



Position Paper for a Central European EPR Register

Executive Summary

Extended Producer Responsibility (EPR) is a key instrument of EU circular economy policy, yet EPR registration and reporting across Europe remain highly fragmented. Multiple national and stream-specific registers create unnecessary administrative burden, increase compliance costs and hinder the smooth functioning of the European market.

At a time when EU policy strongly focuses on **competitiveness, regulatory simplification and strengthening the Single Market**, this fragmentation stands in clear contradiction to stated political objectives.

A **Central European EPR Register** would be a pragmatic and high-impact solution. By providing a single, standardised entry point for EPR registration and data exchange, it would:

- reduce administrative burden and cost for all involved participants
- lower barriers to compliance and market participation
- strengthen the prevention of free riding
- improve data quality and transparency across Europe

Such a Register would not replace national EPR systems but support them through a shared digital infrastructure.

In the context of the upcoming Circular Economy Act (CEA), the PRO Circularity Alliance calls for a structured policy discussion on a Central European EPR Register and stands ready to actively contribute practical expertise to its development.



Introduction

EPR systems have evolved significantly over the past decades, expanding across waste streams and Member States. This evolution has been driven by legitimate environmental objectives, but it has also resulted in a complex administrative reality.

Today, almost every Member State operates its own EPR register, often further fragmented by waste streams. As a result:

- **Producers** must register separately in multiple national and stream-specific systems, with completely different interfaces, information requirements and often only available in national language
- **National authorities** must set up their own IT infrastructure, leading to dozens of registers within the EU, which all require finances for development and maintenance, though they all share the same basic requirements and technical needs

In recent months, the competitiveness of the European economy and the resilience of the Single Market have become central themes in EU policy debates. Calls for fewer administrative obstacles, smarter regulation and better implementation of existing rules are now firmly part of the political agenda. Yet, while these objectives are widely shared, **concrete instruments to deliver them often remain vague.**

Harmonisation Matters – Now More Than Ever

The fragmentation of EPR registration systems is a clear and tangible example of where political ambition and regulatory reality diverge.

Multiple, uncoordinated national registers:

- increase complexity without delivering additional environmental value
- place a disproportionate burden on cross-border operators and SMEs
- weaken the functioning of the Single Market and data transparency within the EU
- require unnecessary amounts of financial resources for technical set-up and administration

This is not a marginal issue. EPR affects millions of producers across virtually all consumer-facing sectors. Where compliance becomes unnecessarily complex, cross border trade suffers — and where compliance is difficult and time consuming, non-compliance becomes more attractive.

The European EPR Register

The ongoing work on the CEA provides a particularly timely opportunity to address these challenges. A harmonised European EPR register would be fully aligned with its objective of harmonising the European market and should be considered as part of the broader policy debate around the future governance and implementation of EPR in Europe.

At its core, such a register would provide:

- a **single point of registration** for producers active in the EU
- a **harmonised structure and layout**, applicable across waste streams and Member States
- standardised data submission and reporting formats

The Register would function as a **shared administrative and digital infrastructure**, enabling efficient data exchange between producers, PROs and national authorities.

A central European EPR Register would be a lighthouse example of policy:

- supports environmental objectives
- reduces bureaucracy and administrative costs
- strengthens compliance
- improves functioning of the European market
- **and benefits all related stakeholders**

Few measures offer such a clear alignment between sustainability policy and economic competitiveness.

In recent months, several industry papers have highlighted the need for a centralised, European-level entry point for EPR registration.

The industry is not calling for deregulation, but for better, smarter implementation. Producers and Producer Responsibility Organisations (PROs) are directly confronted with the operational reality of EPR systems on a daily basis. They understand where complexity adds value — and where it does not.

Through organisations such as the PRO Circularity Alliance, the industry stands ready to:

- contribute practical expertise
- support the design of workable solutions
- engage constructively in implementation discussions

Conclusion

The fragmentation of EPR registration systems is a concrete, solvable problem — and one that sits squarely at the intersection of environmental policy, competitiveness and Single Market governance.

At a moment when the EU is seeking ways to strengthen its economic base while advancing the circular economy, a Central European EPR Register represents a pragmatic and high-impact opportunity, ultimately reducing bureaucracy for industry and saving great amounts of financial resources.

The PRO Circularity Alliance calls for this option to be taken seriously in the context of the CEA and stands ready to actively contribute to its further development.

About the Alliance

The PRO Circularity Alliance unites Producer Responsibility Organisations across Europe. In a time of rapid legislative change, we offer a collective voice, collaborative platform, and shared intelligence to strengthen EPR implementation across sectors and countries.

We are a cross-material, member-driven industry association representing the interests of PROs across all waste streams. Founded to respond to a rapidly evolving regulatory environment, we bring together PROs from across Europe to strengthen their role, share knowledge, and shape policy through collective action.

As a Brussels-based association, we operate at the heart of EU policymaking. We actively engage with institutions, participate in expert groups, and provide our members with structured access to decision-making processes and regulatory developments that shape EPR across Europe. Governed by PROs themselves, we are independent, transparent, and guided by real-world experience.