



Computer & Communications
Industry Association
Open Markets. Open Systems. Open Networks.



EUROPEAN
OUTDOOR
GROUP

Industry calls for the simplification, digitalisation & harmonisation of Extended Producer Responsibility and an EPR Digital One-Stop Shop

Brussels, 10 June 2025

Considering the growing complexity of Extended Producer Responsibility (EPR) in the EU and its impact on the continent's competitiveness and ability to meet its circular economy objectives, the undersigned European and national industry representatives **strongly welcome the European Commission's commitment to an EPR digital one-stop shop and greater harmonisation**, as announced in the [Single Market Strategy](#).

EPR is a fundamental part of waste management in the EU and a key tool for the transition to a more sustainable and circular economy. It is therefore crucial to ensure the efficiency of such systems. Diverging legal frameworks and approaches to EPR across Member States, but also within Member States, across regions and product categories, have led to layers of complexity that are today heavily impacting companies operating in the EU. The fragmentation and complexity of EPR represent significant administrative costs, diverting resources away from companies' sustainability objectives.

If a company makes available packaged products that must comply with three EU-mandated EPR schemes (e.g. packaging, batteries and electronic equipment), they will have to start three different compliance processes in each country, from the very first unit made available. For each compliance process, it means researching and monitoring specific obligations per country and waste streams, registering (through different entities and involving different steps) and reporting to different Producer Responsibility Organisations (one per waste stream and country) with different reporting formats and frequency, product categorisation or eco-modulation criteria, and finally manage payments to a number of different entities.

In practice, a company operating in all 27 Member States with products qualifying for three EPR schemes would have to manage 81 different compliance processes at once. With the entry into force of EPR for textiles at EU level, companies selling a range of products which include textiles would then have to face up to 108 compliance processes across the EU¹. This does not take into account possible national EPR schemes or non-EU EPR schemes that can add to these numbers. Moreover, companies cannot streamline the registration or reporting process across the EU due to differences in information and data requirements, as well as input procedures or associated administrative steps.

¹ *Estimations of time required to complete these compliance processes are few, but according to a recent study by Eunomia ([Extended Producer Responsibility Administrative Burden on One-Stop Shops from April 2025](#)), the average staff hours required for companies interviewed to comply with EPR obligations across products and countries on a yearly basis, ranged from 1 staff hour to 4,000 staff hours (the equivalent of 500 workdays), with nearly a quarter of respondent reporting over 1,000 hours (125 workdays) and over half of respondents over 100 hours (12.5 workdays). Companies reported requiring between 0 to 3 Full Time Equivalents to oversee compliance, which is difficult to quantify as most SMEs do not have dedicated staff for EPR and compliance has to be performed by employees in charge of other tasks.*

While the European Commission has been committed to improving the harmonisation of certain aspects of EPR in recent legislations, obligations are set to become increasingly complex and concern a growing number of companies with extension of EPR to new waste streams, such as textiles in the revision of the Waste Framework Directive and as announced by the European Commission in the [Clean Industrial Deal](#).

To tackle this growing complexity, and in accordance with the European Commission's simplification and competitiveness agenda, **we strongly welcome the commitment to a digital one-stop shop for information, registration and reporting. The objective of such OSS should be to establish a single point of entry for all mandated EPR schemes in the European Union and Member States.** We believe that the creation of a digital layer, operating as an interface between producers, their representatives, and entities managing EPR schemes, would unlock a high level of simplification by allowing Member States to broadly maintain their existing frameworks. To maximise the efficiency of such an interface and the benefits, an OSS should:

- Allow access to all necessary information regarding EU and national-mandated EPR schemes;
- Facilitate a single registration, reporting and eventually payment process, through which the necessary producer and product data can be collected, consolidated and formatted with the support of AI tools, before being submitted directly to relevant entities managing national EPR registries and Producer Responsibility Organisations;
- Support the communication between various actors involved in EPR and existing and future national EPR registries through application programming interfaces (APIs), hereby also facilitating controls and audits by competent authorities and PROs.

We therefore call on the European Commission and co-legislators to:

- **Establish, through the upcoming Circular Economy Act, the legal basis for a digital one-stop shop that would be developed and managed by the European Commission to ensure neutrality, non-discriminatory access and trust;**
- Accompany the digitalisation of existing EPR registries, and ensure sufficient digitalisation of future registries through harmonised minimum requirements, such as the support for APIs;
- Continue the effort to harmonise key aspects of EPR frameworks across Member States in the Circular Economy Act and via secondary legislation where possible, which would greatly facilitate the development and running of a single interface and participate in the simplification of the existing system. This includes establishing common criteria for data reporting; harmonised reporting dates and frequencies, and harmonised product categorisation and eco-modulation criteria.

The undersigned associations are eager to participate in the development of this digital one-stop shop to ensure solutions that benefit actors across the chain and deliver the highest level of simplification.

List of signatories:

CCIA Europe – Computer & Communications Industry Association
Ecommerce Europe
Eurocommerce
EURATEX
EUROPEN
European Outdoor Group
FESI - Federation of European Sporting Goods Industry