it as appropriate (relevant information reflecting producer's activities in that MS).

- Registration information (Annex X, Part A, Directive 2012/19/EU):
  - Name and address of the producer or of the authorised. In the case of an AR as defined in Article 17, also the contact details of the producer that is represented.
  - National identification code of the producer, including European tax number or national tax number of the producer.
  - Category of EEE set out in Annex III of the Directive 2012/19/EU (with photovoltaics to be reported separately - Regulation 2019/290)
  - Type of EEE (household or other than household equipment).
  - Brand name of EEE.
  - Information on how the producer meets its responsibilities: individual or collective scheme, including information on financial guarantee.
  - Selling technique used (e.g. distance selling).
  - Declaration stating that the information provided is true.
- Reporting information (Annex X, Part B, Directive 2012/19/EU):
  - National identification code of the producer.
  - Reporting period.

- Category of EEE set out in Annex III (with photovoltaics to be reported separately - Regulation 2019/290)
- Quantity of EEE PoM, by weight.
- Quantity, by weight, of waste of EEE separately collected, recycled (including prepared for re-use), recovered and disposed of within the MS or shipped within or outside the Union.

- Format requirements:

Commission Implementing Regulation (EU) 2019/290 (see more information below) provides harmonised templates for registration and reporting. MS shall ensure that the registers use:

- The format set out in Part A and Part B of Annex I for registration of producers and ARs (see detailed parameters in Table A3 and Table A4).
- The format set out in Annex II for reporting to the register on data related to EEE PoM (see detailed parameters below in Table A5). MS may require additional information elements identified as such in the format set out in Annex II.

#### 4. Reporting frequency:

- **Directive 2012/19/EU:** Does not establish a specific reporting frequency for producer data:
  - Article 16.2 (b) requires producers to update their registration information "as appropriate."
  - Article 16.3 requires the Commission to adopt implementing acts establishing the format for registration and reporting and the frequency of reporting to the register.
  - Article 16.4 requires MS to collect information on an annual basis.
- **Regulation (EU) 2019/290:** Specifies the following reporting frequencies:
  - EEE PoM: Quarterly reports (to be made available to the register within 20 days of the end of each three-month period) using the format in Annex II.
  - WEEE data (separately collected, recycled, recovered, disposed): Annual reports for the previous calendar year using the format in Annex II.

#### 5. Controls and enforcement

According to legislation, MS apply penalties applicable to infringements of the national provisions adopted pursuant to this Directive and shall take all measures necessary to ensure that they are implemented.

#### 6. Implementing Act:

Commission Implementing Regulation (EU) 2019/290 of 19 February 2019 establishing the format for registration and reporting of producers of EEE to the register aims to harmonise the format for registration and reporting of producers and AR (s) of EEE across all MS, reducing administrative burden and ensuring consistency. More specifically, it establishes:

- The format for registration in national registers of producers and ARs of EEE (Annex I of Regulation 2019/290), as referred to in Articles 16 and 17 of Directive 2012/19/EU.

- The format for reporting the information on EEE PoM (Annex II of Regulation 2019/290), as referred to in Articles 16 and 17 of Directive 2012/19/EU.
- The reporting frequency and procedures for submitting this information to national registers (Articles 5 and 6 of Regulation 2019/290).

## 7. References about register in the annexes:

### ANNEX III of the Directive 2012/19/EU – Categories of EEE covered

Category no.	Category
1	Temperature exchange equipment
2	Screens, monitors, and equipment containing screens having a surface greater than 100 cm <sup>2</sup>
3	Lamps
4	<p>Large equipment (any external dimension more than 50 cm) including, but not limited to: Household appliances; IT and telecommunication equipment; consumer equipment; luminaires; equipment reproducing sound or images, musical equipment; electrical and electronic tools; toys, leisure and sports equipment; medical devices; monitoring and control instruments; automatic dispensers; equipment for the generation of electric currents. This category does not include equipment included in categories 1 to 3.</p> <p>Small equipment (no external dimension more than 50 cm) including, but not limited to: Household appliances; consumer equipment; luminaires; equipment reproducing sound or images, musical equipment; electrical and electronic tools; toys, leisure and sports equipment; medical devices; monitoring and control instruments; automatic dispensers; equipment for the generation of electric currents. This category does not include equipment included in categories 1 to 3 and 6.</p>
5	
6	Small IT and telecommunication equipment (no external dimension more than 50 cm)

*Table A1. Categories of EEE covered*

*Note: Photovoltaics should be reported separately according to Commission Implementing Regulation 2019/290); IT= Information Technology.*

## ANNEX IV of the Directive 2012/19/EU – Non-exhaustive list of EEE which falls within the categories listed in Annex III

Category no.	Category	Non-Exhaustive list of EEE per category
1	Temperature exchange equipment	Refrigerators, Freezers, Equipment which automatically delivers cold products, Air conditioning equipment, Dehumidifying equipment, Heat pumps, Radiators containing oil and other temperature exchange equipment using fluids other than water for the temperature exchange.
2	Screens, monitors, and equipment containing screens having a surface greater than 100 cm <sup>2</sup>	Screens, Televisions, LCD photo frames, Monitors, Laptops, Notebooks
3	Lamps	Straight fluorescent lamps, Compact fluorescent lamps, Fluorescent lamps, High intensity discharge lamps - including pressure sodium lamps and metal halide lamps, Low pressure sodium lamps, LED.
4	Large equipment	Washing machines, Clothes dryers, Dish washing machines, Cookers, Electric stoves, Electric hot plates, Luminaires, Equipment reproducing sound or images, Musical equipment (excluding pipe organs installed in churches), Appliances for knitting and weaving, Large computer-mainframes, Large printing machines, Copying equipment, Large coin slot machines, Large medical devices, Large monitoring and control instruments, Large appliances which automatically deliver products and money, Photovoltaic panels.
5	Small equipment	Vacuum cleaners, Carpet sweepers, Appliances for sewing, Luminaires, Microwaves, Ventilation equipment, Irons, Toasters, Electric knives, Electric kettles, Clocks and Watches, Electric shavers, Scales, Appliances for hair and body care, Calculators, Radio sets, Video cameras, Video recorders, Hi-fi equipment, Musical instruments, Equipment reproducing sound or images, Electrical and electronic toys, Sports equipment, Computers for biking, diving, running, rowing, etc., Smoke detectors, Heating regulators, Thermostats, Small Electrical and electronic tools, Small medical devices, Small Monitoring and control instruments, Small Appliances which automatically deliver products, Small equipment with integrated photovoltaic panels.
6	Small IT and telecommunication equipment (no external dimension more than 50 cm)	Mobile phones, GPS, Pocket calculators, Routers, Personal computers, Printers, Telephones

Table A2. Non-exhaustive list of EEE

Note: Photovoltaics should be reported separately according to Commission Implementing Regulation 2019/290); EEE in scope includes all EEE that fits the definition of EEE provided in the Directive and classified within the categories set out in Annex III; The current categories do not prevent national registers to require reporting in other groups; IT= Information Technology.

## ANNEX I of the Commission Implementing Regulation (EU) 2019/290

### Format for registration in a MS

Key information elements are marked with 'M'.

Filter-dependent information elements marked with 'F' are part of key information elements but only apply when a specific response under a previous information element is selected.

Additional information elements are marked with 'M\*'.  
 M\* = Mandatory information element

## PART A

### Format for registration of a producer

Information element	Description	Type of information element
Name of producer:	Official name of the producer linked to the national tax number or to the identification code/number provided when registering in the business register in the Member State.	
—If the producer is a legal person (company), provide the name of the company		F
—If the producer is a natural person, provide:		F
—First name		
—Last name		
Trading name of the producer	Name the producer uses for advertising and sales purposes, which is different from the legal name in its articles of incorporation or other official documents.	M*
Legal address of producer:		
—Street name		M
—Street number		M
—Postal code		M
—Location	Official address of the producer.	M
—Province		M*
—Municipality		M*
—Website address (if a website address exists)		M
Categories of annual turnover of EEE	Indication of the producer's annual turnover. MS requesting this information element must provide different 'categories of annual turnover of EEE' so that the producer can choose the relevant category.	M*
Contact person of producer	Person associated with the producer as point of contact. It is an individual who is selected as the initial or regular contact point for that producer.	
—First name		M
—Last name		M
—Phone number	Business phone.	M
—Email address	Business email address.	M
—Address		
—Street name	Business address of the contact person.	M
—Street number		M

Information element	Description	Type of information element
—Postal code		M
—Location		M
—Province		M*
—Municipality		M*
National identification code/business registration code	For producers that are legal persons, the identification code/number provided when registering in the business register in the Member State.	F
National tax number	Tax number of the producer in the Member State.	M*
Other identification information	For producers established in third countries, an official registration number/code.	F
Category/categories of EEE	Description of the category or categories of EEE that the producer places on the market of the Member State by number pursuant to Annex III to Directive 2012/19/EU.	M
Sub-category/sub-categories of EEE	Description of the sub-category or sub-categories of EEE that the producer places on the market of the Member State as applied in the Member State.	M*
Type of EEE (household or other than household equipment)	For each one of the categories or, if applicable, the sub-categories of EEE that the producer places on the market of the Member State, indication of 'household' or 'other than household' equipment.	M*
Brand name of EEE	For each one of the categories or, if applicable, the subcategories of EEE that the producer places on the market of the Member State, the arbitrarily adopted name that is given by a producer to the EEE to distinguish it as produced or sold by that producer and that may be used and protected as a trademark.	M*
Producer responsibility	Information on how the producer meets the responsibilities set out in Directive 2012/19/EU in the Member State. If the same producer has set up an individual compliance scheme for certain categories of EEE and has joined a collective compliance scheme for others, both should be indicated.	
The producer has set up an individual compliance scheme. Yes/No		M
If the answer is 'Yes', provide additional information about the individual compliance scheme.	Description of additional information that the producer shall submit in relation to the individual compliance scheme.	M*
The producer has joined collective compliance scheme(s). Yes/No		M
Financing responsibility:	Information on the form of the guarantee that each producer provides when placing a product on the market of the Member State pursuant to Article 12 of Directive 2012/19/EU.	
The producer participates in one or more collective compliance schemes. Yes/No		M

Information element	Description	Type of information element
The producer provides a recycling insurance. Yes/No		M
The producer provides a blocked bank account. Yes/No		M
Other (please specify)	If the financial guarantee in a Member State does not have any of the forms mentioned above, the producer shall describe the form of the guarantee.	F
Distance selling:		
The producer uses distance selling to sell EEE directly to private households or to users other than private households in another Member State. Yes/No	The producer established in the Member State shall indicate if, at the time of registration, it also sells EEE by means of distance communication directly to private households or to users other than private households in another Member State.	M
List of Member State(s) in which the producer sells EEE by distance selling	If the producer established in the Member State sells EEE by means of distance communication directly to private households or to users other than private households in another Member State, it must provide the name of the Member State(s).	F
Name of the authorised representative in the Member State(s) in which the producer sells EEE by distance selling	If the producer established in the Member State sells EEE by means of distance communication directly to private households or to users other than private households in another Member State, it must provide the name of the authorised representative in that Member State(s).	F
Declaration <i>'I/We declare that the information provided is true and provides accurate information on the above-named producer and an accurate reflection of the type of electrical and electronic equipment placed on the market of ... (add the name of the Member State) by the above-named producer.'</i>	Declaration of the producer or, where applicable, of the third party acting on behalf of the producer that the information provided is true and accurate. In case of electronic forms, this declaration shall be marked (check box).	M

Table A3. Format for registration of a producer

**PART B**
**Format for registration of an authorised representative**

Information element	Description	Type of information element
Name of authorised representative:	Official name of the authorised representative linked to the national tax number or to the identification code/number provided when registering in the business register in the Member State.	
—If the authorised representative is a legal person (company), provide the name of the company		F
—If the authorised representative is a natural person, provide:		F
—First name		
—Last name		
Legal address of authorised representative:	Official address of the authorised representative. The authorised representative shall be established on the territory of the Member State.	
—Street name		M
—Street number		M
—Postal code		M
—Location		M
—Province		M*
—Municipality		M*
—Website address (if a website address exists)		M
Contact person of authorised representative:	Person associated with the authorised representative as the point of contact. It is an individual who is selected as the initial or regular contact point for that authorised representative. The contact person shall be established on the territory of the Member State.	
—First name		M
—Last name		M
—Phone number	Business phone.	M
—Email address	Business email address.	M
—Address	Business address of the contact person.	
—Street name		M
—Street number		M
—Postal code		M
—Location		M
—Province		M*
—Municipality		M*
National identification code/business registration code	For authorised representatives that are legal persons, the identification code/number provided when registering in the business register in the Member State.	F

Information element	Description	Type of information element
National tax number	Tax number of the authorised representative in the Member State.	M*
Name of the represented producer(s):	Official name of the producer(s) represented by the authorised representative as linked to the national/European tax number of the producer or to the identification code/number provided when registering in the business register in the country where the producer is established.	M
—If the producer is a legal person (company), provide the name of the company		
—If the producer is a natural person, provide:	If the authorised representative represents more than one producer and the Member State provides for the authorised representative to be registered once, the authorised representative shall indicate separately the name and the contact details of each one of the represented producers.	
—First name		
—Last name		
Contact details of the represented producer(s):	Official contact details of the producer(s) represented by the authorised representative.	
—Phone number		M
—Email address		M
—Address		M
—Street name		M
—Street number		M
—Postal code		M
—Location		M
—Country	M	
—Website address (if a website address exists)	F	
Categories of the represented producer's annual turnover of EEE	Indication of the represented producer's annual turnover. MS requesting this information element must provide different 'categories of annual turnover of EEE' so that the represented producer can choose the relevant category. If the authorised representative represents more than one producer and the Member State provides for the authorised representative to be registered once, the authorised representative shall indicate separately, for each one of the represented producers, the category of annual turnover of EEE. Description of the category or categories of EEE that the represented producer places on the market of the Member State by number pursuant to Annex III to Directive 2012/19/EU.	M*
Category/categories of EEE	If the authorised representative represents more than one producer and the Member State provides for the authorised representative to be registered once, the authorised representative shall describe separately the categories of EEE that each one of the represented producers places on the market of the Member State.	M
Sub-category/sub-categories of EEE	Description of the sub-category or sub-categories of EEE that the producer places on the market of the Member State as applied in the Member State.	M*

Information element	Description	Type of information element
Type of EEE (household or other than household equipment)	<p>If the authorised representative represents more than one producer and the Member State provides for the authorised representative to be registered once, the authorised representative shall describe separately the sub-categories of EEE that each one of the represented producers places on the market of the Member State.</p> <p>For each one of the categories or, if applicable, the sub-categories of EEE that the represented producer places on the market of the Member State, indication of 'household' or 'other than household' equipment.</p>	M*
Brand name of EEE	<p>For each one of the categories or, if applicable, the subcategories of EEE that the represented producer places on the market of the Member State, the arbitrarily adopted name that is given by a producer to the EEE to distinguish it as produced or sold by that producer and that may be used and protected as a trademark.</p>	M*
Producer responsibility:	<p>Information on how the represented producer meets the responsibilities set out in Directive 2012/19/EU in the Member State. If the same producer or the authorised representative on behalf of the producer has set up an individual compliance scheme for certain categories of EEE and has joined a collective compliance scheme for others, both should be indicated.</p> <p>If the authorised representative represents more than one producer and the Member State provides for the authorised representative to be registered once, the authorised representative shall indicate separately how each one of the represented producers meets the responsibilities set out in Directive 2012/19/EU in the Member State.</p>	
The producer or the authorised representative on behalf of the producer has set up an individual compliance scheme in the Member State. Yes/No		M
If the answer is 'Yes', provide additional information about the individual compliance scheme. The producer or the authorised representative on behalf of the producer has joined collective compliance scheme(s) in the Member State Yes/No	Description of additional information that the producer or the authorised representative on behalf of the producer shall submit in relation to the individual compliance scheme.	M*
Financing responsibility:		
The producer or the authorised representative on behalf of the producer participates in one or more collective compliance schemes. Yes/No	Information on the form of the guarantee that each represented producer provides when placing a product on the market of the Member State pursuant to Article 12 of Directive 2012/19/EU.	M

Information element	Description	Type of information element
	The producer or the authorised representative on behalf of the producer provides a recycling insurance. Yes/No	M
	The producer or the authorised representative on behalf of the producer provides a blocked bank account. Yes/No	M
Other (please specify)	If the financial guarantee in a Member State does not have any of the forms mentioned above, the authorised representative shall describe the form of the guarantee.	M
Declaration <i>'I/We declare that the above-named authorised representative has been appointed with a written mandate by the represented producer(s) pursuant to Article 17(3) of Directive 2012/19/EU on waste electrical and electronic equipment.'</i>	Declaration of the authorised representative or, where applicable, of the third party acting on behalf of the authorised representative that the authorised representative has been appointed by written mandate according to Article 17(3) of Directive 2012/19/EU on waste electrical and electronic equipment. In case of electronic forms, this declaration shall be marked (check box).	M
Declaration <i>'I/We declare that the information provided is true and provides accurate information on the above-named authorised representative and an accurate reflection of the type of electrical and electronic equipment placed on the market of ... (add the name of the Member State) by the producer(s) represented by the above-named authorised representative.'</i>	Declaration of the authorised representative or, where applicable, of the third party acting on behalf of the authorised representative that the information provided is true and accurate. In case of electronic forms, this declaration shall be marked (check box).	M

Table A4. Format for registration of an authorised representative

## ANNEX II of the Commission Implementing Regulation (EU) 2019/290

### Format for reporting to the register of a MS on EEE PoM

Key information elements are marked with 'M'.

Filter-dependent information elements marked with 'F' are part of the key information elements but only apply when a specific response under a previous information element is selected.

Additional information elements are marked with 'M\*'.

Information element	Description	Type of information element
Name of producer or authorised representative or organisation implementing extended producer responsibility obligations on behalf of producers:	Official name of the producer or authorised representative or organisation implementing extended producer responsibility obligations on behalf of producers linked to the national tax number or to the identification code/number provided when registering in the business register in the Member State.	
—If the producer or authorised representative is a legal person (company), provide the name of the company		F
—If the producer or authorised representative is a natural person, provide:		F
—First name		
—Last name		
—If a Member State allows for the report to be submitted by an organisation implementing extended producer responsibility obligations on behalf of producers, provide the name of this organisation and the names of the producers and/or authorised representatives on whose behalf the information is provided.		F
National identification code/business registration code	For producers or authorised representatives that are legal persons or organisations implementing extended producer responsibility obligations on behalf of producers, the identification code/number provided when registering in the business register in the Member State.	F
National tax number	Tax number of the producer or authorised representative or of organisation implementing extended producer responsibility obligations on behalf of producers in the Member State.	M*
Reporting period	The producer or authorised representative or, where applicable, the organisation implementing extended producer responsibility obligations on behalf of producers shall specify the relevant reporting period.	M
Contact person for reporting:	Person associated with the producer or authorised representative or, where applicable, the organisation implementing extended producer responsibility obligations on behalf of producers who is selected as the initial or regular contact point for reporting to the register.	
—First name		M
—Last name		M
—Phone number	Business phone.	M
—Email address	Business email address.	M
Quantity of EEE placed on the market of the Member State (in tonnes):	Each producer or each authorised representative shall report the weight of EEE placed on the market of the	

Information element	Description	Type of information element
Per category of EEE	Member State in tonnes as defined in Article 2(a) of Commission Implementing Regulation (EU) 2017/699. Where the Member State allows for an organisation implementing extended producer responsibility obligations on behalf of producers to provide this information, it is to be specified whether this information shall be reported for each represented producer and authorised representative individually or in total, for all represented producers and authorised representatives. The weight of EEE that the producer places on the market of the Member State per category of EEE pursuant to Annex III to Directive 2012/19/EU, with photovoltaic panels to be reported separately.	M
per sub-category of EEE	The weight of EEE that the producer places on the market of the Member State per sub-category of EEE as applied in the Member State.	M*
per type of EEE (household or other than household equipment)	The weight of EEE that the producer places on the market of the Member State per type of equipment ('household' or 'other than household' equipment).	M*
Declaration <i>'I/We declare that the information provided in this document is true and provides an accurate reflection of the type and quantity of electrical and electronic equipment placed on the market of ... (add the name of the Member State) by the above-named producer(s).'</i>	Declaration of the producer or authorised representative or, where applicable, the third party acting on the behalf of the producer or authorised representative that the information provided is true and accurate. In case of electronic forms, this declaration shall be marked (check box).	M

Table A5. Format for reporting to the register on EEE PoM

## Annex I.II – Packaging legal framework analysis

**Name of the regulation:** Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (Text with EEA relevance)

**Source :** <https://eur-lex.europa.eu/eli/reg/2025/40/oj/eng>

**Status:** The regulation entered into force on 11 February 2025 and applies from 12 August 2026.

### Summary of the contents regarding registration obligations and registers:

**Section/article:** Section 3: Register of producers and EPR, Article 44: Register of producers; ANNEX IX: Information for registration and reporting to the register referred to in Article 44.

#### 1. General requirements for MS (and/or register competent authorities):

- Set up a national register within 18 months of the adoption of the first implementing act.
- Include links to other national registers in the national register platform.
- Ensure the list of registered producers is easily accessible, publicly available, and free of charge.
- Make system details available on the competent authority's website.
- Grant registrations and provide a registration number within a maximum of twelve weeks from the moment all required information (Part A of Annex IX) is provided.
- Charge producers cost-based and proportionate fees for processing the application.
- Monitor the information submitted pursuant to Annex IX.
- Remove producers from the register three years after their registration ends if the producer has ceased to exist.
- The Commission shall, adopt implementing acts establishing the format for registration and reporting.

#### 2. Roles involved in the registration/reporting data procedure:

- Producers (meet EPR obligations individually or collectively, if the later, through PROs). Producers (or their ARs) cannot place packaging or packaged products on the market or unpack products unless they are registered.
- Delegations of the registration/reporting requirements:
  - PRO(s): Represent one or more producers collectively. Submit registration and reporting data on behalf of their member producers. (unless the MS specifies otherwise).
    - Where a producer has entrusted a PRO with carrying out the EPR obligations on its behalf pursuant to Article 46.1, the obligations set out in the register article shall be met by that organisation, unless otherwise specified by the MS in which the register is established (Art. 44.2).

- AR: Act on behalf of producers not established in the MS, with written mandate. Must register and submit data in the MS where the producer sells.
  - A producer shall appoint, by written mandate, an AR for the EPR in each MS where the producer makes packaging or packaged products available for the first time, other than the MS where the producer is established. MS may provide that producers established in third countries shall appoint, by written mandate, an AR for the EPR when making packaging or packaged products available on their territory for the first time (Art. 45.3).
  - The application of Article 45.3 of Regulation (EU) 2025/40 shall be suspended until 1 January 2035. MS may either provide that producers established in third countries shall appoint, by written mandate, an AR for the EPR when making packaging or packaged products available on their territory for the first time or ensure traceability and enforcement regarding packaging producers established in third countries through alternative means (COM(2025) 982 Proposal for a Regulation suspending the application of the rules on the appointment of an AR for EPR for batteries and waste batteries and packaging and packaging waste).
- Re-use system operators (fulfilling EPR obligations).

### 3. Information requirements:

- Registration applications must include the data specified in Annex IX (see detailed parameters in point 8, Part A).
- Put on the market reporting must include the data specified in Annex IX (see detailed parameters in point 8, Part B (a)) for each full preceding calendar year.
- AR acting on behalf of more than one producer must also provide the name and contact details of each producer separately.
- Producers with individual EPR scheme, Producers via PROs and the re-use system operators shall submit the waste management reporting information in Annex IX (see detailed parameters in point 8, Part B (c)) for each preceding calendar year on an annual basis.
- MS may request additional information or documents if needed for compliance monitoring. Competent authority may apply modalities with respect to the requirements and process of registration without adding substantive requirements.

### 4. Simplified reporting:

- Producers placing/unpacking less than 10 tonnes of packaging per year must submit simplified data (see detailed parameters in Annex IX, point 8, Part B (b)) by 1 June for each full preceding calendar year.
- MS can set a lower threshold if needed for accurate reporting.

## 5. Reporting frequency:

- Producers (or appointed representatives/PROs) must submit reporting annual data by 1 June for the previous calendar year (Part B, point (a) and (b), of Annex IX).
- Producers (or appointed representatives/PROs) must notify the competent authority of any changes to the information contained in the registration and of any permanent cessation.
- Operators of reuse systems must submit waste management reporting data annually.
- If it is necessary for budgetary reasons, a MS may require submitting reporting data in Part B, points (a) and (b), of Annex IX on a quarterly basis.

## 6. Controls and enforcement:

- MS may require reporting data (Part B, point 1, of Annex IX) to be audited and certified by independent auditors under the supervision of the competent authorities referred to in Article 40.1, based on national standards.

## 7. Implementing Act:

**The Commission shall, by 12 February 2026, adopt implementing acts establishing the format for registration in, and reporting to, the register and specifying the granularity of data to be provided and the packaging types and material categories to be covered by the information submitted.**

The format for the submission of information pursuant to Article 44 shall be interoperable, shall be based on open standards and machine-readable data, and shall be transferable through an interoperable data exchange network without vendor lock-in.

Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 65.2- Committee procedure.

## 8. References about register in the annexes:

**ANNEX IX: Information for registration and reporting to the register referred to in Article 44**

### Part A. Information to be submitted upon registration:

- (a) Producer information:
- Name and brand names (if available) under which the producer makes its packaging, including packaging of packaged products;
  - Address of the producer, including postal code and place, street and number, country, telephone, web address and e-mail address, indicating a single contact point;
  - National identification code, including its trade register number or equivalent official registration number and the European or national tax identification number

- Declaration on how the producer meets its responsibilities under Article 45-Extended producer responsibility, including a certificate issued by the PROs where Article 46.1 – Producer responsibility organisation applies
- (b) AR information, if any:
- Name, Address including postal code and place, street and number, country, Telephone, E-mail address
- (c) PROs information, if any:
- Name, Contact details, including postal code and place, street and number, country, Telephone, Web address and e-mail address;
  - National identification code, including the trade register number or an equivalent official registration number and the European or national tax identification number;
  - Represented producer’s mandate;
  - Statement by the producer/AR/PRO stating that the information provided is true.
- (d) For registration obligations delegated to PROs, also include the following information about the producer represented:
- Names, Contact details, including postal codes and places, streets and numbers, countries, Telephones, Web addresses and e-mail addresses;
  - Mandate of each represented producer;
  - Where PRO represents more than one producer, a separate indication of how each one of them meets the responsibilities set out in Article 45- Extended producer responsibility.

#### Part B. Information to be submitted for reporting:

- (a) Information to be submitted for reporting in accordance with Article 44.7:
- National identification code of the producer;
  - Reporting period;
  - Quantities by weight of packaging categories (see Table A6) that the producer makes available on the territory of the MS for the first time or unpacks without being an end user (no details about the specific units, in kg or tonnes);
  - Arrangements to ensure the producer responsibility.

Table A6 (Categories and parameters for assessment of recyclability of packaging) includes the indicative list of packaging materials, types and categories referred to in Article 6:

Category No	Predominant packaging material	Packaging type	Format (illustrative and non-exhaustive)	Colour / Optical transmittance
1	Glass	Glass and composite packaging, of which the majority is glass	Bottles, jars, flacons, cosmetics pots, tubs, ampoules, vials made of glass (soda lime silica), aerosol cans	—

Category No	Predominant packaging material	Packaging type	Format (illustrative and non-exhaustive)	Colour / Optical transmittance
2	Paper/cardboard	Paper/cardboard packaging	Boxes, trays, grouped packaging, flexible paper packaging (e.g. films, sheets, pouches, lidding, cones, wrappers)	—
3	Paper/cardboard	Composite packaging of which the majority is paper/cardboard	Liquid packaging board, and paper cups (i.e. laminated with polyolefin and with or without aluminium), trays, plates and cups, metallised or plastic laminated paper/cardboard, paper/cardboard with plastic liners/ windows	—
4	Metal	Steel and composite packaging of which the majority is steel	Rigid formats (aerosols cans, cans, paint tins, boxes, trays, drums, tubes) made of steel, including tinplate and stainless steel	—
5	Metal	Aluminium and composite packaging of which the majority is aluminium – rigid	Rigid formats (food and beverage cans, bottles, aerosols, drums, tubes, cans, boxes, trays) made of aluminium	—
6	Metal	Aluminium and composite packaging of which the majority is aluminium – semi-rigid and flexible	Semi rigid and flexible formats (containers and trays, tubes, foils, flexible foil) made of aluminium	—
7	Plastic	PET – rigid	Bottles and flasks	Transparent clear / coloured, opaque
8	Plastic	PET – rigid	Rigid formats other than bottles and flasks (including pots, tubs, jars, cups, mono- and multilayer trays and containers, aerosol cans)	Transparent clear / coloured, opaque
9	Plastic	PET – flexible	Films	Natural / coloured
10	Plastic	PE – rigid	Containers, bottles, trays, pots and tubes	Natural / coloured
11	Plastic	PE – flexible	Films, including multilayer and multi-material packaging	Natural / coloured
12	Plastic	PP – rigid	Containers, bottles, trays, pots and tubes	Natural / coloured
13	Plastic	PP – flexible	Films, including multilayer and multi-material packaging	Natural / coloured
14	Plastic	HDPE and PP – rigid	Crates and pallets, corrugated board plastic	Natural / coloured
15	Plastic	PS and XPS – rigid	Rigid formats (including dairy packaging, trays, cups and other food containers)	Natural / coloured
16	Plastic	EPS – rigid	Rigid formats (including fish boxes / white goods and trays)	Natural / coloured
17	Plastic	Other rigid plastics (e.g. PVC, PC) including multi-materials – rigid	Rigid formats, including. Intermediate bulk containers, drums	—
18	Plastic	Other flexible plastics including multi-materials – flexible	Pouches, blisters, thermoformed packaging, vacuum packaging, modified atmosphere/modified humidity packaging, including flexible intermediate bulk containers, bags, stretch films	—
19	Plastic	Biodegradable plastics <sup>(1)</sup> – rigid (e.g. PLA, PHB) and flexible (e.g. PLA)	Rigid and flexible formats	—
20	Wood, cork	Wooden packaging, including cork	Pallets, boxes, crates	—
21	Textile	Natural and synthetic textile fibres	Bags	—
22	Ceramics or porcelain stoneware	Clay, stone	Pots, containers, bottles, jars	—

Table A6. Indicative list of packaging materials, types and categories referred to in Article 6 of the Packaging Regulation

(b) Information to be submitted for simplified reporting in accordance with Article 44.8:

- National identification code of the producer
- Reporting period
- Information on packaging types set out in following Table A7 (no details about the specific units, in kg or tonnes)
- Arrangements to ensure the producer responsibility

The following Table A7 for simplified reporting includes the quantities by weight made available on the territory of the MS or unpacked:

Quantities by weight made available on the territory of the Member State or unpacked
Glass
Plastic
Paper/cardboard
Ferrous metal
Aluminium
Wood
Other
Total

*Table A7. Table for simplified reporting*

- (c) Information to be submitted for waste management reporting in accordance with Article 44.10:
- Quantities, by weight, per category of packaging waste, as defined in Table 2 of Annex II of the regulation, collected in the MS and sent for sorting;
  - Quantities, by weight, per category of packaging waste recycled, recovered and disposed of within the MS or shipped within Union or in a third country as set out in Table 3 of Annex XII of the regulation;
  - Quantities, by weight, of separately collected single-use plastic beverage bottles with a capacity of up to three litres and single-use metal beverage containers with a capacity of up to three litres, as set out in Table A6 of Annex XII.

## Annex I.III – Textile legal framework analysis

**Name of legislation:** Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives

**Source :** <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008L0098-20251016>

**Status:** The directive has been in force since 12 December 2008 and was last amended on 16 October 2025. Deadline for transposition at the national level: 17 April 2028 (Article 22a (14)). From 17 April 2029, Articles 22a, 22b, 22c and 22d shall apply to enterprises which employ fewer than 10 persons and whose annual turnover and annual balance sheet does not exceed EUR 2 million.

### Summary of the contents regarding registration obligations and registers:

**Section/article :** CHAPTER III : Waste Management. Article 22b: Register of producers of textile, textile-related or footwear products.

#### 1. General requirements:

- Each MS must establish a register of producers of textile, textile-related or footwear products listed in Annex Ivc to monitor compliance with Article 22a and Article 22c.1.
- A Commission website must provide links to all national producer registers.
- MS must submit their register link to the Commission within 30 days from the launch of the national register.
- Information contained in each register must be easily accessible, publicly available, free of charge, provided in a machine-readable, sortable and searchable format, and compliant with open standards, while respecting confidentiality of sensitive commercial and industrial information in accordance with relevant Union and national law.
- Where the information in the register of producers is not publicly accessible, MS shall ensure that providers of online platforms allowing consumers to conclude distance contracts with producers offering textile products are granted access to the register of producers.
- MS must ensure that the competent authority:
  - Receive producer registration applications via an electronic data-processing system published on its website
  - Grant registrations and issue a registration number within 12 weeks of receiving the information required under Article 22b
  - Set detailed registration procedures without adding substantive requirements beyond Article 22b
  - Charge cost-based, proportionate fees for processing applications
- The competent authority may refuse or withdraw a producer's registration where:
  - The information laid down in Article 22b.4; or corresponding supporting documents are not provided or are insufficient
  - The producer no longer meets the requirements laid down in Article 22b

- MS must ensure producers are obliged to register before placing products on the market for the first time
- A producer who ceases to exist must be removed from the register
- MS shall ensure that relevant actors are involved in the implementation of the EPR (producers, PROs, private or public waste operators, local authorities, re-use and preparing for re-use operators, social economy entities) (Art. 22a.7)
- The Commission shall adopt implementing acts establishing the harmonised format for registration

## 2. Roles involved in the registration/reporting data procedure:

- Producers (meet EPR obligations collectively through PROs). Producers cannot place products on the market unless registered in the relevant MS.
- Delegations of the registration/reporting requirements:
  - PRO(s): Represent one or more producers collectively. Submit registration and reporting data on behalf of their member producers.
    - MS shall ensure that the obligations under registration article can, on the producer's behalf, be met by a PRO by written mandate. Where a producer has designated a PRO, the obligations under this Article shall be met by that organisation *mutatis mutandis* unless otherwise specified by the MS (Article 22b).
  - AR: Act on behalf of producers not established in the MS, with written mandate. Must register and submit data in the MS where the producer sells:
    - MS shall ensure that a producer established in another MS and making textile available on their territory appoints, by written mandate, a legal or natural person established on their territory as its AR for the purpose of fulfilling the obligations of a producer (Art. 22a.3).
    - MS may provide that a producer as defined in Article 3.4(b), point (d), established in a third country and making textile, textile-related or footwear products listed in Annex Ivc available for the first time on their territory is to appoint, by written mandate, a legal or natural person established on their territory as its AR for the purpose of fulfilling the obligations of a producer related to the EPR scheme on their territory (Art. 22a.3).
    - The application of the Article 22a.3 of Directive 2008/98/EC shall be suspended until 1 January 2035. The proposal also includes the following exception: MS may either provide that a producer as defined in Article 3.4(b), point (d) (sells textile, textile-related or footwear products listed in Annex Ivc by means of distance contracts directly to end-users, whether or not they are private households, in a MS, and is established in another MS or in a third country), of that Directive established in a third country and making textile, textile-related or footwear products listed in Annex Ivc of that Directive available for the first time on their territory is to appoint, by written mandate,

a legal or natural person established on their territory as its AR for the purpose of fulfilling the obligations of a producer related to the EPR scheme on their territory or ensure traceability and enforcement with regard to producers established in third countries through alternative means (2025/0396 (COD) Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL suspending the application of the rules on the appointment of ARs for EPR for waste, WEEE and single use plastic waste).

### 3. Information requirements:

- Producers must file a registration application in every MS where they first make available textile, textile-related or footwear products listed in Annex Ivc.

The registration application must include (Art 22b.4):

- Producer identification
  - Name, trademark and brand names used in the MS
  - Producer address (street name and number, postcode, city, country)
  - Telephone number (if applicable)
  - Website address
  - Email address
  - Single point of contact
- National identification codes
  - National producer identification code
  - Trade register number or equivalent official registration number
  - EU or national tax identification number
- Products PoM
  - NC codes corresponding to the textile, textile-related or footwear products listed in Annex Ivc the producer intends to place on the market for the first time
- PRO (if applicable)
  - Name
  - Postal code, city, street name and number, country
  - Phone number (if applicable)
  - Website
  - Email address
  - National identification code
  - Trade register or equivalent number
  - EU or national tax identification number
  - Mandate of the represented producer
- Declaration of correctness
  - A declaration by the producer, AR or PRO confirming the accuracy of the information provided.

#### 4. Reporting obligations:

Reporting data is delegated to PROs according to the following articles:

- MS shall ensure that PROs provide, on an annual basis, the competent authorities with the information referred to in paragraph 18, points (a) and (b), including the relevant information referred to in paragraph 18, point (a), required, on an annual basis, from the producers of the textile, textile-related or footwear products listed in Annex Ivc that have been made available on the market for the first time. MS shall ensure that PROs specify the quantity by weight in respect of the information referred to in paragraph 18, point (a) (Art. 22c.20).
- MS shall require that, in respect of producers that are enterprises that employ fewer than 10 persons and whose annual turnover and annual balance sheet does not exceed EUR 2 million, producer responsibility organisations request those enterprises to submit, on an annual basis, only the information listed in paragraph 18, point (a), point (i) (Art. 22c.20).

#### 5. Reporting frequency:

- PROs and micro-enterprises must be fulfilled on an annual basis, each according to the scope of data required from them.
- Producers or, where applicable, ARs must notify the competent authority without undue delay of any changes to the registration information or of any permanent cessation of placing the relevant products on the market for the first time.

#### 6. Control and enforcement:

MS shall take the necessary measures to ensure that any producer of products or organisation implementing EPR obligations on behalf of producers of products put in place an adequate self-control mechanism, supported, where relevant, by regular independent audits, to appraise (Art. 8a.3) the quality of data collected and reported from the reporting system is in place to gather data on the products PoM of the MS by the producers of products subject to EPR and data on the collection and treatment of waste resulting from those products specifying, where appropriate, the waste material flows.

#### 7. Implementing Act:

By 17 April 2027, the Commission shall adopt implementing acts establishing the harmonised format for registration in the register of producers based on the information requirements set out in Article 22b.4. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 39.2.

The Commission is empowered to adopt delegated acts in accordance with Article 38a to amend Annex Ivc to this Directive in order to bring the Combined Nomenclature (CN) codes listed therein in line with the CN codes listed in Annex I to Council Regulation (EEC) No 2658/87 (Art. 22a).

## 8. References about register in the annexes:

### ANNEX Ivc PRODUCTS THAT FALL WITHIN THE SCOPE OF THE EXTENDED PRODUCER RESPONSIBILITY FOR CERTAIN TEXTILE, TEXTILE-RELATED AND FOOTWEAR PRODUCTS

Part I: Textile products, and textile articles of apparel and clothing accessories for household use or other uses, where such products are similar in nature and composition to those for household use, that fall within the scope of Article 22a:

CN Codes	Description
61 – all listed codes within the chapter	Articles of apparel and clothing accessories, knitted or crocheted
62 – all listed codes within the chapter	Articles of apparel and clothing accessories, not knitted or crocheted
6301	Blankets and travelling rugs (except 6301 10 00)
6302	Bed linen, table linen, toilet linen and kitchen linen
6303	Curtains (including drapes) and interior blinds; curtain or bed valances
6304	Other furnishing articles, excluding those of heading 9404
6309	Worn clothing and other worn articles
6504	Hats and other headgear, plaited or made by assembling strips of any material, whether or not lined or trimmed
6505	Hats and other headgear, knitted or crocheted, or made up from lace, felt or other textile fabric, in the piece (but not in strips), whether or not lined or trimmed; hairnets of any material, whether or not lined or trimmed

*Table A8. Textile products covered by the EPR*

Part II: Footwear, and articles of apparel and clothing accessories for household use or other uses, where such products are similar in nature and composition to those for household use, whose main composition is not textile, that fall within the scope of Article 22a:

CN Codes	Description
4203	Articles of apparel and clothing accessories, of leather or composition leather (excl. footwear and headgear and parts thereof, and goods of chapter 95, e.g. shin guards, fencing masks)
6401	Waterproof footwear with outer soles and uppers of rubber or of plastics, the uppers of which are neither fixed to the sole nor assembled by stitching, riveting, nailing, screwing, plugging or similar processes
6402	Other footwear with outer soles and uppers of rubber or plastics
6403	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of leather
6404	Footwear with outer soles of rubber, plastics, leather or composition leather and uppers of textile materials
6405	Other footwear

Table A9. Other products covered by the EPR

### 9. Other actor's reporting obligations:

- PROs must publish annually on their website the information required under Article 22c.18(a), plus the selection procedure for waste management operators under Article 22c.18(b).
- PROs must submit annually to the competent authority the information required under Article 22c.20, including all elements listed in Article 22c.18 (a) and (b).
- MS must report annually to the European Environment Agency (EEA). MS must submit their annual data within 18 months after the end of the reporting year.
- Social economy entities must report annually the data required under Article 22c.12 to the competent authority.
- All the reporting information per stakeholder are detailed below in table A10.

Concerned actors	Article(s)	Required reporting data
Social economy entities	Art. 22c(12)	Total quantities collected (by weight) for products listed in Annex IVc; <ul style="list-style-type: none"> <li>• Quantities fit for re-use, including exports where possible</li> <li>• Quantities destined for preparing for re-use and recycling, specifying fibre-to-fibre recycling and, where possible, exports</li> <li>• Quantities destined for other recovery or disposal</li> </ul>
Producer Responsibility Organisations (PROs) – Public information	Art. 22c(18)(a)–(b)	<ul style="list-style-type: none"> <li>• Ownership and membership information (for collective EPR fulfilment)</li> <li>• Financial contributions paid by producers per unit sold or per tonne placed on the market</li> <li>• Selection procedure for waste management operators</li> </ul>

Concerned actors	Article(s)	Required reporting data
Producer Responsibility Organisations (PROs) – Reporting to competent authority	Art. 22c(20)	<ul style="list-style-type: none"> <li>• Quantities (by weight) of products placed on the market for the first time</li> <li>• Quantity by weight of separate collection of used and waste textile, textile-related and footwear products listed in Annex Ivc, specifying separately such unsold products</li> <li>• Rates of re-use, preparing for re-use, and recycling, including fibre-to-fibre recycling</li> <li>• Rates of other recovery and disposal</li> <li>• Export rates of used textile products listed in Annex Ivc fit for re-use and export rates of waste textiles listed in Annex Ivc</li>   <li>• Ownership and membership information (for collective EPR fulfilment)</li> <li>• Financial contributions paid by producers per unit sold or per tonne placed on the market</li> <li>• Selection procedure for waste management operators</li> <li>• Quantities (by weight) of products placed on the market for the first time</li> <li>• Quantity by weight of separate collection of used and waste textile, textile-related and footwear products listed in Annex Ivc, specifying separately such unsold products</li> <li>• Rates of re-use, preparing for re-use, and recycling, including fibre-to-fibre recycling</li> <li>• Rates of other recovery and disposal</li> <li>• Export rates of used textile products listed in Annex Ivc fit for re-use and export rates of waste textiles listed in Annex Ivc</li> <li>• Micro-enterprise exception: only the quantity of products placed on the market is required</li> </ul>

Table A10. Detail of reporting obligations per concerned actors

# LIFE4EPR



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