



LIFE4EPR

Towards harmonized Extended Producer Responsibility schemes across the EU

Concept of the EU-LIFE4EPR Registration and Reporting Gateway

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

T3.2 – Co-creation of a concept for an EU-wide register of producers/products

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Working Document



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Table of Acronyms

Acronym	Term
AB	Advisory Board
AR(s)	Authorised Representative
BaU	Business-as-Usual
EEE	Electrical and Electronic Equipment
EPR	Extended Producer Responsibility
EU	European Union
IS	Individual Systems
EU-LIFE4EPR RRG	EU LIFE4EPR Registration and Reporting Gateway
MO	Modus Operandi
MS(s)	Member State
NR(s)	National Register(s)
NRA(s)	National Register Authority
POM	Placed on the market
PRO(s)	Producer Responsibility Organisation(s)
URN	Unique Registration Number
WEEE	Waste Electrical & Electronic Equipment
WP	Work Package

Executive Summary

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.

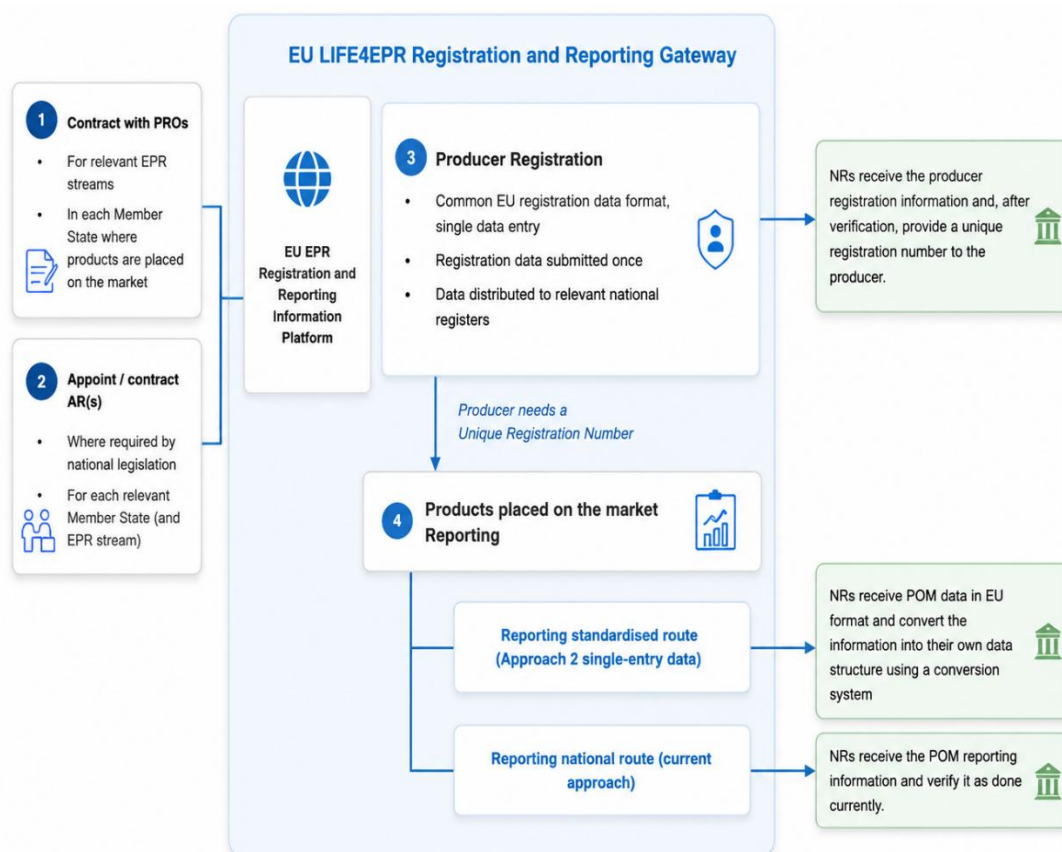
Towards harmonisation. The EU-LIFE4EPR Registration and Reporting Gateway

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:

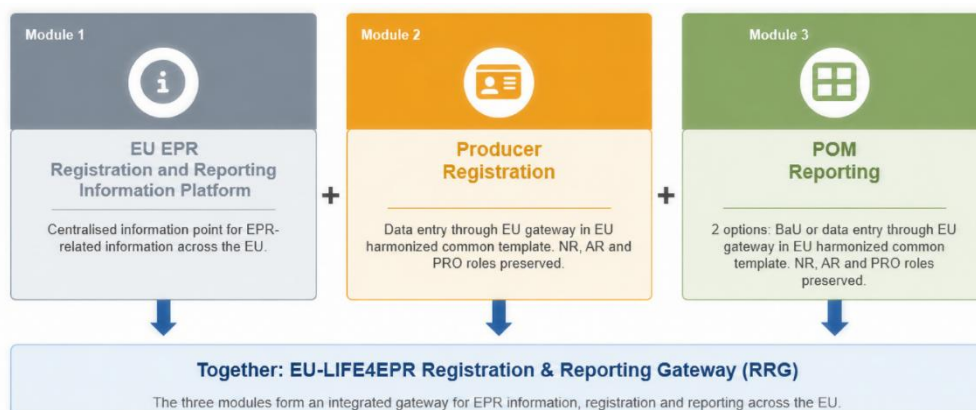
- **Facilitates harmonised producer registration and reporting to national registers without constituting a central EU register.**
- **Is a platform accessible from producers, ARs, PROs, NR Authorities and marketplaces.**
- **Preserves existing stakeholder roles such as NRs, AR, and PROs, ensuring that 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. The following figure summarises the producer EPR compliance journey and the scope of the EU-LIFE4EPR RRG.



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

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

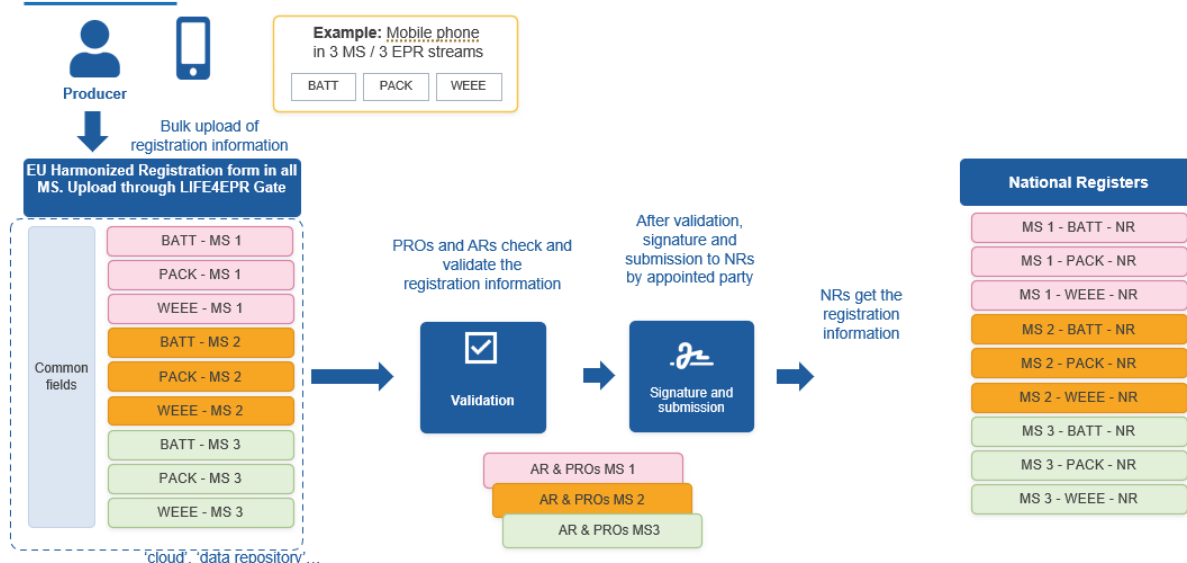


Architecture of the LIFE4EPR Registration and Reporting Gateway (RRG).

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



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.

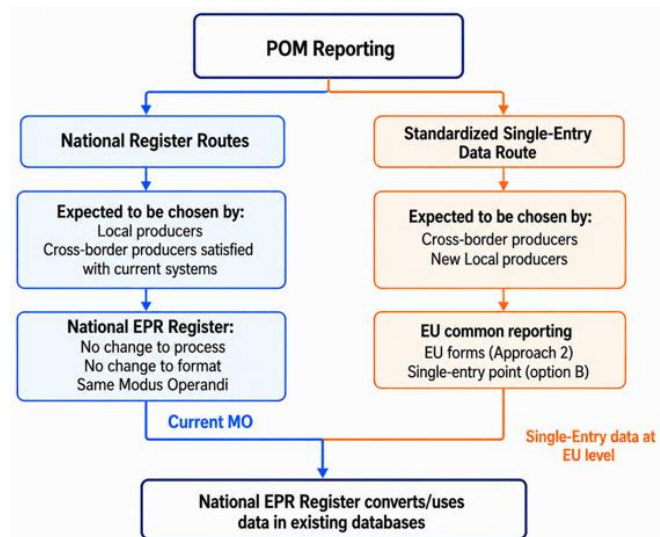
Module 3. Products placed-on-market reporting: this module concerns the reporting of products POM and uses a hybrid approach, recognising that the scale of the problem is not yet fully quantified. With this approach, local producers (those placing products on only one Member State), or those satisfied 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.

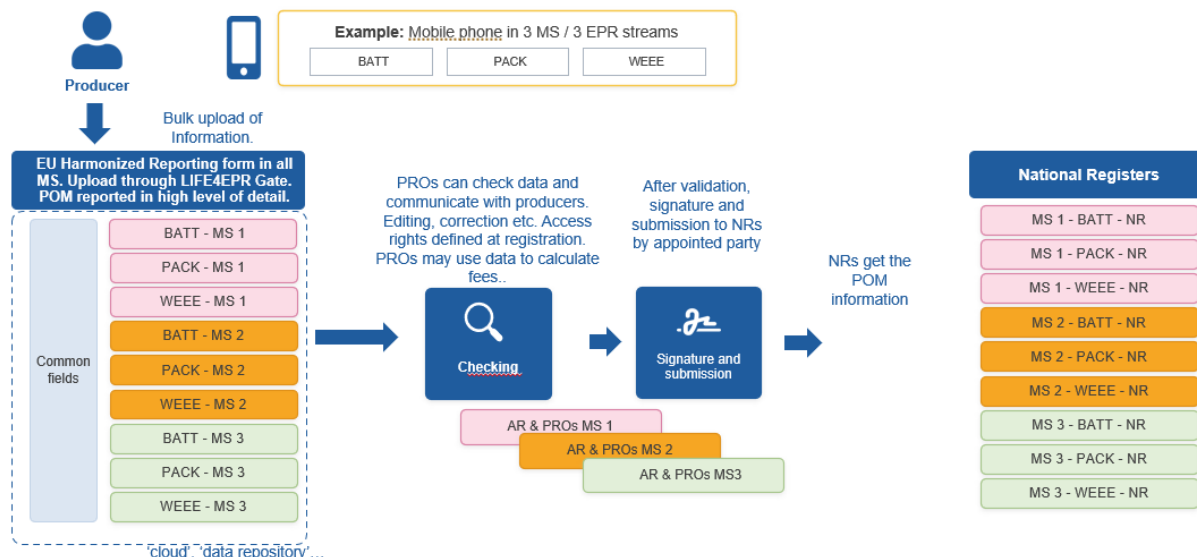
The hybrid model proposed for products POM reporting allows producers to choose the way in which they wish to report, giving them two options: a business-as-usual (BaU) route and a harmonized route. Producers using the harmonized route will be able to report POM data using the same code structure in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



Scheme of the hybrid option for Reporting of products POM.

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



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:

- harmonisation of the definition of producer and reporting responsibilities;
- harmonisation of product categories and scope;
- availability of registration and reporting forms in both national languages and English; and

- harmonisation of reporting frequencies and deadlines.



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.

1 Introduction

Extended Producer Responsibility (EPR) schemes are one of the key policy instruments used in the European Union to support the transition towards a circular economy. Under EPR, producers placing products on the market are required to take financial and/or organisational responsibility for the management of products at end-of-life. Across the EU, these obligations apply to several product streams, including packaging, waste electrical and electronic equipment (WEEE), batteries, textiles, and other waste streams regulated at national level.

While EPR obligations are implemented through EU legislation, the practical organisation of producer registration and reporting remains largely fragmented at Member State level. Producers placing products on the market in multiple Member States must comply with different national registration systems, reporting formats, procedures, languages, and timelines. In many cases, separate registration and reporting obligations also exist for each EPR stream. As a result, producers operating cross-border face significant administrative burdens and compliance costs, while national authorities face challenges related to data consistency, enforcement, and identification of producers active across several Member States.

The LIFE4EPR project was launched to explore possible pathways towards a more harmonised and interoperable EU approach for EPR producer registration and reporting. As part of the project activities, a series of co-creation workshops were organised involving representatives from national authorities, producer responsibility organisations, producers, authorised representatives, 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.

This report presents the EU-wide concept that emerged from the co-creation workshops. It summarises the rationale behind the proposed approach, describes its main components and operational logic, and reflects the views and considerations expressed by stakeholders during the co-creation process. While stakeholder feedback played a central role, the final conclusions were developed internally by the consortium, who consolidated the inputs and identified a balanced and feasible way forward that could work across Member States. The report does not aim to propose a final legislative model, but rather to provide a practical and stakeholder-informed conceptual basis for further discussion and assessment at EU level.

The report is structured as follows. Section 2 sets out the problem context, including the current functioning of EPR registers, key challenges, the unknown scale of the problem, and the relationship between EPR registers and PRO reporting. Section 3 presents the methodology used to develop the concept, including the background analysis, co-creation workshops and stakeholder engagement activities. Section 4 describes the design options explored during the co-creation process, while Section 5 summarises the main results and stakeholder feedback from the co-creation sessions. Section 6 presents the results of the online survey. Section 7 describes the selected EU-wide EPR Register Concept, including its rationale, operational elements, actors, data flows and main

implementation considerations. Section 8 presents complementary measures identified to support the implementation of the concept. Finally, Section 9 provides the main conclusions and outlines considerations for future work and policy discussions.

A summary describing the LIFE4EPR Registration and Reporting Gateway concept will be produced for better dissemination.

2 Problem context

2.1 Current EPR Registers

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

National EPR registers typically consist of two main components:

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

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

Illustrative Example: A producer based in Spain places on the market a mobile phone (a piece of EEE) containing a battery, and packaging, and sells it in both Spain and Italy. Because the product falls under three EPR streams in two Member States, the producer must register and report in six different national EPR registers (3 streams × 2 Member States).

Each register may require different data formats, product classifications, procedures, and reporting timelines. As a result, producers often need to adapt and resubmit the same information multiple times across different national systems, creating significant administrative burden. This complexity increases further as producers expand to additional Member States.

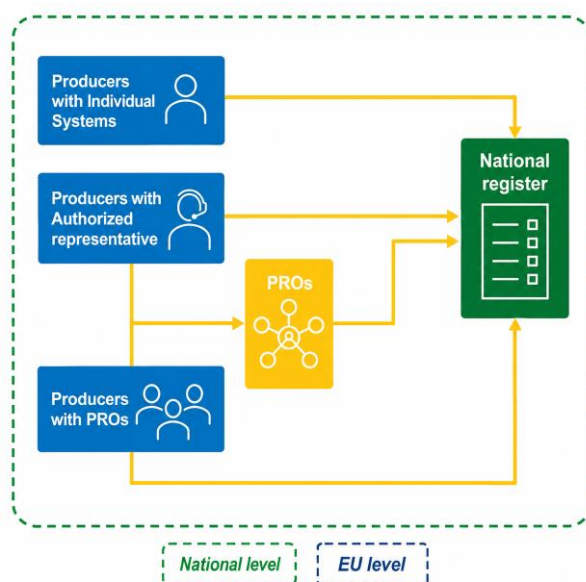
While the description above is used as a baseline scenario, the LIFE4EPR consortium has done extensive research in WP2 and WP3 and is aware of deviations to it, e.g. German WEEE registration,

Hungarian national approach for WEEE, Irish WEEE Blackbox reporting system or Norwegian statistical approach. For simplicity, when assessing the impact of the different options discussed, we compare them to the baseline situation described in this section.

2.1.1. Producer Registration

Producer registration currently takes place at Member State level. In most cases, producers may register directly to national registers or through PROs (as a service offered by PROs). Data verification is run also at national level by national registers and PROs. There is currently no EU-wide system for EPR producer registration, see Figure 1. Registration often happens once and free of charge, and may be updated if the situation of the producer changes (e.g. exceptions on the frequency and cost exist).

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



The parameters requested in producer registration processes differ across MS and streams. Table 15 of Deliverable 3.1¹ provides an overview of these parameters for selected MS (namely, Austria, Germany, Estonia, Spain, Finland, France, Italy, Lithuania, and the Netherlands) analyzed for EEE, packaging and textiles.

2.1.2. Reporting of products Placed on the market (POM)

Figure 2 illustrates a simplified overview of the current reporting framework in most Member States. In most cases, producers are required to report the quantities of products placed on the market to both: PROs contracted, so they can calculate the fees and collection responsibility associated to EPR, and national registers (NRs) for legal compliance and enforcement purposes. Reporting requirements vary across countries. NRs use different product codes and reporting formats across

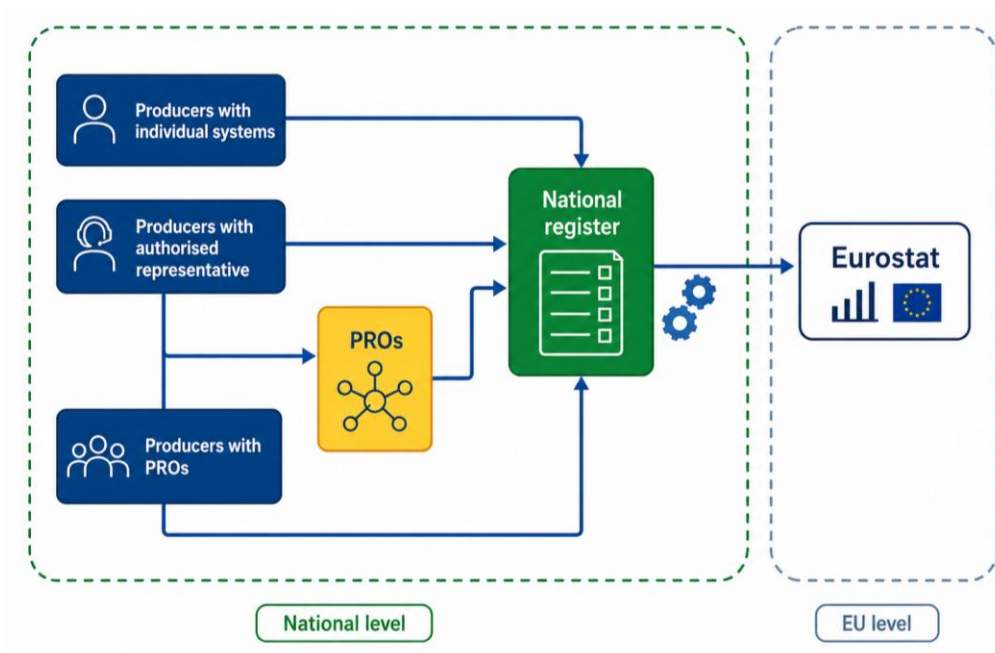
¹ <https://life4epr.ent.cat/wp-content/uploads/2026/03/LIFE4E2-1.pdf>

MS. PROs apply their own coding systems, typically aligned with their fee structure, which also differ across Member States.

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

For producers placing products on the market in multiple Member States, this results in: 1) Multiple reporting obligations (one per country and stream), and 2) The need to use different coding systems and formats. In addition, as PROs typically operate at national level, producers (or their authorised representatives) must establish separate contractual arrangements in each MS where they place products on the market. Often, PROs work typically per stream (e.g. packaging) and sometimes sub stream (e.g. PROs dealing with photovoltaic panels only), this increases the number of contracts and separate reporting obligations of producers.

Figure 2: Current data flow for Products POM Reporting at National level



2.2 Key Challenges in EPR Registration and Reporting

With the current systems introduced in section 2.1, producers face several challenges in complying with EPR obligations related to the registration and reporting of products placed on the market. LIFE4EPR partners have identified the following ones (check deliverables D2.1² and D3.1³ for details arising from the mapping exercises):

² https://life4epr.ent.cat/wp-content/uploads/2026/02/LIFE4EPR_WP2_D2.1_Mapping-of-Existing-EPR-and-PROs-across-the-EU.pdf

³ <https://life4epr.ent.cat/wp-content/uploads/2026/03/LIFE4E2-1.pdf>

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

2.3 Scope and Magnitude of the Problem

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

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

It should be noted that the **overall size and scale of the problem remain uncertain**. There is currently no comprehensive data on the number or proportion of producers operating across multiple MS, nor on the extent to which they are affected by regulatory fragmentation. Estimating the share of cross-border producers in the EU market (and assessing the intensity of the burden they face) falls outside the scope of the LIFE4EPR project but represents a critical knowledge gap for policy design and evaluation of the impact of the schemes proposed⁴.

This uncertainty has several important implications. First, it makes it **difficult to assess the scale and urgency** of the problem, and therefore to determine the appropriate level of intervention. Second, it remains **unclear how many producers would benefit most from harmonisation measures**, and whether these benefits would justify the associated costs or require changes to producers already

⁴ While this is out of the scope of the project, we circulated a survey to NRs requesting the number of producers meeting their EPR obligations through individual systems, collective systems and those established in another MS. NRs however do not collect information on the latter, therefore we could not estimate the dimension of the problem.

satisfied with the current system. Finally, any systemic changes, particularly those involving harmonisation or restructuring of existing systems, would likely **affect all actors**, including those who may not currently experience significant challenges (the ones putting their product in a single country's market).

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

2.4 Relation between EPR registers and PROs reporting

The practical burden on producers can vary significantly based on how they fulfil their EPR obligations. In many cases, producers join PROs to collectively meet these obligations, while individual systems (IS) are exceptions. When a producer fulfils its EPR obligations collectively through a PRO, it is required to report the quantities of products placed on the market (POM) to the PRO, which uses this information to calculate the applicable fees. When a visible fee is used in the country, the structures of the PROs fees and the visible fees are compatible and linked. As previously mentioned, producers are also obliged to register and report to the national EPR registers. National Registers and PROs use EPR reporting information for different purposes, resulting in often different datasets. While national registers focus on compliance monitoring and enforcement, PRO reporting is typically linked to fee calculation and operational management, see Figure 3.

In practice, producers often provide products placed on the market (POM) data primarily to PROs, which may also offer registration and reporting services on their behalf. In these cases, a producer may only submit data once to the PRO, while the PRO performs the data conversion and reporting required at national level. This can already mitigate some of the fragmentation challenges identified.

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

Figure 3 Scheme of the EPR reporting done by producers when dealing collectively with EPR obligation through PROs



3 Methodology

The EU-wide concept presented in this report was developed through a co-creation process carried out within the LIFE4EPR project. The methodology aimed to ensure that the proposed concept was informed by the practical experience, needs, and concerns of the different stakeholders involved in Extended Producer Responsibility (EPR) registration and reporting systems across the European Union.

The co-creation processes combined background research, stakeholder consultations, interactive workshops, and iterative refinement of concepts. The approach was not designed to develop a purely theoretical model, but rather to identify practical and feasible schemes that could reduce administrative burden for producers while remaining compatible with the existing national EPR structures and enforcement systems.

3.1 Background analysis

Prior to the co-creation workshops, the LIFE4EPR project carried out an assessment of the current landscape of EPR registration and reporting obligations within the EU, mainly through Task 3.1 of the project, reported in Deliverable D.3.1⁵. This work aimed to better understand the level of fragmentation of existing systems, the administrative barriers faced by producers, and the possible opportunities for simplification and harmonisation.

The assessment included the identification and analysis of:

- Existing national EPR register structures;
- Registration and reporting obligations across different EPR streams;
- The role of national authorities, PROs, ARs, and producers;
- Administrative barriers faced by cross-border producers;
- Existing initiatives and experiences related to harmonisation and digital interoperability.

Task 3.1 also gathered information through stakeholder consultations, desk research, and exchanges with national authorities and market actors to map current practices and identify key operational challenges associated with multi-country EPR compliance.

This preliminary analysis served as the basis for defining the main challenges to be addressed during the co-creation activities and for preparing the initial design options discussed with stakeholders.

Additionally, Deliverable D2.1⁶ shows the results of an extensive mapping of existing EPR schemes and PROs in MS for all product streams. This mapping exercise provided valuable information showing the availability and type of information on EPR provided by competent authorities and the level of fragmentation in the EPR sector.

⁵ <https://life4epr.ent.cat/wp-content/uploads/2026/03/LIFE4E2-1.pdf>

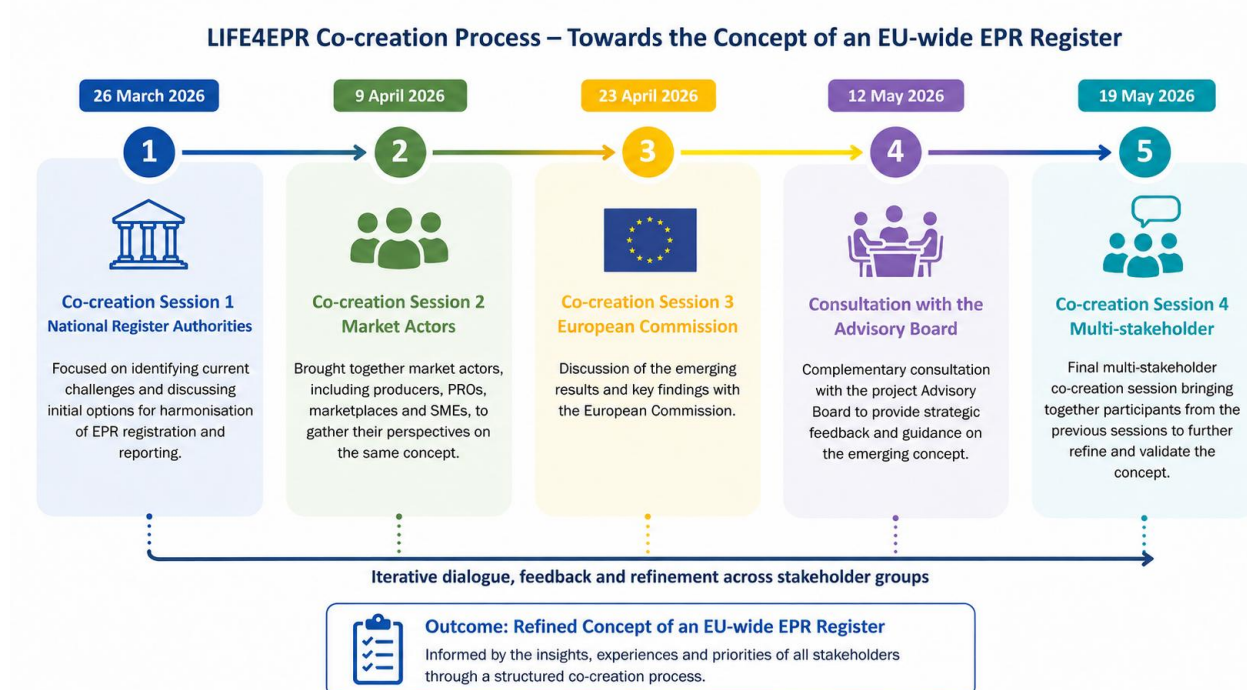
⁶ https://life4epr.ent.cat/wp-content/uploads/2026/02/LIFE4EPR_WP2_D2.1_Mapping-of-Existing-EPR-and-PROs-across-the-EU.pdf

3.2 Co-creation workshops

Between March and May 2026, the LIFE4EPR project organised a series of co-creation workshops to support the development of the concept of a potential EU-wide Extended Producer Responsibility (EPR) register.

As shown in Figure 4, the concept of the EU-wide EPR register was developed through five sequential co-creation sessions, progressively incorporating feedback from National Register Authorities, market actors, the European Commission, the Advisory Board, and a final joint multi-stakeholder session. This process enabled the concept to be refined step by step through dialogue and validation across stakeholder groups.

Figure 4: Overview of the co-creation process carried out within the LIFE4EPR project to co-design the EU-wide EPR Register.



The co-creation process focused on identifying current challenges in EPR registration and reporting, assessing options for harmonising producer registration at EU level, and exploring corresponding approaches for harmonising the reporting of products placed on the market. It also contributed to refining the key building blocks and governance considerations for a potential EU-wide EPR register concept.

Before and after each co-creation session, the feedback received was internally reviewed and further elaborated through dedicated discussions with consortium experts, ensuring that each workshop built on a consolidated and progressively refined knowledge base.

Following the fourth co-creation workshop, participants were invited to complete an online survey aimed at consolidating stakeholder feedback on the proposed EU-wide concept. The survey gathered input on key requirements for a potential EU-wide EPR system, stakeholder preferences

regarding the different design options discussed during the workshops, and the prioritisation of complementary supporting measures. The survey results were used to support the final refinement and validation of the concept presented in this report.

The co-creation process allowed the concept presented in this report to evolve progressively through stakeholder feedback, practical discussions, and collaborative exchanges between the different actors involved in EPR implementation across the EU.

Lively discussions and bilateral interactions provided in-depth information about the functioning and diversity of the current systems, roles played by each type of stakeholder and the views and needs of all of them.

3.3 Stakeholder engagement

The active participation of a broad range of stakeholders involved in EPR implementation, compliance, and enforcement across the European Union contributed to the development of the concept.

Participants involved throughout the co-creation activities included:

- NR authorities;
- Environmental ministries and agencies;
- Producers
- PROs;
- Producers and business associations;
- ARs;
- Online marketplaces;
- Consultants and technical experts;
- European-level stakeholder organisations;
- European Commission representatives.

Different stakeholder engagement methods were used throughout the process, including online meetings, surveys, bilateral exchanges, and dedicated co-creation workshops.

Attention was given to ensuring balanced participation from both public authorities and market actors. For the first co-creation workshop, focused primarily on national register authorities and public authorities, invitations were distributed by the European Commission through the Technical Adaptation Committee (TAC) network. This approach ensured direct participation from competent authorities involved in EPR implementation and enforcement at Member State level.

For the second workshop, focused on market actors and operational perspectives, invitations were distributed through several stakeholder networks, including members of WEEE Forum (WF), EXPRA, and key stakeholder contacts identified through the LIFE4EPR project activities (especially under Task 5.3 of the LIFE4EPR project). This broader outreach aimed to involve producers, PROs, authorised representatives, and other economic operators directly affected by cross-border EPR obligations.

Stakeholders participating in the workshops were invited to provide feedback on:

- Existing administrative and operational barriers;
- Practical challenges associated with national & multi-country compliance;
- Data management and reporting needs;
- Preferred governance approaches;
- Feasibility of different harmonisation options;
- Potential pathways towards simplification and interoperability;
- Principles and roles that the LIFE4EPR approach should meet, maintain and respect.

The participation of the different stakeholder groups throughout the process contributed to ensuring that the discussions reflected both regulatory and operational perspectives, as well as the practical realities faced by market actors operating across multiple Member States.

Additionally, the consortium also took into consideration existing initiatives (e.g. SEED project and the OSS approach), position papers (e.g. APPLIA's one) and joined and organised bilateral interviews with selected stakeholders. Table 1 provides an overview of the number of stakeholders registered and attending each co-creation session. A more detailed description of the stakeholder profiles participating in each workshop is provided in Annex I: Stakeholder participation details.

After the last co-creation session, an online survey was sent to all participants to collect additional input on the requirements to be included in the concept, their preferred scheme, and the prioritisation of complementary measures. The survey results were used to further validate and refine the design options discussed during the workshops and informed the development of the final concept presented in Section 7.

Table 1: Overview of participation in the co-creation sessions

Co-Creation Session	Main stakeholder groups	Registered participants	Attending participants
1	NRAs, ministries, agencies	58	66
2	Producers, PROs, ARs, marketplaces, associations	80	54
4	NRAs, ministries, agencies, producers, PROs, ARs, marketplaces, associations	94	67

3.4 Development of the final concept

The final concept presented in Section 7 of this report was developed through the internal analysis of the problem feeding from mapping exercises and information collected through the whole project, progressive integration of feedback collected during the co-creation workshops on roles and needs, surveys, bilateral exchanges, and internal project discussions.

Throughout the process, stakeholders shared information about their roles, needs and expectations, assessed different governance and operational models, discussing their feasibility, advantages, and implementation challenges. The exchanges focused on interoperability between national systems, simplification of registration and reporting obligations, preservation of national enforcement capacities, compatibility with existing roles and structures and possible harmonisation pathways.

The different design options were progressively refined following each workshop session and further consolidated through discussions within the LIFE4EPR consortium and consultations with the Advisory Board. The final concept presented in this report therefore reflects the outcome of this analysis.

4 Design options

4.1 The EU information Hub

Before considering any harmonisation of registration and reporting systems, it is important to improve the transparency and accessibility of EPR-related information across Member States. To this end, the establishment of an **EU EPR Information Hub** (Figure 5) could improve the situation significantly, hence **it is a piece included in all the design options** presented in section 4.2.

The EU EPR Information hub (Figure 4) would act as a centralised informative point for EPR-related information across the EU, without replacing or modifying national registers. A model like Eurostat could be envisaged, whereby National Registers provide selected, up to date, standardised data to the EU-level information platform.

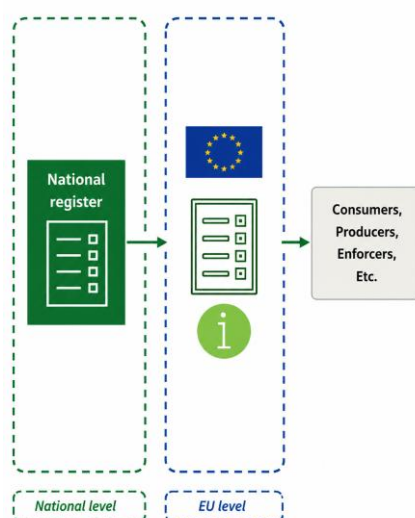
Such platform would:

- Provide a **single access point of information for producers**, facilitating compliance by offering structured and user-friendly access to:
 - National register websites.
 - PROs operating in each MS.
 - Applicable national legislation and key requirements.
 - Information on EPR compliance obligations, outlining the specific responsibilities and obligations for producers in each MS and EPR stream.
- **Enable checks on producer compliance**, verify whether producers are registered in specific MS, with differentiated access levels for enforcement authorities.
- Include support tools, such as:
 - A helpdesk or contact point to respond to queries, particularly from SMEs and distance sellers.
 - **Producer Guidance** on producer definitions specific to each combination of MS and EPR stream, to clarify responsibilities based on local legislation and compliance requirements (e.g. decision trees or guided tools to clarify the definition of “producer” across different MS).
 - **Access to lists of PROs, NRs, and ARs** operating in each MS-EPR stream, providing detailed contact information and operational scope.
 - **Access to FAQs and hotlines** to provide quick answers and direct contact options for producers or other stakeholders.
 - Public consultation of registered producers, offering transparency and the opportunity for public input on the registration process and compliance monitoring.

- EPR information for the wider public, ensuring that general information about EPR initiatives, producer roles, and compliance can be easily accessed and understood by all stakeholders.
- Circular initiatives for the wider public, promoting engagement and understanding of circular economy practices and encouraging broader participation in EPR schemes.

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

Figure 5: EU EPR Information hub



4.2 Options for EPR harmonisation

Regarding the harmonization of registration and reporting systems, the LIFE4EPR team identified several approaches, following two main models. The first model is a standalone model, whereby all producers (both local and cross-border) would be required to use the same registration and reporting system. The second model is a hybrid model, which would allow producers to use either the existing national systems or a new EU-wide registration and/or reporting system. The standalone models are explained in section 4.2.1 and the hybrid models in section 4.2.2.

4.2.1 Standalone models

Figure 6 provides an overview of the main design options for an EU-wide EPR register presented in the previous co-creation sessions. Each option is explained in detail in ANNEX II: Design options.

Overall, there are two alternative options with respect to the data entry:

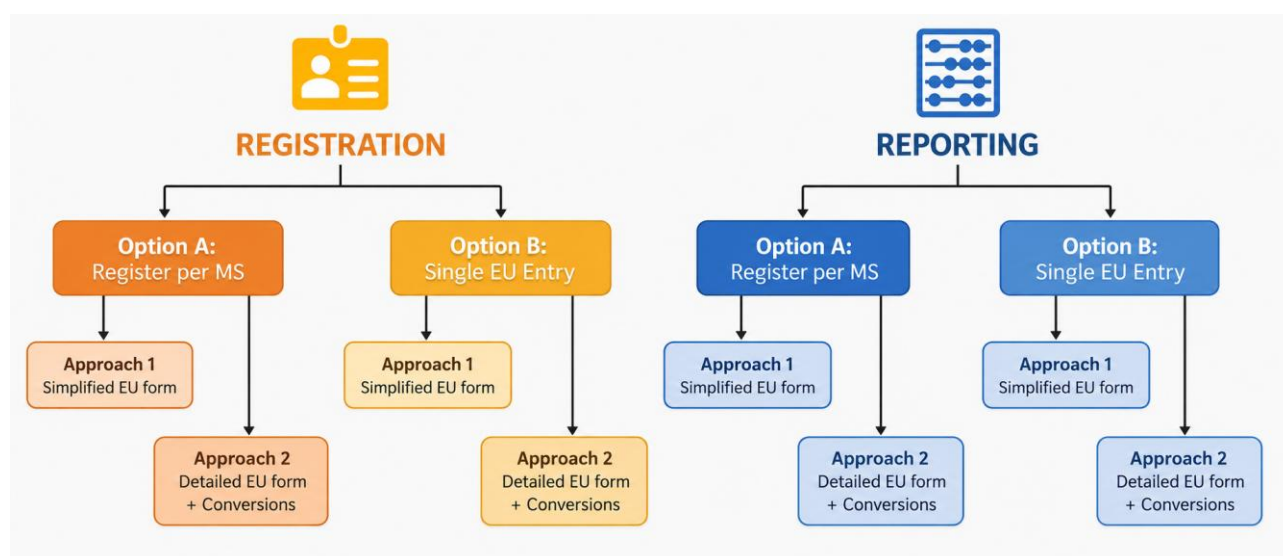
- at MS level: the producer will access and enter data in as many national registers and EPR streams as applicable. Common fields will be reported multiple times, or
- at a single EU entry point: data covering all relevant countries and streams is uploaded in bulk (by producers or their representatives) through a single-entry point, allowing common data fields to be reported only once and then distributed to the relevant countries and actors.

For each option, two alternative approaches are considered:

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

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

Figure 6: Overview of EU-wide EPR Register Design Options



Within the two options for data entry (i.e. registration and reporting managed at MS level or through a single EU entry point) both alternative approaches can be applied, resulting in different possible combinations (Figure 6). Table 2 shows key differences between both approaches. Both approaches rely on the benefit of harmonising the structure of the data to be reported. Producers having to report to multiple countries will be able to standardise their data sets, saving them time, and allowing for better comparability and cross checking of data.

- **Approach 1** consists of introducing a fully standardised EU data model based on a simplified (low level of granularity) EU form. Under this option, existing national data structures would be replaced by a new, common format used uniformly across all national registers. While this approach is conceptually straightforward, it would require significant changes to existing national systems.
- **Approach 2** introduces the concept of conversion factors and seeks to balance harmonisation with flexibility. Instead of changing the internal data structure of national systems, it builds on a common registering and reporting format with a high level of granularity. Producers would report their data using a detailed and standardised set of categories (i.e. highly disaggregated product codes), identical across all MS. This harmonised input dataset would then be processed by national registers (NRs) and Producer Responsibility Organisations

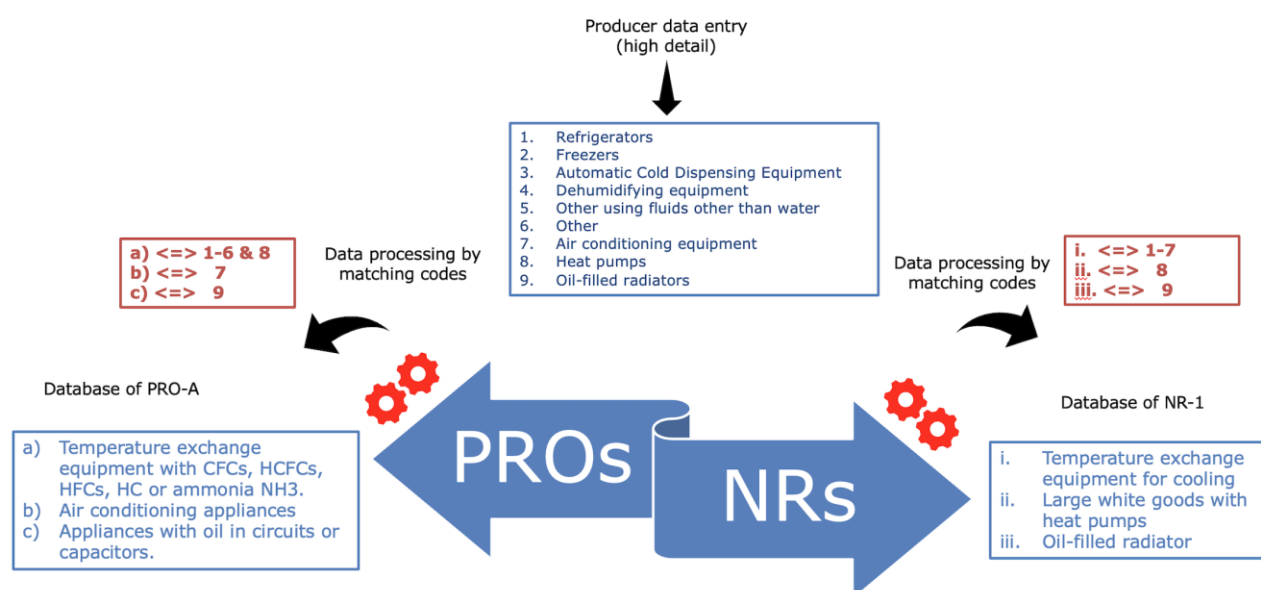
(PROs), which would apply conversion factors or aggregation rules to translate the detailed data into their respective reporting structures.

Table 2: Key differences between Approach 1 and Approach 2 with respect to system adaptation, data structure, complexity and burden.

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

In practical terms, a producer placing products on multiple national markets would only need to compile and submit one dataset structured according to the harmonised, granular format. This dataset would be shared with the relevant national registers and PROs in each country of operation. To ensure that the dataset can be converted and used by both NRs and PROs, it must include all information potentially needed for their respective processes. Each receiving entity (NRs and PROs) would then map and aggregate the data according to its own categories and reporting requirements, ensuring compatibility with existing databases requiring little changes to their internal structures (see an example in Figure 7). **Approach 2 addresses one of the main challenges identified by producers which is the high diversity of data structures used not only by NRs but also by PROs.**

Figure 7: Example of the conversion factors and the higher level of granularity applied in Approach 2 with Temperature Exchange Equipment



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

1. NRs across MS will use the same coding system and forms for each stream (e.g. common EU form for EEE, common EU form for batteries etc.), which would require them to adapt their current structures accordingly.
2. New simplified coding system may not be compatible with existing data structures therefore will complicate comparability and analysis of new records with previous data sets.
3. PROs will continue to operate with distinct coding systems at national level (i.e. each PRO using their own fee system).
4. Producers affiliated with a PRO would most likely continue reporting using the PRO's specific codes (different in each country).
5. The PRO would then process and translate this information for submission to the NR, requiring additional effort to convert producer data into the harmonised NR format.

As a result, with Approach 1, the current operational model would largely remain unchanged, with the EU harmonised format adding an additional layer rather than fully replacing existing structures.

The key advantage of Approach 2 lies in reducing the administrative burden for producers, who would no longer need to reclassify and adapt their data to multiple national coding systems of PROs and NRs. At the same time, it preserves the autonomy of national registers and PROs, allowing them to maintain their established data models and historical datasets. However, an important limitation must be acknowledged. The identification of a sufficiently detailed and universally compatible set of reporting categories remains uncertain. **Defining a level of granularity that can accommodate all existing national and PRO data structures across the EU would require a complex mapping exercise. This task falls outside the scope of the LIFE4EPR project.** While the approach 2 is considered conceptually feasible, its practical implementation would depend on further technical work to assess whether such a universally compatible classification system can be achieved. The use of other existing product codes is also to be explored e.g. customs codes, codes for commodities etc.

It should be noted that while convertible codes may not be necessary for streams where EPR legislation has not been implemented yet (as it is expected that EU legislation will ensure that NRs use the same EU harmonised codes), convertibility of codes may still be relevant for addressing differences in the reporting codes of the PROs of these new streams.

4.2.2 Hybrid models

In addition to the standalone options of introducing a fully harmonised EU approach described above or maintaining national systems with the introduction of conversion factors, a hybrid scheme could combine elements of both.

Hybrid models aim to balance the need for harmonization and simplification (particularly for cross-border producers) with the need to preserve existing national systems for producers that are not significantly affected by current fragmentation (the latter, mostly 'local producers'). This model takes into account the lack of information about the dimension of the problem; given that the number of

producers affected by reporting burden is unknown, this approach is conceived to not disturb the current modus operandi of producers satisfied with the current system (suspected to be a majority, hence, reducing implementation impact), while providing a favourable option to producers reporting (or planning to) to more than one MS.

A hybrid model would allow producers to choose between:

- I. Currently existing national routes (no change of modus operandi), and
- II. a harmonized route.

Producers placing products in only one MS (also called ‘local producers’), or those satisfied with existing registers, could continue using the current national registration process and data structures without changes in their modus operandi (MO) or reporting formats. By contrast, cross-border producers, placing products on the market in more than one MS, could opt to report through a single-entry point using an EU format, see Figure 8.

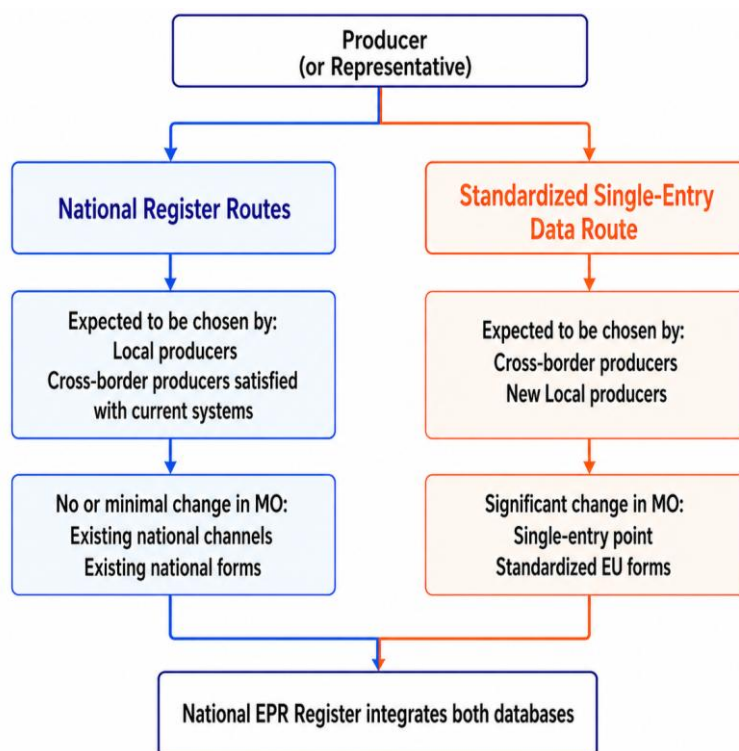
This would create a dual system in which National Registers would need to manage two data pathways: existing national formats and the harmonised EU format (the latter straightforward convertible into their existing structure if Approach 2 is chosen). Since NRAs would receive information in two different formats: current coding system (I) and harmonised EU system (II), both data sets need to be integrable into a single database. Therefore, this approach entails the processing of the data received in a high level of detail from the EU harmonised option (II) and its conversion into the national existing codes (I) for integration.

This model would provide a targeted response to the problem by focusing simplification efforts on the actors most affected by fragmentation, while avoiding unnecessary disruption for others. It also recognises that the scale of the problem is not yet fully quantified. For this reason, the hybrid model could function as a flexible and transitional scheme, allowing time to assess whether deeper harmonisation is necessary. The hybrid model could be considered both for the registration and for the reporting or only for one of them, e.g. reporting.

If future evidence confirms that fragmented registration and reporting systems create significant inefficiencies, the system could progressively evolve towards greater standardisation by for example, cancelling the business-as-usual option and adjusting or reducing the level of detail of the harmonised version. Conversely, if the problem proves limited, national systems could continue to operate with incremental improvements.

The hybrid model would be most relevant for EPR streams with long-established national registers, such as EEE, packaging and batteries. For new registers, however, the harmonised route should be considered from the outset, avoiding the creation of additional fragmented systems. It should also be clarified that models presented above (both standalone and hybrid) would only apply to reporting to National Registers. They would not cover registration with PROs or contractual arrangements between producers and PROs, which are beyond the scope of LIFE4EPR project. These models are complemented by non-structural measures, such as an EU EPR information hub and other supporting actions (e.g. harmonised definitions, multilingual support, aligned procedures), which further ease compliance without requiring fundamental system changes.

Figure 8: Scheme of the hybrid model



For the producer registration, three hybrid options were discussed, see Figure 9.

- **Hybrid registration BaU-B2:** Producers can choose between register through NR (BaU) or through a single-entry data EU platform with detailed fields EU forms (B2).
- **Hybrid registration A1-B1:** A common harmonised simplified Registration Form is applied to all NRs, using **simplified** fields (Approach 1) for both pathways. Producers can choose between register through NR (A1) or through a single-entry data EU platform (B1).
- **Hybrid registration A2-B2:** A common harmonised detailed Registration Form is applied to all NRs, using **detailed** fields (Approach 2) for both pathways. Producers can choose between register through NR (A2) or through a single-entry data EU platform (B2).

Analogously, for the products POM reporting, three hybrid options were considered, see Figure 10.

- **Hybrid reporting BaU-B2:** Producers can choose between report through NR (BaU) or through a single-entry data EU platform with detailed fields EU forms (B2).
- **Hybrid reporting A1-B1:** A common harmonised simplified Reporting Form is applied to all NRs, using **simplified** fields (Approach 1) for both pathways. Producers can choose between report through NR (A1) or through a single-entry data EU platform (B2).
- **Hybrid reporting A2-B2:** A common harmonised detailed Reporting Form is applied to all NRs, using **detailed** fields (Approach 2) for both pathways. Producers can choose between report through NR (A2) or through a single-entry data EU platform (B2).

Figure 9: Hybrid options for Registration

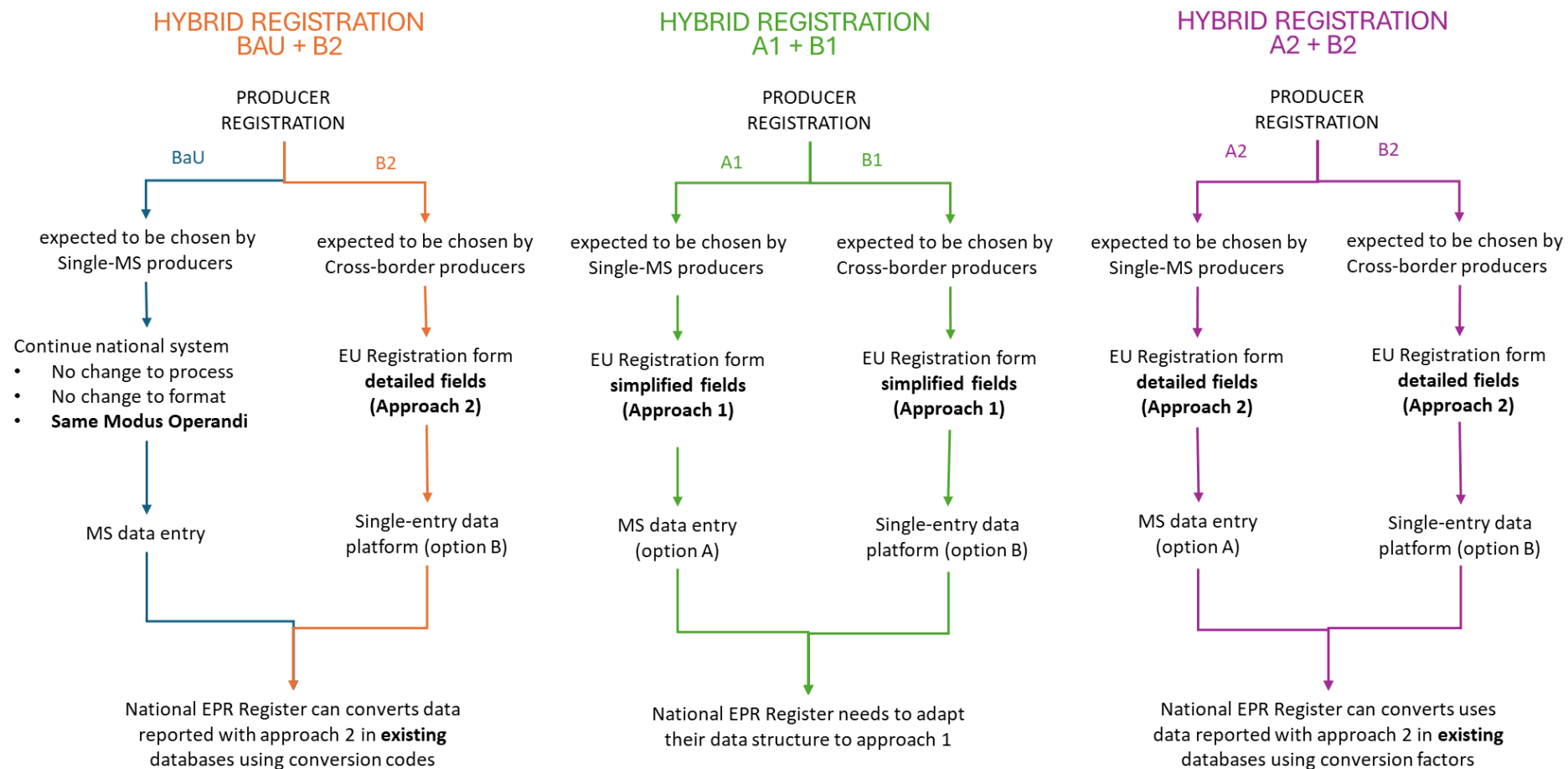
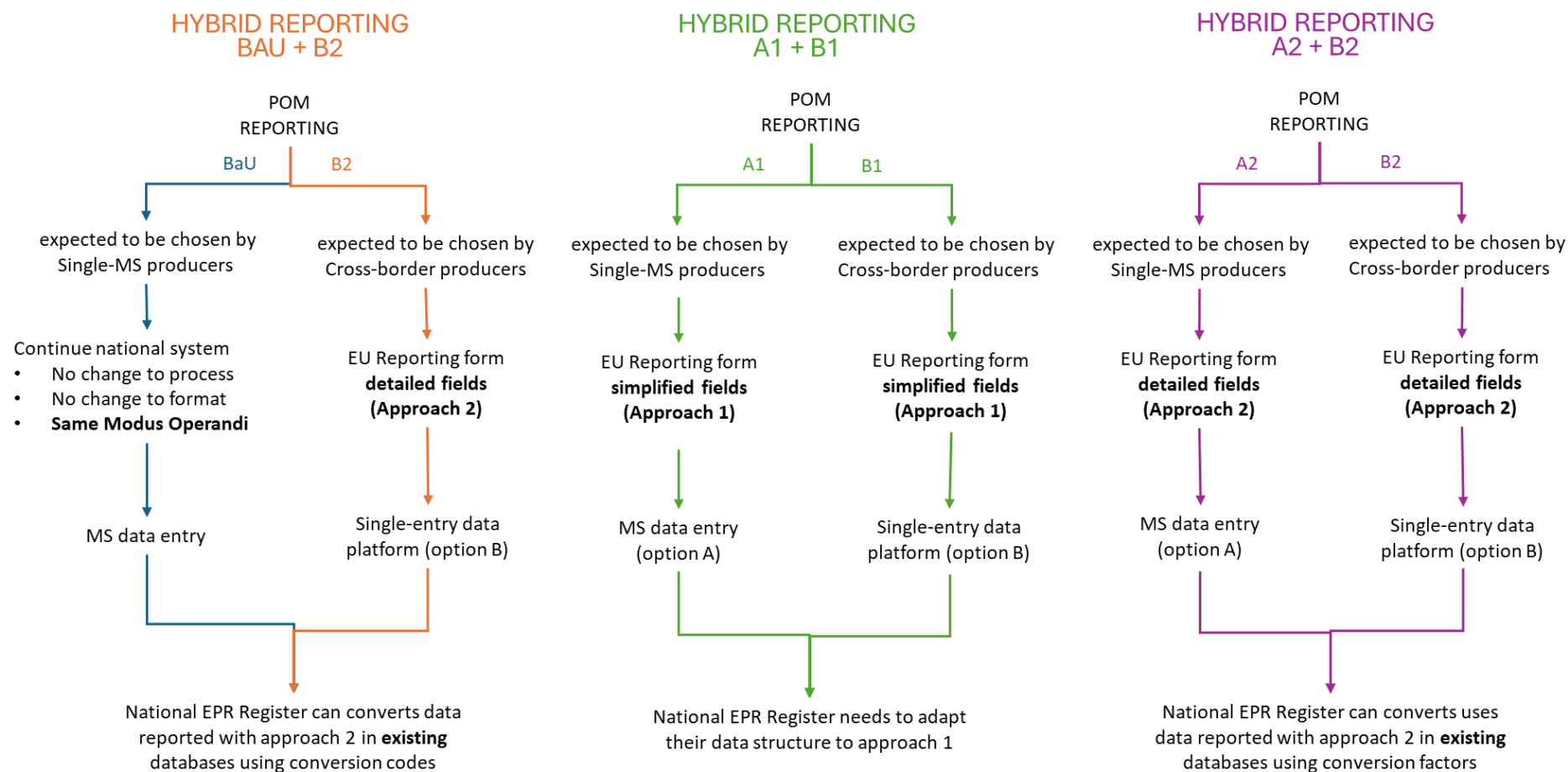


Figure 10: Hybrid options for Reporting



5 Results of the co-creation sessions

This section shows a summary of the stakeholders' views that were collected during the co-creation sessions. The general impression is that every group of stakeholders (NRs, 'local producers', cross border producers, PROs etc.) have different needs and interests, some of these conflicting and sometimes with different degrees of alignment (detailed results of the surveys per type of stakeholder appear in the ANNEX III: Survey Results).

The design of an EU-wide EPR Registration and Reporting Gateway presented in Section 7 of this report builds on the set of baseline principles defined by the stakeholders and avoids red lines set by the conclusions of the co-creation workshops. Given the complexity of the topic, the high variety of scenarios presented and the limited duration of the workshops, the LIFE4EPR project team cannot guarantee that all attendees had a full and correct understanding of the combinations presented.

5.1 Challenges related to current EPR Registers

The challenges identified by the project team (listed in Section 2.2) were strongly validated by the national authorities in the first session, with 88% of participants agreeing they reflect the current situation.

Some additional clarifications were provided during the discussion. Regarding language barriers, several participants noted that when an Authorised Representative (AR) is appointed, communication is typically handled by the AR, which can mitigate language-related issues. However, this configuration is not consistently applied across all EPR registers, meaning that language barriers remain relevant in many cases. These barriers also remain for producers exploring new markets, who may need to interact directly with EPR registers without support.

Regarding the "Difficulty in identifying the appropriate registration platform" participants pointed out that in the WEEE Directive there is an obligation for the NRs to provide their websites links to all NRs for the same EPR stream. On [EWRN.org](https://ewrn.org) there are links to all the national registers in terms of WEEE, and they are updated regularly.

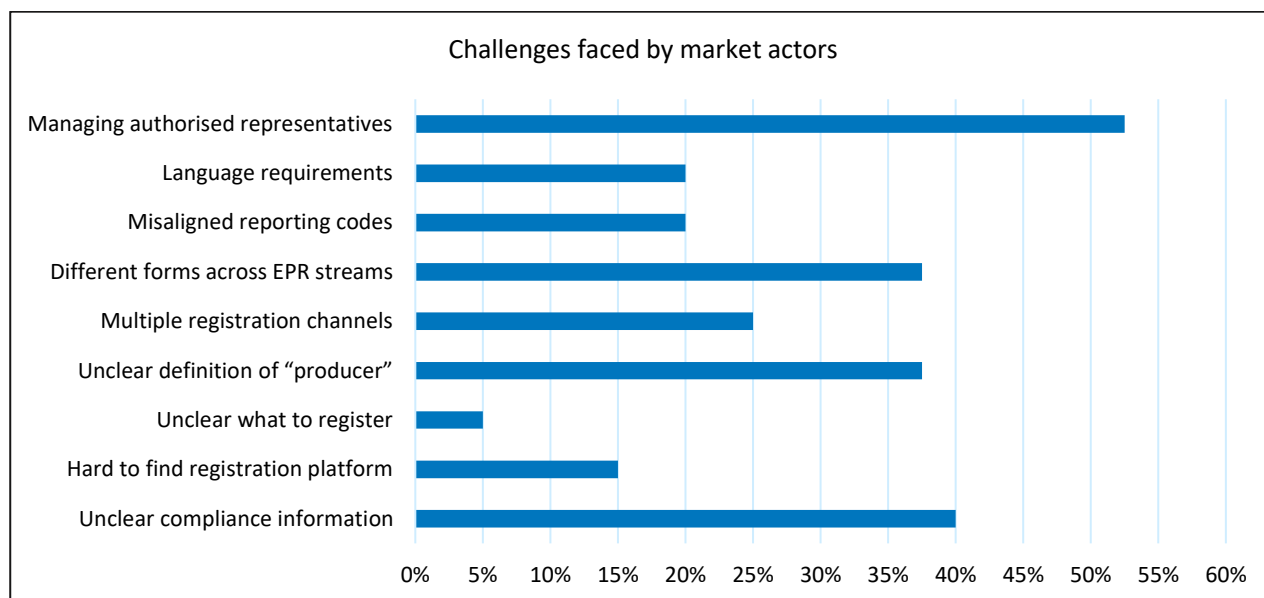
The findings of the 1st session were further confirmed by market actors in the second session, who highlighted managing authorised representatives as the most significant challenge, followed by unclear compliance information, uncertainty around the definition of "producer", multiple registration channels and differences in registration forms across EPR streams (Figure 11).

Challenges related to misaligned reporting codes, language requirements and difficulties in identifying the appropriate registration platform were also selected, although by fewer respondents. By contrast, uncertainty regarding what needs to be registered was perceived as a less significant challenge among respondents in this session. Additional discussion highlighted that these challenges are largely driven by fragmentation across Member States, including differing registration

requirements, deadlines, reporting frequencies and interpretations of legal obligations. Participants also stressed practical barriers such as limited accessibility of some national registers, lack of automated registration options, and difficulties for foreign producers in accessing national systems.

Another recurring concern related to online marketplaces and distance sellers, where fragmented approaches to registration and compliance continue to create gaps and burdens for producers.

Figure 11: Results of the question 6 made to the market actors participating in the 2nd co-creation session with market actors.



NRA consistently identified **enforcement** as the main challenge in managing producers established in other Member States. NRA highlighted difficulties in identifying and tracing producers, addressing free-riding, and enforcing obligations for online sellers and non-EU producers.

A second major barrier concerns **data quality and interoperability**. NRA pointed to difficulties linked to duplicate registrations, inconsistencies in company identifiers, differences between register and PRO data structures, and broader challenges in verifying and cross-checking reported information.

A third challenge relates to **regulatory fragmentation and governance**. Differences in national procedures, diverging interpretations of legislation and fragmented institutional arrangements were seen as creating administrative burdens and limiting effective cooperation across borders. Participants also stressed the growing need for stronger coordination mechanisms, particularly to support enforcement and improve consistency across Member States.

Taken together, the results from both sessions confirm that the main challenges identified by the project team are broadly shared, while also highlighting additional needs related to harmonisation, digitalisation, enforcement and support for cross-border compliance.

5.2 Harmonization of EPR Registers

The discussion on the harmonisation of EPR registration highlighted a range of existing practices, national experiences, and structural considerations that need to be considered when designing a potential EU-wide approach.

Participants pointed out that some degree of harmonisation already exists in specific areas. For example, in the WEEE sector, EU Regulation 2019/290 introduced harmonised reporting requirements. However, its impact has been limited, as it only applies to cases where producers report directly to national registers and it does not bind PROs. As a result, when producers operate through PROs, the intended harmonisation is not fully achieved.

Several national examples illustrated ongoing developments and best practices. In the Netherlands, authorities are transitioning from an older system to a more structured registration approach, starting with batteries in line with recent EU legislation. In France, a centralised website provides information for producers ([website for producer's information](#)), while in Finland, the Waste Act allows **online platform providers to fulfil EPR obligations on behalf of distance sellers**. Finland is also developing a one-stop-shop system enabling producers to join multiple PROs through a single registration process.

Additionally, the work done by the European Network of WEEE Registers, whose main mission is to harmonize as many procedures as possible to ease producer compliance with the WEEE directive, and the recently created Network for European Packaging Registers (<https://www.eunr.org/>) emphasized the importance of enforcement networks.

5.2.1 Harmonization of Producers Registration

Participants identified several challenges associated with the different harmonisation options presented during the workshop (represented in Figure 6).

A key concern relates to the introduction of a single EU registration form. While it could support harmonisation, it may also create complexity if it does not adequately reflect national specificities. According to NRA, national registers require detailed and context-specific information to ensure the proper functioning of their systems, and a standardised form may not capture these differences.

Legal responsibility for the data submitted through a harmonised EU form was also raised as an important issue. It remains unclear who would be accountable for ensuring the accuracy and legal validity of the information provided.

Participants further noted that some issues, such as mismatches between coding systems used by registers and PROs, are more relevant to reporting than to registration. Addressing these issues at the registration stage could therefore introduce unnecessary complexity. In sectors such as packaging, the use of conversion codes was considered highly challenging due to the diversity of national classification systems and the distinction between household and industrial packaging.

Concerns were also raised about the implications of a single-entry point system. National registers currently confirm producer registration and play a key role in supporting producers, including

through advisory services. Participants questioned whether these functions could be effectively replicated at EU level. In addition, practical issues such as authentication, definition of registration date, login systems, and data access were highlighted.

From an enforcement perspective, national registers play a central role in identifying free riders and monitoring compliance within their markets. Participants emphasised that this function relies on proximity to the national context and may not be easily transferable to a centralised system. Similarly, the workload associated with supporting producers and authorised representatives, particularly in relation to interpreting legal obligations, would be difficult to manage at EU level given resource constraints.

Finally, participants stressed that further centralisation could increase administrative burden rather than reduce it. The example of Norway was highlighted, where a highly streamlined system allows producers to register using only their organisation number and product category, with additional data automatically retrieved from existing databases. Introducing an EU-level system in such cases could disrupt efficient national practices.

5.2.1.1 *Ranking of the Producers Registration options*

Participants were asked to rank the different options for harmonising Producer Registration. Overall, the results indicate a clear preference for a gradual and supportive approach rather than a fully centralised system.

During the NRA co-creation event (first co-creation session), the preferred option was the creation of an EU EPR information hub to support compliance. Among the harmonisation options, Option A1 (according to the classification shown in Figure 6, introducing a harmonised EU registration form while maintaining national registration systems) received the highest level of support (38%), however during the session the possibility to introduce country specific fields was raised, which may have caused this high rate. This was followed by Option B1 (25%), representing a more centralised approach based on a single-entry point. Both options rely on a simplified EU registration form.

Options A2 and B2, which combine a harmonised registration form with conversion codes, received significantly lower support. Participants considered these options more complex and resource-intensive to implement.

Regarding implementation challenges, IT and system adaptation emerged as the main concern for Option A1, followed by staff and budget constraints. For Option A2, participants additionally highlighted concerns related to reporting obligations and data quality requirements. For the B options, the most significant challenges identified were ensuring data quality and consistency, together with the adaptation of IT systems.

Market actors responsible for registration also showed a clear preference for Option A over Option B, favouring Member State-level data entry. Of the 40 participants, 25 selected Option A, 11 selected Option B, and 4 considered that none of the options were suitable. Concerning the registration form approach, participants strongly preferred Approach 1 (simplified EU registration form) over

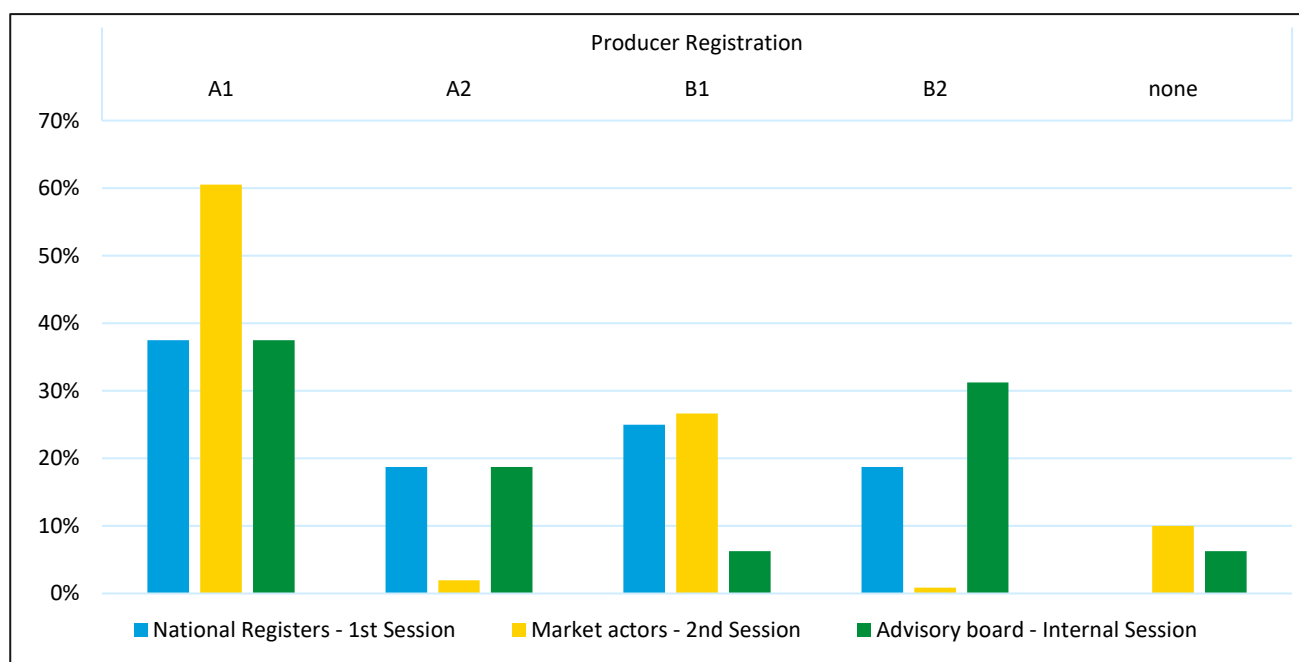
Approach 2. Out of 37 respondents, 31 supported Approach 1, only 1 selected Approaches 2, and 5 chose none.

The preference for Option A1 reflects the view that registration and compliance should remain managed at Member State level, as PROs currently operate within national systems. Participants also emphasised that the registration process should remain as simple and general as possible. Using the example of WEEE (Waste Electrical and Electronic Equipment), stakeholders noted that while the WEEE Directive defines six product categories and some national systems already require more detailed subcategories, increasing the level of classification detail or introducing additional harmonised reporting categories at the registration stage could create unnecessary complexity.

In their view, detailed alignment between PROs and national EPR registers is not required at the registration level and could instead lead to confusion for producers.

During the Advisory Board (AB) meeting, respondents also expressed a preference for Option A1 (reporting to every register in every MS using a simplified common format), selected by 38% of participants. Option B2 (reporting through a single EU data entry point using a common format with convertible codes) ranked second, with 31% support.

Figure 12: Results of the co-creation sessions with respect to the preference option for Producer Registration



5.2.1.2 Simplification measures

Despite the potential of the proposed harmonisation options, participants identified several remaining challenges that would need to be addressed.

One important gap relates to the lack of options for bulk registration and reporting. In particular, the possibility for platforms or intermediaries to upload data on behalf of multiple producers is currently not sufficiently considered, despite its relevance given the growing number of online sellers.

Participants also highlighted the need to strengthen the link between national producer registers and other data sources, such as customs databases. Using national registers as a basis for cross-checks with customs data could significantly improve enforcement and help identify non-compliant producers, especially in cross-border contexts.

Participants also highlighted that one possible simplification measure would be to reduce the number and level of detail of product categories required during the registration phase. Stakeholders noted that highly granular product classifications are generally more relevant for reporting and compliance monitoring than for registration itself. Simplifying the categories used at registration stage could therefore reduce administrative burdens, make the process easier for producers, and avoid unnecessary complexity, while still allowing more detailed information to be collected later through reporting systems where needed.

Another key limitation identified was the absence of a unique and consistent producer identification system across Member States. Stakeholders emphasised that a common or mutually recognised identifier could improve traceability, reduce the risk of duplicate registrations, and facilitate interactions between producers, PROs, Authorised Representatives and National Registers operating in different countries.

In this context, the concept of a **Unique Registration Number (URN)** was discussed as a possible simplification measure. The URN would aim to provide a common reference for identifying producers across the EU-wide EPR Register, while recognising that registration status and compliance obligations may remain specific to each Member State and EPR stream. For this reason, participants stressed that the URN should not create the impression that a single identifier automatically confirms EU-wide compliance.

During the LIFE4EPR co-creation sessions, participants discussed the potential design and functionality of the URN and identified key elements to be considered in its further development. While there was broad support for the concept of a unique producer identifier, participants stressed the need to clearly define its purpose, scope and governance, particularly as verification and enforcement would remain primarily a national responsibility.

Participants highlighted that the URN should support the identification of the legal entity responsible for compliance, the Member States where products are placed on the market, and the EPR streams for which the producer is registered. However, the use of a single static identification number across Member States was also considered potentially problematic, as such codes could be copied, shared or misused by third parties, creating risks of impersonation or fraud. For this reason, the URN should not create the impression that a single identifier automatically confirms EU-wide compliance across all Member States and EPR streams.

The concept initially referred to as a “producer passport” was also discussed. Feedback received during the co-creation process, including from the European Commission, indicated that this terminology could create confusion with EU Digital Product Passport initiatives, which relate to product-level information rather than producer registration. The term “producer certificate” was

therefore considered more appropriate to refer to an EU registration number, code or digital credential assigned to producers upon registration.

Several participants suggested that such a producer certificate could include a limited amount of publicly accessible information, while providing more detailed information to competent authorities, National Registers, PROs and Authorised Representatives. Digital tools such as QR codes, digital certificates or controlled-access verification systems could facilitate access to registration information, improve transparency and support enforcement activities, while ensuring appropriate protection of sensitive information.

Stakeholders also highlighted the potential role of digital certificates as a more secure and future-oriented alternative to static identification numbers. Digital certificates could incorporate stronger authentication and controlled access mechanisms and could potentially be integrated into future digital business wallets, enabling producers to securely authenticate themselves when interacting with National Registers, PROs or other regulatory systems across Member States.

5.2.2 Harmonization of the POM reporting

The workshop explored different options for harmonising the reporting of products placed on the market (POM) across Member States. These options follow the same logic as the registration scenarios and range from a harmonised EU reporting form to more advanced approaches involving conversion codes and/or a single-entry point (see Figure 6).

Participants highlighted significant challenges associated with the harmonisation of reporting, particularly due to the diversity of national systems.

A key issue is the wide variation in the number and type of subcategories used across Member States. Reporting requirements are closely linked to national waste management systems, making it difficult to design a single reporting structure that meets all needs. For this reason, several participants expressed doubts about the feasibility of a fully centralised reporting system.

Different national practices further illustrate this complexity. For example, in Ireland, producers report exclusively to the national register rather than directly to PROs. PROs receive only aggregated data, ensuring the confidentiality of commercially sensitive information, and jointly agree on the subcategories used. This type of system would be difficult to replicate under a centralised EU reporting model.

While the reporting of data on waste collection is not in scope of the LIFE4EPR study, participants also stressed that reporting is not limited to data submission but plays a key role in **verification and enforcement**. Reports must be supported by evidence that waste management operations, such as recycling, have been carried out. This requires cross-checking data from multiple sources, including EPR reports, waste databases, and information from waste collectors and treatment operators. Such complex verification processes may be harder to implement in a centralised system.

At the same time, some participants noted that the creation of an EU-level system would not affect the legal powers of national competent authorities. Member States would still be able to enforce compliance and impose sanctions on producers that fail to meet their reporting obligations.

From a technical perspective, authentication was not considered a major barrier, as existing EU frameworks, such as the mutual recognition of electronic identification under the eIDAS Regulation, could support secure access to a harmonised system. In addition, some participants highlighted the potential benefits of an EU-level hub, which could improve control and supervision by consolidating market data and enabling better cross-border monitoring.

The introduction of a single-entry point was also seen by some as an opportunity to simplify compliance. Allowing producers to register and report once for all Member States could reduce administrative burden, limit duplication, and support more consistent data exchange. However, these benefits must be balanced against the challenges related to national specificities and system complexity.

Finally, participants raised concerns about non-EU sellers, who can place products on the EU market without complying with EPR obligations. This creates unfair competition and contributes to significant levels of free riding, with compliant producers bearing a disproportionate share of waste management costs. Addressing this issue remains a key challenge for any future reporting system.

5.2.3 Ranking of the POM reporting options

Participants were asked to rank the different options for harmonising products placed on the market (POM) reporting. Overall, the results indicate a preference for more limited and simplified harmonisation approaches.

During the NRA co-creation event (first co-creation session), Option A1 received the strongest support, with 63% of participants selecting this option. Option B1, which introduces a more centralised single-entry point system while maintaining a simplified EU reporting form, ranked second with 19% support. Options A2 and B2, which include the use of conversion codes in addition to the harmonised reporting form, received significantly lower support, with only 6% and 13% respectively. No participants selected “none” of the options.

Market actors involved in reporting also showed a strong preference for Option A1. Of the participants, 70% selected Option A1, while only 8% supported Option B1. None of the respondents selected Options A2 or B2, and 22% considered that none of the proposed options were appropriate. These results suggest a clear preference among market actors for maintaining reporting processes at Member State level while simplifying and harmonising reporting formats at EU level.

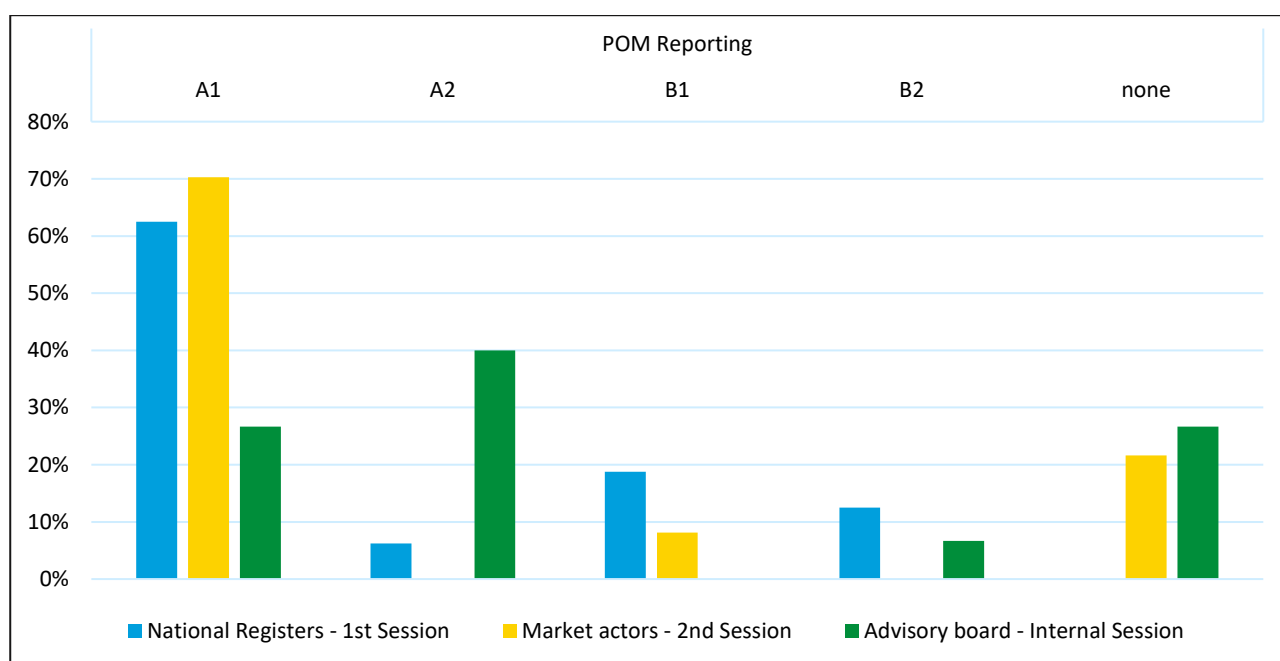
The Advisory Board session showed a more divided distribution of preferences. Option A2 received the highest support (40%), followed by Option A1 (27%). None of the participants selected Option B1, while 7% supported Option B2 and 27% chose none of the options.

Overall, the results demonstrate a preference for harmonisation approaches based on simplified EU reporting forms combined with decentralised Member State-level data entry. More centralised approaches and those involving conversion codes were generally perceived as more complex and difficult to implement.

Participants also raised concerns regarding the overall feasibility of harmonising EPR reporting at EU level, which explains the relatively high share of respondents selecting none of the proposed options, particularly among market actors and Advisory Board members.

Across all options, data quality and consistency requirements were identified as the main implementation challenge, followed by the need for significant IT and system adaptation. For the options involving more detailed reporting approaches and conversion codes, participants also highlighted concerns related to additional reporting obligations, increased complexity, and resource constraints, including staffing and budget limitations.

Figure 13: Results of the co-creation sessions with respect to the preference option for products POM Reporting



5.2.4 Key learnings from the first 3 sessions

Stakeholders widely welcomed the concept of an EU EPR Information Hub, acknowledging its potential to simplify and harmonise the registration process across MSs. This measure was also supported by similar initiatives observed in other areas.

Both national registers and market actors expressed a clear preference for keeping registration and reporting at the national level (Option A). Enforcement at the national level is already challenging and expanding it to an EU-wide register would introduce even greater complexity. Additionally, PROs are currently operating at the national level, further reinforcing the preference for national registration systems.

While the marketplaces and a producer association showed interest in Option B, which advocates for a single EU entry point, this option remains less favoured overall.

Stakeholders expressed reluctance to provide more granular details in their reporting. However, it remains unclear what exactly "higher detail" would entail. Despite this, participants favoured

Approach 1 (simplified EU forms) over Approach 2, which would allow national registers and PROs to retain their current data structures.

It is important to note that just because Approach 1 (simplified EU forms) is used in EPR registers, this does not imply that the reporting process to PROs will be similarly simplified. This distinction highlights that **harmonising producer registration is less complex than harmonising products' POM (Placed on Market) reporting**.

The uncertainties regarding the number of producers affected by fragmentation, and the scale of the problem (see section 2.3), make it challenging to assess the urgency of harmonisation efforts. Additionally, system changes to address these issues will have a broad impact, not only on those producers facing the most significant challenges but also on actors who are currently not experiencing these issues. This highlights the need for a well-balanced approach that considers both the immediate needs of cross-border producers and the wider ecosystem of actors involved in EPR registration and reporting.

It can be inferred from the above that a system combining standardised forms with reporting at MS level, while also offering a unified approach to specific actors such as marketplaces, could be a suitable option. However, this approach may require the use of detailed reporting codes to ensure effective data integration.

5.3 Co-creation results on hybrid models

Following the second co-creation session, the LIFE4EPR project team began considering a hybrid model as a potential option. This was based on the information collected until then (see previous point) and the observation that the lack of harmonization in registration and reporting systems primarily affects cross-border producers, while local producers generally do not face the same challenges. As a result, requiring all producers to transition to a new registration and reporting system did not appear to be a proportionate option, given that a large share of producers is not directly affected by the current shortcomings.

The hybrid model was first introduced during the Advisory Board co-creation session and was further discussed in the final co-creation session. It was not considered or discussed during the earlier co-creation sessions.

5.3.1 Advisory Board input

During the Advisory Board session, participants were asked to assess the feasibility of a hybrid model while the size and scope of the problem continue to be quantified. Under this model, producers would have two options for registration and reporting: they could either continue using the existing system of multiple Member State (MS) and EPR-specific registers or use a single-entry point based on detailed EU reporting forms.

Two single-entry point models were presented:

- 1) an EU single-entry platform (producers will report to one url and information will reach the relevant NRs), and

2) National Registers (NRs) acting as single-entry points for all Member States.

In this case the scheme entails a network of interconnected National Registers, whereby producers will be able to submit information regarding several MS through the site of one NR who will distribute the information received to the relevant Member States and registers. Under the latter model, every competent National Register and Member State authority receiving the information through this single channel would remain responsible for communicating with producers or authorised representatives (ARs), when necessary.

Participation during the voting of options was very low, overall, participants did not consider the hybrid model to be feasible. Seven out of the eight participants voted against this option. When asked about their preferred single-entry model, two participants voted in favour of an EU-wide single-entry platform, two supported interconnected National Registers, and three indicated that none of the proposed options were suitable. Due to the meeting time constraints, it was not possible to explore in greater detail the reasons underlying participants' responses and preferences.

5.3.2 LIFE4EPR simulation exercise

Following the Advisory Board session, ERION, WF and ENT carried out a simulation exercise based on the options presented to the Advisory Board. The exercise was conducted from the perspective of a producer reporting products POM, with the aim of identifying the practical steps required to complete registration and reporting obligations under each option.

The simulation showed that the option of interconnected National Registers acting as a single-entry point would require significant changes at the national level before it could be implemented. Furthermore, it would require, as a first step, the integration of all EPR streams into a single National Register, whereas most existing National Registers are currently organised by specific EPR streams.

Based on these findings, the project team concluded that, among the single-entry point options, the interconnected NRs option was not feasible due to extreme complexity, relevant changes in the current structures (e.g., merging of NRs of the different streams in a country) and change of roles of NRs (as data receivers and distributors of data to other NRs).

The “EU Gateway” approach

The internal simulation exercise concluded that the hybrid model for reporting “BaU & B2” (i.e. the first option shown in Figure 10) was the only option able to meet most requirements and expectations. Under this configuration, stakeholders' roles and competencies would not be affected, and producers could choose either to maintain their current *modus operandi*, following the fragmented approach, or to upload harmonised data in bulk.

The harmonized data route of the hybrid model was conceived as a data repository, named informally the ‘EU Gateway’, with controlled access by the different stakeholders involved.

Most of the implementation impact would fall on the NRs and PROs, which would access the EU data repository to obtain the data reported by (mainly cross-border) producers and integrate it with the data provided by producers that did not change their reporting behaviour. **In essence, the proposed**

scheme changes the way data are provided and accessed, rather than creating parallel reporting routes or introducing new roles and actors. This scheme is described in detail in Section 7.

5.3.3 Final co-creation meeting

In the final co-creation session, participants were asked to assess the feasibility of a hybrid reporting model combining BaU and B2 options. Approximately two-thirds of respondents (23 out of 33) considered this option to be unfeasible, however, there was good support to BaU option and B2 option (both are covered with the reporting option finally proposed).

The concerns raised by participants can be grouped into several categories:

- **Increased complexity and administrative burden.** Many participants argued that a hybrid model would add complexity while providing limited benefits. The coexistence of two reporting routes could create confusion for producers, PROs, and public authorities regarding which reporting channel should be used. Participants also highlighted the risk of incorrect submissions, increased administrative burdens, and additional financial and technical costs associated with adapting existing systems.
- **Risk of double reporting and data fragmentation.** A recurring concern was the possibility of duplicate reporting requirements and the coexistence of multiple data formats. Participants stressed that data should be submitted only once and that maintaining parallel reporting systems could lead to fragmentation, inconsistencies, and difficulties in assessing and consolidating data across jurisdictions.
- **Enforcement, supervision, and governance challenges.** Several respondents questioned how compliance monitoring, controls, and enforcement would operate under a hybrid model. Concerns were raised regarding the allocation of responsibilities between producers, PROs, national authorities, and EU-level bodies, as well as the supervision of cross-border producers. The contractual relationship between producers and PROs was also identified as a potential challenge for enforcement mechanisms.
- **Insufficient harmonisation across Member States.** Many participants considered that a hybrid model would not address the underlying problem of divergent national registration and reporting requirements. Respondents emphasised that harmonisation of reporting formats, data requirements, regulations, and standards at the EU level would be a more effective option. Several participants noted that the success of any hybrid model would still depend on a significant degree of harmonisation across Member States.
- **Technical and implementation challenges.** Participants highlighted the need to develop conversion factors between reporting systems, adapt existing IT infrastructures, and implement substantial changes to national registers. Concerns were also raised about the capacity of national authorities to undertake these changes at a time when other regulatory developments, such as the Packaging and Packaging Waste Regulation (PPWR), are already requiring significant adjustments.
- **Role of PROs and existing reporting structures.** Respondents noted that PROs often receive data directly from individual producers and that collective uploads are not foreseen in many

existing systems. The role of PROs within a hybrid framework was therefore considered unclear and potentially difficult to integrate into the proposed architecture.

- **Data governance and financing.** Additional concerns related to data security, governance arrangements for a potential EU-level platform, audit and verification procedures, delays in data transmission, and the financing of the new system.

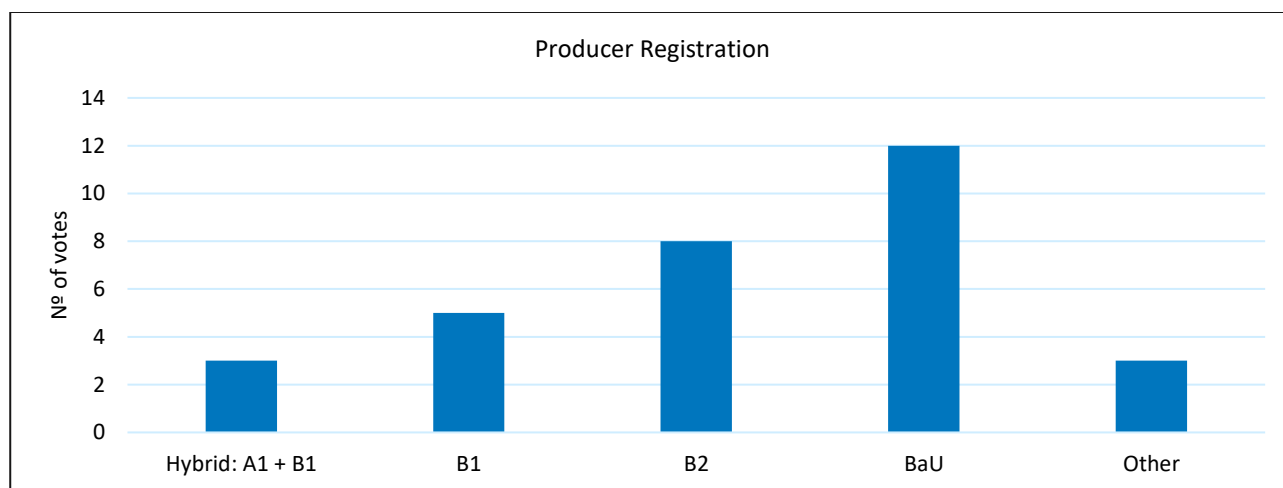
Overall, participants generally favoured greater harmonisation at the EU level over the introduction of parallel reporting routes. Several respondents argued that a single reporting format and a coordinated EU-wide approach would be more effective in reducing administrative burdens, improving data quality, and facilitating enforcement.

Participants were also asked to indicate their preferred registration approach among five options: (1) Hybrid A1–B1, (2) Stand-alone B1, (3) Stand-alone B2, (4) maintaining the current registration systems (Business-as-Usual, BaU), and (5) another alternative approach.

The most preferred option was maintaining the current registration systems (BaU), which received 12 out of 31 votes. This was followed by the Stand-alone B2 approach, which received 8 votes. The Stand-alone B1 approach ranked third with 5 votes, while the Hybrid A1–B1 approach and the "Other" category each received 3 votes, see Figure 14. These results suggest that participants generally favoured either retaining the existing registration framework or moving towards a fully harmonised stand-alone scheme, while support for hybrid options remained limited.

The registration option finally proposed aligns with the reporting option bearing in mind the efficient and rational use of resources.

Figure 14: Results of the 4th co-creation sessions with respect to the preference option for producer registration



5.3.4 Consultation to WEEE Forum members

The final reporting scheme based on a common data repository ('EU Gateway') was also presented to WEEE Forum members during the association's annual General Assembly, held on May 2026.

The option discussed was the 'EU Gateway' scheme based on the hybrid reporting model that combines BaU and B2 scenarios (i.e. the first option shown in Figure 10). Under this framework,

producers could continue using their existing national reporting channels or opt for uploading data in bulk to an EU repository. This repository will be accessed by authorised actors to retrieve the relevant data. Data would be provided using a harmonised and detailed EU dataset and subsequently converted into national structures by the relevant National Registers and PROs.

As all WEEE Forum members operate as PROs, this consultation provided a perspective complementary to the broader co-creation sessions, focused on the operational implications for compliance schemes.

Overall, the proposed ‘EU Gateway’ configuration was received with interest. While acknowledging that the approach was not without difficulties, members generally regarded it as an improvement on the options previously considered and worth considering. This appeared linked to the understanding that the ‘EU Gateway’ would function as a data repository rather than a replacement for PROs, which would continue to draw data into their own systems and to act as verifiers and submitters to National Registers where applicable.

WEEE Forum members raised the following concerns:

- **Legal responsibility of PROs for the placed-on-market data:** in the scheme proposed it should be clearly identified the role and responsibility of each actor, where producers generate the data that is accessed by PROs for verification and submission to NRs. the system should allow to submit the data by the same current users (i.e. authorised actor, being the producer itself, the PRO or the AR).
- **Data confidentiality:** the harmonised route would require very granular, product- and market-specific data, which is more sensitive than the category-level data that PROs handle today; it was clarified that the access rights would be defined so that each PRO can only access the data of its own affiliated producers. At the registration stage the roles and data access rights need to be defined.
- **Harmonised product categories:** it was suggested that a harmonised set of product categories (for example, for EEE, building on the UNU keys⁷) could be simpler than using conversion tables and could support the rationalisation of PRO fee structures. The adequate level of granularity would, however, need to be assessed, as the categories must remain compatible with the criteria used by PROs for fee calculation. Product categories should also consider and be compatible with the potential use of the **visible fee** (e.g. the visible fee for a two-door fridge is usually higher than that of a small fridge).
- **Governance and financing:** the governance and financing of the ‘EU Gateway’ configuration was mentioned as a key open question, but no conclusions were reached on this point.

Additional input was received during bilateral discussions and meetings as below:

- **Reporting frequency:** a single harmonised frequency for NRs and PROs may not suit all markets, as some prefer a higher frequency (e.g. due to cash-flow reasons, e.g. PROs in very competitive markets), others, like SMEs, would probably prefer longer reporting periods.

⁷ E-waste Statistics: Guidelines on classifications, reporting and indicators (2026, UNITAR – SCYCLE, Bonn, Germany)

There is willingness to align with a common EU frequency (quarterly or six-monthly), but harmonisation should balance simplification with national and market diversity.

- **Other reporting obligations:** producers sometimes also report POM data to other entities (e.g. Romania financial institutions), such as financial authorities, so harmonising with these obligations should also be considered for reducing reporting burden.
- **Visibility and verification of reported data:** PROs should have sufficient access to producer data for verification and audit. Systematic cross-checks, for example reported volumes against registered categories and thresholds, would improve data quality, and error-correction mechanisms should be foreseen.
- **Role and definition of National Registers:** a clearer, more consistent understanding of their role across Member States, with transparency on appointment and a clear separation between registration and enforcement functions, would support a more coherent system.
- **Multi-stream, single platform:** combining stream-specific platforms (WEEE, batteries, packaging) into a single system was seen as a clear simplification, supporting the multi-stream logic of the concept.
- **Ability to correct submitted data:** some systems only allow data to be added, not modified or deleted, so the harmonised route should allow producers to correct or update submissions.
- **Transparency with confidentiality of volumes:** public registers showing which producers are registered and with which scheme are good practice for transparency and enforcement, while POM quantities stay confidential and aggregated.
- **Proper fields for Authorised Representatives:** appointing an AR is mandatory in many streams, but some registration procedures do not provide a structured field to declare the AR. Registration forms should include dedicated fields for AR information.
- **De minimis thresholds for small producers:** in some systems, registration is only required above a certain volume, which reduces the burden on small producers. This seems a controversial topic, not supported by all members that see a risk of for example, rather large companies to split their operations into smaller companies to evade their EPR obligations.

6 Results of the online survey

An online survey was sent to all the participants of the co-creation sections for them to gather their views on the possible design and requirements of an EU-wide EPR registration and reporting scheme.

The survey focuses on governance and enforcement roles, harmonisation of registration and reporting, interoperability between national systems, the role of NRAs, PROs and ARs, as well as complementary measures that could reduce administrative burden, especially for cross-border producers.

It should be noted that the survey sample is not representative, and therefore the results may reflect the profile of the respondents rather than the views of the wider stakeholder community.

This section describes the results gathered in the survey, while the description of the participation can be found in Annex AI.6. Survey participation.

6.1 Requirements for an EU-wide EPR Registration & Reporting Scheme

For this part of the survey, participants were asked to rate the level of agreement for a set of requirements for an EU-wide EPR registration and reporting scheme. Results were used to streamline the configuration proposed for the LIFE4EPR pilot.

6.1.1 Governance and Enforcement

As can be seen in Table 3, respondents expressed strong support for maintaining the central role of national authorities and NRs in EPR governance and enforcement, while enhancing cross-border cooperation and information sharing between Member States. Stakeholder-specific differences are presented in Annex AIII.1. Governance and Enforcement requirements.

Large majorities supported national enforcement responsibilities (Requirement 1), as well as key operational functions of NRs. These include the verification of registration and POM data (Requirement 2), informing producers about compliance obligations (Requirement 3), and direct communication with producers, ARs and PROs (Requirement 4). Respondents also supported the issuance of national registration numbers or digital certificates (Requirement 5).

There was strong support for cross-border access to registration information (Requirements 6, 8 and 9), while respondents clearly rejected limiting access to information to the Member State of origin only (Requirement 7). Views were more mixed regarding public access to basic producer registration information (Requirement 10), although overall support remained positive.

The EU-LIFE4EPR Gateway scheme is closely aligned with this preference. It preserves the existing roles and competences of National Registers and national authorities, while introducing mechanisms to improve interoperability, data exchange and access to information across MSs.

The proposed EU-LIFE4EPR Gateway responds to these requirements by ensuring that NRs remain the competent bodies for registration, validation, communication and enforcement-related functions. At the same time, the concept explores ways to simplify the identification of producers across countries and EPR streams. In this context, the possibility of a unified registration identifier is under consideration. This could take the form of a registration number compiling all registrations of a producer by stream and country. The use of a barcode or QR code could allow registration information to be updated dynamically, without requiring producers to change the code displayed on products, websites or other communication channels. The consortium will further assess whether this format could create practical issues for NRs, producers or marketplaces during the following tasks of the project. As an alternative, a composite registration number in written format, for example combining an ID number, stream code and country code, could be considered, although its static nature may make updates more complex for producers and marketplaces.

The EU-LIFE4EPR Gateway scheme reflects the strong support for cross-border access to registration information through the proposed EU EPR information hub. This hub would compile information from all NRs and provide different levels of access depending on the type of user and purpose of access. This would allow relevant information to be accessible to enforcement authorities and other authorised actors, while also enabling an appropriate level of public access to basic registration information.

Table 3: Survey results on the Governance and Enforcement Requirements

A. Governance and Enforcement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
1. Competent national authorities should retain their enforcement role at national level.	35	17	3	4	0	0
2. National Registers (NRs) should be able to verify and validate both producer registration data and products placed on the market (POM) data, including submissions made by PROs or Authorized Representatives (ARs) on behalf of producers.	30	27	0	1	1	0
3. NRs should be able to inform producers about EPR compliance obligations.	30	21	5	2	0	1
4. NRs should be able to communicate directly with producers, ARs, and PROs.	28	26	3	1	0	1
5. NRs should be able to issue a national producer registration number, or code embedded in a digital verifiable certificate.	25	20	9	3	2	0
6. NR authorities should be able to access producer registration information from other Member States.	25	19	10	4	1	0
7. NR authorities should be able to access registration information only from their own Member State (not from other MS).	2	6	10	21	16	4
8. NRs should be able to share producer registration data with enforcement authorities in other Member States upon request.	24	23	8	2	1	1
9. Enforcement authorities should be able to access detailed producer registration information across all Member States.	25	21	9	2	1	1
10. Public users, such as consumers, should be able to visualize basic producer registration information for all Member States and EPR streams.	13	25	14	4	3	0

6.1.2 Registration Structure and Harmonization

As can be seen in Table 4, respondents expressed broad support for greater harmonisation of producer registration requirements across Member States. Stakeholder-specific observations are presented in Annex AIII.2. Registration Structure and Harmonization.

Strong majorities supported a common structure for registration numbers (Requirement 11), an EU-defined minimum registration dataset (Requirement 12), and a harmonised registration form accepted by all National Registers (Requirement 14).

Support was more moderate for introducing a single EU-wide registration number for each legal entity (Requirement 11b) and for consolidating all EPR streams into a single national register (Requirement 15), suggesting some caution regarding deeper structural integration.

Views were most divided on whether Member States should be allowed to request additional registration fields beyond the EU minimum requirements (Requirement 13). Overall, respondents favoured harmonisation of registration processes while expressing different views on the level of flexibility that should remain available to national authorities

The EU-LIFE4EPR Gateway scheme is aligned with these results, as it proposes the use of a producer registration identifier that could be used across all EU Member States, together with a common EU registration form.

In relation to the registration identifier, the proposed EU-LIFE4EPR Gateway is currently considering a compiled unique registration certificate that could be updated dynamically, for example through a barcode or QR code. Other alternatives, such as a static code in written format, are also under consideration. Overall, the EU-LIFE4EPR Gateway scheme aims to move towards a single identifier for each producer, which is broadly supported by the survey results.

Regarding the consolidation of several stream-specific National Registers within a country, this is considered a structural and legislative change that falls outside the scope of LIFE4EPR. Therefore, the proposed scheme does not require the unification of National Registers across EPR streams.

The possibility for Member States to request additional registration fields beyond the EU minimum requirements is not included in the EU-LIFE4EPR Gateway, as this could create further fragmentation and additional administrative burden. The lower level of support received for this requirement, compared with the other requirements in this section, suggests that the EU-LIFE4EPR Gateway scheme is broadly aligned with stakeholders' views on this issue.

Table 4: Survey results on the Registration Structure and Harmonization Requirements

B. Registration Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
11. The format of national producer registration numbers (obtained after the EPR registration step) should follow a common EU-wide structure across MS	30	17	8	3	1	0
11b. There should be one number for the same legal entity across EU (single registration number).	19	15	11	7	7	0
12. EU legislation should define a minimum set of mandatory fields for producer registration for all EPR streams, applicable across all Member States.	28	24	2	5	0	0
13. National authorities should be allowed to request additional registration fields beyond the EU minimum requirements.	12	17	9	11	8	2
14. A harmonised EU registration form should be accepted by all NRs as the basis for national registration.	28	20	7	4	0	0
15. Each Member State should consolidate EPR registration for all EPR streams into a single national EPR register covering all EPR streams, instead of one national register per EPR stream.	22	17	11	3	5	1

6.1.3 Reporting of POM data structure and harmonization Requirements

As can be seen in Table 5, respondents expressed strong support for harmonising POM reporting requirements across the EU. Stakeholder-specific observations are provided in Annex AIII.3. Reporting of POM Data structure and Harmonization Requirements.

Respondents generally preferred the use of EU-harmonised reporting categories (Requirement 17) over nationally defined categories (Requirement 16).

There was also strong support for establishing a minimum set of mandatory reporting fields (Requirement 18) and for the use of a harmonised EU reporting form accepted by all National Registers (Requirement 20).

As in the registration section, opinions were more divided regarding whether Member States should be allowed to request additional reporting information beyond the EU minimum requirements (Requirement 19). Overall, respondents favoured greater harmonisation of reporting structures, while recognising the need to balance standardisation and national flexibility.

The EU-LIFE4EPR Gateway scheme is aligned with these results, as it offers producers the possibility to report data using a common EU format and harmonised reporting categories. This approach responds to stakeholders' preference for more standardised POM reporting requirements and a reporting form that can be accepted by all National Registers.

Under the LIFE4EPR approach, National Registers may decide either to adopt the harmonised EU reporting categories directly or to use the detailed information submitted by producers to convert the data into their own national datasets. This allows the system to support harmonisation while preserving a certain degree of compatibility with existing national structures.

Regarding the possibility for Member States to request additional reporting information, the EU-LIFE4EPR Gateway seeks to reduce fragmentation and administrative burden by defining a common reporting format. At the same time, the B2 approach provides a structured data basis that can support national processing needs, where required, without obliging producers to submit the same information in multiple national formats.

Table 5: Survey results on the Reporting of POM data structure and harmonization Requirements

C. Reporting of POM Data Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
16. NRs should be able to receive POM data using the product categories and subcategories they specify.	11	18	9	15	5	1
17. NRs should receive POM data using product categories and subcategories harmonised at EU level.	23	21	7	4	3	1
18. EU legislation should define a minimum set of mandatory fields for reporting forms.	26	23	4	5	1	0
19. National authorities should be allowed to request additional reporting fields beyond the EU minimum requirements.	12	15	10	13	7	2
20. A harmonised EU reporting form should be accepted by all National Registers as the basis for national reporting.	29	17	4	5	4	0

6.1.4 Role of PROs and ARs Requirements

As can be seen in Table 6, respondents strongly supported allowing both PROs and Authorised Representatives (ARs) to submit information on behalf of producers (Requirements 21 and 22). In contrast, there was limited support for restricting the role of ARs to cases where producers are not affiliated with a PRO (Requirement 22bis).

Opinions were more divided regarding the possibility of a single EU-based AR acting across all Member States (Requirement 22tris).

The advisory role of PROs received particularly strong support (Requirement 23). Respondents also favoured the use of EU-harmonised reporting categories by PROs (Requirement 25), the provision of up-to-date information on authorised PROs and ARs (Requirement 26), and digital communication between all actors involved in the system (Requirement 27).

Overall, the results support an active role for PROs and ARs while favouring greater transparency, communication and harmonisation. Further stakeholder-specific observations are presented in AIII.4. Role of PROs and Authorised Representatives Requirements.

The LIFE4EPR approach is aligned with these results, as it maintains the current roles and rights of the actors involved. PROs and ARs would continue to be able to submit information on behalf of producers, in line with existing national arrangements.

The possibility of creating a single EU-based AR acting across all Member States falls outside the scope of the proposed approach.

The EU-LIFE4EPR Gateway model also preserves the advisory role of PROs and enables them to continue supporting producers. Although this aspect will not be directly covered by the pilot, the proposed scheme would allow PROs to use the high-granularity data submitted by producers for their own internal calculations. PROs could establish conversion tables to translate detailed producer data into their own fee structures.

The proposed EU EPR information hub would also include information on authorised PROs and ARs per Member State, supporting greater transparency and access to up-to-date information. In addition, the EU Gateway would allow data to be uploaded, accessed, corrected and submitted. Whether the EU Gateway should also be used for official communication with National Registers, or whether it should remain primarily a data repository while National Registers continue using their existing communication channels, will be further assessed during the pilot design.

Table 6: Survey results on the Role of PROs and Authorised Representatives Requirements

D. Role of PROs and Authorised Representatives	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
21. PROs should be allowed to submit data on behalf of producers when agreed by both parties.	33	17	6	3	0	0
22. ARs should be allowed to submit data on behalf of producers.	28	23	5	1	0	2
22bis. ARs should be allowed to submit data on behalf of producers only in case the producer does not belong to a PRO.	8	14	12	16	5	4
22tris. One single EU-based AR should be allowed to submit data on behalf of producers.	12	13	11	10	10	3
23. PROs should be able to inform and advise producers regarding EPR compliance obligations.	35	21	3	0	0	0
24. PROs should be able to receive POM data using their own categories and subcategories.	13	16	10	8	10	2
25. PROs should receive POM data using categories and subcategories harmonised at EU level.	26	17	7	5	3	1
26. NRs should provide up-to-date information on authorised PROs and ARs operating in their Member State.	31	21	5	0	0	2
27. PROs, NRs, ARs, and producers should be able to communicate digitally with each other through the system.	29	15	13	0	2	0

6.1.5 Technical and Security Requirements

As can be seen in Table 7, Respondents strongly supported the use of secure electronic identification and signature systems for registration and reporting submissions (Requirement 28), indicating broad agreement on the need for secure and reliable digital processes.

There was also support for the principle that producers should not be required to submit the same information separately to multiple national EPR systems (Requirement 29). However, views on this issue were more mixed, suggesting some concerns regarding implementation and governance arrangements.

Overall, the findings indicate support for secure digital options and for reducing unnecessary administrative burdens through more streamlined reporting processes. Further stakeholder-specific observations are presented in AIII.5. Technical and Security Requirements.

The proposed EU-LIFE4EPR Gateway is aligned with these results. Secure electronic identification and signature systems are included in the proposed approach, and different technical options will be evaluated. Suggestions from the SEED project on the OSS approach, such as double authentication, could also be considered as potential elements of the EU-LIFE4EPR Gateway.

The proposal also responds to the objective of avoiding duplicate submissions. Producers would be able to upload the information required by the relevant National Registers and EPR streams in one step. Access to, and processing of, this information by subsequent users, including PROs, ARs and National Registers, would ensure that the relevant data are made available to the corresponding recipients. This will require interoperability between the EU Gateway and the different users authorised to access the information.

Table 7: Survey Results on the technical and security requirements

E. Technical and Security Requirements	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
28. Registration and reporting submissions should use a secure and accredited electronic identification and signature system.	34	15	9	0	0	1
29 A producer should not be required to submit the same registration or reporting data separately to multiple national EPR - a single submission should be sufficient	25	9	9	9	5	2

6.1.6 Additional comments on the requirements

In addition to the survey responses, participants provided qualitative feedback on the potential design and implementation of an EU-wide EPR registration and reporting framework.

A recurring theme was support for a **"report once – use multiple times"** principle, whereby producers would submit information through a single-entry point and the relevant data would subsequently be shared with national authorities, National Registers (NRs), Producer Responsibility Organisations (PROs) and other authorised entities. Several stakeholders suggested that such a system could draw inspiration from the EU One-Stop-Shop (OSS) model used for VAT reporting.

Many respondents stressed that simplification should be achieved not only through digitalisation but also through greater harmonisation of registration and reporting requirements. While stakeholders generally supported common registration and reporting formats, categories and minimum datasets, several emphasised that Member States should retain limited flexibility to request additional information for enforcement purposes. However, such additional requirements

should remain interoperable with the EU framework and should not recreate parallel national systems.

Stakeholders also highlighted the importance of interoperability between national systems, improved cross-border information exchange and stronger enforcement against free-riders. Several comments emphasised that any future configuration should build upon existing national infrastructures rather than replace them.

A number of respondents underlined the central role of PROs in registration and reporting processes, noting that producers often report through PROs rather than directly to National Registers. Several stakeholders therefore considered that PROs should continue to play an important role in data validation and transmission.

Comments also highlighted the need to balance transparency with the protection of commercially sensitive information. Respondents generally supported information sharing for compliance and enforcement purposes but stressed that access to detailed producer-level data should be restricted to authorised entities and follow a need-to-know principle.

Finally, stakeholders raised several issues not explicitly covered by the survey questions, including the harmonisation of financial guarantee requirements, the need for effective cross-border enforcement mechanisms, the potential benefits of common producer identifiers, and the importance of taking national legal requirements regarding public access to information and record-keeping into account.

It was also mentioned the inclusion of reporting of eco-modulation criteria into the LIFE4EPR proposal. While it is under discussion if eco-modulation should be included in the pilot, it is certain that producers could report evidence of the eco-modulation criteria using the same system proposed. However, this would mean that an EU harmonised eco-modulation system should be in place, and not a fragmented approach with different criteria set per MS.

This qualitative feedback largely reinforces the survey findings, highlighting support for greater harmonisation, interoperability and simplification, while emphasising the need for effective governance, enforcement and data protection arrangements.

6.2 Preferred approach of the EU-wide EPR register

Through the online survey, stakeholders were also asked to indicate their preferred approach for registration and reporting.

As can be seen in Figure 15, the most voted registration option was B2 (Detailed EU form + Single-Entry data entry) with 12 out of 60 votes, followed by A1 (Simplified EU form + MS data entry) with 10 votes, and B1 (Simplified EU form + Single-Entry data entry) with 8 votes. The option receiving the fewest votes was the hybrid BaU+B2 model, which was not selected by any respondent.

For reporting, the most preferred option was A1 (Simplified EU form + MS data entry) with 13 out of 60 votes, followed closely by B2 (Detailed EU form + Single-Entry data entry) with 12 votes. The third

most supported option was BaU, with 8 votes. As for registration, the hybrid BaU+B2 model received no support.

The results do not indicate a clear consensus around a single approach. However, they show a preference for options that introduce some degree of harmonisation at EU level, either through a simplified or detailed EU format. For registration, stakeholders showed slightly greater support for a single-entry approach (particularly B2), whereas for reporting there was a marginal preference for maintaining Member State-based data submission through a harmonised EU format (A1). Hybrid models generally attracted limited support, suggesting that stakeholders tend to favour either maintaining existing systems or moving towards a more clearly harmonised model rather than combining both.

Stakeholder preferences varied considerably (see Table 8 and Table 9). National Registers and enforcement authorities showed a stronger preference for maintaining national data-entry routes (BaU and A1), while producer organisations, PROs and industry associations were more supportive of options involving a single-entry data submission mechanism, particularly B2. This reflects the differing priorities of authorities, which tend to favour options compatible with existing national systems, and market actors, which place greater emphasis on reducing administrative burden and simplifying compliance across Member States.

Figure 15: Results of the survey with respect to the preferred approaches for registration and reporting.

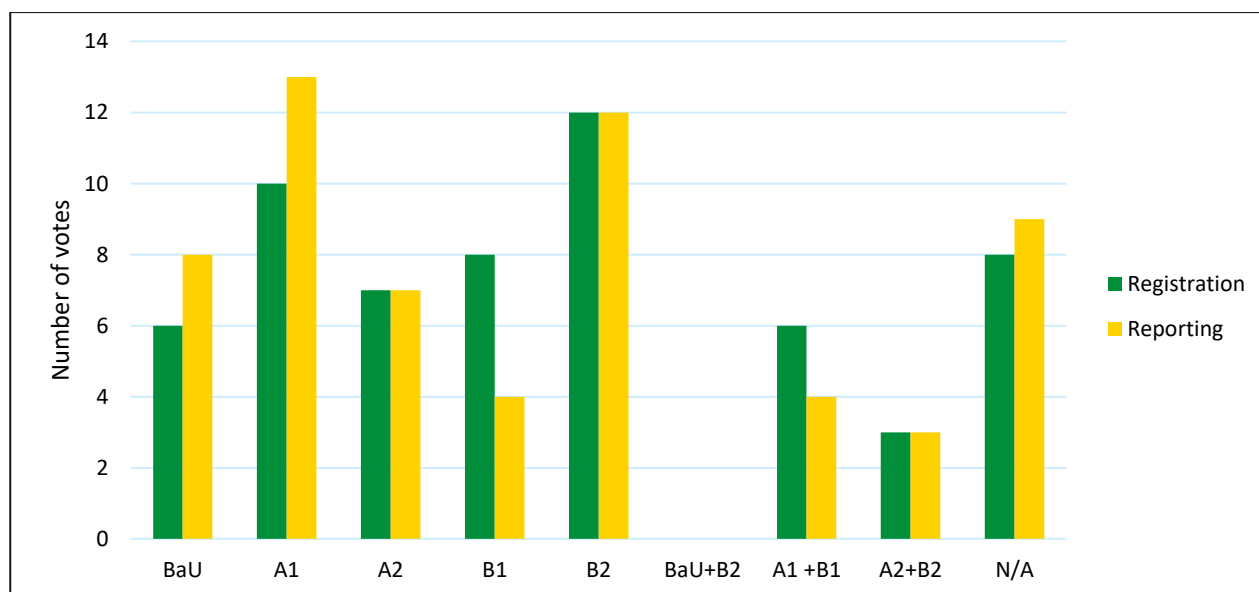


Table 8: Results of the survey with respect to the Registration preference by stakeholder type

	BaU	A1	A2	B1	B2	BaU + B2	A1 + B1	A2 + B2	N/A
Producer	0	0	2	2	2	0	1	0	2
Producer association / industry association	0	2	1	2	0	0	0	0	3
Producer Responsibility Organisation	0	5	3	0	4	0	4	2	0
PRO association	0	0	0	0	0	0	0	1	1
National Registers/ relevant national authority	4	1	0	1	4	0	1	0	1
Authorised Representative	1	0	0	0	0	0	0	0	0

Marketplace / online platform	0	0	0	1	0	0	0	0	0
Enforcement authority	1	0	0	2	0	0	0	0	1
Consultancy / legal advisor	0	1	0	0	0	0	0	0	0
NGO / civil society	0	0	0	0	1	0	0	0	0
Other	0	1	1	0	0	0	0	0	0
	6	10	7	8	11	0	6	3	8

Table 9: Results of the survey with respect to the Reporting preference by stakeholder type

	BaU	A1	A2	B1	B2	BaU + B2	A1 + B1	A2 + B2	N/A
Producer	0	0	2	2	2	0	1	0	2
Producer association / industry association	0	4	1	0	0	0	0	0	3
Producer Responsibility Organisation	2	4	3	0	4	0	2	2	1
PRO association	0	0	0	0	0	0	0	1	1
National Registers/ relevant national authority	4	1	0	1	4	0	1	0	1
Authorised Representative	0	0	1	0	0	0	0	0	0
Marketplace / online platform	0	0	0	1	0	0	0	0	0
Enforcement authority	1	2	0	0	0	0	0	0	1
Consultancy / legal advisor	1	0	0	0	0	0	0	0	0
NGO / civil society	0	0	0	0	1	0	0	0	0
Other	0	2	0	0	0	0	0	0	0
	8	13	7	4	11	0	4	3	9

6.2.1 Additional comments on the preferred approaches

Many respondents provided additional comments regarding the proposed registration and reporting approaches. While views differed on the preferred option, several common themes emerged.

Many stakeholders agreed that greater harmonisation of EPR registration and reporting requirements across Member States is needed, particularly for producers operating in multiple countries. Harmonised reporting formats, common product classifications and standardised data requirements were frequently highlighted as priorities to reduce administrative burden and improve consistency.

Several respondents stressed that registration and reporting should not necessarily follow the same architecture. Registration was often described as a one-off administrative process that should remain as simple as possible, whereas reporting was seen as the area where harmonisation could generate the greatest benefits due to its recurring nature and higher administrative burden.

A recurring message was that enforcement, data validation and compliance monitoring must remain the responsibility of national authorities and registers. Respondents emphasised that any future EU-wide system should preserve the ability of Member States to validate data, request additional information where necessary and carry out enforcement actions at national level.

Opinions on hybrid options were divided. Some stakeholders considered hybrid models a pragmatic transition towards greater harmonisation, particularly for cross-border producers, while allowing

existing national systems to continue operating. Others argued that maintaining multiple reporting channels could increase complexity, create confusion regarding responsibilities and require significant technical adaptations by producers, PROs and national authorities (*it should be noted that the proposed EU-LIFE4EPR Gateway maintains the existing roles of all actors*).

Many respondents highlighted the importance of leveraging existing national registers, PRO infrastructures and reporting systems rather than replacing them entirely. Several comments noted that large-scale reforms could be costly, disruptive and difficult to implement within short timelines. Realistic transition periods, adequate resources and interoperability with current systems were considered essential (*it is worth mentioning that the suggested approach does not replace any existing infrastructures by creating a complementary path for data provision*).

Overall, the comments suggest broad support for increased harmonisation of EPR registration and reporting across the EU but also underline the need to preserve national enforcement functions, ensure data quality, and carefully manage the transition from existing national systems.

6.3 Additional comments

Additional recommendations focused less on the choice between options and more on the design and governance of a future EU-wide system. Several stakeholders stressed the need for a clear governance framework, including responsibilities for system management, maintenance, financing, data ownership and GDPR compliance. The specifications of the proposed EU-LIFE4EPR Gateway will align with current GDPR legislation and define users' rights for accessing, editing and submitting data.

Multiple respondents proposed the introduction of a unique EU producer identifier to improve traceability, avoid duplicate registrations and facilitate information exchange between Member States. Several comments also supported the creation of a central EU register for producer master data, interoperable with existing national registers and PRO systems.

Respondents further emphasised the central role of PROs in EPR implementation and noted that future configurations should adequately reflect their operational responsibilities, particularly regarding reporting, fee collection and compliance verification.

Finally, stakeholders highlighted the importance of realistic implementation timelines, sufficient financial and technical resources, and robust cybersecurity and data protection measures. Several respondents also noted that future EPR registration and reporting systems should contribute to broader policy objectives, including improved enforcement, reduced free-riding, support for circular economy goals and interoperability with other EU initiatives. Implementation timelines have also been a recurring topic in internal consortium discussions. The development of the EU Gateway, conversion tables and, most importantly, convertible codes would likely require a dedicated project lasting approximately two to three years.

7 EU-LIFE4EPR Registration & Reporting Gateway

7.1 Rationale behind the selection

During the co-creation process, it became clear that no single option would fully meet the expectations of all the actors involved in EPR registration and reporting. While the LIFE4EPR team sought to reflect the inputs received from co-creation participants, the final decision on the selected concept was taken by the LIFE4EPR partners.

The selected concept of the EU-wide registration and reporting scheme therefore reflects both the stakeholder feedback collected throughout the process and the expert judgement of the LIFE4EPR project consortium, considering the overarching objectives of the project: identifying a configuration that is feasible, proportionate, and capable of supporting future harmonisation efforts.

The selection of the concept for the EU-wide EPR registration and reporting scheme was primarily based on the following criteria:

1. Minimising the overall administrative burden and disruption for the actors involved in EPR registration and reporting, while ensuring that simplification benefits are distributed across the system.
2. Simplifying and harmonizing the registration and reporting process without compromising national verification and enforcement mechanisms.
3. Ensuring alignment with the supported principles identified during the co-creation process, while avoiding the main concerns raised by stakeholders.

Based on these criteria, the selected concept consists of three main modules:

1. An **EU EPR Information Hub**, as described in Section 4.1;
2. A standalone **Approach B2 for producer registration**, described in Section 7.3; and
3. A **hybrid option combining Business-as-Usual (BaU) and Approach B2 for placed-on-market (POM) reporting**, described in Section 7.4.

Together, these three modules are referred to in this report as the **EU-LIFE4EPR Registration & Reporting Gateway (EU-LIFE4EPR RRG)**.

The difference between registration and reporting is that registration happens once and relies on a largely common set of fields which makes a single shared standard feasible. Reporting takes place regularly and is closely linked to national categories, which makes a single standard considerably more difficult. Requiring all producers to register through a common interface does represent a change for those active in only one MS. At the same time, applying a single registration route to all producers avoids creating parallel systems and supports the consistency and completeness that national authorities need for enforcement and free-rider detection.

For producers' registration, a single common standard was considered achievable, since registration is structurally less complex than reporting, and a consistent, cross-border-recognisable producer identity offers benefits for traceability and enforcement. Establishing a common basis at registration level while allowing an optional harmonised approach for reporting concentrates the harmonisation effort where it is most feasible and adds most value.

For POM reporting, there were several concerns related to the risk that a hybrid model could add complexity or create parallel systems. The simulation exercise (described in section 5) helped address these by showing that, under the BaU-B2 configuration, NRs can keep their existing national data structures and reporting channels: producers using the standardised route submit in the harmonised format, which is converted into the national structure before verification, while producers using the national route continue exactly as today. This means no producer reports twice, and the harmonised option can be introduced without replacing the existing national systems, though National Registers and PROs receiving standardised data would need to implement the corresponding conversion capability.

The system should be viable for all types of producers: 'local', 'cross-border', and those hiring PROs or not (individual systems).

7.2 Concept scope

It is important to note that the overall producer compliance journey includes activities that fall both outside and within the scope of the proposed EU-LIFE4EPR RRG, as illustrated in Figure 16. Before interacting with the EU-LIFE4EPR RRG, producers must complete two main compliance steps that remain outside the EU-LIFE4EPR RRG scope.

First, producers must establish contractual arrangements with the relevant PROs operating in the Member States where their products are placed on the market and for all EPR streams applicable to those products. In addition, where required by national legislation, producers must appoint and establish contractual arrangements with Authorised Representatives (ARs) in the relevant Member States. These activities would continue to be managed through existing national arrangements and are not part of the EU-LIFE4EPR RRG scope; however, the EU info hub would facilitate these processes by providing clear information to producers about them.

Once these two obligations have been fulfilled, producers could access the EU-LIFE4EPR RRG for data upload during registration. Producer Registration, the first step, is carried out through a harmonised EU-wide registration process. Registration information would be submitted once through the EU Gateway, a common interface and distributed to/accessed by the relevant national registers. The relevant NRAs remain responsible for verifying the registration information and, following successful verification, issuing a Unique Registration Number (URN) to the producer.

As discussed at the end of Section 5.2.1.2, this producer identification element was previously referred to during the co-creation process as a "producer certificate", following the recommendation to avoid the term "producer passport" due to its potential confusion with EU Digital Product Passport initiatives. In the context of the EU-LIFE4EPR RRG Concept, the URN refers to the unique

registration number or code assigned to a producer after successful registration. The term “producer certificate” may be understood as a broader digital credential that could, in future, incorporate or authenticate this URN, for example through a digital business wallet or similar secure identification mechanism.

Following successful registration, producers could proceed to the reporting of products placed on the market (POM). At this stage, producers may choose between two reporting routes:

- **National Reporting Route (BaU):** In this case, there would not be any change of the current *modus operandi*, and the roles of PROs, ARs and NRs would remain untouched. Producers would submit POM data using existing reporting formats and procedures. National registers would receive and verify the information in the same manner as under the current system.
- **Standardised Reporting Route (based on Approach B2):** producers would upload POM data using a harmonised reporting format to an EU data repository (single-entry approach). In this case, PROs, ARs and NRAs would access the data in the repository as a new way of receiving data from producers. PROs, and NRs that receive the standardised data may convert it, where necessary, into their existing national data structures using predefined mapping or conversion codes before carrying out verification and enforcement activities.

Importantly, the detailed definition of the harmonised data format and the development of the corresponding conversion codes do not fall within the scope of the LIFE4EPR project.⁸ For the EU-LIFE4EPR RRG pilot sufficiently realistic templates and fields will be defined for testing and validation of the concept.

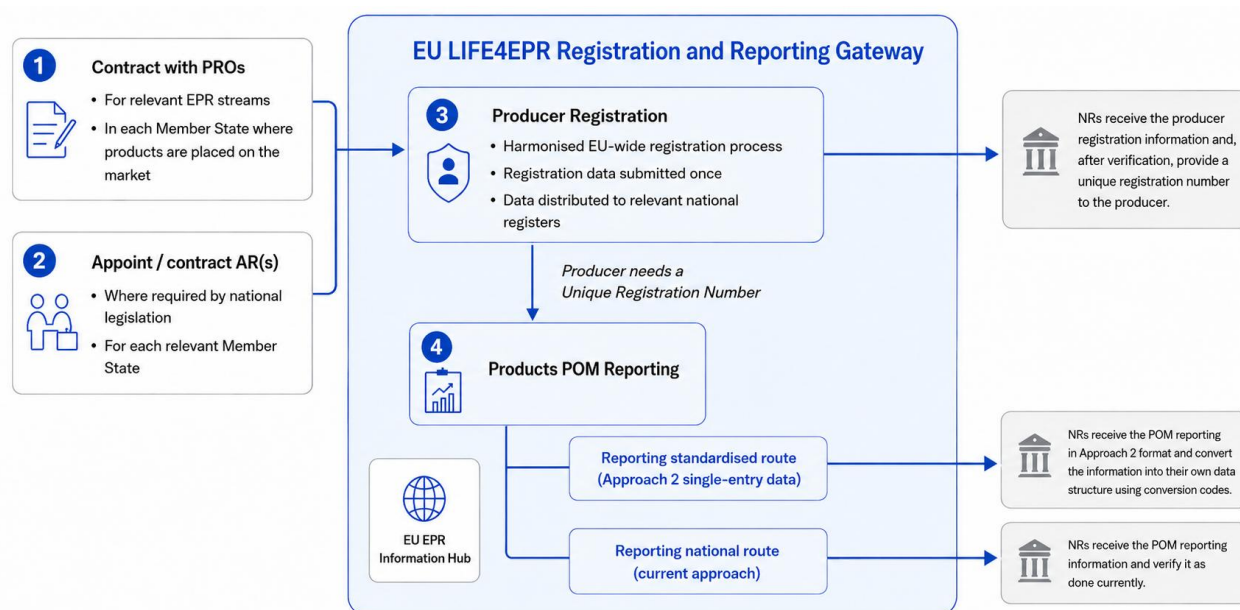
Under both reporting routes:

- PROs would be able to play an advisory, verification and submission role,
- ARs would be able to advise producers and represent them in the data submission, and
- NRAs would remain responsible for acknowledging receipt of the data, validating and enforcing producer reporting obligations.

The proposed EU-LIFE4EPR RRG therefore focuses on harmonising producer registration and facilitating POM reporting while preserving existing national compliance, verification and enforcement mechanisms. Activities related to PRO membership and AR appointments remain outside the scope of the EU-LIFE4EPR RRG.

⁸ These activities require substantial effort and, in practice, constitute a project in its own, given the level of technical detail and coordination needed across Member States

Figure 16: Overview of the EU-LIFE4EPR RRG concept scope



7.3 Producers' Registration

Figure 17 illustrates the Producers' Registration process within the EU-LIFE4EPR RRG. The registration process is based on the principle that producers (or their representatives) would submit registration information once through a common EU-wide registration interface, using a harmonised set of data fields applicable across MSs and EPR streams. The system would allow for subsequent additional registrations of producers, as it is very likely that the producer would not register at the same time in several countries.

The registration could be initiated by a producer (in the case of individual producers), or a representative of the producer, such as the PRO, AR or a marketplace. The system would allow for bulk registration of multiple producers at a time, a procedure that would be particularly relevant for PROs and marketplaces that may need to register several producers using their services.

The registration form would contain a set of common producer information fields, together with information identifying the MSs in which the producer places products on the market and the EPR streams applicable to those products (e.g. batteries, packaging and WEEE).

As part of the registration process, the producer would select the relevant PROs and ARs associated with each MS and EPR stream covered by the registration.

Once the registration information has been uploaded, the selected PROs and ARs would be notified and invited to review the information submitted by the producer. The registration would not proceed until the relevant PROs and ARs had validated the information. This validation step would confirm, among other things, that the producer had established the necessary contractual arrangements and that the information provided was complete and consistent with the information held by the PROs and ARs.

This step would only concern the confirmation of the information by PROs and ARs, not the contractual relationship itself, which would be established beforehand through national arrangements and stays outside the scope of the register. The inclusion of a PRO validation step draws on national experience (as described in Section 7.1.1), where confirmation by a PRO that the producer has joined a compliance scheme provides assurance that the producer is genuinely covered before registration is completed. It would, however, constitute a deliberate design choice, as making registration dependent on confirmation by a third party would also have implications for producers and for the workload of PROs. This balance should therefore be examined further during the pilot phase.

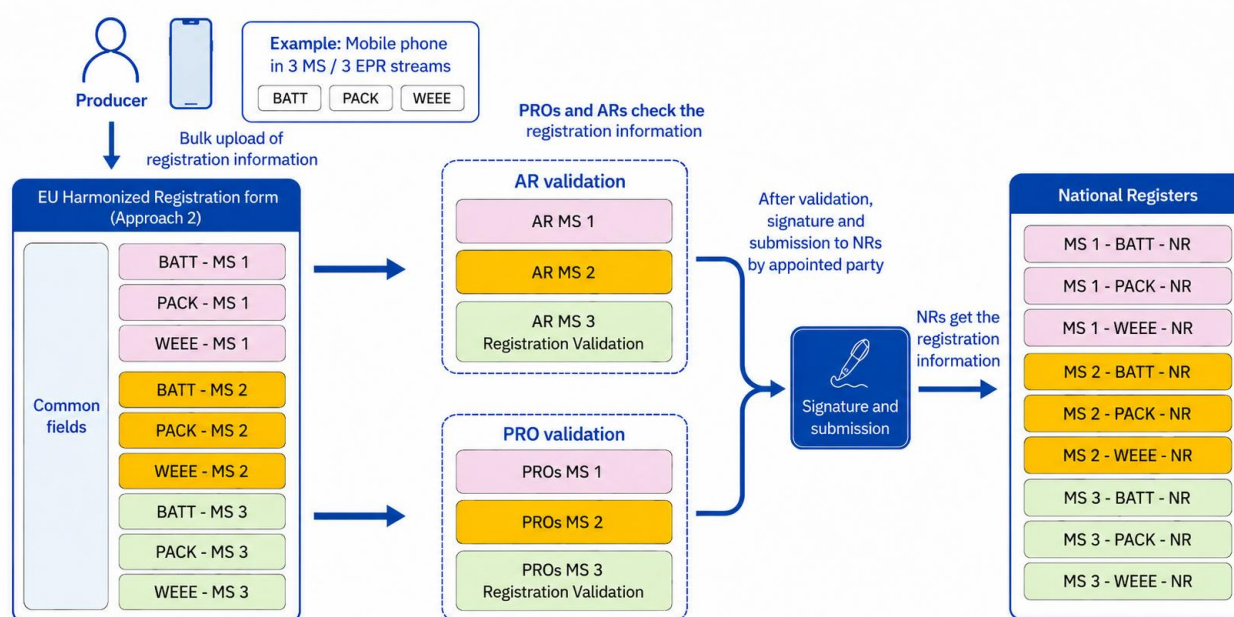
Following successful validation by the selected PROs and ARs, the producer (or their representative) would electronically sign and submit the registration application. The registration information would then be transmitted to the relevant NRA corresponding to the Member States and EPR streams covered by the application.

The NRA would remain responsible for reviewing and verifying the registration information in accordance with national requirements. The system would allow relevant parties to keep track of the date of the official submission of the registration form and the official validation date of the registration (with issuance of a registration number). Following successful verification, the relevant national registers would issue a Unique Registration Number (URN) to the producer.

The URN would serve as the producer's identifier within the EU-LIFE4EPR RRG, national registers, product compliance documents, and would subsequently be used for products POM reporting and other registration-related interactions. The details of URN are described in section 7.3.1.

This approach would enable producers operating in multiple MS and across multiple EPR streams to submit registration information through a single harmonised process, while preserving the role of PROs, ARs, and NRAs in validation, verification and enforcement activities.

Figure 17: Example of workflow for Producer Registration through the EU-LIFE4EPR RRG for a producer placing mobile phones in 3 MSs..



Note: The user case of an individual system not using PRO services is not included in the diagram.

7.3.1 Unique Registration Number

As part of the harmonised producer registration process, NRA would issue a Unique Registration Number (URN) following the successful verification of the producer's registration information. The URN would serve as the producer's identifier within the EU-LIFE4EPR system and related EPR compliance administration (e.g. NRs etc.)

The URN provides a harmonised mechanism for identifying producers across MSs and EPR streams, thereby facilitating information exchange, reducing duplication of registration data and supporting cross-border traceability.

The status and scope of compliance would vary over time, across EPR streams and across Member States, this is why a registration code that could allow for live update is under consideration and will be defined during the pilot stage.

In this context, the pilot should further assess whether the URN should operate as a single standalone number or as part of a layered verification system. This could distinguish between the identification of the legal entity, the national registration or compliance status for each Member State and EPR stream, and an EU-level interface allowing this status to be checked. This would help ensure that the URN supports cross-border traceability without creating the impression that a single identifier automatically confirms EU-wide compliance.

Some initial thoughts are described in Annex IV: Unique Producer Number together with the experience shared by ADEME from the French Unique Identification Number (IDU).

7.3.2 EU Digital Identity Wallet in the registration stage

The EU Digital Identity Wallet could play a complementary role in the producer registration stage of the proposed EU-LIFE4EPR RRG. It could serve as an enabling tool to support secure access, identity verification and electronic signature during the registration process.

The European Commission describes the EU Digital Identity Wallet as a means for citizens, residents and businesses to prove their identity, store and share digital documents, and sign electronically when accessing digital services⁹. In the context of the EU-LIFE4EPR RRG, these functionalities could support several steps of the producer registration workflow.

- First, the Wallet could be used to authenticate users accessing the EU-LIFE4EPR RRG. This could include producers, representatives acting on behalf of producers, PROs, Authorised Representatives (ARs), marketplaces and national register authorities. This would help ensure that only authorised actors can upload, validate, sign or verify registration information.
- Second, the Wallet could support the verification of the legal identity and role of the person or organisation interacting with the platform. For example, it could help confirm whether a user is acting on behalf of a producer, PRO, AR or competent authority. This would be particularly relevant where a representative submits registration information on behalf of a producer, or where PROs and ARs are requested to validate the information uploaded by the producer.
- Third, the Wallet could support the electronic signature or electronic seal of the registration submission. Once the producer information has been uploaded and validated by the selected PROs and ARs, the producer or its representative could use the Wallet to sign and submit the registration application. This could strengthen legal certainty, traceability and accountability in the registration process.

The potential use of the EU Digital Identity Wallet should therefore be considered as part of the access and trust layer of the EU-wide EPR Register. The Wallet would help verify who is interacting with the system and whether they have the authority to perform specific actions, while the EU-wide EPR Register would remain responsible for managing the registration workflow, data submission, validation process and transmission of information to national registers.

The use of the Wallet could also support the future development of the Unique Registration Number (URN). For example, the URN could be linked to digitally verified producer identity information, while the Wallet could be used to access or share selected registration credentials. However, the URN and the Wallet should remain conceptually distinct: the URN identifies the producer within the EPR registration system, while the Wallet provides a secure means to authenticate users, verify identity and sign or share information.

Further technical and legal assessment would be needed to determine how the EU Digital Identity Wallet could be integrated into the EU-wide EPR Register, particularly regarding business identity,

⁹ https://commission.europa.eu/topics/digital-economy-and-society/european-digital-identity_es

delegation of powers, cross-border recognition, data protection, access rights and interoperability with national systems.

Other means for authenticating users will be explored during the design of the pilot (e.g. double authentication).

7.4 Products POM Reporting

In the proposed EU-LIFE4EPR RRG scheme, producers placing products on the market in only one Member State (hereafter referred to as *local producers*), as well as producers satisfied with existing national reporting systems, could continue using the current national reporting routes and data structures without changes to their reporting practices or *modus operandi*. By contrast, cross-border producers placing products on the market in more than one Member State could opt to upload data referring to all their activities for different product streams and countries in a harmonised format in bulk to an EU Gateway (single-entry point based on Approach B2) (see Figure 18)

Figure 18: Scheme of the hybrid option for Reporting of products POM

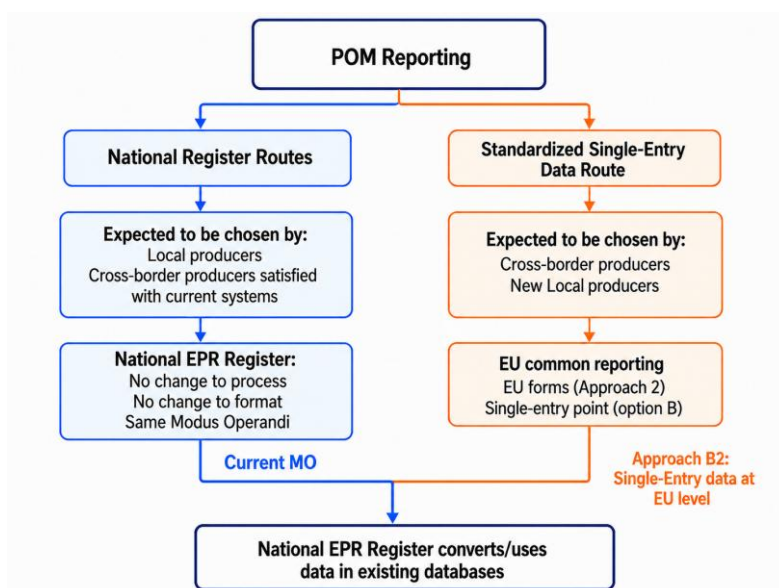
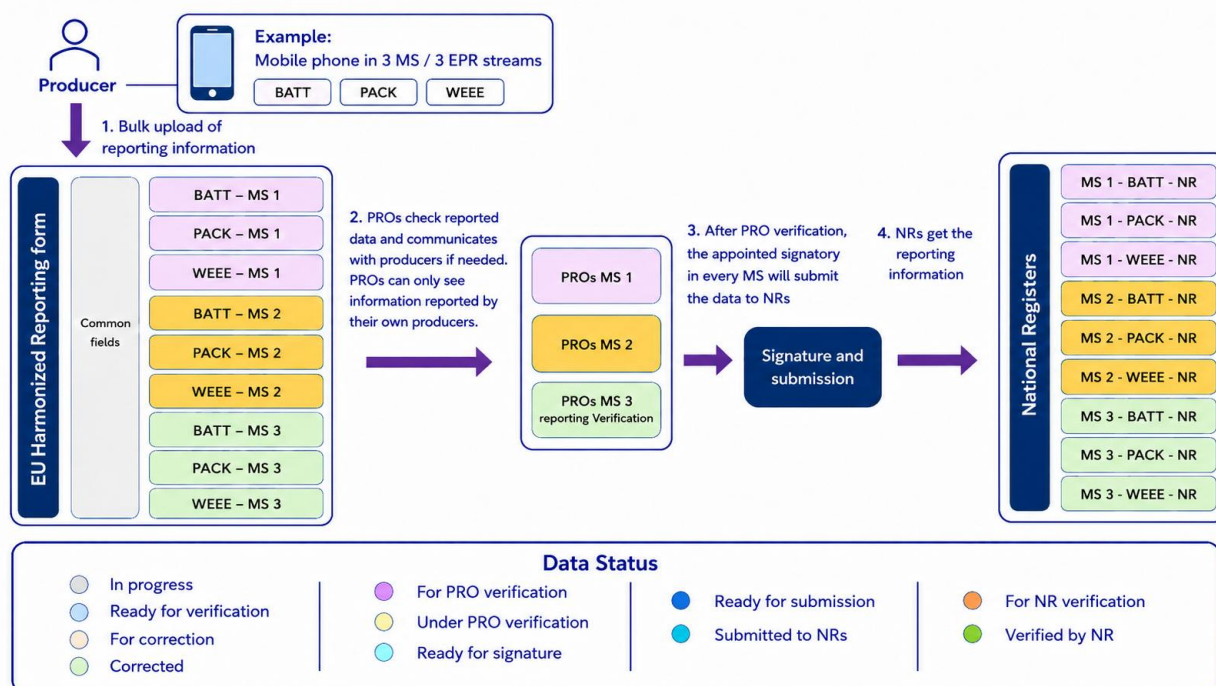


Figure 19: Example of workflow of products POM reporting using the EU-LIFE4EPR RRG where a producer is placing mobile phones on three MSs.



Note: The user case of an individual system not using PRO services is not included in the diagram.

The data upload can be carried out by a producer (in the case of individual producers), or a representative of the producer using national branches or ARs in other MS markets or a marketplace reporting on behalf of the producers using their services. The system should allow for bulk reporting of data from multiple producers at a time for the case of marketplaces, companies with multiple national subsidiaries or similar.

A key feature of this reporting route would be the use of a common EU data model based on the higher level of granularity envisaged under Approach B2. The required data fields, reporting categories, code lists and conversion tables would need to be defined at EU level to ensure that information submitted through the harmonised route can be consistently interpreted and processed by all relevant National Registers and PROs. Developing such a framework would require agreement among Member States on common data structures, coding systems and conversion rules. Codes should be compatible with the use of visible fees (if applicable). It is uncertain whether a manageable level of detail in the harmonised codes can be made fully compatible with all existing NRs and PROs data sets. A certain number of adjustments to the respective NRs and PROs coding system cannot be excluded to fully align both.

The system would also need to include robust procedures for data validation and correction. National Registers should retain the ability to contact producers, ARs or other reporting entities where clarification or correction is required. Likewise, producers should be able to amend submitted information following verification by National Registers or PROs. To support these interactions, the

platform should include different reporting statuses, such as *submitted*, *under review*, *validated*, *rejected* and *corrected*. This will be further defined during the pilot phase.

Data access and confidentiality would be critical elements of the harmonised reporting route. Access rights should be established during the registration process, specifying which representatives, National Registers and PROs are authorised to access and upload specific datasets and what their rights are (e.g. editing, commenting, submission, download, etc.). Appropriate safeguards would be required to ensure that each organisation can only access information necessary for the fulfilment of its legal and operational responsibilities. PROs should only have access to information relating to producers and products affiliated with their schemes in the corresponding country.

The conversion of harmonised EU reporting data into national datasets would constitute another key component of the system. One option would be for each National Register and PRO to carry out its own conversion. A more efficient configuration could be implemented at EU level as part of the EU-LIFE4EPR RRG scheme, whereby National Registers would provide the relevant national conversion tables, which would be integrated into the EU-LIFE4EPR system and used to automatically convert harmonised reporting data into the corresponding national formats.

Where conversion rules are available, the system could automatically generate national datasets from the harmonised submissions. Where no conversion rules have been developed, the information will remain available at the original Approach B2 level of granularity. National Registers would then access the information through the platform and integrate it into their own databases according to their specific requirements.

A similar mechanism could be envisaged for PROs as a future extension of the platform. In such a scenario, PROs would access only the information relating to producers and products affiliated with their schemes. The data could then be converted into the PRO-specific format and used for fee calculation and other compliance-related activities outside the EU platform before being integrated into the PRO's internal systems.

The implementation of this approach may also require clarification of data governance arrangements, including questions related to data ownership, responsibilities for data maintenance, conditions for data access, correction procedures, and rules governing the transfer, processing, display or reuse of information.

For newly registered producers or producers that need to modify their registrations, the harmonised reporting route could become the default or sole reporting pathway. Such an approach would avoid the creation of additional reporting fragmentation and support a gradual transition towards more standardised reporting practices across Member States. Existing producers could continue using national reporting routes where appropriate, while new market entrants would progressively populate the harmonised system.

Finally, the harmonised reporting route could facilitate the future integration of eco-modulation criteria into producer reporting obligations. This would be particularly relevant if eco-modulation criteria become harmonised across Member States, allowing such information to be incorporated

into a common reporting template and reducing the need for multiple national reporting requirements.

7.5 Caveats of the concept

The proposed EU-LIFE4EPR RRG should be understood as a conceptual model to be tested through the pilot. Several elements would require further technical, legal, governance and financial assessment before implementation at EU level:

- A first caveat concerns the definition of the harmonised reporting format and the corresponding conversion codes. Defining a level of granularity that can accommodate all existing NRs and PRO data structures across the EU would require a complex mapping exercise. This would include the identification of common reporting categories, code lists, conversion tables and compatibility rules with national registers and PRO fee structures, including where visible fees apply. This task falls outside the scope of LIFE4EPR. While the approach is considered conceptually feasible, its practical implementation would depend on further technical work to assess whether a sufficiently detailed, but still manageable, classification system can be developed.
- A second caveat relates to the governance of the EU Gateway and the EU EPR information hub. The pilot will not define a full governance model for the future operation of the system. Issues such as system ownership, hosting, long-term maintenance, financing, decision-making procedures, liability, data ownership, data quality control, access rights and responsibilities for correcting or updating information would need to be further defined before any operational deployment.
- Third, the concept assumes that National Registers and PROs would be able to receive, access and process harmonised data submitted through the EU Gateway. However, the development of the internal structures, IT adaptations and conversion capabilities needed by National Registers and PROs is not covered by the LIFE4EPR pilot. These adaptations may require additional resources, technical support and implementation time.
- Fourth, contractual arrangements between producers and PROs, and between producers and Authorised Representatives, remain outside the scope of the EU-LIFE4EPR RRG. The proposed scheme may facilitate access to information on authorised PROs and ARs, and may support the validation of certain registration information, but it would not replace national arrangements governing PRO membership, AR appointment or contractual obligations.
- Fifth, although the EU EPR information hub is included in the overall concept, it will not be part of the pilot phase. Its content, access levels, updating procedures and links with existing national or EU information sources would therefore need to be further developed in a subsequent phase.
- Sixth, the pilot will not assess the full economic impact of the proposed scheme. Costs related to the development and operation of the EU Gateway, the adaptation of national systems, the preparation of conversion tables, cybersecurity measures, training, technical

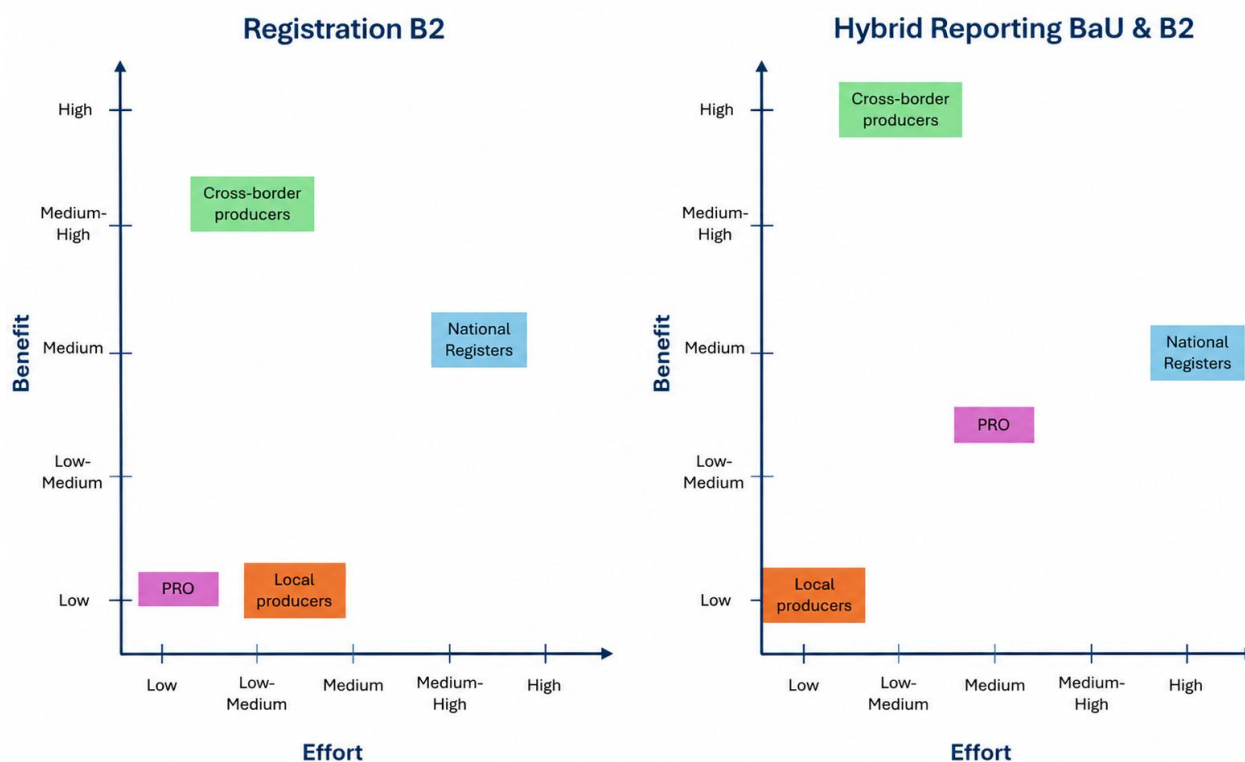
support and long-term maintenance would need to be evaluated separately. Similarly, the potential savings for producers, PROs, ARs, National Registers and enforcement authorities would require a dedicated cost-benefit assessment. Besides the qualitative discussion presented in Section 7.6, the pilot will not quantify the adaptation costs for producers and PROs, nor the potential savings associated with the implementation of the concept.

- Finally, the implementation of the concept would depend on broader institutional and legal conditions. These include the willingness of Member States and National Registers to participate, the legal basis for data exchange and cross-border access, compliance with data protection and cybersecurity requirements, and the degree of alignment with other EU digital and circular economy initiatives. The LIFE4EPR pilot can therefore test the feasibility and added value of the proposed approach, but further work would be needed to move from a pilot concept to a fully operational EU-wide system.

7.6 Benefits and implementation effort associated with the EU-LIFE4EPR Registration and Reporting Gateway

Figure 20 provides a comparative overview of the expected benefits and implementation effort associated with B2 registration and the hybrid BaU & B2 POM reporting for the main stakeholder groups in a preliminary and qualitative manner.

Figure 20: Stakeholder Benefit–Effort Assessment of the Proposed Registration and Reporting Approaches



7.6.1 Implications of implementing Approach B2 for Producer

Registration:

It is assumed that registration will be a one-time requirement, only to be re-opened in case of a change of the producer situation.

Ideally, **producers already registered** would need to update their registration information and migrate to the EU harmonised registration system or provide the information missing in the new registration system, however this is an implementing decision that may be further discussed with NRAs. This would represent a considerable one-off administrative effort, and the benefits arising from it should be evaluated before concluding the best way to proceed. In any case, it is recommended to assign them a new URN aligned with the URN that producers registering through the new system will get. This will necessitate an update of the records where producers are using their registration numbers. This measure will affect all types of producers (local, cross border, individual etc.) already registered.

Regarding **local producers** having to register for the first time using the new LIFE4EPR approach, because these producers operate in only one Member State, the long-term benefits would be relatively limited, as they do not currently experience significant administrative burdens arising from multiple national registration systems. A further advantage is that they would no longer need to register separately for each EPR stream, except in countries that already operate a single multi-stream register.

Cross-border producers would benefit from replacing multiple national registration procedures with a common registration structure. The harmonised approach could reduce duplication of registration activities, simplify updates of company information, and improve consistency across Member States. It would also consolidate stream-specific registrations into one process, replacing the multiple national submissions they currently manage. **National Register Authorities** would need to adapt their systems to receive, process and exchange harmonised registration data. They would also need to support the migration of existing registrations and establish interoperability mechanisms with the EU-wide registration framework. This would require integrating API-based data exchange so that, once a producer submits its information to the EU Gateway, it can automatically flow to all relevant national registers. In the longer term, authorities could benefit from improved data consistency, easier identification of cross-border producers and enhanced cooperation between Member States. A process to assign a URN to already registered producers may be needed (e.g. similar to the alignment of bank account numbers when two banks merge) and may consider requesting missing information to registered producers so they hold the same information from 'old' and 'new' producers.

Producer Responsibility Organisations may need to adapt interfaces and procedures if they offer the service to register their producers, but impacts are expected to remain limited. Similarly, **marketplaces** registering the producers using their services, will have to align their processes with

the templates and procedures of the EU Gateway if they chose the B2 pathway. However, they will be able to register producers in bulk using the same data structure for all MS.

PROs would take on an active role in the registration flow, as registration requires validation by the relevant PROs before it can be completed (see Section 7.3). This represents a recurring task rather than a one-off adaptation, and its operational and workload implications for PROs should be assessed during the pilot phase. PROs offering registration services to their producers may also need to adapt their interfaces and procedures.

As PROs, **Authorised Representatives (ARs)** would also need to take an active role in the registration and reporting flows as they would need to validate the information before signature and submission.

Producers operating individual systems would be affected similarly to other producers.

7.6.2 Implications of implementing the Hybrid BaU+B2 Approach for POM Reporting:

Unlike registration, the proposed reporting approach would be combined. Producers could choose between the two routes (BaU, B2). Continuing to report through existing national reporting systems (BaU); or reporting through a harmonised EU single-entry reporting route (B2). Consequently, impacts would depend on the reporting route selected by each producer.

The model also preserves flexibility because it does not replace national systems, the relative use of each route and the case for any further alignment can be reassessed as evidence improves.

Most **local producers** are expected to continue using existing national reporting channels (BaU). As a result, implementation effort would be minimal and reporting practices would remain largely unchanged. Those choosing the harmonised route would need to adapt to the common reporting format but could benefit from greater standardisation and future scalability. It is assumed that local producers planning expansion of their activities to other MS will also benefit from the harmonised route, this point will be made clear to users when giving them the opportunity to choose one path or the other at the moment of reporting.

Cross-border producers and marketplaces (the latter if reporting on behalf of their producers), together with producers expanding to other MS, are expected to be the primary users and beneficiaries of the harmonised reporting route (B2). The ability to submit data once through a common format rather than preparing multiple national reports could significantly reduce administrative burden, reporting costs and data transformation requirements. Benefits would increase with the number of Member States and EPR streams involved. The LIFE4EPR approach would consider an alignment of the reporting deadlines, which will imply a significant improvement for producers. However, the LIFE4EPR system can also work with different deadlines per Member State as it just functions as a data repository. **Information about deadlines can be uploaded on the system to alert users of their upcoming obligations.**

National Register Authorities would need to manage both, national reporting formats and harmonised EU reporting formats simultaneously. Depending on the technical implementation, authorities may need to establish conversion, validation and data exchange mechanisms. The coexistence of two reporting routes would increase complexity in the short term, although improved data quality and consistency could generate benefits in the longer term. API integration will be required to enable the automated transfer of data between national systems and the EU framework, with the associated costs for NRAs. A decision on implementation may consider that NRAs will be free to opt for a simplified approach and cancel the BaU route, hence using a simple B2 approach, this would increase the burden for ‘local producers’ that will have to adapt their reporting structures individually and may be a considerable achievement for SMEs.

Producer Responsibility Organisations submitting POM data on behalf of their producers may need to adapt systems to process harmonised reporting data and potentially accommodate multiple data pathways. Improved data quality and greater consistency between Member States may provide operational benefits.

PROs would also need to know who is responsible for the POM data that producers submit directly through the harmonised route, as today most PROs are appointed to submit the figures reported for their producers. Because this data is more detailed, it also raises confidentiality questions. These are handled by giving each PRO access only to the data of its own affiliated producers and their products (see Section 7.4).

Cross-border producers operating individual systems could benefit significantly from the harmonised reporting route through reduced reporting fragmentation and simplified compliance management. Local operators are likely to experience fewer benefits and may prefer to remain on national reporting routes.

While most of the implementing impact of this LIFE4EPR approach goes to registers, PROs and marketplaces, the management of the resources required is more efficient as they will have a collective benefit affecting the thousands of producers in the market using their services.

8 Complementary Measures

In parallel to the exploration of an EU-wide harmonised EPR register, the LIFE4EPR project identified a range of complementary measures that could improve the functioning of the current system without requiring major structural changes to national registers. These measures emerged from stakeholder consultations and co-creation activities and address practical challenges experienced by producers, marketplaces, national authorities and Producer Responsibility Organisations.

The following complementary measures were identified:

1. **Harmonise key definitions and roles across Member States.** Align the definition of “producer” and clarify the entities responsible for registration and reporting (e.g. importer,

distributor, distance seller or authorised representative) to ensure consistent application of EPR obligations across the EU.

2. **Improve accessibility of compliance information.** Ensure that registration portals, reporting forms, guidance documents and support materials are easy to find, available in English and, where possible, official EU languages to facilitate compliance for cross-border producers.
3. **Further harmonise product scope.** Reduce differences in the products covered by EPR obligations across Member States to create a more predictable and transparent regulatory environment for producers operating in multiple markets.
4. **Align reporting requirements.** Increase consistency in reporting frequencies, deadlines, reporting formats and data validation procedures. Greater alignment would significantly reduce administrative burden while maintaining national implementation structures.
5. **Harmonise data validation and audit procedures.** Align verification methods, audit requirements and supporting documentation requirements across Member States. This would reduce duplication of efforts and facilitate compliance for producers operating in several countries while preserving data quality and enforcement effectiveness.
6. **Improve the framework for Authorised Representatives (ARs).** Increase transparency and consistency regarding the appointment and operation of ARs. Potential measures include harmonised appointment procedures, public registers of authorised representatives and, where appropriate, allowing PROs to act as ARs.
7. **Harmonise eco-modulation requirements.** Aim at a uniform set of eco-modulation criteria and the information producers must provide to demonstrate compliance. Greater consistency would improve transparency, facilitate compliance and support environmental objectives.
8. **Explore marketplace “pay-on-behalf” models.** Consider mechanisms whereby online marketplaces fulfil EPR obligations on behalf of sellers, helping to address free-riding and improve compliance, particularly in cross-border e-commerce.
9. **Establish national EPR helpdesks.** Provide producers with easy access to reliable compliance information through national helpdesks and a central EU information platform linking national authorities, registers and PROs.
10. **Strengthen cross-border information exchange and enforcement cooperation.** Improve data sharing between Member States, national registers and enforcement authorities to facilitate the identification of non-compliant producers and support coordinated enforcement actions.

These complementary measures represent practical and incremental improvements that could significantly enhance the functioning of the current EPR system. While they do not replace the potential benefits of an EU-LIFE4EPR gateway scheme for registration and reporting, they offer a

realistic pathway to address many existing challenges in the short to medium term and could be implemented independently of future decisions on EU-wide registration and reporting systems.

8.1 Survey results on complementary measures

In the survey, stakeholders were also asked to prioritise the proposed complementary measures, see Table 10 and tables in AIII.6. Complementary Measures.

The highest priority was given to measures that would improve the harmonisation of core EPR obligations across Member States, particularly:

- the **harmonisation of the definition of producer and reporting responsibilities** (52 high or very high priority votes),
- **harmonisation of product categories and scope** (45 votes), and
- **the availability of registration and reporting forms in both national languages and English** (44 votes).
- Measures related to reporting harmonisation, such as **aligning reporting frequencies and deadlines, also received strong support.**

By contrast, measures relating to authorised representatives, producer hotlines and the possibility for PROs to act as authorised representatives received lower levels of priority (as noted in the introduction to Section 6, the survey results should be interpreted with caution due to the non-representative sample).

Table 10: Results of the survey with respect to the complementary measures

Section 4: Prioritisation of Complementary Measures	Very high priority	High priority	Medium priority	Low priority	Not a priority
Harmonize definition of producer, and reporting and registration obligation (who should report and for which stream/s) across MS.	31	20	4	2	2
Registration and reporting forms should be available in multiple languages, at least in the national language(s) of the MS and in English.	29	15	10	4	1
Harmonize products categories in scope across MS and per stream.	24	20	9	3	3
Align reporting frequencies and deadlines across MS and per stream.	13	12	14	11	9
Align data validation procedures (e.g. audits) across MS.	15	15	17	9	3
Harmonisation of authorised representative (AR) procedures across Member States, including appointment processes, public AR registers, and the possibility for PROs to act as ARs where appropriate	18	13	17	9	2
Set up a public register of AR across MS.	10	15	20	10	4
Allow PROs to be ARs.	12	9	19	12	7
Remove AR obligations in a MS for producers who are part of PRO	6	5	13	18	17
Hotline for EPR queries in all MS / local language and English.	6	16	13	16	8
Collect information and cross-referencing of data on producers operating in multiple MS.	15	17	16	6	5
Harmonize eco-modulation criteria per product stream across MS.	19	15	11	4	10

Stakeholders provided several additional observations regarding the proposed complementary measures in the survey. Several stakeholders noted that complementary measures should be addressed through EU legislation rather than through the design of an EPR register itself.

A recurring theme was the need to strengthen enforcement and market surveillance across MSs. Respondents highlighted the value of improved access to information on registered producers, cross-border data exchange, and the introduction of a common EU producer identifier to support traceability, compliance checks and the detection of free-riders. Several stakeholders also supported enhanced cross-checks with customs and statistical databases and improved mechanisms for verifying compliance in cross-border e-commerce.

While some stakeholders advocated removing the requirement to appoint separate ARs in every Member State or allowing PROs to act as ARs, others stressed that the two functions serve different purposes and should remain distinct to avoid conflicts of interest and preserve accountability. Several respondents therefore called for a broader review and clarification of the AR framework.

Stakeholders generally supported greater uniformity of eco-modulation criteria at EU level, while recognising the need to account for differences in local waste management systems and collection costs. Several respondents also emphasised that eco-modulation should better recognise reuse and waste-prevention initiatives and should provide sufficient implementation time for producers.

Other recommendations included limiting reporting frequencies, establishing harmonised reporting templates used by all PROs, improving multilingual support and technical assistance, introducing a central EU pre-registration system for producer master data, and ensuring that audit requirements remain proportionate and consistent across Member States. Several respondents also stressed the importance of ensuring that reusable products and packaging are treated consistently across national EPR schemes.

9 Conclusions

The LIFE4EPR co-creation process confirmed that fragmentation in EPR systems remains a significant challenge for producers, particularly those operating across more than one Member State. While the project focuses on National EPR Registers, the sessions also showed that the lack of harmonization extends to PRO registration and reporting systems. As a result, any long-term scheme should consider both NR and PRO-related processes. Otherwise, the challenges identified by stakeholders would only be partially addressed.

In most Member States, producers are required to register their companies and report products POM both to national EPR registers and, where applicable, to PROs. However, these actors use reported EPR data for different purposes. National Registers 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 producer registration is often a one-time obligation, the main workload and burden for producers is associated to the regular reporting of POM to PROs and NRs.

The main challenges identified through the project were:

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

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 Member States, 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 are therefore essential to support informed decision-making and ensure that future measures are proportionate, targeted and effective.

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. An important feature of the proposed is that **it maintains the existing roles and competences of all actors, including producers, NRs, PROs, and ARs**. The concept changes the way data are accessed and provided, rather than creating parallel reporting routes or introducing and new roles and actors.

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

- **EU EPR Information Hub:** This module acts as a centralised point for EPR-related information across the EU, without replacing or modifying national registers. A model like Eurostat could be envisaged, whereby National Registers provide select, up to date, standardised data to the EU-level information platform.
- **Producer registration:** This module concerns the harmonisation of producers’ registration using a single-entry data point at EU level. Under this approach, NRs replace their current registration formats with a harmonised format, and producers upload registration information using a B2 approach: data regarding all registers in scope is uploaded in bulk to a single data gateway accessible by participating stakeholders. 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 Member States.

- **Products placed-on-market reporting:** this module concerns the reporting of products placed on the market. The proposed concept includes a hybrid model designed to provide a targeted response to the problem by focusing simplification efforts on the actors most affected by fragmentation, while avoiding unnecessary disruption for others. It also recognises that the scale of the problem is not yet fully quantified. For this reason, a hybrid model could function as a flexible and transitional configuration, allowing time to assess whether deeper harmonisation is necessary.

The **hybrid model proposed for products POM reporting** includes both a business-as-usual (BaU) route and a harmonized route B2. The harmonized route introduces a data repository, referred to as the 'EU Gateway', with controlled access by the different stakeholders involved. Stakeholders' roles and competences are not affected, and producers may choose either to maintain their current modus operandi through existing national routes or to upload harmonised data in bulk.

Most of the implementation impact would fall on NRs and PROs, which would access the EU data repository 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. In order to integrate both data sets, these need to be compatible and interoperable, for this the EU-LIFE4EPR RRG proposes that the harmonised route requires POM reporting in a high level of detail, to allow conversion of these codes into the existing NRs and PROs codes. Producers placing products on only one MS (also called 'local producers'), or those satisfied with existing registers, could continue using the current national registration process and data structures without changes in their modus operandi or reporting formats. Cross-border producers placing products on the market in more than one Member State could opt to upload data covering all their activities, product streams and countries in a harmonised format through the EU Gateway.

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. This task 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. The concept is also flexible in terms of practical implementation: until the scale of the problem is quantified, the LIFE4EPR registration approach can work as a temporary measure that will be replaced eventually by a single B2 approach. Additionally, Member States may decide to implement directly a single B2 approach (hence no BaU

option) from the start. Once the system has settled down, regular analysis of the reporting codes used will allow to make adjustments to 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. The 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 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.

In addition to the concept of EU-LIFE4EPR RRG, 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 Member States, particularly:

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

By contrast, measures relating to authorised representatives, producer hotlines and the possibility for PROs to act as authorised representatives received lower levels of priority. However, these results should be interpreted with caution, as the profile of survey respondents may have influenced the outcome.

Overall, the LIFE4EPR approach 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, 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.

Annex I: Stakeholder participation details

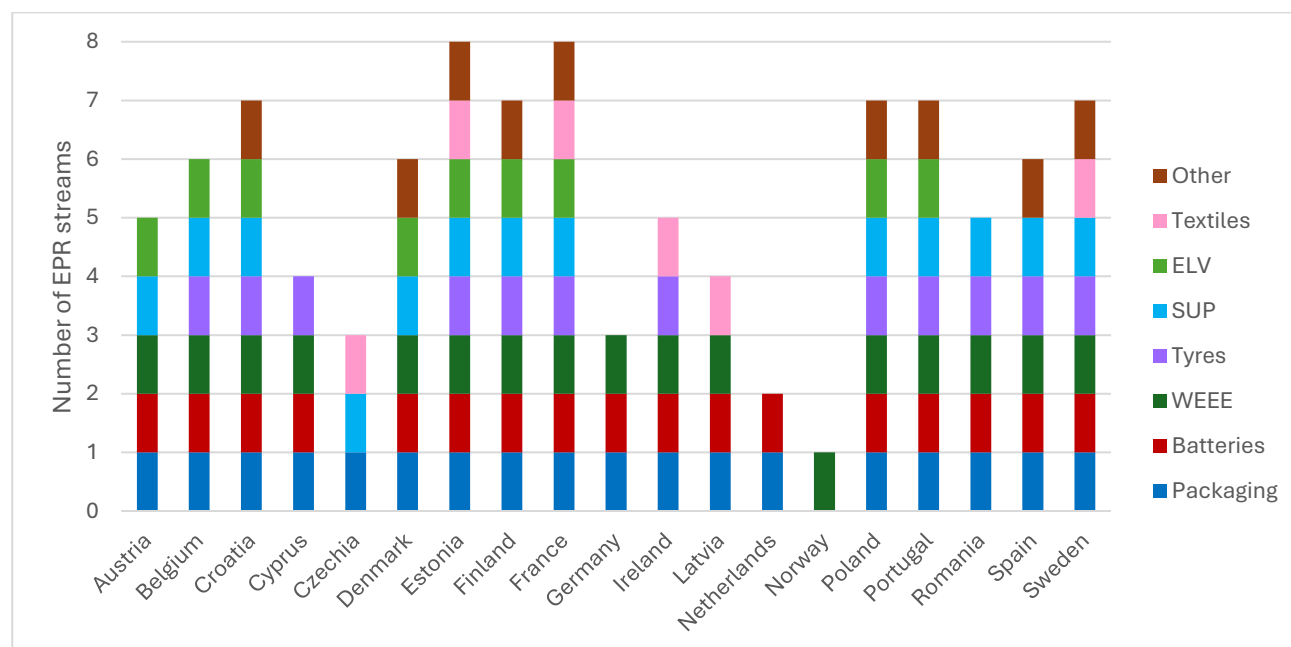
AI.1. First co-creation session

A total of 66 participants attended the workshop via Zoom, of which 57 actively contributed to the Mentimeter poll. Participants represented National Register Authorities from 19 countries and covered a broad range of EPR streams. In most cases, multiple EPR streams were represented within each country. Norway was the only exception, where participation corresponded to a single EPR stream (see

Figure A. 1). Participants reported that several EPR streams are already covered by existing national registers, notably packaging, batteries and WEEE. In addition, a significant number of national authorities indicated that textile EPR schemes are expected to be introduced soon, reflecting the ongoing expansion of EPR obligations across Member States.

Participants pointed to recurring challenges for national authorities, including enforcement difficulties, free-rider detection, verification of cross-border and non-EU producers, language barriers and inconsistencies in procedures and data requirements across Member States. They also underlined the growing complexity linked to online marketplaces and distance sellers, and called for clearer guidance, better transparency tools and more harmonised approaches to support producer identification and compliance.

Figure A. 1: Countries and EPR streams represented by the NRA participating in the first co-creation session



AI.2. Second co-creation session

A total of 54 participants attended the second co-creation workshop via Zoom, of which 50 actively contributed to the Mentimeter poll. Participants represented a broad and diverse range of market

actors potentially affected by the harmonisation of EPR registers, with particularly strong participation from Producer Responsibility Organisations (PROs), which constituted the largest group represented. Participation also included large producers, SMEs, marketplaces, associations of producers and PROs, as well as other relevant stakeholders (see Figure A. 2). The strong representation of PROs reflects their central role in current EPR systems and brought valuable operational perspectives to the discussion, particularly regarding registration and reporting practices.

Eight participants indicated that they do not interact directly with national EPR registers, mainly reflecting stakeholders with coordinating, representative or advisory roles. In addition, five participants indicated that they place products on the market in all EU Member States, while several participants also reported activity in non-EU markets, reflecting the cross-border scope of the actors represented. Participants reported experience with EPR compliance across many Member States, with notable representation in countries such as Spain, France, Italy, Belgium and the Netherlands.

The EPR streams represented were also diverse. Packaging, batteries and EEE were the most reported streams across countries, while some participants also reported activity in tyres, textiles and ELVs. Participants operating across all Member States indicated involvement in multi-stream and other product flows as well, reinforcing the broad scope of expertise represented in the session (see Figure A. 3).

Figure A. 2: Type of organizations participating in the 2nd co-creation session distributed by the countries where they place products on the market and interact with national EPR registers.

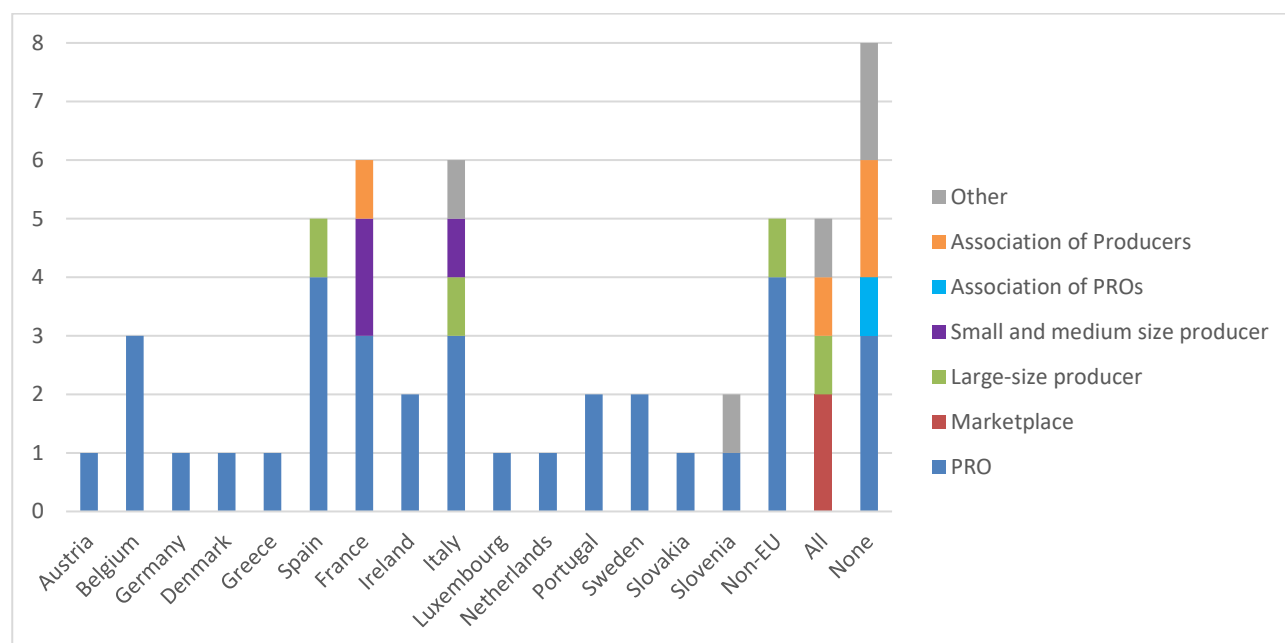
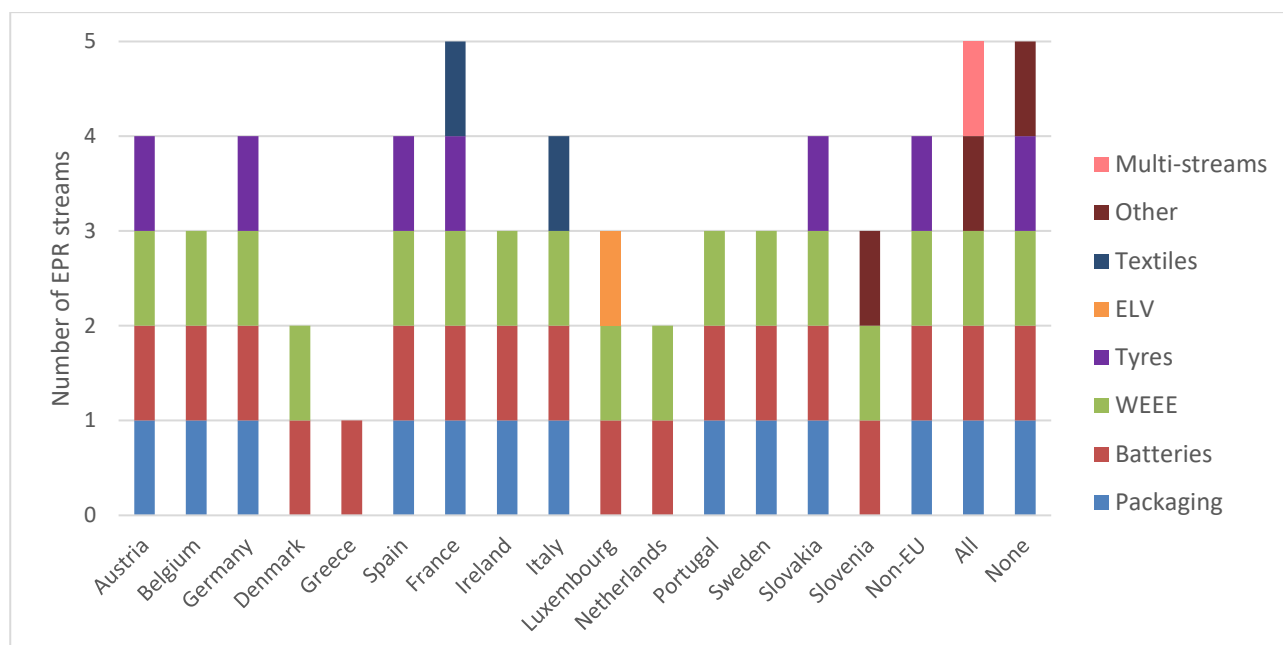


Figure A. 3 Countries and EPR streams where the participants of the 2nd co-creation workshop report POM on the market.



AI.3. Third co-creation session

The third co-creation session was held as bilateral meeting between the LIFE4EPR team and nine members of DG Environment. The meeting aimed to present feedback from the first co-creation workshops and gather the Commission's views before refining the preferred option. The discussion indicated limited support at this stage for a centralised EU platform, while showing clear interest in exploring interoperability between national registers, strong support for an EU EPR Information Hub, and the need for further evidence before pursuing structural harmonisation.

AI.4. Internal meeting with the Advisory Board

The meeting with the Advisory Board of the LIFE4EPR project brought together a diverse group of stakeholders with expertise across multiple EPR streams and perspectives.

Participation covered several EPR streams, including packaging, WEEE, batteries, textiles and multi-stream schemes, with organisations operating at national, European and global levels. Participating organisations included Stichting Open, APPLiA Europe, Decathlon, PRONEXA AG, OVAM, RREUSE, CITEO, ADEME, Producer Register Limited, Recycling Europe, the European Remanufacturing Council, TCBL, EWRN, Stiftung ear, OECD, BEBAT, the German Environment Agency, the European Commission and Policy Hub.

AI.5. Fourth co-creation session

All the participants of the previous co-creation sessions were invited to participate in the fourth co-creation session. A total of 67 participants attended the fourth co-creation workshop via Zoom.

Active participants in the Mentimeter exercise represented producer responsibility organisations (PROs), producer and industry associations, national producer registers, environmental agencies and ministries, market surveillance and regulatory authorities, retailers and brands, compliance schemes, research and innovation projects, and international networks working on circular economy and EPR implementation.

Participating organisations included APPLiA Europe, EURATEX, Decathlon, EXPRA, Erion, Producer Register Limited, PRONEXA, Stiftung ear (EWRN), WEEE Ireland, Repak, Recipo, EKO-KOM, EuroCommerce, TEXroad and the SAGE project. Public authorities and regulatory bodies were also represented, including Rijkswaterstaat (Netherlands), the Finnish Supervisory Agency, the Estonian Environmental Agency, the Portuguese Environmental Agency (APA), the German Federal Ministry for the Environment (BMUK), the Ministries responsible for climate and environment in Latvia and Estonia, the Ministry of the Environment of the Czech Republic, the Latvian WEEE and Batteries Producers Register, ADEME (France), and the German Central Agency Packaging Register (ZSVR).

The diversity of participants enriched the discussion by bringing together practical implementation experience, regulatory expertise and strategic insights from different national contexts and EPR streams.

In addition to the organisations actively contributing through the Mentimeter exercise, a number of other stakeholders attended the co-creation session and participated in the broader meeting discussions, although they did not provide inputs through the Mentimeter platform.

AI.6. Survey participation

A total of 59 stakeholders participated in the survey. The largest respondent group consisted of Producer Responsibility Organisations (PROs) (18 respondents), followed by National Registers and relevant national authorities (12 respondents), producers (9 respondents), and producer or industry associations (8 respondents). Other stakeholder groups included enforcement authorities (4 respondents), PRO associations (2 respondents), authorised representatives (1 respondent), marketplaces/online platforms (1 respondent), consultancy/legal advisors (1 respondent), NGOs/civil society organisations (1 respondent), and other stakeholders (2 respondents).

Among respondents representing producers, manufacturers were the most common type (12 responses), followed by distributors (8), importers (6), distance sellers/online sellers (5), and marketplaces (4). Several producer respondents identified with more than one role.

The survey covered a broad range of EPR streams. The most represented streams were packaging (45 responses), WEEE/EEE (42), batteries (40), and single-use plastics (28). Other relevant streams included textiles (20), tyres (17), vehicles/ELV (16), oils (7), and other EPR streams (11).

Respondents represented organisations operating across a wide geographical area. EPR activities were reported in almost all EU Member States, with the highest number of responses relating to France (17 each), Austria, Belgium and Germany (16 each), Spain (15), Italy and Poland (14 each), and Slovakia (11). Several respondents also reported activities in non-EU countries such as Norway, Switzerland and the United Kingdom.

The survey captured both organisations operating nationally and those active across multiple Member States. While 27 respondents indicated that their organisation operates in only one Member State, 15 respondents reported operating in more than 10 Member States, highlighting the significant participation of cross-border actors. Similarly, 7 respondents indicated that they must register in national EPR registers in 11–27 Member States, illustrating the complexity faced by some producers and their representatives.

Regarding the use of authorised representatives (ARs), 14 respondents indicated that they make use of an AR to fulfil EPR obligations, while 9 respondents reported not using an AR. The remaining respondents selected “not applicable”, reflecting the significant participation of PROs, national authorities and other stakeholders for whom this question was not relevant.

Key takeaway: The survey achieved a balanced representation of the main EPR stakeholder groups, with particularly strong participation from PROs, national authorities and organisations active across multiple Member States, ensuring that the results reflect both operational and regulatory perspectives on EPR registration and reporting.

ANNEX II: Design options

All.1. Registration options

All.1.1. Registration Option A (MS data entry with EU Registration form)

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

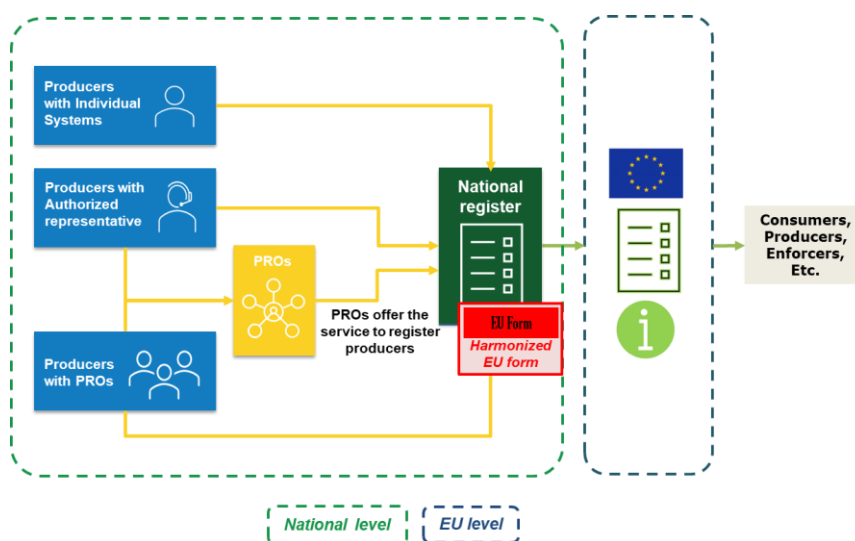
Under this option, producers placing products on the market in multiple MSs would be required to submit the same type of information in a harmonised format, named **EU Register Form**, irrespective of the country of registration. However, producers would still be required to register separately in each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

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

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

A standardised EU registration form would be defined at EU level, including a set of minimum common harmonised data fields. National Registers (NRs) and Producer Responsibility Organisations (PROs) would be required to **adapt their registration procedures and systems** to align with this common structure. Product categories would be **harmonised and simplified at EU level**. This approach would require **structural adjustments** to national systems but would ensure greater consistency and comparability of data.

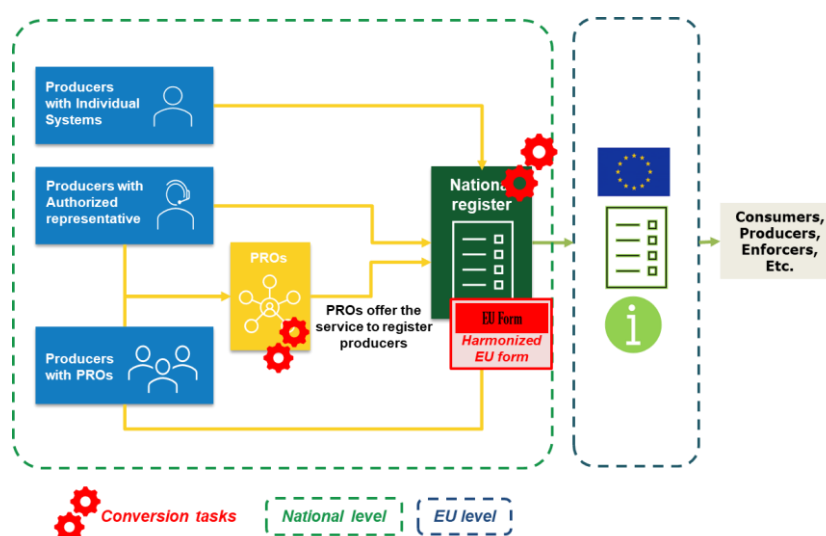
Figure A. 4 Registering data flow in Option A and Approach 1



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

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

Figure A. 5 Registering data flow in Option A and Approach 2



All.1.2. Registration Option B (Single EU data entry with EU Registration form)

The following options (illustrated in Figure A. 6 and Figure A. 7, respectively) represent the centralised versions of Option B.1 and B.2.

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

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

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

The registration process would include common information, provided once and applicable across all Member States (e.g. legal entity details) and country-specific information (e.g. info related to AR,

PRO, product scope), submitted per MS but using a harmonised format (simplified in B1 and more detailed in B2).

Figure A. 6 Registering data flow in Option B Approach 1

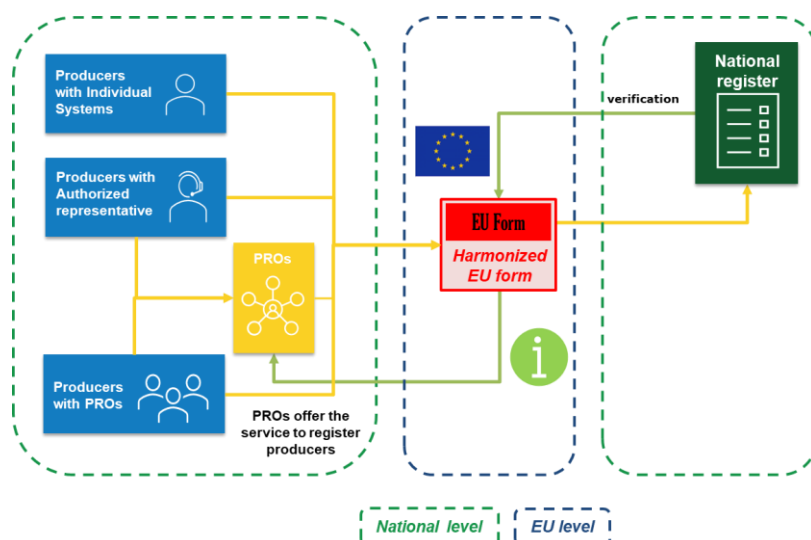
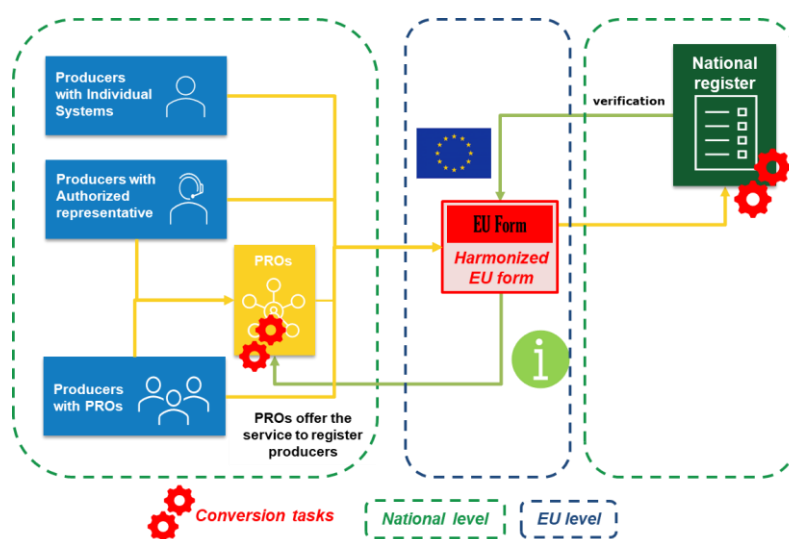


Figure A. 7 Registering data flow in Option B Approach 2



All.2. Harmonization of the products POM Reporting

All.2.1. Reporting Option A (MS data entry with EU Reporting form)

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

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

public. Ensuring data quality, validation, and confidentiality at both national and EU levels would be essential.

Within this framework, two approaches can be distinguished:

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

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

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

Reporting is based on a more granular EU data structure, including detailed product information. Producers would report using this detailed EU format regardless of the MS. National Registers and PROs would retain their existing coding systems, relying on conversion tools to map EU-level data into national categories. Existing reporting flows would remain unchanged, with reporting continuing via PROs, ARs, or directly to NRs.

Figure A. 8: Data flow for Option A and Approach 1 aiming at harmonizing reporting with an EU (simplified) Reporting Form

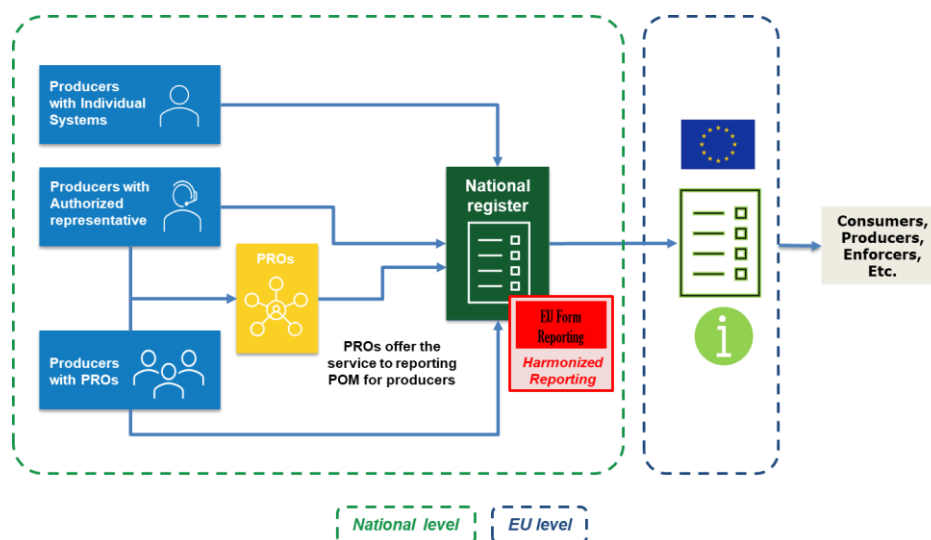
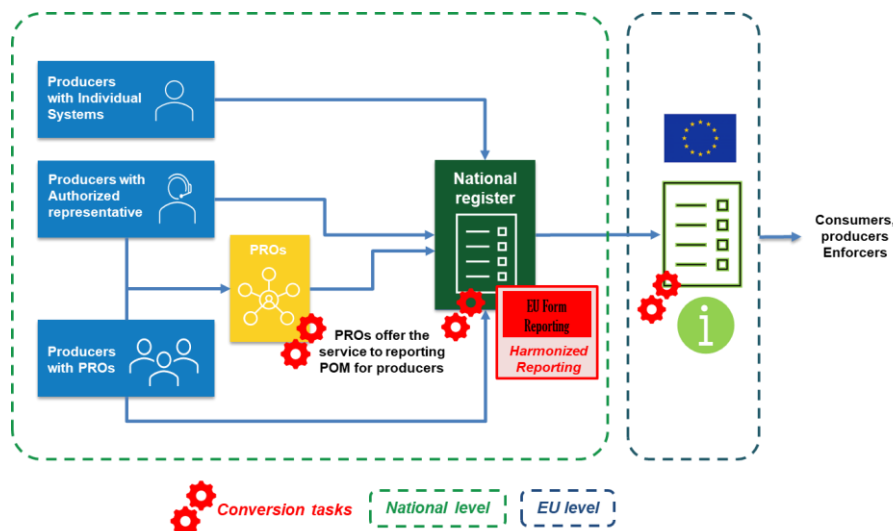


Figure A. 9: Data flow for Option A and Approach 2 aiming at harmonizing reporting with an EU (detailed) Reporting Form with conversion codes



All.2.2. Reporting Option B (Single EU data entry with EU Reporting form)

Figure A. 10 and Figure A. 11 show very similar centralized approaches. In both cases, a single EU data entry point is used by producers (or their representatives) to provide POM data regularly.

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

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

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

Figure A. 10: Data flows for Option B and Approach 1 with harmonized reporting and single-data-entry point

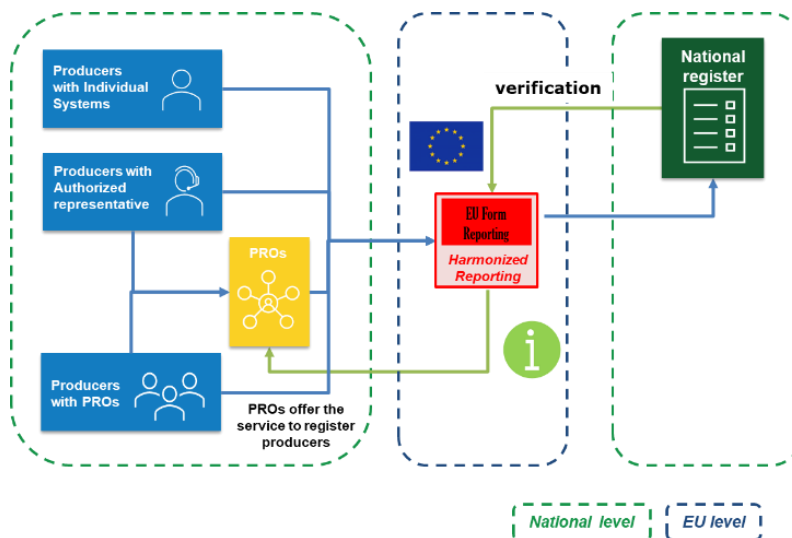
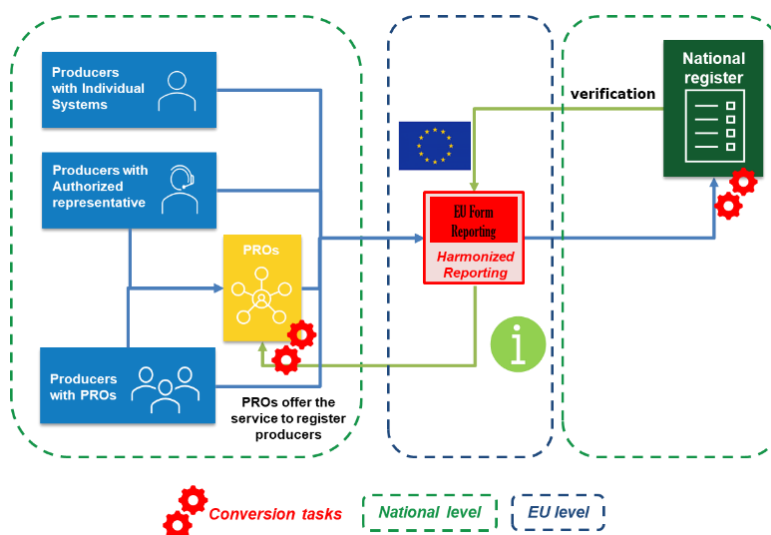


Figure A. 11: Data flows for Option B and Approach 2 with harmonized reporting, single entry point and conversion factors.



ANNEX III: Survey Results

AIII.1. Governance and Enforcement requirements

While stakeholder views were generally aligned, some differences emerged. National Register authorities consistently expressed strong support for an active role of National Registers in verification, communication and cross-border cooperation. PROs were among the strongest supporters of information sharing between Member States and strongly opposed limiting access to registration information to national authorities only.

A broad consensus emerged against restricting access to registration information to the Member State of origin, indicating strong support for cross-border cooperation and enforcement.

The greatest divergence concerned public access to producer registration information. Authorities and PROs generally supported greater transparency, whereas producers and producer associations expressed more caution, reflecting concerns related to confidentiality and commercial sensitivity.

A. Governance and Enforcement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
1. Competent national authorities should retain their enforcement role at national level.	35	17	3	4	0	0
Producer	2	4	0	3	0	0
Producer association / industry association	4	4	0	0	0	0
Producer Responsibility Organisation (PRO)	12	5	1	0	0	0
PRO association	1	0	1	0	0	0
National Registers/ relevant national authority (NR)	9	2	1	0	0	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	3	1	0	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	1	0	0	1	0	0
2. National Registers (NRs) should be able to verify and validate both producer registration data and products placed on the market (POM) data, including submissions made by PROs or Authorized Representatives (ARs) on behalf of producers.	30	27	0	1	1	0
Producer	2	6	0	1	0	0
Producer association / industry association	2	6	0	0	0	0
Producer Responsibility Organisation (PRO)	9	8	0	0	1	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	10	2	0	0	0	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	3	0	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	2	0	0	0	0	0

A. Governance and Enforcement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
3. NRs should be able to inform producers about EPR compliance obligations.	30	21	5	2	0	1
Producer	3	5	0	1	0	0
Producer association / industry association	5	3	0	0	0	0
Producer Responsibility Organisation (PRO)	9	9	0	0	0	0
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	8	0	3	0	0	1
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	2	0	1	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	0	1	0	0	0
4. NRs should be able to communicate directly with producers, ARs, and PROs.	28	26	3	1	0	1
Producer	3	5	0	1	0	0
Producer association / industry association	2	5	1	0	0	0
Producer Responsibility Organisation (PRO)	8	10	0	0	0	0
PRO association	1	0	1	0	0	0
National Registers/ relevant national authority (NR)	11	0	0	0	0	1
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	2	1	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	0	2	0	0	0	0
5. NRs should be able to issue a national producer registration number, or code embedded in a digital verifiable certificate.	25	20	9	3	2	0
Producer	2	4	2	1	0	0
Producer association / industry association	2	5	1	0	0	0
Producer Responsibility Organisation (PRO)	10	6	2	0	0	0
PRO association	1	0	0	0	1	0
National Registers/ relevant national authority (NR)	6	1	2	2	1	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	2	1	1	0	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	0	1	0	0	0
A. Governance and Enforcement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
6. NR authorities should be able to access producer registration information from other Member States.	25	19	10	4	1	0
Producer	4	3	1	1	0	0
Producer association / industry association	5	1	1	1	0	0
Producer Responsibility Organisation (PRO)	5	11	1	1	0	0
PRO association	1	0	0	0	1	0
National Registers/ relevant national authority (NR)	8	3	1	0	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	1	1	2	0	0	0
Consultancy / legal advisor	0	0	0	1	0	0
NGO / civil society	1	0	0	0	0	0
Other	0	0	2	0	0	0
7. NR authorities should be able to access registration information only from their own Member State (not from other MS).	2	6	10	21	16	4
Producer	0	0	2	4	3	0
Producer association / industry association	0	1	1	2	4	0
Producer Responsibility Organisation (PRO)	1	2	1	11	2	1
PRO association	0	1	0	0	1	0
National Registers/ relevant national authority (NR)	0	1	1	2	6	2
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	1	0	1	2	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	0	0	0	0	1
Other	0	0	2	0	0	0

A. Governance and Enforcement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
8. NRs should be able to share producer registration data with enforcement authorities in other Member States upon request.	24	23	8	2	1	1
Producer	4	4	1	0	0	0
Producer association / industry association	4	2	1	1	0	0
Producer Responsibility Organisation (PRO)	6	8	2	1	0	1
PRO association	1	0	0	0	1	0
National Registers/ relevant national authority (NR)	6	5	1	0	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	2	2	0	0	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	0	2	0	0	0	0
9. Enforcement authorities should be able to access detailed producer registration information across all Member States.	25	21	9	2	1	1
Producer	3	4	1	0	1	0
Producer association / industry association	5	1	1	1	0	0
Producer Responsibility Organisation (PRO)	5	8	3	1	0	1
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	7	4	1	0	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	3	0	1	0	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	1	0	0	0	0
10. Public users, such as consumers, should be able to visualize basic producer registration information for all Member States and EPR streams.	13	25	14	4	3	0
Producer	0	3	3	1	2	0
Producer association / industry association	2	1	4	0	1	0
Producer Responsibility Organisation (PRO)	1	11	4	2	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	5	5	2	0	0	0
Authorised Representative (AR)	0	0	0	1	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	2	2	0	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	1	0	0	0	0

AIII.2. Registration Structure and Harmonization Requirements

As can be seen in the following tables, Stakeholder groups broadly supported greater harmonisation of registration requirements, including common registration number structures, minimum registration datasets and harmonised registration forms.

The main divergence concerned whether Member States should be allowed to request additional registration information beyond the EU minimum dataset. National Register authorities generally supported retaining such flexibility, whereas producers and producer associations favoured a more standardised approach with fewer national variations.

National Register authorities were also more cautious regarding the introduction of a single EU-wide registration number, suggesting a preference for harmonised national systems rather than full centralisation. PROs emerged as one of the strongest supporters of deeper harmonisation measures.

B. Registration Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
11. The format of national producer registration numbers (obtained after the EPR registration step) should follow a common EU-wide structure across MS	30	17	8	3	1	0
Producer	6	3	0	0	0	0
Producer association / industry association	5	2	1	0	0	0
Producer Responsibility Organisation (PRO)	9	6	2	1	0	0
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	4	4	2	2	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	1	1	0	1	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	0	1	1	0	0	0
11b. There should be one number for the same legal entity across EU (single registration number).	19	15	11	7	7	0
Producer	6	1	2	0	0	0
Producer association / industry association	2	3	2	1	0	0
Producer Responsibility Organisation (PRO)	4	8	3	2	1	0
PRO association	1	0	0	0	1	0
National Registers/ relevant national authority (NR)	4	2	1	3	2	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	0	0	2	1	1	0
Consultancy / legal advisor	0	0	0	0	1	0
NGO / civil society	1	0	0	0	0	0
Other	0	1	0	0	1	0

B. Registration Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
12. EU legislation should define a minimum set of mandatory fields for producer registration for all EPR streams, applicable across all Member States.	28	24	2	5	0	0
Producer	5	3	0	1	0	0
Producer association / industry association	4	3	0	1	0	0
Producer Responsibility Organisation (PRO)	7	9	0	2	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	7	3	1	1	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	0	4	0	0	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	2	0	0	0	0	0
13. National authorities should be allowed to request additional registration fields beyond the EU minimum requirements.	12	17	9	11	8	2
Producer	0	2	0	1	5	1
Producer association / industry association	0	1	0	4	2	1
Producer Responsibility Organisation (PRO)	3	7	4	4	0	0
PRO association	0	0	1	1	0	0
National Registers/ relevant national authority (NR)	5	5	2	0	0	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	0	0	0	0	1	0
Enforcement authority	2	1	1	0	0	0
Consultancy / legal advisor	0	0	0	1	0	0
NGO / civil society	0	0	1	0	0	0
Other	2	0	0	0	0	0

B. Registration Structure and Harmonisation		Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
14. A harmonised EU registration form should be accepted by all NRs as the basis for national registration.		28	20	7	4	0	0
Producer		4	5	0	0	0	0
Producer association / industry association		6	1	1	0	0	0
Producer Responsibility Organisation (PRO)		7	9	1	1	0	0
PRO association		2	0	0	0	0	0
National Registers/ relevant national authority (NR)		6	2	2	2	0	0
Authorised Representative (AR)		0	1	0	0	0	0
Marketplace / online platform		1	0	0	0	0	0
Enforcement authority		0	1	3	0	0	0
Consultancy / legal advisor		0	0	0	1	0	0
NGO / civil society		1	0	0	0	0	0
Other		1	1	0	0	0	0
15. Each Member State should consolidate EPR registration for all EPR streams into a single national EPR register covering all EPR streams, instead of one national register per EPR stream.		22	17	11	3	5	1
Producer		4	3	2	0	0	0
Producer association / industry association		3	2	1	1	0	1
Producer Responsibility Organisation (PRO)		5	8	2	1	2	0
PRO association		1	0	0	0	1	0
National Registers/ relevant national authority (NR)		7	1	2	1	1	0
Authorised Representative (AR)		0	0	1	0	0	0
Marketplace / online platform		1	0	0	0	0	0
Enforcement authority		0	2	2	0	0	0
Consultancy / legal advisor		1	0	0	0	0	0
NGO / civil society		0	1	0	0	0	0
Other		0	0	1	0	1	0

AIII.3. Reporting of POM Data structure and Harmonization Requirements

Stakeholders generally supported greater harmonisation of POM reporting requirements. Producers, producer associations and PROs showed strong support for EU-harmonised reporting categories, common reporting forms and minimum reporting datasets.

National Register authorities also supported harmonisation but expressed greater support for maintaining nationally defined reporting categories and for allowing Member States to request additional reporting information beyond the EU minimum requirements.

As in the registration section, the clearest divergence concerned national flexibility. Producers and industry representatives generally favoured limiting national variations, whereas National Register authorities supported retaining flexibility to address national reporting needs.

C. Reporting of POM Data Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
16. NRs should be able to receive POM data using the product categories and subcategories they specify.	11	18	9	15	5	1
Producer	1	3	1	4	0	0
Producer association / industry association	2	0	0	2	3	1
Producer Responsibility Organisation (PRO)	1	8	3	4	2	0
PRO association	0	1	0	1	0	0
National Registers/ relevant national authority (NR)	6	2	3	1	0	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	1	1	1	1	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	0	0	1	0	0
Other	0	1	0	1	0	0
17. NRs should receive POM data using product categories and subcategories harmonised at EU level.	23	21	7	4	3	1
Producer	5	4	0	0	0	0
Producer association / industry association	4	2	0	1	0	1
Producer Responsibility Organisation (PRO)	5	10	1	2	0	0
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	2	3	3	1	3	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	1	2	0	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	2	0	0	0	0	0
C. Reporting of POM Data Structure and Harmonisation	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
18. EU legislation should define a minimum set of mandatory fields for reporting forms.	26	23	4	5	1	0
Producer	6	3	0	0	0	0
Producer association / industry association	3	3	1	1	0	0
Producer Responsibility Organisation (PRO)	7	9	1	1	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	4	5	0	2	1	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	2	0	1	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	2	0	0	0	0	0
19. National authorities should be allowed to request additional reporting fields beyond the EU minimum requirements.	12	15	10	13	7	2
Producer	0	2	1	2	3	1
Producer association / industry association	0	2	0	3	2	1
Producer Responsibility Organisation (PRO)	3	6	4	4	1	0
PRO association	0	0	1	1	0	0
National Registers/ relevant national authority (NR)	6	3	2	1	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	0	0	0	0	1	0
Enforcement authority	1	2	1	0	0	0
Consultancy / legal advisor	0	0	0	1	0	0
NGO / civil society	0	0	0	1	0	0
Other	2	0	0	0	0	0
20. A harmonised EU reporting form should be accepted by all National Registers as the basis for national reporting.	29	17	4	5	4	0
Producer	7	1	1	0	0	0
Producer association / industry association	6	1	0	1	0	0
Producer Responsibility Organisation (PRO)	8	7	0	2	1	0
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	2	6	1	1	2	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	2	1	0	0	0
Consultancy / legal advisor	0	0	0	0	1	0
NGO / civil society	1	0	0	0	0	0
Other	1	0	0	1	0	0

AIII.4. Role of PROs and Authorised Representatives Requirements

Stakeholder groups showed broad agreement regarding the role of PROs and Authorised Representatives (ARs) in supporting producer compliance. Most respondents supported allowing both PROs and ARs to submit information on behalf of producers and recognised the important advisory role of PROs.

The most divergent views concerned the possibility of a single EU-based AR operating across all Member States. Producers generally supported this approach, while National Register authorities expressed greater reservations.

Stakeholders also favoured harmonised reporting categories, greater transparency regarding authorised PROs and ARs, and improved digital communication between all actors involved in the system.

D. Role of PROs and Authorised Representatives	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
21. PROs should be allowed to submit data on behalf of producers when agreed by both parties.	33	17	6	3	0	0
Producer	3	3	2	1	0	0
Producer association / industry association	5	3	0	0	0	0
Producer Responsibility Organisation (PRO)	11	5	1	1	0	0
PRO association	1	0	1	0	0	0
National Registers/ relevant national authority (NR)	7	3	1	1	0	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	3	1	0	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	1	0	0	0	0
22. ARs should be allowed to submit data on behalf of producers.	28	23	5	1	0	2
Producer	3	4	1	0	0	1
Producer association / industry association	5	2	1	0	0	0
Producer Responsibility Organisation (PRO)	5	10	2	1	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	8	3	0	0	0	1
Authorised Representative (AR)	1	0	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	3	1	0	0	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	1	0	0	0	0

D. Role of PROs and Authorised Representatives	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
22bis. ARs should be allowed to submit data on behalf of producers only in case the producer does not belong to a PRO.	8	14	12	16	5	4
Producer	0	1	5	2	0	1
Producer association / industry association	2	0	2	3	1	0
Producer Responsibility Organisation (PRO)	2	6	2	4	3	1
PRO association	0	1	1	0	0	0
National Registers/ relevant national authority (NR)	2	3	1	4	1	1
Authorised Representative (AR)	0	0	0	1	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	1	1	0	2	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	0	0	0	0	1
Other	1	1	0	0	0	0
22tris. One single EU-based AR should be allowed to submit data on behalf of producers.	12	13	11	10	10	3
Producer	2	3	2	1	0	1
Producer association / industry association	5	0	2	1	0	0
Producer Responsibility Organisation (PRO)	1	6	3	4	4	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	2	1	2	3	3	1
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	0	2	1	0	1	0
Consultancy / legal advisor	0	0	0	0	1	0
NGO / civil society	0	0	0	0	0	1
Other	0	0	0	1	1	0
23. PROs should be able to inform and advise producers regarding EPR compliance obligations.	35	21	3	0	0	0
Producer	4	4	1	0	0	0
Producer association / industry association	4	4	0	0	0	0
Producer Responsibility Organisation (PRO)	13	5	0	0	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	8	3	1	0	0	0
Authorised Representative (AR)	1	0	0	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	2	2	0	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	0	1	0	0	0	0
Other	1	1	0	0	0	0

D. Role of PROs and Authorised Representatives	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
24. PROs should be able to receive POM data using their own categories and subcategories.	13	16	10	8	10	2
Producer	1	2	0	1	5	0
Producer association / industry association	2	0	1	1	3	1
Producer Responsibility Organisation (PRO)	5	7	2	4	0	0
PRO association	0	0	2	0	0	0
National Registers/ relevant national authority (NR)	3	5	1	1	2	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	0	0	1	0	0	0
Enforcement authority	1	1	2	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	0	0	0	0	0	1
Other	0	0	1	1	0	0

D. Role of PROs and Authorised Representatives	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
25. PROs should receive POM data using categories and subcategories harmonised at EU level.	26	17	7	5	3	1
Producer	6	3	0	0	0	0
Producer association / industry association	6	1	0	0	0	1
Producer Responsibility Organisation (PRO)	7	6	2	3	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	2	3	3	2	2	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	2	1	1	0	0	0
Consultancy / legal advisor	0	0	0	0	1	0
NGO / civil society	1	0	0	0	0	0
Other	0	1	1	0	0	0
26. NRs should provide up-to-date information on authorised PROs and ARs operating in their Member State.	31	21	5	0	0	2
Producer	3	5	1	0	0	0
Producer association / industry association	5	3	0	0	0	0
Producer Responsibility Organisation (PRO)	11	7	0	0	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	6	3	2	0	0	1
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	3	1	0	0	0	0
Consultancy / legal advisor	0	1	0	0	0	0
NGO / civil society	0	0	0	0	0	1
Other	1	0	1	0	0	0
27. PROs, NRs, ARs, and producers should be able to communicate digitally with each other through the system.	29	15	13	0	2	0
Producer	6	3	0	0	0	0
Producer association / industry association	5	2	1	0	0	0
Producer Responsibility Organisation (PRO)	9	6	3	0	0	0
PRO association	1	1	0	0	0	0
National Registers/ relevant national authority (NR)	4	1	6	0	1	0
Authorised Representative (AR)	0	1	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	0	3	0	0	0
Consultancy / legal advisor	1	0	0	0	0	0
NGO / civil society	1	0	0	0	0	0
Other	0	1	0	0	1	0

AIII.5. Technical and Security Requirements

Stakeholder groups showed strong consensus regarding the need for secure digital registration and reporting processes. Support for secure electronic identification and signature systems was consistently high across all stakeholder categories.

Greater differences emerged regarding the principle of a single submission of registration and reporting information. Producers and producer associations were among the strongest supporters of this approach, while National Register authorities expressed more reservations regarding implementation and governance aspects. PROs also showed more mixed views.

Overall, stakeholders broadly supported secure digital options, while views differed regarding the extent to which reporting processes should be streamlined through a single-submission model.

E. Technical and Security Requirements	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Not applicable
28. Registration and reporting submissions should use a secure and accredited electronic identification and signature system.	34	15	9	0	0	1
Producer	5	2	2	0	0	0
Producer association / industry association	6	1	0	0	0	1
Producer Responsibility Organisation (PRO)	10	7	1	0	0	0
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	7	2	3	0	0	0
Authorised Representative (AR)	1	0	0	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	1	1	2	0	0	0
Consultancy / legal advisor	0	0	1	0	0	0
NGO / civil society	1	0	0	0	0	0
N/A	0	0	0	0	0	0
Other	0	2	0	0	0	0
29 A producer should not be required to submit the same registration or reporting data separately to multiple national EPR - a single submission should be sufficient	25	9	9	9	5	2
Producer	6	1	1	1	0	0
Producer association / industry association	5	1	0	1	0	1
Producer Responsibility Organisation (PRO)	5	4	4	1	3	1
PRO association	2	0	0	0	0	0
National Registers/ relevant national authority (NR)	5	1	1	4	1	0
Authorised Representative (AR)	0	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0	0
Enforcement authority	0	1	2	1	0	0
Consultancy / legal advisor	0	0	0	0	1	0
NGO / civil society	1	0	0	0	0	0
N/A	0	0	0	0	0	0
Other	0	1	0	1	0	0

AIII.6. Complementary Measures

Section 4: Prioritisation of Complementary Measures	Very high priority	High priority	Medium priority	Low priority	Not a priority
Harmonize definition of producer, and reporting and registration obligation (who should report and for which stream/s) across MS.	31	20	4	2	2
Producer	6	3	0	0	0
Producer association / industry association	5	2	1	0	0
Producer Responsibility Organisation (PRO)	11	4	2	1	0
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	5	4	1	0	2
Authorised Representative (AR)	0	1	0	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	1	2	0	1	0
Consultancy / legal advisor	0	1	0	0	0
NGO / civil society	1	0	0	0	0
Other	0	2	0	0	0
Registration and reporting forms should be available in multiple languages, at least in the national language(s) of the MS and in English.	29	15	10	4	1
Producer	6	2	1	0	0
Producer association / industry association	4	2	1	1	0
Producer Responsibility Organisation (PRO)	6	7	5	0	0
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	10	0	1	1	0
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	1	1	0	1	1
Consultancy / legal advisor	0	1	0	0	0
NGO / civil society	0	1	0	0	0
Other	0	0	1	1	0
Harmonize products categories in scope across MS and per stream.	24	20	9	3	3
Producer	6	2	1	0	0
Producer association / industry association	4	4	0	0	0
Producer Responsibility Organisation (PRO)	7	7	3	0	1
PRO association	2	0	0	0	0
National Registers/ relevant national authority (NR)	2	4	2	2	2
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	2	1	1	0
Consultancy / legal advisor	0	0	1	0	0
NGO / civil society	1	0	0	0	0
Other	1	1	0	0	0
Align reporting frequencies and deadlines across MS and per stream.	13	12	14	11	9
Producer	3	1	4	0	1
Producer association / industry association	3	2	2	0	1
Producer Responsibility Organisation (PRO)	4	6	2	4	2
PRO association	0	0	1	1	0
National Registers/ relevant national authority (NR)	2	1	2	4	3
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	0	2	1	1
Consultancy / legal advisor	0	0	0	0	1
NGO / civil society	0	1	0	0	0
Other	0	1	0	1	0

Section 4: Prioritisation of Complementary Measures	Very high priority	High priority	Medium priority	Low priority	Not a priority
Align data validation procedures (e.g. audits) across MS.	15	15	17	9	3
Producer	3	4	2	0	0
Producer association / industry association	2	3	2	1	0
Producer Responsibility Organisation (PRO)	4	4	9	1	0
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	3	1	2	5	1
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	1	0	2	1
Consultancy / legal advisor	0	0	0	0	1
NGO / civil society	0	0	1	0	0
Other	1	1	0	0	0
Harmonisation of authorised representative (AR) procedures across Member States, including appointment processes, public AR registers, and the possibility for PROs to act as ARs where appropriate	18	13	17	9	2
Producer	3	1	3	2	0
Producer association / industry association	4	1	2	1	0
Producer Responsibility Organisation (PRO)	7	3	6	2	0
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	2	3	3	2	2
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	3	0	1	0
Consultancy / legal advisor	0	0	0	1	0
NGO / civil society	0	0	1	0	0
Other	0	1	1	0	0
Set up a public register of AR across MS.	10	15	20	10	4
Producer	2	3	2	2	0
Producer association / industry association	1	2	4	1	0
Producer Responsibility Organisation (PRO)	2	6	6	4	0
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	3	2	3	1	3
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	0	3	1	0
Consultancy / legal advisor	0	0	0	1	0
NGO / civil society	0	0	1	0	0
Other	0	1	0	0	1
Allow PROs to be ARs.	12	9	19	12	7
Producer	1	2	3	3	0
Producer association / industry association	2	2	1	3	0
Producer Responsibility Organisation (PRO)	3	1	7	4	3
PRO association	1	0	0	1	0
National Registers/ relevant national authority (NR)	3	1	4	1	3
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	0	2	1	0	1
Consultancy / legal advisor	1	0	0	0	0
NGO / civil society	0	0	1	0	0
Other	0	1	1	0	0

Section 4: Prioritisation of Complementary Measures	Very high priority	High priority	Medium priority	Low priority	Not a priority
Remove AR obligations in a MS for producers who are part of PRO	6	5	13	18	17
Producer	2	2	2	3	0
Producer association / industry association	2	0	0	2	4
Producer Responsibility Organisation (PRO)	0	2	4	9	3
PRO association	0	0	0	1	1
National Registers/ relevant national authority (NR)	1	0	3	3	5
Authorised Representative (AR)	0	0	0	0	1
Marketplace / online platform	0	0	1	0	0
Enforcement authority	1	0	1	0	2
Consultancy / legal advisor	0	0	0	0	1
NGO / civil society	0	0	1	0	0
Other	0	1	1	0	0
Hotline for EPR queries in all MS / local language and English.	6	16	13	16	8
Producer	1	5	0	3	0
Producer association / industry association	2	0	2	2	2
Producer Responsibility Organisation (PRO)	1	5	5	5	2
PRO association	0	0	1	1	0
National Registers/ relevant national authority (NR)	1	3	3	2	3
Authorised Representative (AR)	0	1	0	0	0
Marketplace / online platform	0	0	1	0	0
Enforcement authority	0	1	1	2	0
Consultancy / legal advisor	0	0	0	0	1
NGO / civil society	1	0	0	0	0
Other	0	1	0	1	0
Collect information and cross-referencing of data on producers operating in multiple MS.	15	17	16	6	5
Producer	2	3	4	0	0
Producer association / industry association	4	2	0	2	0
Producer Responsibility Organisation (PRO)	2	7	6	1	2
PRO association	1	1	0	0	0
National Registers/ relevant national authority (NR)	5	3	2	1	1
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	0	0	1	0	0
Enforcement authority	0	0	2	1	1
Consultancy / legal advisor	0	0	0	0	1
NGO / civil society	0	1	0	0	0
Other	1	0	0	1	0
Harmonize eco-modulation criteria per product stream across MS.	19	15	11	4	10
Producer	5	2	2	0	0
Producer association / industry association	2	1	1	2	2
Producer Responsibility Organisation (PRO)	5	6	5	0	2
PRO association	0	1	0	0	1
National Registers/ relevant national authority (NR)	1	5	0	2	4
Authorised Representative (AR)	0	0	1	0	0
Marketplace / online platform	1	0	0	0	0
Enforcement authority	1	0	2	0	1
Consultancy / legal advisor	1	0	0	0	0
NGO / civil society	1	0	0	0	0
Other	2	0	0	0	0

Annex IV: Unique Producer Number

The Unique Registration Number (URN) could function as a common identifier assigned to a producer following successful registration verification by the relevant national register(s). Once issued, the URN would be linked to the producer's registration profile in the EU-wide EPR Register.

The URN would identify the legal entity and connect it to the Member States, EPR streams, PROs and Authorised Representatives covered by the registration. For example, one producer could have a single URN, but the register would show that this URN is linked to packaging in Spain, WEEE in Italy, batteries in France, etc.

The URN should not be a simple “compliant / non-compliant” certificate. Instead, it should provide access to a live registration record. This record could show, for each Member State and EPR stream, whether the producer is registered, which PRO or AR is associated with the producer, the date of validation, the validity period, and whether the registration is active, suspended or expired.

In practice, the system could include two levels of access. A limited public view could allow marketplaces, distributors, consumers or authorities to verify whether a producer has an active registration for a specific Member State and EPR stream. A restricted view, accessible only to competent authorities, national registers, PROs and ARs, could include more detailed information such as contact details, contractual validation, reporting history and enforcement-relevant data.

The URN could therefore work in a similar way to a digital producer passport. A producer could display the URN, or potentially a QR code linked to it, on invoices, marketplace profiles or compliance documentation. When checked, the URN would not simply confirm that the producer is compliant in general but would indicate the specific Member States and EPR streams for which the producer has an active registration.

This approach would help avoid misleading interpretations. A producer may be registered for packaging in one Member State but not for batteries or WEEE or may have been validly registered at one point but later lose registration status. For this reason, the URN should always be linked to real-time or regularly updated registration information rather than being treated as permanent proof of compliance.

In practical terms, the URN could follow a structure such as:

URN – Producer legal entity – Member State – EPR stream – status

For example, the producer may have one overarching URN, while the register contains stream- and country-specific status information under that identifier. This would allow the system to combine simplification for producers with the level of detail needed by national registers for verification and enforcement.

This also means that the URN works mainly as an identifier of the legal entity, while the actual compliance status stays per Member State and stream underneath it. One idea that could be explored further is to anchor the identity of the producer on the eIDAS electronic seal, which EU legal entities can already hold, while keeping the national registration numbers per Member State and stream as the compliance reference. The body that would issue and maintain the overarching identifier should also be defined during the detailed design phase.

AIIV.1. Experience from the French Unique Identification Number (IDU)

During the concept development process, ADEME shared the French experience with the Unique Identification Number (Identifiant Unique – IDU), which provides valuable insights for the development of the LIFE4EPR URN.

In France, producers are assigned an IDU for each producer-stream combination once compliance with the relevant EPR stream has been demonstrated. In practice, this occurs when a PRO confirms to ADEME that the producer has joined the relevant compliance scheme. The IDU can then be used by producers to demonstrate their registration status. If the producer leaves the PRO and is no longer covered by the compliance scheme, the IDU is withdrawn.

The French experience highlights the important role that PROs can play in validating producer information and confirming compliance status. It also raises an important consideration for the proposed EU-wide EPR Register.

From the French perspective, a European registration process alone may not be sufficient to demonstrate compliance with national EPR obligations if no evidence exists that the producer has entered into the necessary agreements with the relevant PROs. This observation supports the inclusion of PRO validation within the registration workflow proposed under the LIFE4EPR concept.

ADEME also highlighted several practical challenges encountered during the implementation of the IDU system that are directly relevant to the design of a future EU-wide URN.

- First, a producer may be compliant at a given moment but not at another, meaning that any registration number or digital certificate should be linked to up-to-date compliance information rather than being considered permanent proof of compliance.
- Second, a producer may be compliant in one EPR stream but not in another, highlighting the need for the scope of the registration to clearly identify the streams covered.
- Third, within a single EPR stream, producers may be compliant for some product categories but not for others, suggesting that the level of granularity associated with the registration identifier should be carefully considered.

Finally, inconsistencies in producer identification data may arise when different organisations use different identifiers or when producers fail to keep their information updated. A harmonised EU-wide registration process could help improve the consistency and quality of producer identification data across Member States.

Overall, the French experience demonstrates that a unique producer identifier is both feasible and useful for supporting registration, compliance monitoring and market surveillance activities. At the same time, it highlights the importance of clearly defining the scope, validity and governance of the URN and ensuring that it complements, rather than replaces, national compliance and enforcement systems.



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