



“Cutting green tape”: Unlocking European Competitiveness through simplified EPR

A call from industry for clearer and leaner regulation on producer responsibility in support of the green transition

The **waste management industry plays a central role in achieving the European Union’s (EU) sustainability and circular economy ambitions**. However, our ability to deliver effective, scalable solutions is increasingly hampered by **excessive bureaucracy, fragmented Extended Producer Responsibility (EPR) rules, and inefficient administrative processes**.

As the EU moves forward with the **Omnibus Packages**, which aim to simplify legislation to strengthen competitiveness, and prepares the **Circular Economy Act**, we call for **meaningful reform to reduce administrative burden** for our sector and for creating a **regulatory environment that enables action rather than obstructs it**.

The challenge: complex and fragmented EPR systems undermine compliance and sustainability

Despite the shared goals of circularity and environmental stewardship, the current implementation of EPR across EU Member States suffers from:

- **Lack of harmonisation:** Differing national rules for registration, reporting, and enforcement create legal uncertainty, particularly for cross-border operators.
- **Inconsistent definitions and procedures:** Producers face varying interpretations of what constitutes a product, a producer, or material.
- **Redundant reporting obligations:** Businesses often must submit the same data to multiple authorities in different formats and timelines.
- **Slow and opaque administrative processes:** Registration or compliance approval can take months, slowing product market access and innovation.

These inefficiencies not only **weaken compliance outcomes**, but also **divert resources** from more impactful sustainability efforts like take-back systems, recycling innovation, and consumer engagement.

Our recommendations: a pragmatic approach to lower administrative burden for EPR systems

Drawing from on-the-ground experience in implementing EPR, we propose the following practical improvements aligned with the goals of the Omnibus Packages and the EU’s competitiveness agenda:

1. Harmonised and clear EU-wide rules

- Uniform definitions, obligations, and timelines across all Member States.
- Clarify what constitutes a producer and the scope of EPR responsibility under each product category (e.g., batteries, packaging, WEEE).



- Single digital access points for producers operating in multiple countries.

2. Simplified administrative procedures

- Set **clear deadlines** (e.g., max 1 year) for permit or registration decisions.
- Standardise **templates for reporting** and use **machine-readable formats**.
- Promote **e-signatures and digital documentation** to replace paper.

3. Efficient and transparent oversight

- Reduce **duplicative audits and registrations** by recognising mutual compliance across Member States.
- Improve feedback loops and reduce legal uncertainty by increasing transparency in how authorities interpret and enforce rules.

4. Smarter rulemaking and fair implementation

- Apply a **“real-world test”** to proposed legislation, ensuring implementation is proportionate to company size and sector capability.
- Avoid overregulation by **streamlining rules based on impact, not volume**.
- Ensure **cost distribution is fair**, especially for SMEs and start-ups, by preventing unnecessary duplication of compliance costs.

Conclusion: simplification of EPR rules is essential to Europe’s green and competitive future

Europe’s industrial transformation depends on **clarity, speed, and predictability** in its regulatory systems. As companies working at the forefront of sustainability, we are ready and willing to do our part. But we need policymakers to deliver a framework that is as efficient and forward-looking as the goals it supports.

We urge the European Commission and Member States to seize the opportunity of the **Omnibus Packages** and the **Circular Economy Act** to deliver **real bureaucratic relief** in the EPR space. A more harmonised and streamlined EPR regime will allow us to invest more in **innovation, recycling infrastructure, and sustainable design**, and less in paperwork.