

Concept of the EU-LIFE4EPR Registration and Reporting Gateway

Executive summary (July 2026)

The LIFE4EPR project and the current situation

The LIFE4EPR explores possible pathways towards a more harmonised and interoperable EU approach for Extended Producer Responsibility (EPR) producer registration and reporting. A series of co-creation workshops were organised involving representatives from national authorities, producer responsibility organisations (PROs), producers, authorised representatives (ARs), marketplaces, consultants, and other relevant stakeholders. The objective of these workshops was to collectively identify the main barriers created by the current fragmented landscape and to explore feasible approaches and measures for reducing administrative burden while maintaining the existing national enforcement structures and minimising changes in roles and existing structures.

The LIFE4EPR co-creation workshops confirmed that fragmentation in EPR systems remains a significant challenge for producers, particularly those operating across more than one Member State.

The main challenges identified through the project were:

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

While producer registration is often a one-time obligation, the main workload and burden for producers is associated with the regular reporting of placed on market data to PROs and NRs.

In most MS, producers are required to register their companies and report products placed on the market (POM) both to National EPR Registers (NRs) and, where applicable, to PROs. However, these actors use reported EPR data for different purposes. NRs focus on compliance monitoring and enforcement, while PRO reporting is usually linked to fee calculation and operational management. This often results in different datasets, reporting frequencies, formats, classification systems and validation procedures across countries and product streams. Data validation, and the frequency and format of reporting also differ from country to country and per product stream.

While the project focuses on NRs, the sessions also showed that the limited harmonization extends to the registration and reporting systems of PROs. As a result, any long-term harmonisation scheme should consider both, NRs and PRO-related processes. Otherwise, the challenges identified by stakeholders would only be partially addressed.

The overall size and scale of the problem remain uncertain.

There is no comprehensive data on the number or proportion of producers operating across multiple MS, nor on the extent to which they are affected by regulatory fragmentation. Strengthening the evidence base on the scale, distribution and practical impacts of this fragmentation is essential to support informed decision-making and ensure that future measures are proportionate, targeted and effective.

Towards harmonisation. The EU-LIFE4EPR Registration and Reporting Gateway

LIFE4EPR assessed different scenarios and consulted stakeholders on their needs, priorities and expectations. Considering implementation complexity, compatibility with existing roles and structures, and expected benefits for stakeholders, the consortium developed the concept of the EU-LIFE4EPR Registration and Reporting Gateway (RRG).

The EU-LIFE4EPR Registration and Reporting Gateway:

- **Facilitates harmonised producer registration and reporting to national registers without constituting a central EU register.**
- **Is a platform accessible from producers, ARs, PROs, NR Authorities and marketplaces.**
- **Preserves existing stakeholder roles such as NRs, AR, and PROs, ensuring that NR remain the legal register, with the platform not replacing them but only interfacing with them.**
- **Introduces standardised data structure for producer registration and reporting to ensure EPR compliance at national register level.**
- **Enables a single-entry point for data submission.**
- **Establishes a shared EU data repository accessible to designated stakeholders.**
- **Applies a hybrid approach for place-on-market reporting: producers can choose between their current national route and the harmonized EU route.**
- **Is intended to support producers in meeting EPR obligations, including identifying and contacting relevant organisations (PROs and ARs), and strengthening enforcement, particularly in addressing freeriding.**
- **Does not manage contractual relationships between producers and PROs or ARs, nor the associated financial flows. Payments of EPR fees to PROs remain outside the platform and continue to be handled through existing arrangements.**

While producer registration and POM reporting are facilitated directly through the EU-LIFE4EPR RRG, contracting PROs and appointing Authorised Representatives (ARs) remain outside the scope of the Gateway but are supported by the EU EPR Registration and Reporting information platform. Figure 1 summarises the producer EPR compliance journey and the scope of the EU-LIFE4EPR RRG.

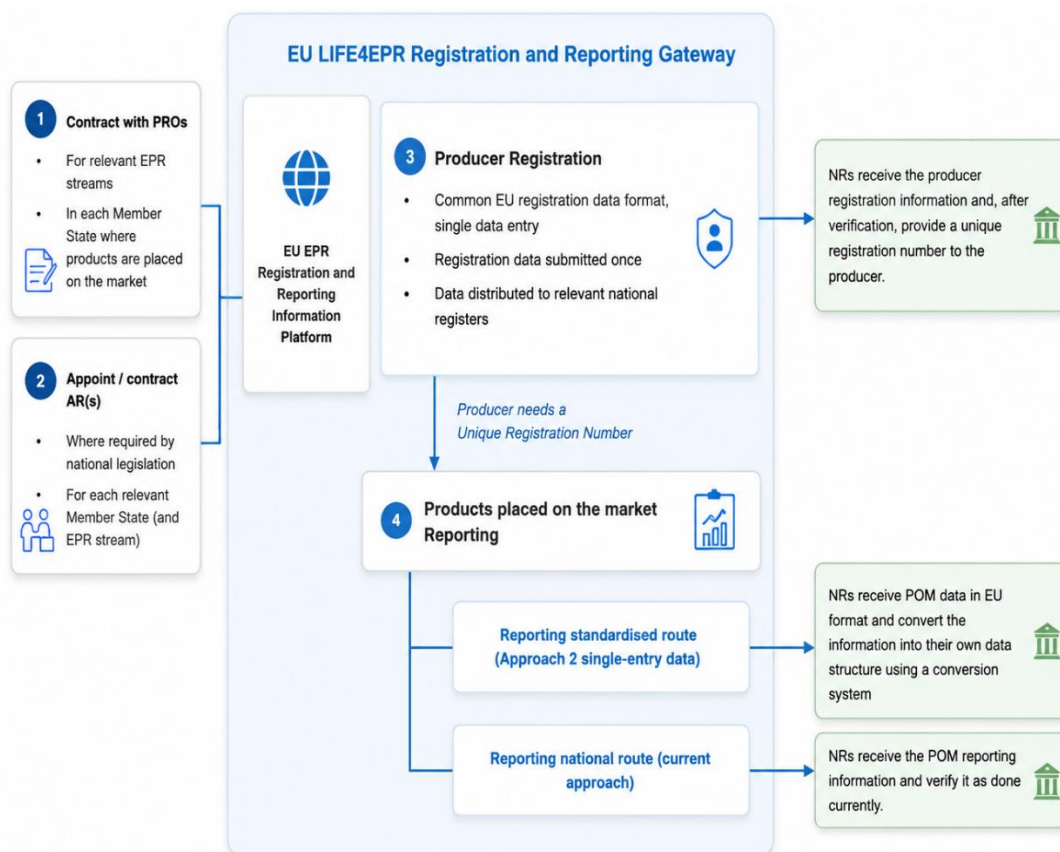


Figure 1. Architecture of the LIFE4EPR Registration and Reporting Gateway (RRG).

The **EU-LIFE4EPR Registration and Reporting Gateway** includes three main modules.

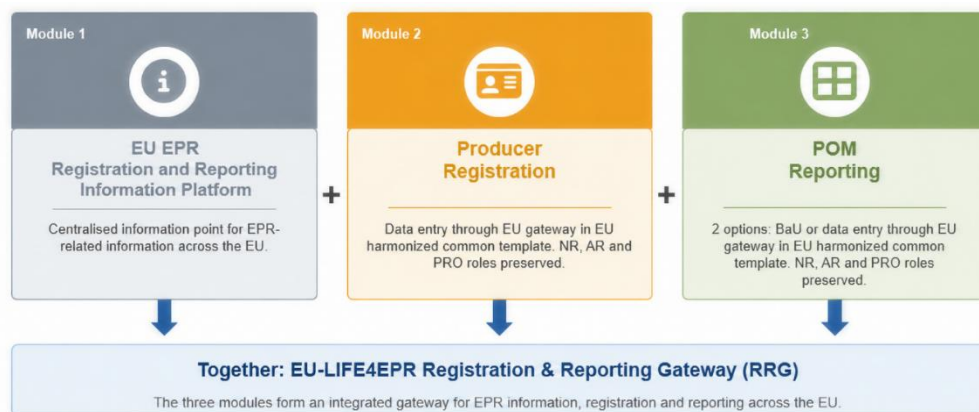


Figure 2. Architecture of the LIFE4EPR Registration and Reporting Gateway (RRG).

Module 1. EU EPR Registration and Reporting Information Platform: This module acts as a centralised point for EPR-related information across the EU, without replacing or modifying NRs. In this area, NRs will provide selected, up to date, standardised data. Enforcers will be able to access in-depth data about producers in all MS.. Producers will find up-to-date information about their obligations, main contacts (e.g. NRs, PROs, ARs), FAQs etc. The wider public will be able to consult a compilation of the public producers' registration information provided by national registers, with links to each national register for the complete record.

Module 2. Producer registration: This module concerns producers' registration. Under this approach, NRs replace their current registration forms with an EU harmonised format. Producers upload all the registration information concerning MS in scope in bulk into the LIFE4EPR RRG via an EU single channel. Data uploaded is then accessible by participating stakeholders e.g. PROs and ARs for checking and validation, signature and submission to NRs. NRs will receive the information and continue the registration process at national level. Registration is conceived as a one-time procedure. The model also foresees the creation of a unique registration number with a harmonised format for all producers across MS.

Module 2: Producer Registration

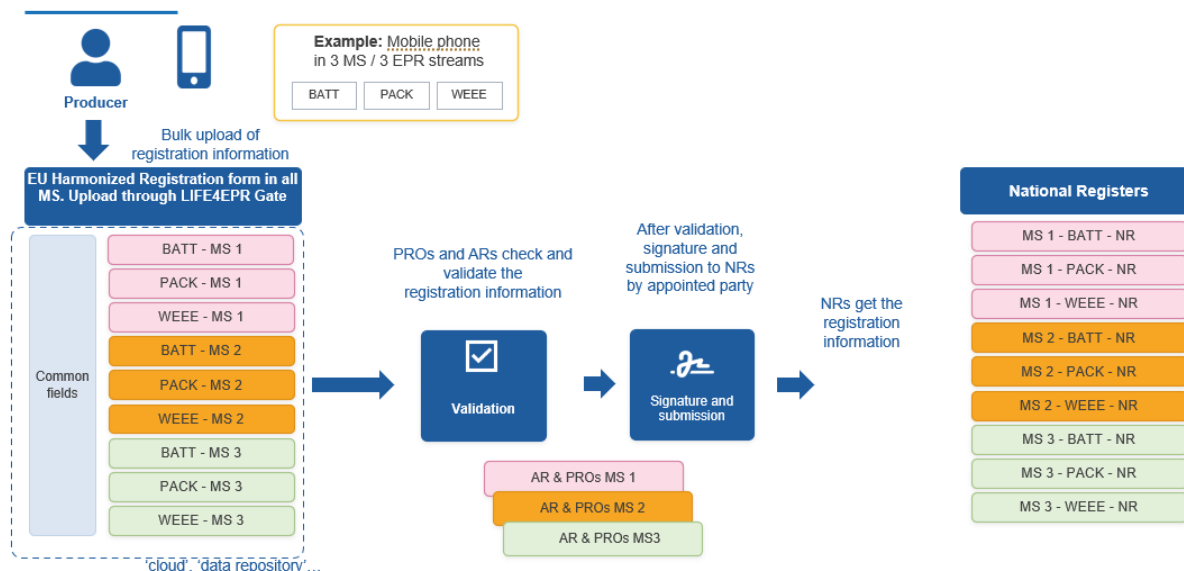


Figure 3: Example of workflow for Producer Registration through the EU-LIFE4EPR RRG for a producer placing mobile phones in 3 MS. In this case the producer is meeting its EPR responsibilities through a PRO for packaging, EEE and batteries.

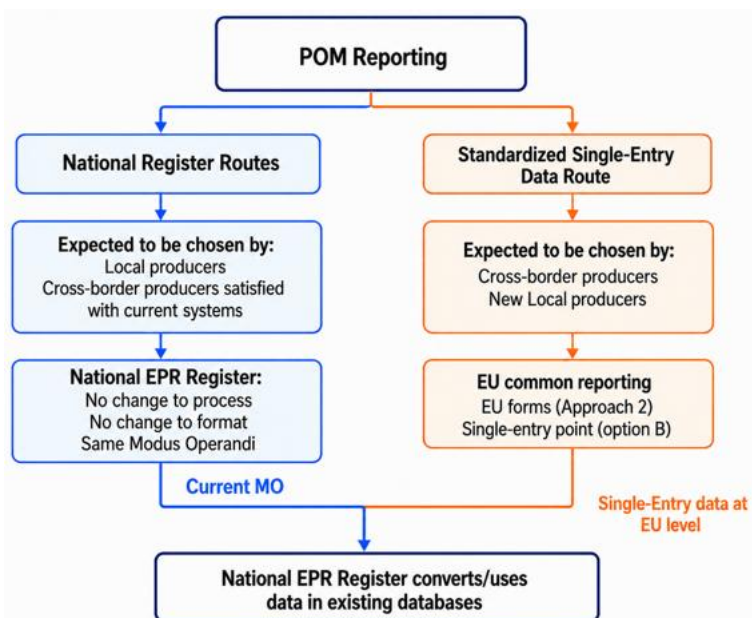
Module 3. Products placed-on-market reporting: this module concerns the reporting of products POM and uses a hybrid approach, recognising that the scale of the problem is not yet fully quantified. With this approach, local producers (those placing products on only one Member State), or those satisfied with existing registers, could continue using the current national reporting process and data structures without changes in their modus operandi or reporting formats, while other producers (such as cross-border producers, those

placing products on the market in more than one Member State) can opt to upload data covering all their activities, product streams and countries in a harmonised format through the EU-LIFE4EPR RRG.

Such hybrid model could function as a flexible and transitional configuration, allowing time to assess whether deeper harmonisation is necessary. New producers and EPR streams that have no legacy databases should opt for the harmonised option only.

This approach is also compatible with national approaches where PROs do not exist, and producers comply with their EPR obligations individually.

The hybrid model proposed for products POM reporting allows producers to choose the way in which they wish to report, giving them two options: a business-as-usual (BaU) route and a harmonized route. Producers using the harmonized route will be able to report POM data using the same code structure in all MS in scope (same fields reported in all MS)



In the harmonised route, data will be uploaded in bulk to a data repository, referred to as the 'EU-LIFE4EPR RRG', with controlled access by the different stakeholders involved; PROs, ARs and NRs will be able to download, verify, submit etc. the data, depending on the user rights defined by the producer at the registration procedure.

Figure 4: Scheme of the hybrid option for Reporting of products POM.

Module 3: Products placed on the market (POM) reporting.

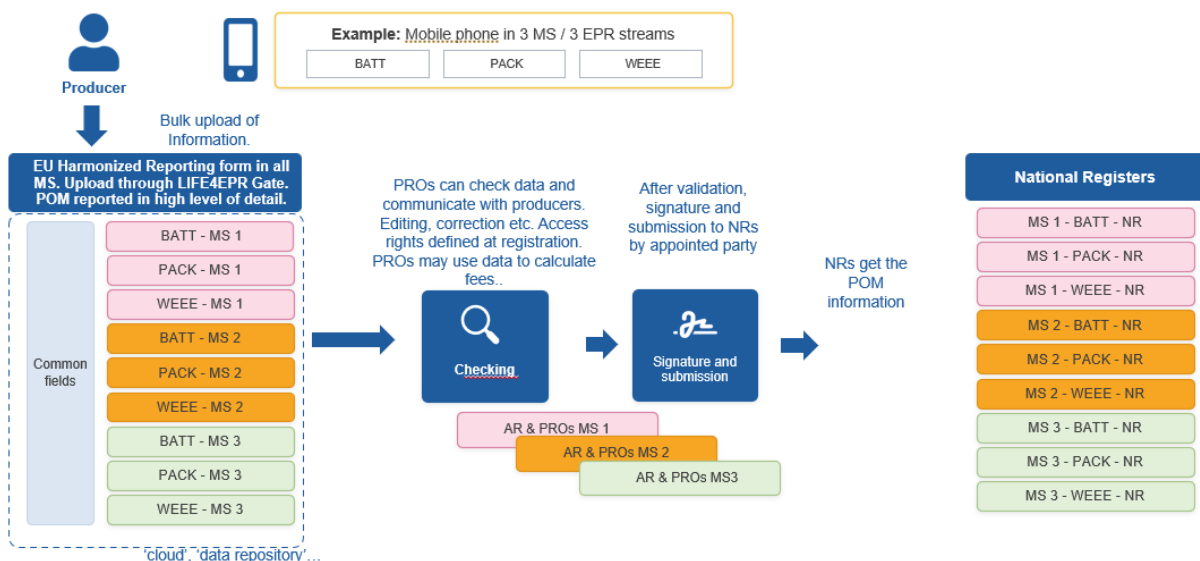


Figure 5: Example of workflow of products POM reporting using the EU-LIFE4EPR RRG where a producer is placing mobile phones on three MS. In this case the producer is meeting its EPR responsibilities through a PRO for packaging, EEE and batteries.

Most of the implementation impact would fall on NRs and PROs, which would access the EU-LIFE4EPR RRG to obtain the data reported mainly by cross-border producers and integrate it with data provided by producers that do not change their reporting behaviour.

PROs and NRs will receive and integrate both data sets, BaU and EU harmonised. For this, datasets need to be compatible and interoperable. The EU-LIFE4EPR RRG concept proposes that in the harmonised route producers report POM in a high level of detail, so it is possible to set conversion rules between the EU detailed categories and subcategories and the existing codes of PROs and NRs. Defining these detailed EU codes and conversion tables is out of the scope of the LIFE4EPR project.

It should be noted that the scope of the LIFE4EPR pilot does not include the management of data by PROs. In theory, the EU-LIFE4EPR RRG approach of convertible codes could be extrapolated to the codes used by PROs to calculate their fees and responsibilities. Hence, producers would be able to submit data once in an EU harmonised format and report to both, PROs and NRs at once. PROs and NRs would convert the data into their own code structures.

Defining a level of granularity for the harmonised codes that can accommodate all existing national and PRO data structures across the EU would require a complex mapping exercise that falls outside the scope of the LIFE4EPR project.

While the proposed approach is considered conceptually feasible, its practical implementation would depend on further technical work to assess whether such a universally compatible classification system can be achieved (adjustments on the current codes used by NRs and PROs to accommodate this approach should not be discarded).

The EU-LIFE4EPR RRG scheme places particular emphasis on confidentiality, data access management and the preservation of existing roles. It should also remain sufficiently flexible to accommodate future extensions and linkages, including potential connections with digital product passports, eco-modulation criteria and PRO fee structures. Once the system has settled down, regular analysis of the reporting codes used will allow to adjust, improve and simplify user experience.

A final online survey was sent to participants in the co-creation sessions to gather their views on the possible design and requirements of an EU-wide EPR registration and reporting approach. Survey's results confirmed that the EU-LIFE4EPR RRG scheme is aligned with many of the principles and requirements most strongly supported by stakeholders. Although no single registration or reporting scenario received majority support, the most supported registration scenarios pointed towards a harmonised approach, consistent with the LIFE4EPR RRG proposal. For reporting, both BaU and harmonised approaches received reasonable support, suggesting that a hybrid model integrating both options could respond to a broader range of stakeholder needs.

Recommendations aiming at harmonisation

In addition to the EU-LIFE4EPR RRG concept, the co-creation workshops identified several complementary measures. The highest priority was given to measures that would improve the harmonisation of core EPR obligations across MS, particularly:

1. harmonisation of the definition of producer and reporting responsibilities;
2. harmonisation of product categories and scope;
3. availability of registration and reporting forms in both national languages and English; and
4. harmonisation of reporting frequencies and deadlines.

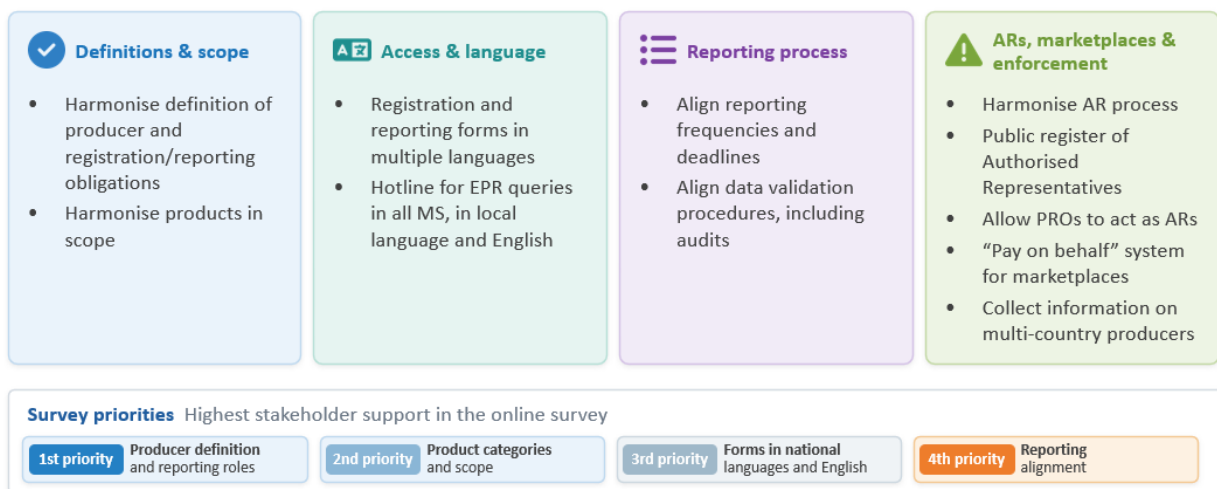


Figure 6: Complementary measures to improve EPR registration and reporting.

A report with the conclusions of the project, including case studies and best practices and concrete policy and regulatory recommendations will be published at the end of the project, around March 2027.

Overall, the EU-LIFE4EPR RRG concept provides a pragmatic and flexible response to the challenges identified. It focuses simplification efforts on the actors most affected by fragmentation, especially cross-border producers, while avoiding unnecessary disruption for producers operating only nationally or for actors satisfied with current systems. At the same time, it recognises that the scale of the problem is not yet fully quantified, and that further technical and policy work will be required before deeper harmonisation can be considered.

In the next phase of the project, the EU-LIFE4EPR RRG concept will be programmed into a pilot webtool and stakeholders will be involved again through a pilot testing exercise of the selected concept. This will allow them to assess its advantages, limitations and practical challenges in greater depth. The pilot will also help define practical details such as the format of the unique registration number, interoperability requirements, reporting formats, data access rights and the process of conversion between harmonised and national or PRO-specific data structures. The governance of the potential EU-LIFE4EPR RRG tool and the implications for the different parties involved will be assessed in detail in the forthcoming deliverable on exploitation and sustainability strategy.