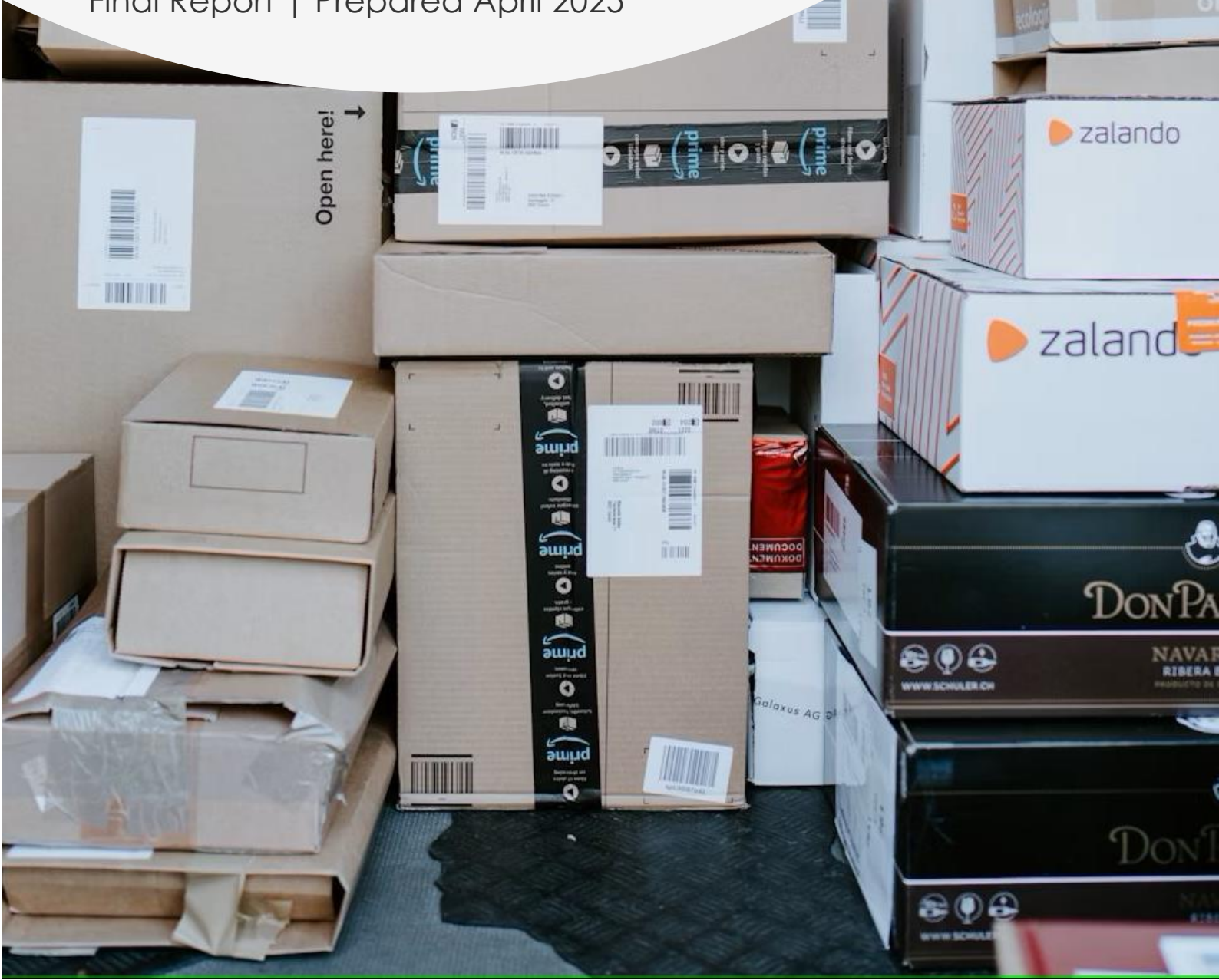


Extended Producer Responsibility Administrative Burden and One- Stop Shops

A Study for Ecommerce
Europe

Final Report | Prepared April 2025



Report For

Ecommerce Europe

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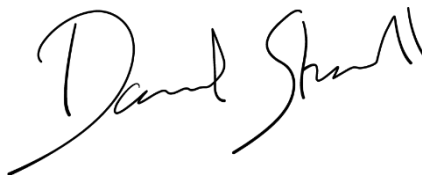
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Executive Summary

The aim of this study is to provide a review of administrative burdens caused by fragmented approaches to extended producer responsibility (EPR) in the EU. This fragmentation represents a significant complexity for firms, particularly for small and medium sized, seeking to comply with EPR requirements in multiple EU Member States. The report also examines the potential for 'one-stop shop' tools to help minimise the challenges posed by divergence in national EPR processes across both different Member States and different product groups.

EPR is a policy tool which seeks to apply the 'polluter pays' principle. At present in the EU, mandatory producer responsibility covers a select range of products but Member States have a relatively high degree of discretion over how EPR schemes are established and managed. As a result, EPR requirements are inconsistent between both Member States and product streams. For businesses operating across the Single Market, this fragmentation can make understanding and complying with EPR complex and time consuming. In the case of EPR, the principle of a one-stop shop tool would be to provide a single platform assimilating information, registration, reporting and payment requirements across all Member States; thereby, practically harmonising EPR requirements for producers and reducing administrative burden.

Approach

To investigate the nature, scale and impact of EPR administrative burdens, and whether a 'one-stop shop' model could reduce burden, our research focused on:

- I) Three business-to-consumer product streams subject to EPR, namely **packaging, batteries and waste electrical and electronic equipment (WEEE)**;
- II) In **seven key markets**: France, Germany, Spain, Italy, Netherlands, Belgium, and Luxembourg.

The evidence presented in this report was drawn from four sources:

- I) A review of industry position papers;
- II) Identification of existing one-stop-shop examples in diverse policy areas
- III) A scan of regulatory and PRO requirements for existing EPR schemes; and
- IV) Stakeholder engagement via qualitative interviews and a survey.

This report presents the research findings. It considers the extent to which fragmented EPR requirements across Member States and products is impacting businesses in Europe and reflects on key characteristics and success criteria for a one-stop shop for EPR in the EU.

Key Findings

EPR obligations are fragmented both between Member States and between product streams within Member States. This is causing administrative burdens for producers at four key stages of EPR compliance. These are summarised as follows:

- I) **Understanding obligations:** Difficulties include understanding and keeping up to date with legislative requirements across Member States and products and the lack of one clear place with accessible information on EPR obligations.
- II) **Registration:** needs to be repeated for every country and product stream but the places and authorities with whom producers must register vary, as in some cases, does the economic actor that needs to do so. Some data requirements are more onerous than others.
- III) **Reporting:** formats, granularity of data, product categorisation and reporting frequencies and deadlines all vary between product streams between and within Member States.
- IV) **Payment:** different PROs use varying approaches to calculating producer fees, which may require producers to provide different information. Multiple invoices from different PROs and in different countries can be difficult to keep track of.

Differences in requirements accumulate for producers selling multiple product streams in multiple Member States. While individual requirements may make sense in context, the producer experience is of a complex system of obligations which can be difficult to understand and time consuming to navigate and fulfil.

Stakeholders emphasised that significant staff time, cost and resourcing are required to manage and understand EPR obligations. In some cases, producers are avoiding or stopping sales in certain markets due to EPR administrative complexity.

Interviews and survey responses provided some quantitative indications of impacts to businesses. Concrete estimations of time required to fulfil overall administrative obligations are few, with some interview and survey respondents for this project also struggling to quantify their time. However, multiplied across products, schemes, and Member States, the administrative burden can be high. One survey respondent estimated compliance took 4,000 hours per year. However, even a couple of hours per product, per member state, for an item that required action under multiple EPR schemes can add up quickly, and be a significant burden for an SME.

Significant costs can be attributed to paying staff to oversee complex EPR compliance, paying for external support, registration fees with relevant authorities and more. Existing estimations of cost impacts on producers are lacking. In our survey, one micro-enterprise estimated costs as 260 EUR – a small amount on the face of it, but which would still scale up significantly in calculating administrative burden across the EU. One large company suggested costs in the region of 400,000 EUR.

SMEs struggle with fragmented EPR and the impacts of those, particularly with cost. Interviewees and survey respondents further pointed out that EPR obligations are causing businesses to stop selling or not expand to specific Member States, with consequences for consumer choice and general competitiveness of EU companies.

A one-stop shop EPR platform could help reduce administrative burden for producers, but cannot be expected to solve every issue encountered in EPR compliance.

This study focuses on the potential for an EU level one-stop shop that would facilitate compliance across all Member States and all products with EPR requirements. This one-stop shop should contain: clear information on users' obligations on its website; all operations within a single platform; and administrative procedures reduced to a single process for users.

Existing examples suggest it is possible to have all three key elements in one-stop shops, and EU institutions have already established successful one-stop shops in other policy areas (e.g., EU VAT one-stop shop).

With regards to an EPR-specific one-stop shop, interviewees generally agreed that it would help to reduce administrative burdens. Interviewees also reported desirable traits to include, such as:

- holding all information in one place and in all necessary languages;
- a single registration place; and
- a single reporting format.

Yet, challenges for implementing a one-stop shop for EPR also emerged, including software gaps, ensuring legal and fair collection and distribution of payments, and lack of harmonisation in the underlying national requirements, not simply in the compliance process itself. These challenges highlight two potential directions for the tool:

1. An online platform where only information on EPR obligations was provided versus doing anything more than that (such as providing registration, reporting or payment functions).
2. A tool requiring more software, that provides information but also allows registration, reporting and payment to be fulfilled in one place, through as few processes as possible. For instance, actively utilising AI to prefill registration forms and other repetitive tasks automatically.

In either scenario, administrative burdens would be reduced, though to different degrees (more in the second option).

The challenges also highlight a key feature of the EPR landscape - one-stop shops cannot be expected to solve every issue encountered in EPR compliance. Lack of harmonisation would remain a key obstacle to reducing administrative burdens in both scenarios.

Table of Contents

Executive Summary	1
1.0 Introduction and Approach	5
1.1 Project Objectives and Scope	6
1.2 Approach.....	6
1.2.1 Review of Industry Position Papers	6
1.2.2 Review of One-Stop Shops.....	7
1.2.3 EPR Regulation and Requirement Scan	7
1.2.4 Stakeholder Interviews and Survey	7
1.3 Report Structure	7
2.0 Are Fragmented EPR Obligations causing Administrative Burden for Producers?	8
2.1 What Types of Administrative Burden are Caused by Fragmented EPR Policy?	9
2.1.1 Administrative Burdens for Producers When Trying to Understand EPR Obligations.....	10
2.1.2 Administrative Burdens for Producers When Registering with PROs and National Registers	10
2.1.3 Administrative Burdens for Producers When Reporting Under EPR Schemes	17
2.1.4 Administrative Burdens for Producers When Paying EPR Membership and Producer Fees.....	26
2.2 What are the Impacts of EPR Administrative Burdens?	29
2.2.1 Time Management	29
2.2.2 Cost.....	32
2.2.3 Disproportionate Impacts on SMEs	33
2.2.4 Other Impacts.....	34
3.0 Could a One-Stop Shop EPR Tool Reduce the Administrative Burden for Producers?	37
3.1 What is a One-Stop Shop?	38
3.2 How Successful Are Existing One-Stop Shops and What Lessons Can Be Learnt?	39
3.2.1 Non-EPR Related One-Stop Shops	39
3.2.2 Existing EPR One-Stop Shops	40
3.3 How Do Stakeholders React to a Potential, Single, EPR-focused One-Stop Shop?	40
3.3.1 General Attitudes.....	40

3.3.2 Desired One-Stop Shop Traits.....	41
3.3.3 Challenges for One-Stop Shops in Practice.....	43
Appendix.....	45
A.1.0 Stakeholder Engagement.....	46
A.2.0 Desk-Based Review.....	53

Glossary

Term	Definition
Authorised representative	A legal individual or entity based within the EU who has a mandate from a producer located outside the EU to represent and act on behalf of the producer with regards to the latter's legislative, i.e. extended producer responsibility (EPR), obligations.
Distance sales	The sale of goods and services where the customer and supplier are not physically together. This applies to goods sold online, over television and over telephone. In the context of EPR, the term is used to identify foreign sellers, i.e. those without a physical presence in the country in which they are placing products on the market.
Economic operator	A person who, in the course of their business, is involved in activities covered by the EU customs legislation i.e. bringing goods into, or taking goods out of, the EU territory. This can include manufacturers, suppliers, importers, distributors, authorised representatives and fulfilment service providers.
Eco-modulation	Where financial contributions paid by the producer under an EPR scheme are modulated for individual or groups of products based on certain environmental criteria, such as durability, recyclability and reusability to incentivise improved environmental performance.
E-commerce	Electronic (i.e. online) trade.
EPR scheme	A set of measures taken by Member States to ensure producers of products bear financial and/or organisational responsibility for the product when it becomes waste.
Free riding	In the context of EPR, producers which free ride do not comply with regulatory obligations but still benefit from the provision of waste management services.
One-stop shop	Tool helping to improve regulatory delivery to citizens and businesses, and reduce the administrative burden of actors needing to fulfil several administrative processes. It is typically online and aims to be user friendly.
Placed on the market	Placing on the market (POM) is when a product, e.g. packaging, is first made available on the European Union market.
Producer	For the purpose of this report, we use this word to refer to the economic operator obligated under EPR. This may vary by product legislation, and may include any manufacturers, importers or distributors, irrespective of selling technique, typically when they make a product available for the first time within a given Member State.
Producer fees	The payments made by producers to an EPR scheme in order to cover the costs of waste management for the products they place on the market.
PRO	A producer responsibility organisation (PRO) is a legal entity which organises the fulfilment of EPR obligations, financially and/or operationally, for several producers.

1.0 Introduction and Approach

Summary

Extended producer responsibility (EPR) is a policy tool which seeks to apply the 'polluter pays' principle. EPR extends a producer's responsibility to the post-consumer stage of a product's life cycle which, in practice, involves producers taking either financial or operational responsibility for collecting and sorting end-of-life products before final treatment. One of the aims of EPR is to incentivise producers to consider environmental impacts when designing their products, as well to increase recycling rates.

At present in the EU, mandatory producer responsibility imposed through EU directives covers a select range of products, including WEEE, packaging, batteries and accumulators, end-of-life vehicles and certain single-use plastic items. The revised Waste Framework Directive (WFD) further commits to EPR for textiles in the future. Member States are required to establish producer responsibility measures for these items but have discretion over exactly how EPR schemes are established and whether to implement EPR for other products.

As a result, **Member States are using a variety of systems and rules for EPR schemes, including for different products within the same jurisdiction.** This inconsistency varies in degree, with some aspects of EPR more aligned than others. Nevertheless, for businesses operating across the Single Market and selling multiple types of products, this fragmentation can make navigating EPR requirements difficult and time consuming, particularly for small and medium-sized enterprises (SMEs).

Ecommerce Europe recognises this challenge and commissioned Eunomia Research and Consulting ('Eunomia') to research the administrative burden of fragmented EPR approaches and to examine the potential for 'one-stop shop' tools to help overcome EPR complexity.

Throughout this report we refer to 'producers' as being subject to EPR. The legal definition of a producer varies a little between products and countries, but in practice, EPR obligations typically apply to organisations placing a product onto the market for the first time – very often the business-to-consumer seller.



1.1 Project Objectives and Scope

The core aims of this study were to:

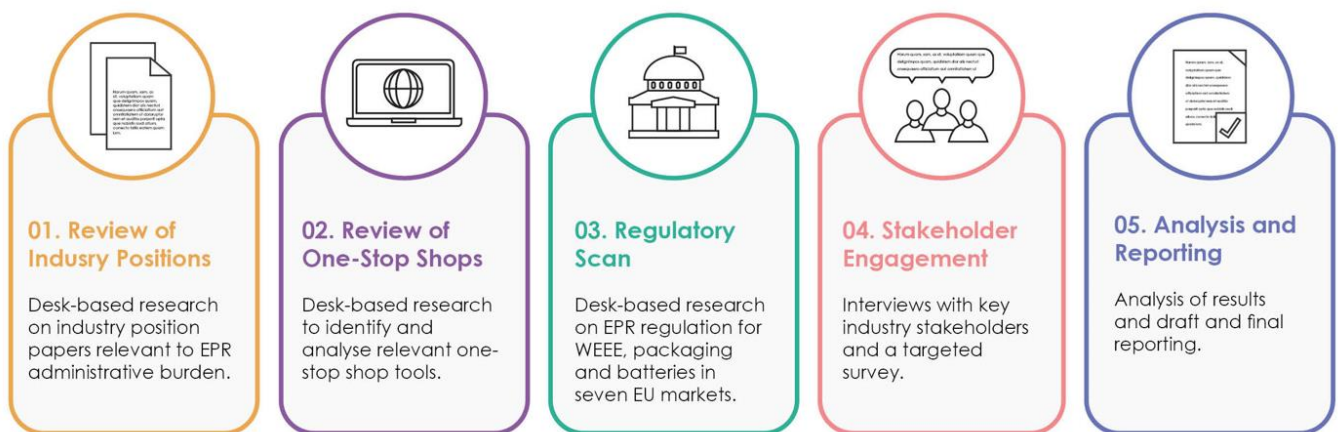
- I) **provide evidence highlighting the nature, scale and impact of administrative burdens** caused by fragmented EPR obligations across Member States; and
- II) **understand one-stop shop approaches to reducing administrative burdens** that have been developed in the context of EPR, and similar obligations, from which lessons might be learned.

The research examined **three product streams currently subject to EPR across the EU - packaging, batteries and WEEE** - with a focus on business-to-consumer (B2C) product streams. Seven key markets were investigated in detail, namely France, Germany, Spain, Italy and Benelux (Belgium, the Netherlands and Luxembourg), with some reference to other EU markets by interviewees and survey respondents. This report presents the findings from the research and reflections on these findings.

1.2 Approach

The evidence presented and analysed in this report was drawn from four research steps, followed by analysis and reporting, as shown in Figure 1-1. Each of these steps is described in more detail below.

Figure 1-1. Key sources of evidence and research steps



1.2.1 Review of Industry Position Papers

To understand industry views on EPR administrative burden, a longlist of 26 relevant industry associations was created (see Appendix A.2.1). This list focused on industry representatives for WEEE, packaging and batteries. Using the longlist, Eunomia collated industry group position papers/statements and public consultation responses relevant to EPR and which referenced administrative burden. From the initial web-search, 20 pieces of literature were found which acknowledged administrative burden of which seven provided relevant detail. The literature was reviewed and analysed in a matrix grid.

1.2.2 Review of One-Stop Shops

Eunomia used desk-based research to generate a definition of one-stop shops and to determine key 'success criteria' by which to assess each one-stop-shop. Eunomia then used online research to identify one-stop shops within a European context. Tools that did not match Eunomia's definition of a one-stop shop were discarded, while those that fit the definition were evaluated against the success criteria. Lastly, the one-stop shops identified were compared and key trends/learnings highlighted. A list of the one-stop shops and a summary of their evaluation can be found in Appendix A.2.2.

1.2.3 EPR Regulation and Requirement Scan

Eunomia conducted a desk-based review of EPR legislation and requirements for WEEE, packaging and batteries in the seven priority markets to identify existing misalignment between and within countries. The registration, reporting and payment processes with select producer responsibility organisations (PRO) were also examined to understand the procedures which economic operators have to go through in practice. These data were compiled in Excel and compared across the seven markets and product streams to highlight where alignment exists and where there are key differences. It is important to note that PRO requirements were not always publicly available as the detail of registration and reporting processes were only accessible by members/in membership areas of a PRO's website, though this in itself is a useful reminder of the potential experience for producers investigating a new market.

1.2.4 Stakeholder Interviews and Survey

To support the desk-based research, Eunomia conducted a two-fold stakeholder engagement process involving industry interviews and a targeted survey. Stakeholders for interview were shortlisted and agreed with Ecommerce Europe in order to ensure a representative selection across product streams and key industry groups. A total of 29 stakeholders were contacted and 13 were interviewed, including from one-stop shops, PROs, SME representatives, online marketplaces and an industry association (see Appendix A.1.0).

A targeted survey was sent to eight membership-based trade organisations engaged primarily in e-commerce, who circulated the survey to their members. This survey provides more views on administrative burdens, the impacts of those, and thoughts on one-stop shops directly from EPR obligated companies. However, the survey response was relatively limited with only 122 responses, many of whom did not answer all questions, and who tended to be from larger businesses (65 %). This lack of engagement, and respondents inability or unwillingness to answer questions seeking to quantify costs highlight how difficult it is for many businesses, perhaps especially SMEs, to navigate EPR requirements. The responses are considered to support the insight gained from the other research stages. More information on the survey is in Appendix A.1.3

1.3 Report Structure

This report is structured as follows:

- **Section 2.0** examines the nature, scale and impact of administrative burdens caused by EU EPR requirements on producers; and
- **Section 3.0** examines whether a one-stop shop could reduce administrative burdens.

2.0 Are Fragmented EPR Obligations causing Administrative Burden for Producers ?

Summary

Eunomia identified numerous administrative burdens caused by fragmented EPR. From the outset, understanding multiple national regulations, keeping track of regulatory changes and identifying specific obligations is challenging for firms. EPR registration is currently repeated for every country and product stream, with different approaches to where and with which authority producers need to register and the information they must provide.

Different reporting requirements for data submission were most frequently cited as burdensome by interviewees. Particularly challenging are:

- varied units and granularity for reporting volumes placed on the market;
- different submission deadlines; and
- inconsistent approaches to categorising products between countries.

The impacts of these administrative burdens are significant. Producers require time and financial resources to understand and manage EPR compliance, imposing costs, and making unintentional non-compliance more likely. This may also discourage producers from reaching out to new markets, or encourage them to leave existing ones, reducing consumer choice and competitiveness of companies.

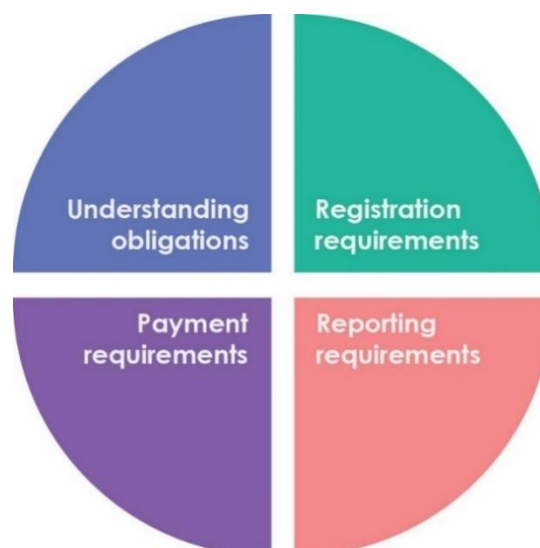
Challenges may be especially acute for SMEs. Any fixed costs are proportionally higher for this group, and they have less capacity to focus on this issue. They may be more likely to submit poor or noncompliant data by accident, or even as deliberate free-riding, as a result. The burden may also make deliberate free-riding more likely.

2.1 What Types of Administrative Burden are Caused by Fragmented EPR Policy?

This study focuses on ‘administrative burdens’ as issues with process requirements resulting from lack of harmonisation, such as different reporting formats. It does not consider impacts of the underlying requirement on a business, because provision of regulatory data will always require time and the aim of this research is to identify *additional* burden created by varying EPR requirements. These burdens were identified through a regulatory scan, a scan of PRO requirements and stakeholder interviews.

Eunomia identified a number of administrative burdens which producers may face when complying with EPR obligations. These can be split into four key stages of EPR compliance, as shown in Figure 2-1.

Figure 2-1. Four key stages of EPR compliance



Administrative burdens associated with each of these phases are discussed in the following sections. Importantly, the burdens discussed stem from two types of variation:

- I) **Fragmentation between Member State** approaches to EPR; and
- II) **Variation between product streams** within individual Member States.

2.1.1 Administrative Burdens for Producers When Trying to Understand EPR Obligations

Given the fragmentation of EPR approaches across EU Member States, it is not surprising that those interviewed felt that simply understanding obligations for one's company in the first instance is an obstacle to fulfilling EPR requirements. The administrative burdens highlighted by interviewees include three overarching points.

- 1 **It is difficult to understand what the regulation and EPR obligations are when entering a market, or when regulations are introduced or updated across markets.**

Obligations stem from numerous national regulations, there are changes in regulation to keep track of and information on obligations is not always available in one clear place, even on a national level. There can also be language barriers to understanding those obligations.

- 2 **It is difficult to understand how their own company fits into each regulatory framework, and therefore which specific obligations apply to their operations.**

It is difficult to understand what regulation is relevant to a specific company and its products and specific questions are particularly confusing, such as, whether a company is deemed a producer or not and which products are in scope (e.g., B2B or B2C).¹

- 3 **There is a highly confusing landscape of actors and roles to engage with, and thus it can be hard to understand how to comply, even once regulations are understood.**

There are numerous PROs and national registers to engage with, and they may not always be equivalent between Member States. For example, looking at the seven markets in more depth: for packaging EPR, two markets offer competing PROs; for EEE, three markets offer competing schemes; and for batteries, four markets offer competing battery schemes. Where there are competing schemes, (e.g., in Germany with 10 packaging PROs), producers are likely to struggle to select the most appropriate PRO for their needs. Interviewees also noted that the potential role and obligations related to authorised representatives were confusing. In some markets, non-national producers may be required to enlist an authorised representative, based within the national market, to legally represent and act on behalf of the producer. Again, requirements around authorised representatives are not consistent

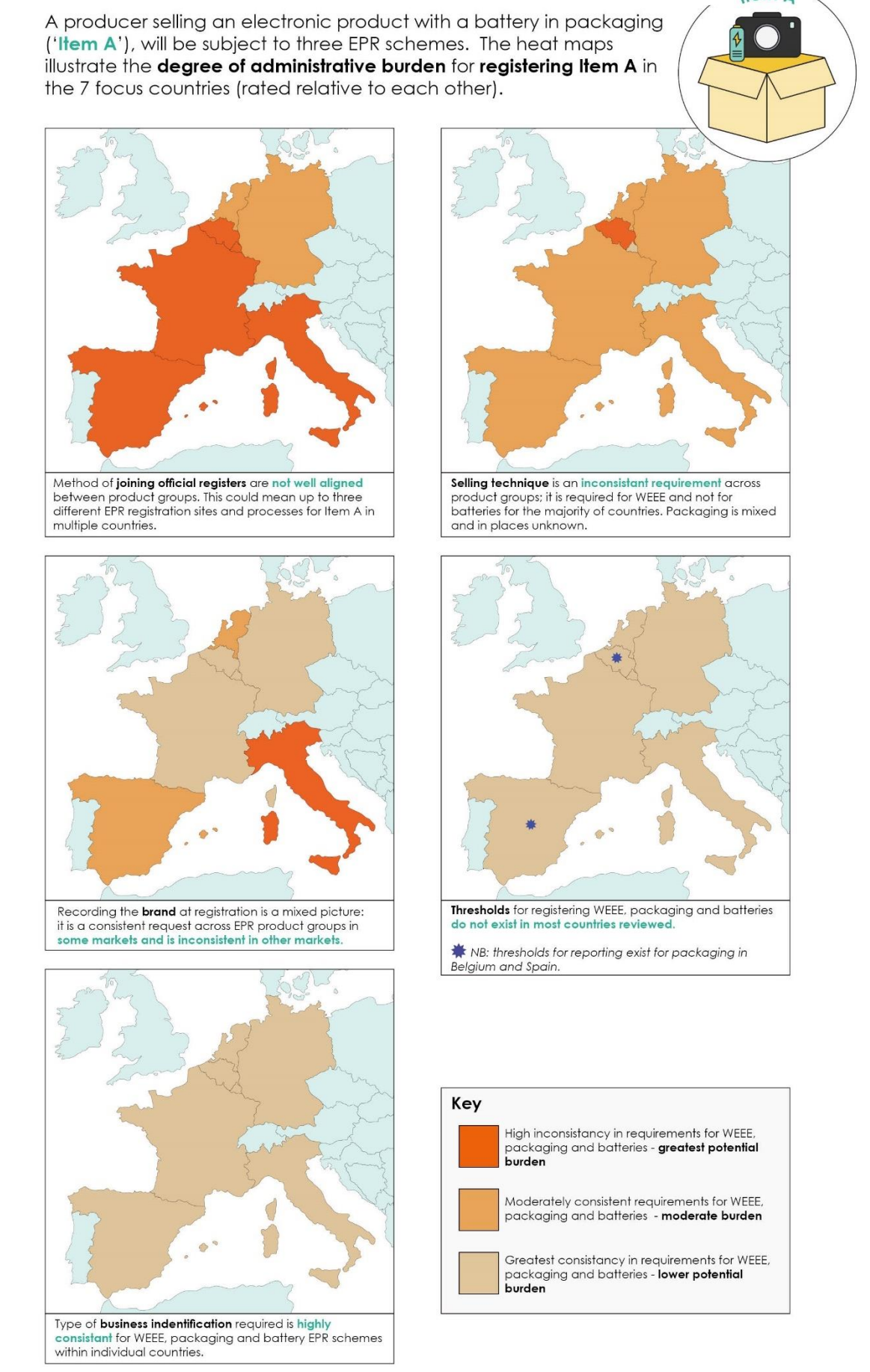
These interview observations are further supported by the current state of the compliance market, in which EPR compliance service providers exist. Their sole purpose is to help businesses comply with their EPR obligations in exchange for payment and to offer an understanding of existing and upcoming obligations as part of their service.

2.1.2 Administrative Burdens for Producers When Registering with PROs and National Registers

To comply with EPR obligations, some form of producer registration is required in all seven selected countries and for all three product streams reviewed. However, how and with which authority producers must register varies. For producers selling multiple product streams in multiple EU countries, fragmented registration presents a key administrative challenge. For five aspects of registration, Figure 2-2 uses heat maps to indicate the level of alignment between EPR schemes for packaging, WEEE and batteries **within** each of the seven countries reviewed. The elements identified cover both procedural aspects of registration and the actual information required from producers.

¹ Interview with representative from PRONEXA AG (former WEEE Europe), 20 September 2024.

Figure 2-2. Alignment of EPR registration within seven EU countries



For the same aspects of registration, plus product categorisation, Table 2-1 below indicates the level of alignment within each product group, compared across the seven countries.

The heat maps and table collate analysis of national legislation, national registers and a high-level examination of PRO requirements. Understanding PRO registration requirements was important because they can have additional specificities to the national legislation, which add to the complexity of the administrative burdens and may not be apparent if only looking at legislation.

Moreover, the diagrams summarise elements where information was found; there remain certain 'unknowns' as some PRO requirements were only accessible to current or prospective PRO members. It is also worth noting that the focus of this exercise was B2C items placed on the market, rather than B2B. If producers place household and professional/commercial/ industrial products on the market, they may have additional burdens due to differing approaches than shown in this table.

The disparities shown in the heat maps and table will contribute to administrative burdens on producers. These are discussed in more detail in the following sections.

At a Glance: What do the heat maps and table show?



Looking within the seven markets, method of registration has lowest alignment while type of business identification and whether thresholds for registration exist have the highest alignment. Recording brand and selling technique have different degrees of alignment depending on the product stream.



Comparing product streams across the seven markets, packaging EPR schemes have least alignment, while battery EPR schemes show greatest alignment for the selected aspects of registration. Method of registration was the least aligned for all three product streams.

Table 2-1. Alignment of EPR registration requirements between seven EU countries

Registration Requirements in BE, FR, DE, IT, LU, ES, NL	 B2C Packaging	 B2C (W)EEE	 B2C Batteries & Accumulators	Level of alignment between the 7 select countries
Method of joining official register	 Some form of EPR registration is always required, but the procedures and sites for registration are not aligned. Notably, some countries have a central national register while in others, producers register with or through a PRO.	 Some form of EPR registration is always required, but the procedures and sites for registration are not aligned. Notably, some countries have a central national register while in others, producers register with or through a PRO.	 Some form of EPR registration is always required, but the procedures and sites for registration are not aligned. Notably, some countries have a central national register while in others, producers register with or through a PRO.	 Low level of alignment
Threshold for registration	 Registration thresholds are not evident in most countries. Reporting thresholds exist in Belgium and the Netherlands but it is unclear whether these also apply to registration.	 Higher level of alignment. There are no registration thresholds.	 Higher level of alignment. There are no registration thresholds.	 Moderate level of alignment
Type of business identification required	 Higher level of alignment where known. Common requirements include EU or national tax number and VAT number. Some country specific identifiers are required for domestic producers in France and Spain.	 Higher level of alignment. Common requirements include EU or national tax number and VAT number. Some country specific codes are required for domestic producers in France.	 Higher level of alignment. Common requirements include EU or national tax number and VAT number. Some country specific codes are required for domestic producers in France.	 High level of alignment
Must register brand of product POM	 Moderate alignment. Only evident in Germany, but unknown for three of the countries.	 Moderately aligned. Brand of EEE is required in four countries and unknown for one.	 Moderately aligned. Brand only required in Germany and Spain,	
Must record selling technique i.e. distance selling	 Low level of alignment. Required in France and Italy, unknown for Spain and Luxembourg.	 Moderate level of alignment. Selling technique is required in the majority of countries.	 Highly aligned. Only required in Spain.	
Product categorisation	 Unknown for the majority of countries, with low alignment where known.	 Moderate level of alignment. Countries have between 6-10 categories (with sub-categories).	 Higher level of alignment. There are three main categories consistent across all countries.	

2.1.2.1 Key Areas of Registration Fragmentation Which Cause Administrative Burdens

EPR Registration Organisations

Which organisation or national authority producers are required to register with varies, both between the Member States reviewed and by product category, creating complexity for producers. In some Member States, producers (or their authorised representatives) must register directly with a national register from which they receive a mandatory registration number, in addition to joining a PRO. In others, producers can join a PRO which fulfils national registration on their behalf. And finally, in some countries, there is no requirement to join a national register, and producers are required to just register with a PRO.

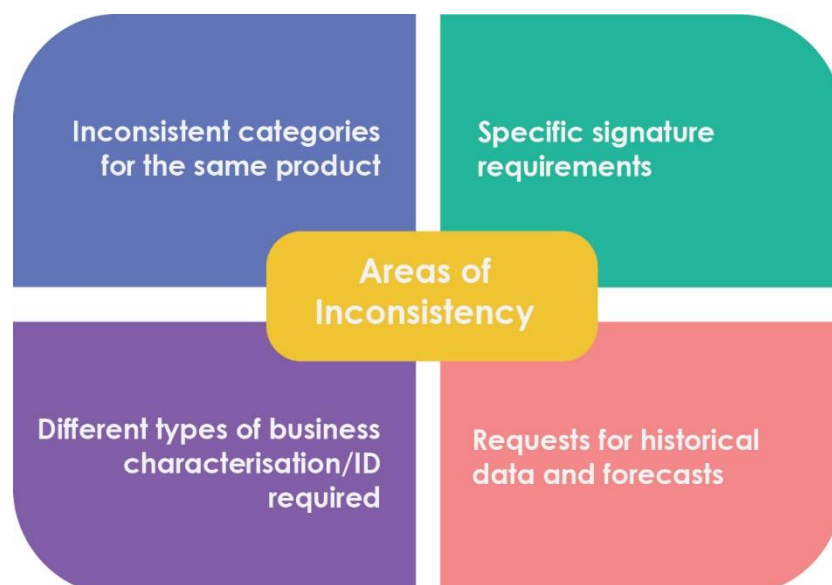
For instance, in Germany producers placing packaging filled with goods on the German market must register with the Central Packaging Register (ZSVR) through the LUCID portal, as well as registering with a PRO. Similarly in Spain, there are separate national producer registers for packaging, EEE and batteries. By contrast in France, producers must join a PRO through which they are registered with the national authority and receive a unique identifier (IDU).²

Information Requirements

Basic information is required from producers for all EPR registrations, such as firm name, headquarter address, contact details etc. These data requirements are reasonably well-aligned across the seven countries and three product streams. There are however some differences, and while individually these may seem small, when multiplied across product streams, countries and even different PROs, these can create significant administrative burdens.

Interviewees highlighted four areas where inconsistency caused particular problems, and these are highlighted in Figure 2-3 and detailed below.

Figure 2-3. Areas of inconsistency highlighted by interviewees



² Ademe Syderep, 'List of Questions by Sector', No date, <https://syderep.ademe.fr/public/faq?filiere=EEE>.

- 1 **Product categories** required at registration were difficult to compare, primarily because this stage of registration was often behind a membership-wall on PRO websites and not publicly available. From the interviews it would appear that category differences are typically much more of an administrative burden in terms of data reporting than for registration alone, though challenges for firms may still arrive at this earlier stage, such as simply understanding their individual obligations. This element of requirements was less transparent to the research team for the reasons highlighted above – and we note this issue of transparency is not simply a restriction on a researcher, but would also be encountered by a producer considering entering a market for the first time.

Where product category information was known, there was relatively good alignment across the seven Member States for batteries and similarities in alignment for EEE, as both tended to follow product lists set out in the Annexes of relevant EU Directives.

More variation exists for packaging categories, with some Member State registers/PRO registrations distinguishing reusables, single-use plastic packaging and beverage containers within a deposit return scheme (DRS). For example, France explicitly groups household packaging and graphic papers together; in Germany, packaging is first distinguished by inclusion or exclusion from the ‘dual-system’ and Spanish legislation makes the distinction between domestic, industrial, commercial, single-use and reusable packaging.

- 2 Regarding **signatures**, interviewees brought to light specific requirements which differed across Member States and which they found to be especially tedious. This included registration sometimes requiring signed documents, specifically in blue ink (e.g., Germany), or specifically witnessed by notaries for wet signatures, or agreements with Authorised Representatives specifically hand signed and witnessed by notaries (e.g., Austria).^{3 4 5}
- 3 Although **business information** requirements are well aligned across the seven Member States and product streams (e.g., company name, address, contact, type of organisation), there is some Member State specificity around identification methods, proof of financial security and distance sellers. For packaging producers for instance, a CNAE activity code is required from all producers in Spain, which was provided as an example of an administrative burden during several interviews.⁶ One interviewee explicitly stated they employed an external advisor to obtain the code for them.⁷ An ASIRET or APE number is required from domestic producers when registering with CITEO in France. Producers registering with CITEO are also required to provide the number of employees in the entity and information on share capital (type and amount).⁸

³ Interview with representative from confidential company, 19 September 2024.

⁴ Interview with representative from PRONEXA AG (former WEEE Europe), 20 September 2024.

⁵ Interview with representatives from Avask Group, 4 November 2024.

⁶ Interview with representatives from a confidential company, 19 September 2024.

⁷ Interview with representatives from a confidential company, 10 October 2024.

⁸ CITEO, ‘3 Étapes Pour Réussir Mon Adhésion’, No date,

https://cdn.citeo.com/papier/3_etapes_pour_reussir_mon_adhesion.pdf.

Some elements of registration are completely country or product specific:

- 4 In Germany, producers are required to provide an **insolvency guarantee** at registration for EEE. Under the ElectroG law, manufacturers/authorised representatives of B2C EEE must prove an 'insolvency safe guarantee' to finance the take-back and disposal of equipment. This must be provided at registration and must be renewed every calendar year.⁹
- 5 **Historical data and forecasts** for amounts of a given product placed on the market are required at registration in Spain. On registering with Ecoembes, a company must provide a forecast for the packaging that they expect to be placed on the market in the year and within 30 days provide a packaging declaration for the current year and previous four years. This depends on companies having collected this information historically and the information being available and in the correct format.

Survey Findings – Understanding The Impact

The survey data highlights that this multiplication of requirements is far from a theoretical concern. When asked about which types of EPR obligations the respondent's company has to comply with:

- Over half (61%) of respondents to this question said they were obliged to interact with all three EPR categories and associated schemes (packaging, EEE and batteries).¹⁰
- 46% of respondents to this question are also subject to additional EPR product requirements beyond these three product groups (e.g., toys, textiles etc). The number of additional obligations ranged from one to 12, indicating that some producers could have to register for up to 15 EPR schemes.
- Over half (52%) of respondents to the question sell to five or more EU countries, and thus could be obligated under 15 different EPR schemes. This does not just present an administrative burden - it may discourage participation in a market altogether.

Key Takeaway:

Overall, registration processes are inconsistent between each country and product category examined. The process of registration can also be repeated should producers be selling in multiple Member States or should they be required to register with both PROs and national registers in the same country for the same product category. This duplication of registration effort and variation in process was pointed to by interviewees as creating administrative burden.¹¹

⁹ Stiftung Ear, 'Guarantee', No date, <https://www.stiftung-ear.de/en/topics/elektrog/producers-ar/guarantee>.

¹⁰ 46 respondents answered this question and 78 respondents did not provide any data. Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

¹¹ Interview with representatives from WEEE Ireland, 19 September 2024.

2.1.3 Administrative Burdens for Producers When Reporting Under EPR Schemes

Of the four types of administrative burden, varied reporting requirements were most frequently noted as burdensome by interviewees. Eight key aspects of reporting emerged from the policy research as notable points of inconsistency between countries and product streams (see Figure 2-4).

Figure 2-4. Eight key aspects of reporting



The eight key aspects shown cover both procedural aspects of reporting and information required.

For 1-6 in the list, Figure 2-5, uses heat maps to indicate the level of alignment between these aspects of EPR schemes for packaging, WEEE and batteries within each of the seven countries reviewed. For 1-8 in the list above, Table 2-2 below indicates the level of alignment within each product group, compared across the seven countries. The maps and table collate analysis of national legislation, national registers and a high-level examination of PRO requirements. There remain certain 'unknowns', and the focus of this exercise was B2C items placed on the market, rather than B2B. The disparities shown will contribute to administrative burdens on producers. These are discussed in more detail in the following sections.

At a Glance: What do the heat maps and table show?



Looking within the individual markets assessed, reporting frequencies, deadlines and thresholds have lowest alignment. Exemptions have highest alignment (reporting exemptions do not tend to exist). While reporting method and data required have a medium level of alignment, this was felt to create the greatest burden by interviewees.



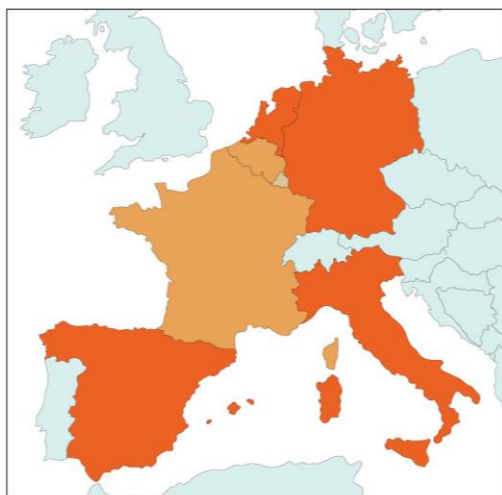
Comparing product streams across the seven markets, packaging shows lowest alignment for reporting requirements, while WEEE has greatest alignment.



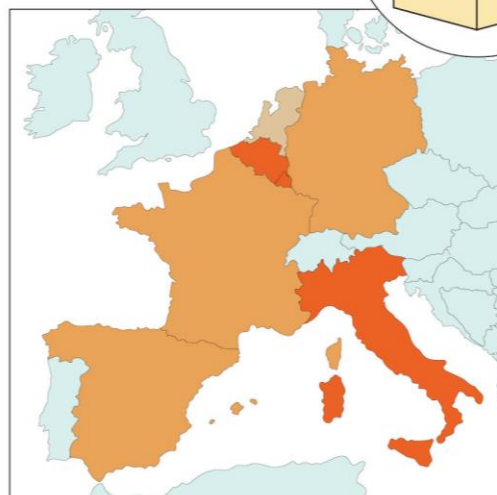
The Packaging and Packaging Waste Regulation (PPWR) was recently published and will enter into force in February 2025 and apply from April 2026. National packaging EPR reporting is likely to become more detailed in the future to reflect this legislation. For instance, in the Netherlands, starting in 2025 plastic packaging reporting will be divided into 13 subcategories including factors such as the presence of recycled content.

Figure 2-5. Alignment of EPR reporting within 7 EU countries

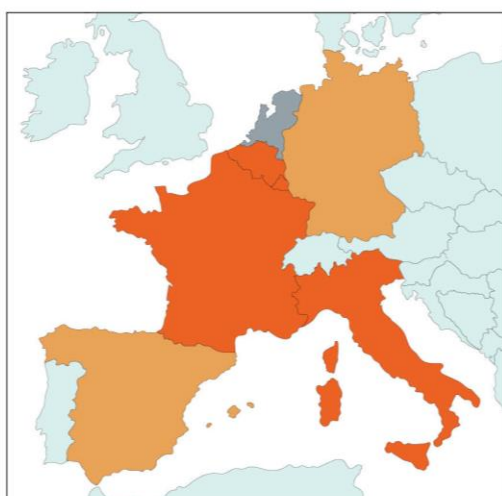
A producer selling an electronic product with a battery in packaging ('Item A'), will be subject to three EPR schemes. The heat maps illustrate the **degree of variation when reporting for Item A** in the seven focus countries (relative to each other).



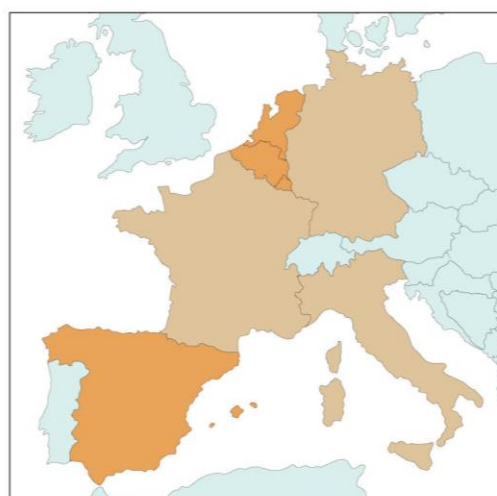
Reporting deadlines are **not well aligned** between product groups in most markets. This could mean up to three different reporting deadlines for Item A in one country.



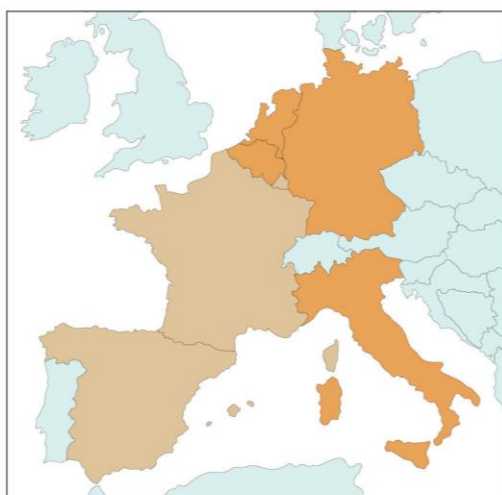
Reporting frequencies are **not well aligned** between product groups in most markets. This could mean up to three different reporting periods for Item A in one country.



Thresholds for simplified reporting are **not well aligned** between product groups in most markets.



Reporting methods are **moderately aligned** within countries but could differ significantly between countries. NB: data required in different formats, layouts etc was the reporting burden **most emphasised by interviewees**.



Reporting exemptions do not tend to exist for batteries and WEEE but **do exist for packaging** in four of the markets reviewed.

Key

- High inconsistency in requirements for WEEE, packaging and batteries - **greatest potential burden**
- Moderately consistent requirements for WEEE, packaging and batteries - **moderate burden**
- Greatest consistency in requirements for WEEE, packaging and batteries - **lower potential burden**
- Lack of data

Table 2-2. Summary of level of alignment for EPR reporting requirements between B2C packaging, WEEE and batteries between seven EU countries. Lower levels of alignment will impose a higher administrative burden.

Reporting Requirements in BE, FR, DE, IT, LU, ES, NL	 B2C Packaging	 B2C (W)EEE	 B2C Batteries & Accumulators	Level of alignment between the 7 select countries
Product categorisation	 Low level of alignment between countries with varying types of packaging categories.	 Medium level of alignment with four of the selected countries aligning with the categories outlined by the WEEE Directive (2012/19/EU).	 Medium level of alignment with categories generally distinguished by use and chemistry. Belgium and France align with the categories outlined in the EU regulation No. 2023-1542	 Low level of alignment
Placed on the market data (by product category)	 Medium level of alignment, as generally producers must report the weight PoM, however other countries such as Spain also require the number of units placed on the market, and Germany requires forecast data.	 Medium level of alignment, as generally producers must report the weight PoM. However, four of the selected countries request data on the number of units placed on the market, and Walloon requires forecast data.	 Medium level of alignment, as generally producers must report the weight PoM. Luxembourg however requires data on the number of units PoM. Belgium also requires forecast data.	 Moderate level of alignment  High level of alignment
Eco-modulation by sustainability criteria	 Eco-modulation is in place across the majority of markets, however criteria vary significantly creating significant administrative burden.	 Advanced modulation is not in place for the majority of markets.	 Eco-modulation is in place across the majority of markets, however criteria for modulation vary across markets.	
Reporting period	 High level of alignment with annual reporting being the most common.	 Low level of alignment with annual, quarterly or monthly reporting required across the seven countries	 Low level of alignment with annual, quarterly or monthly reporting required across the selected countries.	

Continued

Reporting Requirements in BE, FR, DE, IT, LU, ES, NL	 B2C Packaging	 B2C (W)EEE	 B2C Batteries & Accumulators
Reporting deadline	 Low level of alignment with reporting deadlines varying across the selected countries.	 Low level of alignment with reporting deadline varying between countries	 Low level of alignment with reporting deadline varying between countries
Reporting method	 Medium level of alignment with reporting typically taking place via a online portal with some variation in Spain.	 Medium level of alignment with reporting typically taking place via an online portal with some variation in Luxembourg, France and possibly Italy.	 Low level of alignment with reporting method varying across countries.
Thresholds for simplified reporting	 Where there is information available there is a low level of alignment with thresholds varying between the selected countries.	 Medium level of alignment as simplified reporting does not appear to a common option for producers placing EEE on the market in the selected countries.	 Medium level of alignment as simplified reporting does not appear to a common option for producers placing batteries on the market in the selected countries.
Reporting exemptions	 Some exemptions exist in Belgium, Germany, Italy and the Netherlands.	 Some exemptions exist in Luxembourg.	 Some exemptions exist in Luxembourg.

2.1.3.1 Key Areas of Reporting Fragmentation Which Cause Administrative Burdens

Data Requirements and Reporting Methods

- 1 **Different data format requirements were the reporting burden most emphasised by interviewees.** When reporting volumes placed on the market, required formats vary in granularity (how information is broken down and the level of detail required within that breakdown) and unit (weight, product count etc). For example, plastics may be classified in multiple ways: size, weight, product type and more. One interviewee stated that despite their company developing a comprehensive database for their packaging placed on the market, they still have to adjust the data they extract to provide additional detail required by different EPR schemes.¹²
- 2 **Providing data forecasts was an additional requirement in two of the selected countries.** For instance, in Germany, when reporting to LUCID, packaging producers are required to report the volume they plan to place on the market during that year, as well as actual volumes placed on the market.¹³ Legislation in Belgium's Walloon region imposes a similar requirement for battery and EEE producers.¹⁴ This is particularly difficult for SMEs selling only small amounts into a market, which may be subject to significant uncertainty.
- 3 **Other disparities which emerged from the interviews related to how reporting is done, rather than what is reported.** Different reporting layouts for instance require more time to fill in. For plastic packaging in Spain, the form is coded rather than spelling out in language what information is required.¹⁵ Submission methods and formats also differ, for example requiring an excel spreadsheet be submitted in some cases, and an online portal completed for others. Interviewees also highlighted that producers must manage multiple usernames and passwords across different portals.¹⁶

It is worth noting that not all data reporting challenges identified by interviewees can be resolved by streamlining through a one-stop shop. Data management and retention for instance, would remain a requirement. For example, Verpact in the Netherlands requires records to be kept for seven years and to be available to review, and there may be good audit and compliance related reasons for this.

¹² Interview with representatives from Metro group, on 29 October 2024

¹³ Lizenzero, 'Packaging Act: This Is How Your License Year Looks Like', Lizenzero Packaging Licensing, 2024, <https://www.lizenzero.de/en/blog/packaging-act-this-is-how-your-license-year-looks-like/>.

¹⁴ Walloon Government, 'Order of the Walloon Government Establishing an Obligation to Take Back Certain Waste', 2010, <http://environnement.wallonie.be/legis/dechets/decat027.htm>.

¹⁵ Interview with representatives from confidential company, on 19 September 2024

¹⁶ Interview with representative from a confidential company, 10 October 2024.

Product Categorisation

- 1 **Inconsistent categories for reporting the same type of product exist between Member States.** Interviewees felt that varied product categorisation during reporting was particularly problematic. This is most notably the case for packaging. Fost Plus in Belgium, for instance, requires producers to report against 31 distinct packaging categories,¹⁷ while Luxembourg and Germany require reporting against 15 and 8 packaging categories respectively. Differences in terminology add further complexity. For example, in Spain “cardboard for food and drink” is an independent category,¹⁸ while France a similar category is referred to as “Tetrapak,”¹⁹ and in Germany as “composite carton”.²⁰ In comparison, categories for EEE and batteries are more aligned (as noted in section 2.1.2.1 on registration). Examples of category variation are provided in Figure 2-6 and are explored in more detail in turn below.
- 2 **Interviewees highlighted that inconsistent product categories and terminology require producers to adjust their reporting for each Member State.** Plastic for instance, can be split into colour or variety,²¹ and Greece has 63 WEEE categories.²² We note that some of the selected countries used terminology and groupings used in the WEEE Directive (2012/19/EU) for EEE and EU regulation No. 2023-1542 for batteries – allowing producers to use the same reporting categories. It is important to note that the issue here is less the total number of categories in a given market (which may be useful to national regulators and enable more accurate fee differentiation), and more the *diversity* in practice across markets. It is the latter which we identify as process-based administrative burden in the current study.

Figure 2-6. Examples of variation in product categories for batteries, packaging and WEEE compliance schemes

Product category	 Belgium	 France	 Germany	 Italy	 Luxembourg	 Spain	 The Netherlands
	5 categories which are further subcategorised.	5 categories which are further subcategorised.	Distinguished by portable, industrial and automotive (3), then chemistry and type.	The categories that producers placing batteries on the market in Italy are required to report against are unclear.	12 categories.	8 categories	Distinguished by portable, industrial and automotive (3), then chemistry- nickel cadmium, lead acid and other.
	Fost plus: 5 categories with a total of 31 sub-categories.	CITEO: 7 categories with a total of 20 sub-categories.	Grüner Punkt: 8 categories.	CONAI: 7 categories with a total of 18 sub-categories.	VALORLUX: 18 categories.	Ecoembes: 11 categories.	Verpact: 10 categories.
	6 main categories, the number of sub-categories is unknown.	8 main categories, broken by down equipment type.	6 main categories which are subdivided into 17 sub-categories.	6 main categories, the number of sub-categories is unknown.	10 categories, and 42 sub-categories.	7 categories with sub-categories.	6 main categories, the number of sub-categories is unknown.

¹⁷ Fost Plus, 'The Green Dot Rates', No date, <https://www.fostplus.be/en/members/green-dot-rates>.

¹⁸ Ecoembes, 'Packaging', The Green Dot rates, No date, <https://ecoembesempresas.com/en/#packaging>.

¹⁹ CITEO, 'Why Join Citeo?', No date, <https://www.citeo.com/pourquoi-adherer-citeo>.

²⁰ PRO Europe, 'Participation Costs Overview 2024', 2024, <https://www.pro-e.org/files/PRO-Europe-Participation-Costs-Overview-2024.pdf>.

²¹ Interview with representatives from confidential company, on 19 September 2024

²² Interview with representatives from Landbell Group, on 30 October 2024

A Note on Eco-Modulation

Eco-modulation differs from more basic fees based on weight and material type (and occasionally form, such as bottles vs trays) where fees are differentiated to cover variable collection, sorting, recycling and disposal costs. Eco-modulation is intended to deliver additionally improved environmental performance and meet policy objectives by modulating fees based on criteria such as durability, recyclability and reusability. For example, lower financial contributions may be required on packaging that is straight forward to recycle and higher contributions on packaging that has characteristics disruptive to recycling.

Eco-modulation practices vary across Member States, with different environmental criteria used to modulate fees for the same product streams. Our review found eco-modulation systems to incentivise packaging environmental performance across dimensions such as recyclability or the use of recycled content in six of the seven reviewed markets. In contrast, four markets have implemented eco-modulation for batteries and one for EEE. There is significant scope to expand eco-modulation in these product categories by incentivising environmental performance using criteria such as battery chemistry, removable batteries, durability and repairability.

The European Commission is moving towards greater eco-modulation and granularity in producer fees as part of efforts to drive an EU circular economy. Thus, the general trend is towards greater detail being required to calculate producer fees. While individual approaches to eco-modulation may not be overly burdensome, and have the potential to deliver desired policy outcomes, divergent approaches across Member States and PROs will significantly increase the purely administrative burden placed on producers.

Thresholds for Simplified vs Detailed Reporting

- 1 Thresholds for simplified and more detailed reporting vary in occurrence and criteria.** Simplified reporting in the context of EPR reporting requirements refers to a process designed to reduce the administrative burden on producers, especially SMEs, while still ensuring compliance with EPR regulations. This approach typically applies to producers that meet certain criteria, such as lower production volumes. For packaging, thresholds were found in six out of the seven countries reviewed. Simplified reporting was found to be less common for batteries and EEE with only three countries having the option for simplified reporting for batteries, and three for batteries. These thresholds are based on the size of the producer, typically determined by criteria such as volume (kg or units) of a product placed on the market, or the amount in fees paid.
- 2 Crucially, the levels of these thresholds varies between Member States and product streams.** A given producer of the same product stream may be obliged to meet EPR reporting requirements in one country, but not, or to a differing degree, in a second country. Packaging EPR is particularly varied. In Spain, producers who place on the market less than 15 tonnes of packaging per year qualify for simplified reporting,²³

²³ Transatlantic Law International, 'Spain Update: Q&A - Royal Decree 1055/2022 on Packaging and Packaging Waste', Transatlantic Law International, 2023, <https://www.transatlanticlaw.com/content/spain-update-qa-royal-decree-1055-2022-on-packaging-and-packaging-waste/>.

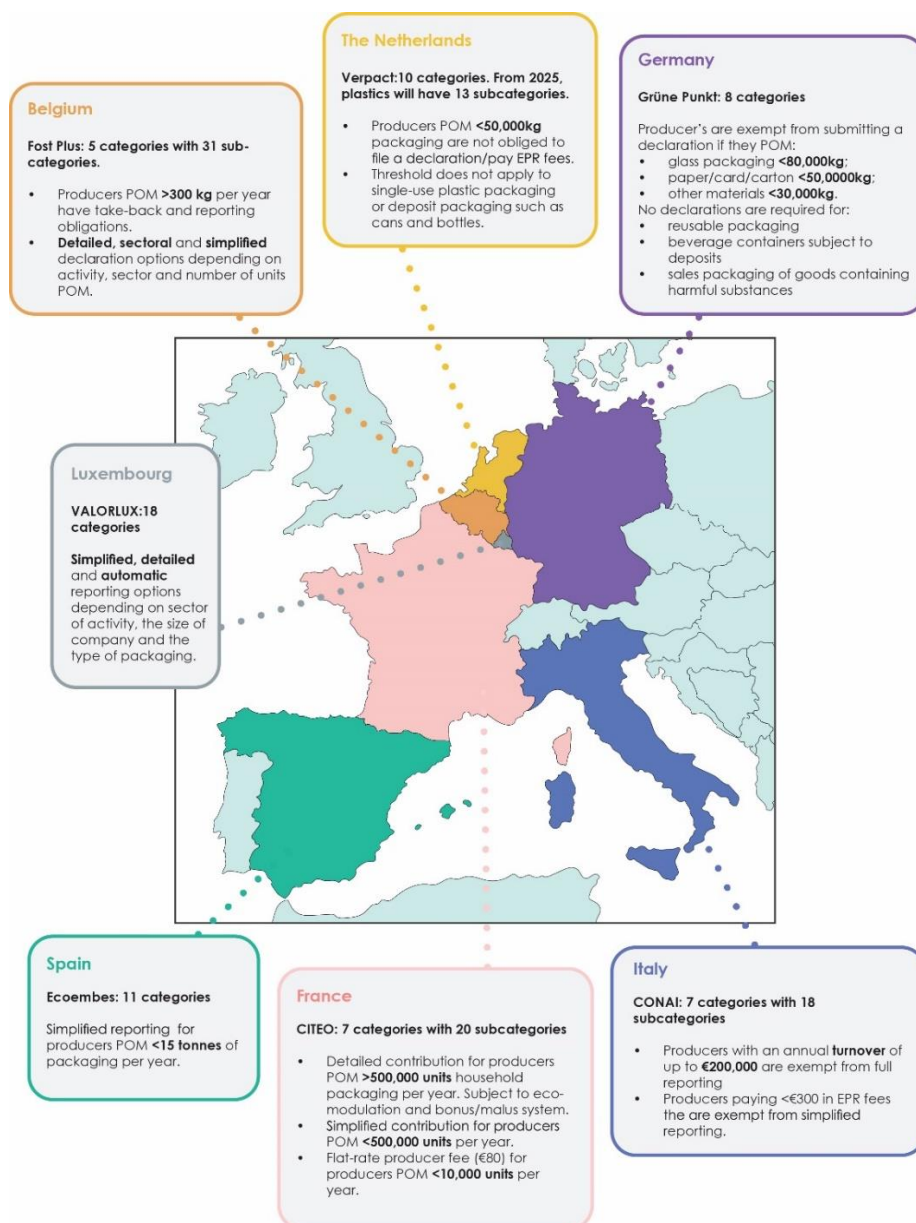
whereas for CITEO in France, producers who placed on the market less than 500,000 units of household packaging per year provide a simplified declaration. In Germany, there are three different thresholds according to packaging material.

3

Some countries also have exemptions in place for reporting, meaning that although a producer may be required to register, they are not required to report any data. For example, in CONAI in Italy states that producers with a previous year's turnover of up to €200,000 are exempt from full reporting, and those paying less than €300 in EPR the previous year are exempt from simplified reporting.²⁴

Figure 2-7 summarises the number of different reporting categories and varying thresholds for packaging reporting across the seven focus markets.

Figure 2-7. Reporting categories and thresholds for packaging



²⁴ CONAI, 'Guide to CONAI Membership and EPR Fee Application 2024', 2024, <https://www.conai.org/download/guide-to-conai-membership-and-epr-fee-application/?tmstvt=1731164794>.

Reporting Frequency and Deadlines

- 1 The number of reporting submissions required for packaging, EEE and batteries vary widely within the countries reviewed and between the product categories (see Table 2-3). For instance, for batteries and EEE, in Belgium, Bebat requires producers selling more than 10,000 batteries a year to report monthly and those under the threshold to report annually.²⁵ EEE and battery PROs in Luxembourg require either quarterly or annual submissions according to the size of fee paid by the producer. For Ecotrel for example, producers of EEE paying annual fees $\geq$ €500 must report quarterly, and those below this threshold report annually.^{26,27} For packaging, six of the seven countries require annual submissions. In Italy, the frequency of reporting to CONAI may be annual, quarterly or monthly depending on the fees from the previous year.²⁸ Only the Netherlands mandates annual reporting for all three material streams.

Table 2-3. Reporting frequencies by product category and country

Product category	 Belgium	 France	 Germany	 Italy	 Luxembourg	 Spain	 The Netherlands
	Annual or monthly depending on the amount PoM each year	Quarterly	Annual	Annual	Annual or quarterly depending on amount of annual contribution. Annual reporting is allowed if the fee is less than €250 (excluding VAT).	Annual	Annual
	Annual	Annual	Annual	Varies depending on the EPR fee declared	Annual	Annual	Annual
	Annual in legislation, however Recupel requires quarterly and annual declarations.	Annual	Monthly or annually depending on whether the EEE is sold B2B or B2C and whether it's indirectly exported.	Quarterly	Quarterly or annually depending on the size of the fee the producer pays. Annual reporting is allowed if the fee is less than €500 (excluding VAT).	Quarterly or annually.	Annual

- 2 Reporting deadlines also vary significantly, both in and of themselves, and as a consequence of the different number of reporting submissions. Where known or publicly available, deadlines for all material streams across the seven countries tend to fall in the first or second quarter of the year (January-May) although the exact date and months vary. For producers, this fragmentation means tracking and managing multiple reporting schedules simultaneously, which could increase cost if dedicated personnel, external consultants or specialised tracking tools are required to ensure compliance. Moreover, missed submissions or errors could lead to fines or other penalties.

²⁵ Bebat, 'Declaration', No date, <https://www.bebat.be/en/b2b/declaration>.

²⁶ Ecotrel, 'Declaration', No date, <https://www.ecotrel.lu/en/professional/declaration>.

²⁷ Ecobatterien, 'Declaration', No date, <https://www.ecobatterien.lu/en/professional/declaration>.

²⁸ CONAI, 'Declaration and Payment', No date, <https://www.conai.org/en/businesses/environmental-contribution/declaration-and-payment/>.

For packaging for instance, annual reporting deadlines between Germany, Italy and the Netherlands are 15th May, 20th January and 21st March respectively. Comparing across products within a country and taking the Netherlands as an example, the 2023 deadlines set in legislation for reporting were 31st March for packaging;²⁹ 1st July for EEE;³⁰ and 1st August for batteries.³¹ Interviewees agreed that varied submission deadlines created additional burdens and added that some deadlines were very tight; for example, a quarterly deadline on the 10th of the month when the quarter ended 10 days previously requires a short turnaround.³²

Key Takeaway:

Information and reporting requirements are currently fragmented. This fragmentation imposes an administrative burden on producers, over and above the ask required by regulation. Ultimately, as the European Commission continues to amend and introduce policy to drive a circular economy, reduce waste and improve product sustainability, there will be an increasing demand for information from product producers. Whether for EPR or digital product passports, the future is one of greater transparency over the products placed on the market in Europe and how they are managed at end-of-life. The level of detail required by EPR schemes is therefore likely to increase in future. Without action however, this will both increase the potential for, and impact of, fragmentation in approaches between products and Member States.

2.1.4 Administrative Burdens for Producers When Paying EPR Membership and Producer Fees

Most producers join a producer responsibility organisation (PRO) to meet their EPR obligations. The PRO navigates and fulfils EPR compliance on behalf of its members, who register, report and pay fees to the PRO. Producer fees cover waste management and recycling costs for the quantity and type of material they place on the market, as well as membership/admin charges.

Reviewing the administrative burden of EPR payment requirements was challenging, as information on EPR payment structures and fees is often restricted to membership sites and therefore not publicly accessible. As a result, the findings in this section were gathered from targeted desk research of illustrative examples alongside stakeholder insights from the interviews. This challenge for the research team is in itself a useful observation – exactly the same challenge would be encountered by business seeking to explore this issue for themselves, and if that business is an SME, it is likely that this kind of investigation will not be the primary role of the individual concerned.

The review revealed three key disparities related to EPR payment requirements which are likely to lead to administrative burden for producers (see Figure 2-8).

These are discussed in turn below.

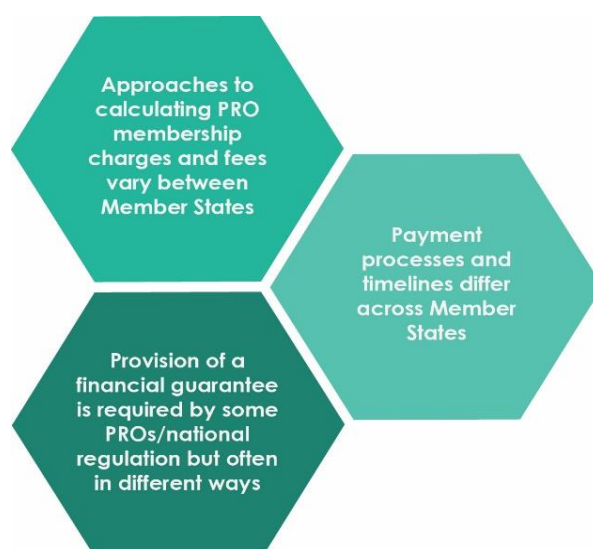
²⁹ Verpact, 'Packaging Administration in 2024', No date, <https://www.verpact.nl/en/packaging-administration-2024>.

³⁰ Ministry of the Interior and Kingdom Relations, 'Waste Electrical and Electronic Equipment Regulations', ministeriele-regeling, 2020, <https://wetten.overheid.nl/BWBR0034782/2020-12-10>.

³¹ Netherlands Enterprise Agency RVO, 'Collecting Batteries and Accumulators', business.gov.nl, No date, <https://business.gov.nl/regulation/collecting-batteries-accumulators/>.

³² Interview with representatives from confidential company, 19 September 2024

Figure 2-8. The three key disparities related to EPR payment requirements



2.1.4.1 Key Areas of Payment Fragmentation Which Cause Administrative Burdens

Approaches to Calculating Producer Fees

Approaches to calculating PRO membership charges and fees are not standardised across Member States, PROs or product categories. Methods include flat fees as well as calculations based on turnover or materials placed on market.

For instance Ecoembes charges producers placing packaging on the market a flat membership fee of €300 or €600 depending on producer turnover. More complex fee calculations include CONAI in Italy which charges a flat fee along with a variable portion of up to €100,000, with three different membership types and a range of producer data.³³ German packaging PROs compete with each other on price and therefore use non-transparent systems with producers purchasing annual licenses per packaging category based on weight placed on the market. Such variation poses a significant upfront economic and administrative burden for producers, increasing the complexity and uncertainty of entering a new market.

Payment Processes and Timelines

Payment processes and timelines differ between PROs, based on volumes of products a producer places on the market within a Member State and subsequent eco-fee contribution. Producers are therefore required to meet different deadlines across Member States.

In Spain for instance, Ecoembes manages payments through an online portal and issue four quarterly invoices, with a fifth 'settlement' invoice to account for any differences between initial payments calculated and payments actually required.³⁴ In France, CITEO issues an

³³ CONAI, 'Guide to the Membership and Application of the Environmental Contribution: Summary Version', 2014, https://www.conai.org/wp-content/uploads/2014/09/CONAI_GUIDE_english_version.pdf.

³⁴ Ecoembes, 'FAQ Member Companies', No date, <https://www.ecoembes.com/sites/default/files/inline-files/empresas/faqs-guide.pdf>.

annual invoice in December where contributions are below €5,000 per year, with four quarterly invoices and an adjustment payment where contributions are above €5,000 per year.³⁵ CONAI in Italy has a different system again, with annual payments where annual contributions are below €3,000, quarterly payments where annual contributions are below €31,000 and monthly payments where annual contributions are above €31,000.³⁶

Multiple payment schedules and timelines, and those that do not meet a producer's own business processes increase the complexity of managing and tracking payments, require additional work to manage cashflow and increase the risk of errors and non-compliance. One interviewee added that simply keeping track of different invoices constituted a burden.³⁷

Financial Guarantees

A financial guarantee is required by some PROs for some product streams. Financial guarantee approaches vary, include prefinancing, inclusion in collective payments and insolvency guarantees.

This is specified in regulation for packaging producers in Spain, and EEE producers in Spain, Italy and some Belgian territories and is required by some PROs to ensure payment and manage risk. Yet, how this works in practice differs:

- In Germany, manufacturers and authorised representatives of B2C EEE producers must prove an 'insolvency safe guarantee' to finance the take-back and disposal of equipment. This must be provided at registration and must be renewed every calendar year.³⁸
- In Spain, producers are required to contribute to a financial guarantee for the whole collective system, in proportion to the packaging they place on the market.
- In the Netherlands, PRO Verpact requires that costs are 'prefinanced' based on estimated packaging that will be placed on the market in the upcoming year.³⁹

These types of requirements place considerable administrative burden on producers requiring them to estimate packaging placed on the market, plan and manage their cashflow, and reconcile their upfront payments against the actual material they place on the market. Differing guarantee requirements across Member States and product categories increase administrative burden by increasing the complexity of managing different product categories and operating across markets.

Key Takeaway:

Overall, different levels for producer fees are unavoidable, as waste management costs vary in different Member States. Varying the frequency of payment by fee level can also be proportionate in terms of system cashflow and burden for smaller businesses. However, where the approach to setting and calculating fees sees significant variation across markets and products, the cumulative effect can be a complex administrative burden, especially for producers selling products in multiple EU countries. Simply keeping track of different invoices further constitutes a burden, which may include language barriers between markets.

³⁵ CITEO, 'Joining Citeo (EPR for Household Packaging)', No date, <https://www.citeo.com/faq-joining-citeo-epr-household-packaging>.

³⁶ CONAI, 'Guide to CONAI Membership and EPR Fee Application 2024'.

³⁷ Interview with representatives from a confidential company, on 10 October 2024

³⁸ Stiftung Ear, 'Guarantee'.

³⁹ Verpact, 'We Are Verpact', No date, <https://www.verpact.nl/en/node/2>.

2.2 What are the Impacts of EPR Administrative Burdens?

Eunomia also explored the impacts on businesses caused by administrative burdens. We take ‘impacts’ to mean the consequences of administrative complexities between markets (e.g., extra staff to deal with the diversity of requirements) rather than factors resulting simply from doing business in a different market (e.g., language barriers), though these are sometimes hard to separate.

Stakeholders often provided qualitative examples of administrative burdens of EPR obligations and resulting impacts on businesses. However, stakeholders had rarely undergone exercises to quantitatively measure the extent of time, cost, or other impacts experienced, and nor were they able to point Eunomia to internal or external studies that had. Where possible, this section pulls out indicative numbers from interviews and survey responses to inform thinking.

2.2.1 Time Management

Most interviewees wished to point out the time-consuming aspect of administrative burdens; significant staff time and resourcing is required to manage EPR obligations. According to several interviewees, some businesses have a whole team of people dedicated to it. One of the service providers helping companies with their EPR compliance must employ eight people to monitor EPR obligations across the globe, and that is limited to understanding the obligations, not inclusive of seeking to be compliant. Other businesses (and this is most likely but not limited to SMEs) ask people to take on EPR-related tasks in addition to other aspects of their role, and in some cases, non-EPR expert staff (e.g., finance) must take on such tasks, requiring even more time to get to grips with obligations.⁴⁰ This may also explain why few businesses were able to answer Eunomia’s survey: lack of appropriate resources and time to do so.

Particularly time-consuming tasks include understanding obligations that are applicable to a company. 22 survey respondents attempted to estimate average staff hours required to familiarising oneself with EPR obligation related to a single EPR scheme in a single Member State, and responses ranged from 1 staff hour to 120 staff hours (the equivalent of three working weeks).⁴¹ Keeping up to date with changes to obligations can also be difficult, especially across multiple markets.⁴² The time required to register a company was reported as particularly troublesome.⁴³ Answers from 20 survey respondents to a specific question on average staff hours required to register with a PRO, ranged from 1 staff hour to 50 staff hours. The same range was found when asked about time required to register with national EPR registers.⁴⁴ As highlighted previously, in some cases companies are required to do both.

Reporting products placed on the market to a PRO is also time-consuming, notably in the development of data tools to produce the right figures to declare, and keeping that master data tool up to date or pulling the data together when necessary.^{45,46,47,48} An interviewee stated that keeping such records up to date is particularly difficult for e-commerce actors

⁴⁰ Interview with representative from a confidential company, 19 September 2024.

⁴¹ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁴² Interview with representative from a confidential company, 10 October 2024.

⁴³ Interview with representatives from WEEE Ireland, 19 September 2024.

⁴⁴ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁴⁵ Interview with representative from a confidential company, 10 October 2024.

⁴⁶ Interview with representatives from PRONEXA AG (former WEEE Europe), 20 September 2024.

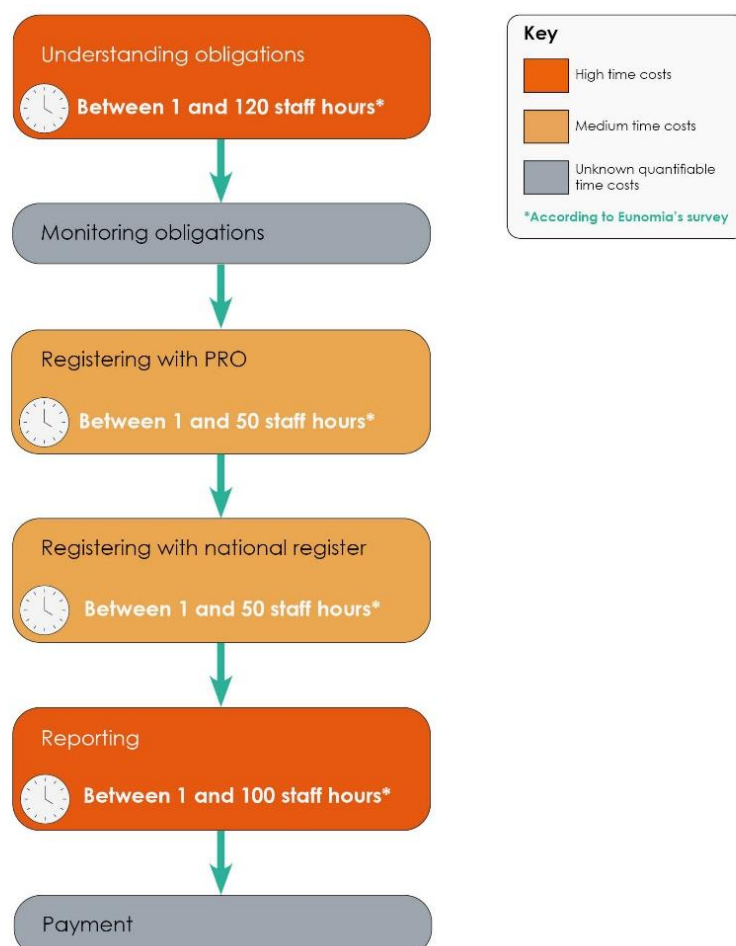
⁴⁷ Interview with representatives from BeVH, 16 October 2024.

⁴⁸ Interview with representatives from Metro Group, 29 October.

(likely due to more diverse and variable selling routes).⁴⁹ Ecommerce Europe have previously conducted a campaign on EPR policies that work for SMEs, and estimated that, today, an SME intending to sell 1 mobile phone unit in each of the current 28 EU markets could have to submit up to 300 reports every year, which represents 40 working days per year to comply with e-waste, batteries and packaging rules.⁵⁰ In practice, a single sales unit might fall below reporting thresholds in some of those markets, but the potential multiplication of requirements across product streams and markets is very real and is frequently experienced by interviewees and survey respondents participating in the current research. Answers from 20 survey respondents to a specific question on average staff hours required to complete reporting obligations for a single type of EPR obligation in one country (e.g., reporting for batteries in Germany), ranged from 1 staff hour to 100 staff hours (equivalent to 12.5 working days).⁵¹

Lastly, payment is also a lengthy process. According to 19 respondents to Eunomia's survey, between 1 and 200 staff hours are needed to ensure all payments have been made to the appropriate entities, including registration and reporting fees, across all products and EU countries, on a yearly basis. No estimations were obtained for payments for a single EPR scheme in a single Member State.

Figure 2-9. Key administrative tasks with time estimations for a business for a single EPR scheme in a single Member State



⁴⁹ Interview with representatives from PRONEXA AG (former WEEE Europe), 20 September 2024.

⁵⁰ Ecommerce Europe, 'Extended Producer Responsibility Policies That Work for SMEs in Europe', 9 July 2020, <https://ecommerce-europe.eu/press-item/extended-producer-responsibility-policies-that-work-for-smes-in-europe/>.

⁵¹ 1000 hours is also put forward, but this is likely a mistake, as it is more than 10 times the next highest average.

Concrete estimations of time required to fulfil overall administrative obligations are few. **Answers from 19 survey respondents on average staff hours required 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).** We note that staff hours provided in this answer are generally high; four respondents answer over 1,000 hours (125 workdays) and 13 answer over 100 hours (12.5 workdays).⁵² This may reflect the fact survey respondents tended to be larger businesses, but it is easy to see how even a smaller business selling products covered by multiple EPR schemes in multiple markets could approach the 100 hours, especially if the staff doing the work are new to the task, or internal systems are not optimised to facilitate it.

Eunomia has tested this with other survey responses outlined in Figure 2-9; Eunomia assumed the minimum time estimates for a business to comply with a single EPR scheme in a single Member State and added them together to gain an understanding of total time required. Assumptions taken from Figure 2-9 are:

- that understanding their obligations takes 1 hour minimum;
- that registration with a PRO or national register takes 1 hour minimum; and
- that reporting products placed on the market takes 1 hour minimum.

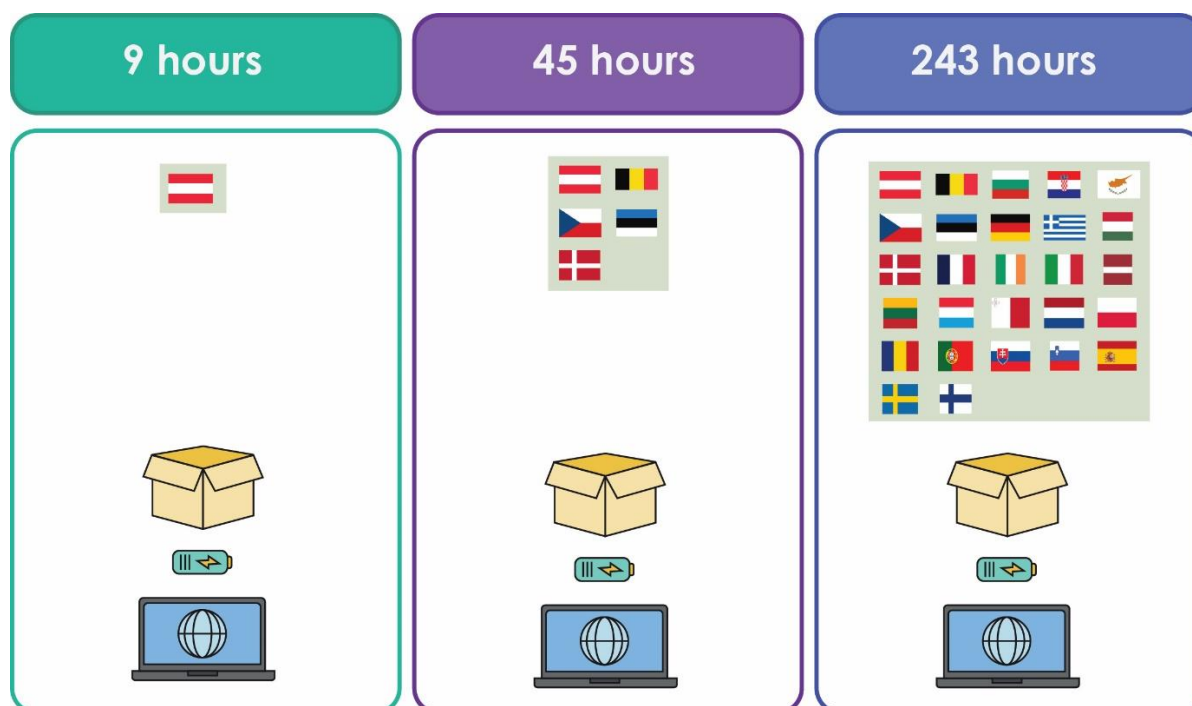
Figure 2-10 reveals that, if a producer was placing on a single EU market an item that required compliance with **three EPR schemes** – for example a computer that had a battery and packaging – this would take approximately 9 hours: 3 hours to understand their obligations, 3 hours to register, and 3 hours to report the products placed on the market.^{53,54} If the producer were placing this computer on the market in **five EU countries**, it would take 45 hours. If the producer were placing this computer on the market in **27 EU countries**, it would take 243 hours. It should be noted that there are additional unquantifiable time costs for monitoring their obligations, managing payments, and these estimates only account for the time to complete the registration data requests with a *PRO*, whereas registration with a *national register* may be required also. These time estimates may therefore be optimistic due to missing time costs. Furthermore, these time estimates account for a producer only placing computers on the market, and would logically increase for producers with additional products falling under more product streams (e.g., if a producer sold computers, lights and textiles).

⁵² Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁵³ Interview with representative from a confidential company, 10 October 2024.

⁵⁴ Verpackungsgesetz, 'How To: Registration at the German Packaging Register', No date, <https://www.verpackungsgesetz.com/en/topics/howto-registration/>.

Figure 2-10. Total imagined time required to understand obligations, register with a PRO and report products placed on the market for a computer in different country scenarios



2.2.2 Cost

Significant costs can be attributed to paying staff to oversee complex EPR compliance.

Answers from 20 survey respondents on Full Time Equivalents (FTEs) dedicated to EPR, ranged from 0 to 3 FTEs, and costs to business will include salaries, overheads, and the opportunity cost of that worker not doing something else for the business. Further answers from 16 survey respondents on staff resources costs for EPR compliance across all Member States on a yearly basis, ranged from 200 EUR to 400,000 EUR.⁵⁵ This seems to correlate with the cost of 0 to 3 FTE, and we imagine varies according to complexity of products sold and number of countries sold to.

Interviewees often complained of costs over and above staff time associated with administrative burdens, some of which are outlined below.

- 1 **Compliance may require additional services.** Even in terms of the registration with a PRO, in some cases, producers must employ notaries to gain 'wet' signatures to obtain registration.⁵⁶ Authorised Representatives are sometimes required, at an extra cost to the business.
- 2 **In addition, producers may feel the need to pay for external support;** service providers (two of whom were interviewed as part of this research) are available to ease some of these burdens.⁵⁷ Of 22 answers from survey respondents on whether they had engaged with a service provider to help them undertake registration and/or reporting requirements in any Member State, over three quarters replied 'yes'. And when responding to costs of obtaining that support, responses ranged from 500 EUR to

⁵⁵ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁵⁶ Interview with representative from a confidential company, 19 September 2024.

⁵⁷ Interview with representatives from PRONEXA AG (former WEEE Europe), 20 September 2024.

100,000 EUR. Some survey respondents pointed out specific markets and product streams they employ service providers for (e.g., "Sweden, EEE"), whilst some obtain support for all or many markets and product streams (e.g., "Most EU markets and for all applicable EPR schemes").⁵⁸

- 3 Additionally and perhaps more significantly from a commercial perspective, **if producers are not permitted to sell until they are officially registered with a national register, and that registration takes a long time, waiting for registration can hinder sales.**⁵⁹ According to Eunomia's survey (and 19 respondents), there can be between 0 and 90 days between beginning registration and obtaining registration with a national register.⁶⁰ If sales are prohibited during that time, commercial consequences may be severe. Producer sales are also affected if they choose to not expand into new markets and forego potential new sales because the administrative burden is perceived as too high (see 2.2.4 on the occurrence).
- 4 **There is also the cost attributed to being members of different PROs, as a fee must be paid for each PRO.**⁶¹ Estimates from 17 survey respondents to a specific question on EPR compliance costs in terms of registration and annual membership fees on a yearly basis, ranged from 0 EUR to 25,000.⁶² This can be seen as an inherent feature of EPR – the national systems need to cover their costs – but as the number of registrations rises, especially if producers do not fully understand national requirements, the risks of mistakes also increase. Should a mistake be made by producers, they not only risk financial sanctions, but equally the bad press from being unaware, with possible associated financial impacts.^{63,64}

Existing estimations of total cost impacts of complex and diverging administrative burdens on producers are lacking. Nonetheless, one interviewee – a refurbishment e-commerce actor of small to medium size, selling to 15 Member States - estimated they paid 6,000 euros per year for Authorised Representatives, in addition to part of the salaries of two staff members which could not be estimated.⁶⁵ **When combining answers from 16 survey respondents to specific questions around the annual cost of EPR compliance across all Member States, related to registration and membership fees, and staff resources, totals range between 260 EUR (for a micro-enterprise) to 400,000 EUR for a large company.**⁶⁶

2.2.3 Disproportionate Impacts on SMEs

Although not all interviewees had examples of where SMEs could struggle with fragmented EPR and the impacts of those, it was clear that they empathised with SMEs and that SMEs share many of the administrative burdens as larger businesses on paper, but may find them even more challenging to meet. **SMEs have less time, resources and financial capacity to adhere to obligations.** This may also explain why few SMEs answered Eunomia's survey: lack of resources and time to do so.

Regarding cost, Ecommerce Europe's estimated that a small and medium sized enterprise intending to sell one type of mobile phone across all EU Member States could face administrative costs equivalent to 140,000 EUR.⁶⁷ In the responses to Eunomia's survey, one

⁵⁸ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁵⁹ Interview with representative from a confidential company, 19 September 2024.

⁶⁰ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁶¹ Interview with representatives from PRONEXA AG (former WEEE Europe), 20 September 2024.

⁶² Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁶³ Interview with representative from a confidential company, 19 September 2024.

⁶⁴ Interview with representative from a confidential company, 19 September 2024.

⁶⁵ Interview with representative from a confidential company, 10 October 2024.

⁶⁶ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁶⁷ <https://ecommerce-europe.eu/press-item/extended-producer-responsibility-policies-that-work-for-smes-in-europe/>

answer from a micro-enterprise stands out regarding obtaining help from service providers: “I tried to, but it's so expensive I can't pay the fees.”⁶⁸

Notwithstanding this, our interviews indicated that SMEs are highly represented among the clients of service providers, though one EPR compliance service provider interviewed clarified that **SMEs typically opt for a lower level of service (e.g., gaining support to help understand their obligations but not asking for support to become compliant): they are simultaneously more affected by obligations, and less able to pay for support to handle them.** Nor are SMEs a homogenous group – at the top end of the scale, businesses will have far more resource to allocate to both comply with, and streamline internal systems to meet, administrative requirements.

It is common in smaller companies for a finance or general compliance employee to undertake the role of overseeing the whole process, in addition to their job role.⁶⁹ Complex reporting of products placed on the market by SMEs can therefore be inaccurate as the internal staff members are not fully informed on EPR compliance.⁷⁰⁷¹ WEEE Ireland also suggested that SMEs might be more likely to freeride due to burdensome obligations.

At a Glance: How do de minimis thresholds impact SMEs?



De minimis thresholds for material placed on the market enable producers and EPR scheme administrators to avoid disproportionate administrative burdens when materials placed on the market are below the threshold. However, producers under the threshold can still be obligated for some elements of complex, duplicated and fragmented requirements:

- Joining an official register is still a requirement across most Member States and product categories including for producers under the de minimis threshold. While official registration can make sense from a regulatory point of view, it is the multiplication and diversity of requirements that is likely to deter SMEs.
- De minimis thresholds can be inconsistent between markets, products, and material types. For example, in the Netherlands producers who placed on the market 50,000 kg or less of packaging per year are exempt from paying a waste management contribution to the producer organisation. This exemption does not apply to producers of single-use plastic packaging; producers who offer 50,000kg or less of these products must also pay a waste management contribution. There are reasons for such differences, but they make the landscape difficult to navigate, especially for firms operating across multiple schemes and markets.

We note that one of the interviewed PROs invested money into trying to make obligations with them easier for SMEs: it takes 20 minutes to register with the PRO on their website, and a contact phone number and email address is provided to help SMEs with their enquiries.^{72,73}

2.2.4 Other Impacts

Some research participants suggested specific countries currently posed more administrative burdens than others. Germany was put forward as a particularly challenging market several times in interviews, specifically related to registration with appropriate authorities. One interviewer revealed that, in a worst-case scenario, registration with the national register could

⁶⁸ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁶⁹ Interview with representatives from WEEE Ireland, 19 September 2024.

⁷⁰ Interview with representative from a confidential company, 19 September 2024.

⁷¹ Interview with representatives from Metro Group, 29 October 2024.

⁷² Bebat, '9 Simple Steps to Join Bebat', accessed 25 November 2024, <https://www.bebat.be/en/blog/9-simple-steps-to-join-bebat>.

⁷³ Interview with representative from a confidential company, 20 September 2024.

take up to five months. It is not legal for companies to sell – or even market – products in Germany without prior registration.⁷⁴ Producers must also clarify which brands they will be selling upon registering; and they cannot deviate from those brands (e.g., a producer who registered to sell Apple products can sell Apple products only until they register to sell other items too). Finally, the penalty for not complying could be up to €100,000.⁷⁵ Spain is also referred to several times, with regards to the complexity of needing to hold a Spanish VAT number to complete registration.

The purpose of this study is not to pinpoint challenges with specific national schemes, but rather to pinpoint administrative burdens specifically caused by fragmentation between schemes and markets, and the impacts it generates. However, in some cases, research participants suggested that specific markets are being avoided due to administrative burdens and complexities: one confidential interviewee knew of producers choosing not to sell in Spain due to complicated requirements.⁷⁶ Some producers are actively stopping sales in specific markets; an EPR compliance service provider saw 200 clients decide to stop selling to Germany in 2023 due to new EPR requirements for electronics.⁷⁷ Another interviewee proposed that **producers might hesitate to expand to new markets, because they are already investing time and resources into their existing markets, and may lack the confidence to extend.**⁷⁸ Eunomia received 21 survey responses to the question on whether there have been instances where EPR obligations are so difficult that the business stops selling or actively decides not to sell in a specific Member State: over a third responded ‘yes’. This should not be seen as representative of the proportion of businesses reaching this conclusion – unhappy businesses were perhaps more likely to respond to the survey – but it is indicative that real barriers are perceived by businesses and are impacting decisions. One answer specifically referenced Germany, adding that “we decided not to sell EEE due to the complexity of reporting”.⁷⁹ And, according to BevH, new markets need to be particularly economically promising to be worth the additional work.⁸⁰

Such decisions negatively affect the EU Single Market, consumer choice, as well as job creation, tax revenue, and overall competitiveness for EU companies. Streamlining compliance is an easy step in making it more appealing for businesses to enter new markets. This might extend to non-EU businesses. One of the interviewed service providers is also targeting sellers based in the US, who may need EPR compliance help in Europe; according to them, EPR obligations have become a considerable pain point for those sellers, who do not experience the same red tape when expanding to other non-EU countries.⁸¹

Inaccurate data may result from varied and demanding obligations, through both honest mistakes, and wilful non-compliance. Mistakes can arise in multiple ways. Obligations require knowledge and skillsets that many producers do not possess, potentially leading them to make mistakes.⁸² Wholesalers who are deemed producers must rely on data from their suppliers that can be inaccurate.⁸³ The tight turnarounds for EPR reporting can also lead to errors.⁸⁴ E-commerce actors with complex selling routes may find it particularly difficult to anticipate and track where their products will ultimately be purchased, and may make more mistakes.⁸⁵

⁷⁴ Interview with representative from a confidential company, 19 September 2024.

⁷⁵ Interview with representative from PRONEXA AG (former WEEE Europe), 20 September 2024.

⁷⁶ Interview with representative from a confidential company, 19 September 2024.

⁷⁷ Interview with representative from Avask Group, 4 November 2024.

⁷⁸ Interview with representative from Avask Group, 4 November 2024.

⁷⁹ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁸⁰ Interview with representatives from BevH, 16 October 2024.

⁸¹ Interview with representative from Avask Group, 4 November 2024.

⁸² Interview with representatives from WEEE Ireland, 19 September 2024.

⁸³ Interview with representatives from Metro Group, 29 October 2024.

⁸⁴ Interview with representative from a confidential company, 19 September 2024.

⁸⁵ Interview with representatives from PRONEXA AG (former WEEE Europe), 20 September 2024.

WEEE Ireland specifically believed that burdensome obligations led to free riding in some cases. For example, they have had cases of companies asking for information who are never heard of again – presumably they have either declined to enter the market, or have decided to evade EPR requirements. Either outcome is bad for business. And where free riding occurs, non-free riding companies are being undercut.⁸⁶ Some comments in the survey data supported this, where respondents pointed out that unfair competition from non-compliant competitors could be considered another cost administrative burden.⁸⁷

WEEE Ireland went so far as to suggest that EPR obligations may be putting companies off circular economy initiatives outside of EPR.⁸⁸ Avask Group reinforced this point; they stressed that EPR obligations no longer felt like an environmental contribution, but rather an additional and burdensome tax and had consequently lost much of their essence.⁸⁹ Whilst some of these criticisms may be inevitable – effective EPR requires significant amounts of information – the complex and fragmented way in which compliance is delivered across markets does not help make the case for strong regulation, even if the actual issue are the processes rather than the underlying ask. Streamlining compliance might also mean that the time that is spent by producers is focused on factors, such as delivery of accurate information, that truly benefits the regulatory regime.

⁸⁶ Interview with representatives from WEEE Ireland, 19 September 2024.

⁸⁷ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁸⁸ Interview with representatives from WEEE Ireland, 19 September 2024.

⁸⁹ Interview with representative from Avask Group, 4 November 2024.

3.0 Could a One-Stop Shop EPR Tool Reduce the Administrative Burden for Producers?

Summary

Eunomia considers a successful one-stop shop that reduces administrative burdens to contain:

1. clear information on users' obligations on its website;
2. to be contained within a single platform; and
3. administrative processes can be reduced to a single process.

Existing one-stop shops suggest that it is possible to have all three key elements and EU institutions have already established successful one-stop shops (e.g., EU VAT One-stop shop).

With regards to an EPR-specific one-stop shop - i.e. a single platform assimilating information, registration, reporting and payment across all Member States in one place - interviewees generally agreed that it would help to reduce administrative burdens for producers. Some stakeholders identified desirable features for a tool.

Potential challenges for implementing a one-stop shop for EPR also emerged in the source of the research, including software gaps, ensuring legal and fair collection and distribution of payments and lack of harmonisation. However, even if such challenges might limit or constrain the abilities of a future one-stop shop, there is still potential for this solution to reduce administrative burdens for producers.

3.1 What is a One-Stop Shop?

Eunomia has adapted the OECD's key traits of one-stop shops to be applicable to EPR. These are presented in Table 3-1. The OECD describes the common traits of one-stop shop tools, although some of these seem inappropriate or superfluous to EPR (e.g., that they should be based on 'life events' for citizens or for business lifecycles). The OECD also *implies* some traits when they should be *explicit* (e.g., that they exist to facilitate several 'processes' being done).

Table 3-1. Key traits of one-stop shops applicable to EPR

Key trait	Description	Source
 Related to regulation	Aid to improve regulatory delivery.	OECD
 Related to administrative burdens	Reducing burdens of administrative tasks, such as "for licences, permits." ⁹¹	OECD
 Reduces burdens by improving service delivery	Purpose to "make service delivery more streamlined and user focused." ⁹²	OECD
 Reduce transaction costs	Purpose to reduce direct and indirect costs of fulfilling administrative obligations.	OECD
 Reduce several processes	Help to reduce the burden of several administrative processes.	Eunomia
 User-friendly	Aim to be user-friendly.	OECD

The above factors appear to promise a lot, but it is important to highlight that one-stop shops cannot do everything in practice. The OECD concedes that one-stop shops 'do not offer a single solution but are part of an overall network'.⁹⁰ We might also add that they cannot remove the necessary requirements of compliance – data is still required, payments still need to be made, no matter how seamless the process is made. Simply put, one-stop shops cannot solve everything or help everyone – but, done well, they can ease friction in the system. In the case of EPR, a one-stop shop would funnel EPR administrative requirements into a single digital gateway and reduce repetitive administrative processes where possible, making EPR compliance easier for producers.

⁹⁰ OECD, *for Citizens and Business*.

To understand how successful existing one-stop shops are, Eunomia identified key features in successful existing one-stop solutions. Key features are shown in Table 3-2 (and more information on methodology to finding them can be found in A.2.2.1):

Table 3-2. key features in successful existing one-stop solutions

1	Informative Website	Clear information on all obligations for the user and context.
2	Single Platform	All steps necessary to the administrative process(es) can be done on that same platform without having to look or being redirected elsewhere.
3	Single Process	All steps necessary to the administrative process(es) can be done on that same platform without having to look or being redirected elsewhere.

Eunomia then identified and evaluated existing one-stop shops according to these key features.

3.2 How Successful Are Existing One-Stop Shops and What Lessons Can Be Learnt?

Eunomia applied the lessons on what makes a one-stop shop successful to existing one-stop shops. This included both solutions outside the realm of EPR, and solutions that already exist to help businesses with EPR compliance. This analysis suggests that one-stop shops can work at the EU level, and that current EPR one-stop solutions are likely to be meeting success criteria, but, as private sector services, are not universally available.

3.2.1 Non-EPR Related One-Stop Shops

Eunomia identified seven non-EPR related one-stop shops to evaluate. The appendices provide more detail on our findings (A.2.2.2) and analysis (A.2.2.3) when reviewing non-EPR related one-stop shops. However, key takeaways include:

- All three success elements were met several times, which suggests that **effective one-stop shops are attainable at EU level**.
- 'Informative website' is the most frequently met key feature. This suggests that **making a one-stop shop an informative website, providing clear information on all obligations for the user, is a key and easy element to have**.
- The 'single process' feature - to avoid the repetition of processes – is also recurring, suggesting that **ensuring a single process is both important and achievable**.
- Containing a one-stop shop within a single platform is the least met success element, **This lack of a 'single platform' may stem from the challenge of enabling all relevant Member State authorities to receive information from the one-stop shop**.

3.2.2 Existing *EPR* One-Stop Shops

Eunomia identified eight EPR-related one-stop shops to evaluate. However, Eunomia was unable to find sufficient online information to measure them against the success criteria. This is because existing EPR-related one-stop shops are owned by private service providers and key elements of their offer and levels of clients satisfaction are commercially confidential.

However, Eunomia did directly interview three of the identified one-stop shops. Based on the interviews, **all three had the key elements required for a successful one-stop shop**. We posit that, because these tools target EPR complexities, and have to satisfy paying clients, they are very likely to try to meet the success criteria (which were in part based how to reduce the impacts of EPR complexities for businesses). However, as commercial services, cost and access will be a challenge for many businesses.

Based on the above, it would appear that **all key elements to a successful one-stop shop pinpointed by Eunomia are achievable and considered important in practice** when it comes to EPR, though this is not publicly verifiable.

3.3 How Do Stakeholders React to a Potential, Single, EPR-focused One-Stop Shop?

Eunomia sought key stakeholders' reactions to a potential, single, EU-wide EPR-focused one-stop shop. During interviews, the notion of a one-stop shop was briefly described to stakeholders as a theoretical single platform assimilating information, registration, reporting and payment across all Member States in one place, to give them a clear and common idea of the topic at hand. Eunomia had 'Project SEED' (Simplify Eco-modulated EPR Delivery) in mind as an example when we did this, reflecting Ecommerce Europe's ask for this work. Project SEED was originally proposed and championed by Amazon, as an ideal vision of a cross-EU EPR one-stop shop, and is now being carried forward through a multi-stakeholder coalition, with an expectation that any resulting system will be independent or multi-stakeholder in delivery. However, SEED was not the explicit focus of the interviews, as interviewees were not assumed to be familiar with this specific proposal.

This question was also asked in the online survey. However, survey responses in relation to a potential future system should be interpreted more carefully, as only limited information could be shared online regarding what was meant by a 'one-stop shop'. It is possible the idea was interpreted differently by different participants and it is likely that the idea will have been a novel concept for respondents, meaning that any views expressed may not yet be deeply considered or held.

These exercises have provided a good idea of general attitudes to such a tool, specific traits for an effective EPR tool (going beyond the generic success criteria in Table 3-2) and also some potential challenges to realisation.

3.3.1 General Attitudes

Interviewees generally agreed that a one-stop shop as described by Eunomia would be beneficial to producers. The service providers, who perceive themselves as private 'one-stop shop' also agree with the notion that a one-stop shop is beneficial, though one clarified that they would not be in favour of a single one-stop shop at an EU level (we presume because it might undermine their service offer to the market, though they may also have doubted the technical and political challenges could be overcome in an open-source tool). Some interviewees clarified what kinds of services the one-stop shop should urgently provide in their view.

However, some interviewees were sceptical about the extent of services a one-stop shop could or should provide, believing that it could not solve all problems or that it was only part of the puzzle. Others went so far as to state that it would only exist in an ideal world.

Respondents to Eunomia's survey give a little more detail regarding attitudes to one-stop shops. When asked how much time they could save if they could use a Cross-EU online platform with their desired characteristics, 16 respondents stated between 20% and 90% and only one did not believe it would save them any time. When asked what this might equate to in savings on a yearly basis, answers ranged from 0 EUR to 200,000 EUR.⁹¹ We cannot rely on these figures too much, as they will largely depend on how the respondent imagined a one-stop shop to operate and how well they can assess potential savings. Nonetheless, it still stands that with one exception, all respondents believed time and cost savings would be achieved by a one-stop shop.

3.3.2 Desired One-Stop Shop Traits

Table 3-3 describes key traits of a potential one-stop shop suggested by the interviewees.

Table 3-3. Desired one-stop shop traits by interviewees

Phase of EPR obligations	Desired one-stop shop traits	Frequency mentioned*
Overall	It should be easy to use	1
Understanding obligations	Information should be in all necessary languages	3
	Holding all information in one place	1
	One point of contact for producers to ask questions	1
Registration	A single place to register	3
	One contract if possible	2
	A single process to register	1
Reporting products placed on the market	A single format (e.g., same files, types and submission style)	3
	A single process to do all the reporting	2
	Harmonisation of data requested (e.g., same units of measurement)	1

⁹¹ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

Phase of EPR obligations	Desired one-stop shop traits	Frequency mentioned*
	A single place to do the reporting	1
Payment	Collecting all payment that is then redistributed locally	1
	Obtaining one invoice for all payments	1

*13 interviews were held in total.

Eunomia's survey also asked respondents which characteristics would be helpful if a cross-EU online platform were created to centralise and facilitate EPR compliance across all countries and products (and provided options to select).

This survey question only received 10 responses. This may reflect audience unfamiliarity with the concept, or the positioning of the question towards the end of the survey. In order of processes to become EPR compliant: almost all wished for all information on EPR obligations on the online platform; almost all wished for a single registration process for all EPR obligations and countries on the platform; all wished for a single reporting process for all products and countries; almost all wished for a single payment process for registration fees; and almost all wished for a single payments process for all ERP fees. Four respondents selected 'other' characteristic too, asking for:

- "Unique point of contact for the company (helpdesk or account manager)"
- "Homogeneity on packaging types definitions etc"
- "A harmonized approach to scope-setting, so that the selection criteria are the same for all markets."⁹²

When compared with the interviews, these suggest slightly different priorities in terms of desired traits. However, the interviews carry slightly more weight, as interviewees were given more explanation regarding one-stop shops, and were not prompted with options for characteristics.

Overall, across both interviews and survey responses, there was clear support for the idea of an EPR one-stop shop as a potentially effective way to reduce administrative burden.

⁹² Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

3.3.3 Challenges for One-Stop Shops in Practice

Overall, while stakeholder interviews showed a favourable attitude towards a theoretical one-stop shop, some concerns were raised about how, and how well, it might achieve its objectives in practice.

Avask noted that **a key obstacle to setting up any kind of one-stop shop would be 'software gaps'**, which could make sending the data back to relevant authorities, and in a convenient format, very difficult. Not all countries have the same software capabilities. A lot of them operate on simple excel spreadsheets. A connected one-stop shop (using API, a software intermediary that allows two applications to talk to each other), sending information back to them, may be too difficult to establish.⁹³ On the other hand, Eunomia notes that software gaps and trusted collection and distribution of payments may be surmountable based on the existence of the EU VAT one-stop shop. The latter permits taxable entities to submit one VAT return and payment for all Member States. The information and payments are split and sent to relevant Member States.⁹⁴ Ebay also pointed out that similar interfaces already exist, implying that these could be turned into one-stop shops (e.g., the SYDEREP portal is organised by the Environment Agency in France, and PROs must already report to the portal.)⁹⁵

Even with a single EU one-stop shop tool in place, some stakeholders believed that such a tool is only "part of the puzzle" and that **more harmonisation of underlying national requirements would still be necessary**. For example, registration and reporting requirements would benefit hugely from harmonisation across Member States; even if producers only had to register or report products placed on the market once, obtaining the necessary information, data and documents for each country and product category to do so would remain very time-consuming.⁹⁶ Metro Group also wished for more harmonisation of producer definitions (though they favoured a one-stop shop regardless) so that entities knew more easily whether they are deemed producers in the relevant countries they operate in, rather than having to understand this through a one-stop shop.⁹⁷ Survey responses to a question around desired traits for one-stop shops also point to harmonisation of product scope and definitions.⁹⁸ It is worth noting that one of the most sceptical interviewees was in fact a PRO that had tried to harmonise its own requirements with a neighbouring country but was unsuccessful.⁹⁹

Lastly, an interviewee suggested that it could be difficult to ensure the **collection and redistribution of payments of EPR fees in a legal and trusted way**.¹⁰⁰

⁹³ Interview with representatives from Avask Group, 11 November 2024

⁹⁴ European Commission, 'Declare and Pay in OSS', No date, https://vat-one-stop-shop.ec.europa.eu/one-stop-shop/declare-and-pay-oss_en.

⁹⁵ Interview with representatives from ebay, 29 November 2024

⁹⁶ Interview with representatives from Avask Group, 11 November 2024

⁹⁷ Interview with representatives from Metro Group, 29 October 2024

⁹⁸ Eunomia survey completed by companies with EPR obligations in EU Member States, March 2025.

⁹⁹ Interview with representative from a confidential company, 19 September 2024.

¹⁰⁰ Interview with representative from a confidential company, 14 October 2024.

Key Takeaway

Interviewees showed a favourable attitude towards a theoretical one-stop shop, but these challenges highlight two potential directions for the tool:

- ① An online platform where only information on EPR obligations was provided (versus doing anything more than that, such as providing registration, reporting or payment functions).
- ② A tool requiring more software, that provides information but also allows registration, reporting and payment to be fulfilled in one place, through as few processes as possible.

In either scenario, administrative burdens would be reduced, though to different degrees.

The challenges also highlight a key feature of the EPR landscape - one-stop shops cannot be expected to solve every issue encountered in EPR compliance. Some administrative burdens are a result of underlying differences in national and product requirements, not simply the fact that information must be entered in multiple places and formats. Lack of harmonisation would still remain a key obstacle to reducing administrative burdens in both scenarios. As currently proposed, even if fully realised, the one-stop shop will only tackle those elements of administrative burden that are generated by having multiple points of registration, reporting, and payment. Harmonisation of underlying requirements, or design choices in national systems that might reduce administrative costs would require policy action, and is out of scope for the one-stop shop itself. Though a one-stop shop would certainly encourage harmonisation, by highlighting administrative burdens caused by EPR, and providing a digitalised platform already carrying out any harmonised administrative requests.

The aims of this study were to review the administrative burdens caused by fragmented approaches to EPR in the EU and to examine the potential for 'one-stop shop' tools to help minimise challenges posed. We have provided much detail on the administrative burdens caused, and their impacts on businesses, in particular SMEs. We now also argue that a one-stop shop has potential to reduce those administrative burdens, but that the extent to which it does so will depend on the level of ambition of the tool.

Appendix

A.1.0 Stakeholder Engagement

A.1.1 Stakeholder Interviews

Table A 1 outlines the 13 stakeholders who were interviewed, including the type and name of organisation (where not confidential), the date of interview and description of the organisation.

Table A 1. Interviews held with stakeholders

Type of organisation	Interview date	Organisation	Description
Industry association	12.09.2024	Confidential	Representing and supporting packaging industry in Europe
	20.09.2024	The European Small Business Alliance (ESBA)	Representing small businesses and self-employed professionals across Europe
	16.10.2024	Bundesverband E-commerce und Versandhandel Deutschland (BeVH)	Representing retail companies using e-commerce in Germany
Service providers	19.09.2024	Confidential	Supporting businesses to comply with all EPR obligations across Europe
	04.11.2024	Avask Group	Supporting e-commerce organisations with compliance solutions.
	30.10.2024	Landbell Group	Supporting companies globally with compliance solutions.
	20.09.2024	PRONEXA AG (former WEEE Europe)	Supporting businesses to comply with EEE EPR requirements across Europe

Type of organisation	Interview date	Organisation	Description
PRO	19.09.2024	WEEE Ireland	WEEE PRO: Providing WEEE collection, sorting and recycling services in Ireland
	20.09.2024	Confidential	Battery PRO providing battery collection, sorting and recycling services in a Member State
Retailer	10.10.2024	Confidential	E-Refurbishing business
	14.10.2024	Confidential	Multinational retailer, operating food stores, supermarkets and more
	28.10.2024	METRO	International wholesaler.
	29.11.2024	ebay	Online marketplace

A.1.2 Longlist of Administrative Burdens

Table A 2 contains a list of administrative burdens identified by interviews, caused by fragmentation of EPR obligations between Member States, and ranked by number of times stated by interviewees. The data provides a good indication of the extent of administrative burdens faced by producers on a regular basis.

Table A 2. Administrative burdens identified by interviewees and ranked in order of frequency mentioned

Phase of obligations	Administrative burden	Frequency mentioned
Understanding obligations	Too many PRO's and national registers to engage with. Difficult to know which registers to engage with generally, and for the different products	4
	Differences between Member States regarding whether a company is a producer	3
	Different regulation in each country	3
	Difficulty understanding one's 'place' within EPR obligations/ how regulation is relevant to you	3
	Lack of accessible information on EPR obligations in one clear place	1
	Horizon scanning of upcoming or potential legislative changes.	1
	Difficulty understanding which products are in scope and for which obligations (e.g., B2B or B2C, between electrical and household electrical items).	1
	Authorised representative definition and role unclear	1
	Language barriers across Member States.	1
Complex and Lengthy	Difficult country specific requirements (e.g., VAT numbers required, blue ink to signed documentation, wet signatures)	3

Phase of obligations	Administrative burden	Frequency mentioned
	Registration in each country where one sells to, meaning duplication	2
	Long wait for confirmation for registration (e.g., Germany)	2
	Different aspects that need completing for registration	1
	Requirement to have Authorised Representative that is then checked by the Authorities	1
Reporting of products placed on the market	Different data requirements across Member States: different levels of granularity, different units.	6
	Different reporting formats across Member States.	4
	Categorisation of products between Member States differs.	5
	Different and tight submission deadlines for different categories.	4
	Complex data requirements	3
	Different report submission methods.	3
	Reporting formats too complex (e.g., Spanish plastic form which is coded)	1
	Difficulty managing multiple logins and passwords for different portals	1
Payment of fees	Multiple payments to the same organisations related to product fees	1
	Multiple invoices to keep track of in different places	1

A.1.3 Targeted Survey

A targeted survey was sent to eight key stakeholders in October 2024, listed in Table A 3. Member organisations and seller platforms then shared the survey with a selection of their current users/businesses. This means that the reach of the survey and thus the response rate is not known. Responses should therefore be treated as indicative rather than representative, and have been triangulated against other sources throughout the analysis.

Table A 3. Long-list of contacts for the survey

Type of organisation	Name of organisation
Industry Association	BeVH
	ESBA
Service Provider	Confidential
	Confidential
	Landbell Group
	METRO
	OTTO
Industry Association	Ecommerce Europe
Retailer	Confidential
	Confidential
	Confidential

Survey Response Rate

Survey response was low, despite actors including two online platforms sharing it with their sellers. We received only 122 respondents to the survey, with few answering all questions (52% completion rate), and most respondents were large companies (64%) which is not representative of companies selling to the EU (many more SMEs). Eunomia tried to obtain more responses; reminders were sent to survey contacts (who in turn reminded their members); a shorter survey was circulated in January, in case the original survey was too difficult, but no responses were received for that second version.

Consequently, survey results are used carefully in the report, mostly to provide examples (as interviewee answers would) rather than a comprehensive representation of companies' experiences with EPR. We have steered away from using quantitative averages to inform the report, as this would be misleading. We also avoid drawing notable differences between what large, medium, small and micro companies believe, as too few of each category answer questions (in particular medium, small and micro enterprises).

We also note that, the fact that so few answers were received is interesting in and of itself. It suggests that EPR is not that well understood by companies generally. It is also possible that several people hold the answers in a single company (leading to situations where the person receiving the survey cannot answer all the questions).

A.1.4 Survey Questions

The following questions were asked in the survey:

1. What is the size of your company?
2. Which types of EPR obligations does your company have to comply with? Please select all that apply.
3. Roughly how many different product types do you sell where the above EPR obligations apply? (For example, how many different models of laptop do you sell?)
4. Roughly how many of those product types require reporting under several EPR obligations? (For example, how many models of laptops are you selling that have EEE and battery EPR obligations?) If you are unsure, please indicate an approximate number.
5. Which EU countries do you sell to where you have EPR obligations? Please select all that apply.
6. Do you have mandatory obligations to use Authorised Representatives for some products or countries?
7. On average, how many staff hours are required to familiarise yourself with your EPR obligations related to a single EPR scheme (e.g., packaging, EEE or batteries) in a single Member State? If you are unsure, please indicate an approximate number.
8. On average, how many staff hours does registration with a Producer Responsibility Organisation (PRO) in a Member State require? If you are unsure, please indicate an approximate number.
9. On average, how many days are there between beginning registration and obtaining registration with a PRO? If you are unsure, please indicate an approximate number.
10. On average, how many staff hours does registration with a national EPR scheme register in a Member State require? If you are unsure, please indicate an approximate number.
11. On average, how many days are there between beginning registration and obtaining registration with a national EPR scheme register? If you are unsure, please indicate an approximate number.
12. On average, how many staff hours are needed to complete reporting obligations for a type of EPR obligations in one EU country (e.g., reporting for batteries in Germany)? If you are unsure, please indicate an approximate number.
13. On average, how many staff hours are needed to comply with EPR obligations across products and countries in total, on a yearly basis? If you are unsure, please indicate an approximate number.

14. On average, how many staff hours are needed to ensure all payments have been made to the appropriate entities, including registration and reporting fees, across all products and EU countries, on a yearly basis? If you are unsure, please indicate an approximate number.
15. How many staff in Full Time Equivalent (FTE) are dedicated to EPR? FTE refers to the number of hours considered full-time. For example, if a company considers 40 hours full time, and there are two employees working 20 hours per week, those two employees would be 1.0 FTE. If you are unsure, please indicate an approximate number.
16. On average, how much does EPR compliance cost you across all the Member States you sell to in total and on a yearly basis? Please provide your answer in EUR if you are able to. If not, please indicate the currency.
17. Which Member State has the most administratively burdensome obligations in your view and in what way?
18. Which product type has the most administratively burdensome obligations in your view and in what way? (e.g., packaging, EEE, batteries, etc)
19. Have there been instances where EPR obligations are so difficult that you stop selling or actively decide not to sell in a specific Member State?
20. And if you responded YES to the question above, for which Member States and for what specific issues?
21. Are there any other impacts arising from the administrative burden of meeting your EPR obligations that have not been mentioned above but you wish to add?(e.g., restrictions on products, unfair competition from non-compliant competitors, improved environmental performance, improved reputational benefits, etc)
22. Have you engaged a service provider to help you undertake the registration and/or reporting requirements on your behalf in any Member State?
23. If you responded YES to the question above, for which countries and types (e.g., packaging, EEE, batteries, others)
24. If you responded YES to the question above, how much does that cost roughly annually? Please provide your answer in EUR if you are able to. If not, please indicate the currency.
25. If a cross-EU online platform were created, to centralise and facilitate EPR compliance across all EU countries and products, which characteristics would be helpful in your view? Please select all that apply, and provide additional characteristics in the 'other' box if you feel the options below to not incorporate key characteristics:
26. What percentage of time do you think you would save if you could use the cross-EU online platform as you have selected above?
27. How much cost saving (EUR) do you think this would equate to on yearly basis? (For example, considering savings on staff paid to fulfil EPR obligations)

A.2.0 Desk-Based Review

A.2.1 Longlist of Industry Associations for Position Paper Review

Table A 4 below provides the longlist of 26 industry associations which were searched online for position papers relevant to EPR administrative burden. Organisation name, type and product/service are recorded.

Table A 4. Longlist of industry associations

Organisation	Organisation type	Product/service
APEAL	Association of European Producers of Steel for Packaging	Packaging
BusinessEurope	Confederation of European Business- represents all sized enterprises in the EU	Various
Digital Europe	Industry association for digital technologies	EEE
Ecommerce Europe	European online retail association	Various- online retailers
EIPA	European Industrial Packaging Association	Packaging
EPBA Europe	European Portable Battery Association	Batteries
Eucobat	Association of national collection schemes for batteries	Waste battery collection
Euratex	European Textiles Association	Textiles
EuRIC	European Recycling Association	Various, including textiles
EUROBAT	Association for European automotive and industrial battery manufacturers	Batteries
Eurocoton	European Federation of Cotton and Allied Textiles Industries	Textiles

Organisation	Organisation type	Product/service
European paper packaging alliance (EPPA)	Association representing food and foodservice packaging companies	Packaging
Europen	Organisation representing the packaging industry value chain.	Packaging
Fefco	European Federation of Corrugated Board Manufacturers	Packaging
Flexible packaging Europe	Association representing the European Flexible Packaging Industry	Plastic packaging
Landbell	Service provider of take-back and recycling obligations for companies	Packaging, WEEE
Lighting Europe	European trade association	WEEE
Metal Packaging Europe (MPE)	European association for the metal packaging industry	Packaging
Plastics Recyclers Europe	Representative of European plastic recyclers	Various- plastics
Recharge Batteries	European association for advanced rechargeable and lithium battery manufacturers	Batteries
Reuse	Second-hand industry association	textiles
Recupel	Collects WEEE	WEEE
The Online Marketplace Coalition	European online Retail association	Various- online retailers
The European Consumer Electronics Retail Council	European Retail association	Various- online retailers
Toy Industries of Europe (TIE)	Represents toy manufacturers in the EU	Toys
WEEE Forum	Not-for-profit association for 36 WEEE PROs	WEEE

A.2.2 One-Stop Shop Research and Findings

A.2.2.1 Key Elements to Successful One-Stop Shops

To understand how successful existing one-stop shops are, Eunomia identified key features in successful existing one-stop solutions. Resulting success criteria are included in Table A 5. These features were derived from consideration of the following:

- Administrative issues and complexities caused by lack of harmonisation, the concrete impacts these had on businesses including SMEs (based on prior Eunomia reports) and aspects of a one-stop shop that would be necessary to address those specific impacts;
- Advantages of one-stop shops highlighted by the OECD;¹⁰¹
- Key aspects of one-stop shops pointed out by interviewees.

In practical terms, three key features appear to be common success criteria, though they may not, in themselves, guarantee success.

Table A 5. Key elements and success criteria for one-stop shops

Key elements	Success criteria
Informative website	Clear information on <i>all</i> obligations for the user and context for the one-stop shop.
Single platform	All steps necessary to the administrative process(es) can be done on that <i>same</i> platform without having to look or being redirected elsewhere.
Single process	Users complete a <i>single process once</i> , rather than duplicating <i>identical</i> processes to overcome their administrative burden.

A.2.2.2 Summary of One-Stop Shop Research and Findings

Table A 6 contains a summary of our evaluation of currently existing one-stop shops. We note that, despite a wide search of one-stop shops, only 15 fit the constructed definition above, and are currently active at EU level, and only these were evaluated, and not all information sought was readily available. As previously identified by the OECD, the one-stop shops analysed here were also varied in purpose, the extent of services provided, whether the tool is their own website or as part of a wider website, and many other elements.

¹⁰¹ OECD, *for Citizens and Business*.

Table A 6. Summary of one-stop shop research and findings

Basic information			Key elements to a successful one-stop shop		
Name	Provider	EPR related?	Informative website?	Single platform?	Single process?*
Avask	Avask	Yes	Yes	Yes	Yes
Deutsche Recycling	Deutsche Recycling Service Gmbh	Yes	Unclear	Unclear	Unclear
European e-Justice Portal	European Union	No	Yes	No	NA
European Recycling Platform (ERP)	Landbell Group (owns both the European Recycling Platform and the Landbell group platform)	Yes	Unclear	Unclear	Unclear
Landbell Group		Yes	Unclear	Unclear	Unclear
European Union Intellectual Property Office (EUIPO)	European Union Intellectual Property Office (EUIPO)	No	Yes	Yes	Yes
EU VAT one-stop shop	European Commission	No	Yes	Yes	Yes
Proposed directive on European cross-border associations	European Commission	No	Unclear	Unclear	Unclear
PV Cycle	PV Cycle	Yes	Unclear	Yes	Yes

Basic information			Key elements to a successful one-stop shop		
Name	Provider	EPR related?	Informative website?	Single platform?	Single process?*
Single Digital Gateway	European Commission	No	Yes	No	NA
The EU Single Window Environment for Customs	European Commission	No	Yes	Yes	Yes
TRACES	European Commission	No	Unclear	Yes	Yes
Valpak	Valpak and Reconomy	Yes	Yes	Yes	Yes
PRONEXA AG (former WEEE Europe)	PRONEXA AG (former WEEE Europe)	Yes	Yes	Yes	Yes
WeeeLogic	WeeeLogic	Yes	Unclear	Unclear	Unclear

* We have marked NA when the key element to success does not apply to this platform (i.e., the platform does not relate to administrative processes that are identical and could be reduced to a single process).

A.2.2.3 Evaluation of Non-EPR Related One-Stop Shops

Eunomia identified seven non-EPR related one-stop shops to evaluate. Of the seven non-EPR related one-stop shops, four stand out as the most successful. The EU VAT One-stop shop, the EU Single Window Environment for Customs, and the EU Intellectual Property Office (EUIPO) have all the key elements to be a successful one-stop shop. The fourth tool, Traces, also appears to be successful on two elements and very possibly the third, but Eunomia does not have sufficient visibility of the tool to determine how it measures versus the last element. These four tools were initiated and managed by European Institutions, suggesting that a centralised platform managed by EU-institutions is possible, even advantageous. **That all three success elements were met several times, suggests that effective one-stop shops are attainable at EU level.**

Of the key elements to a successful one-stop shop, 'informative website' is the most frequently met: five of seven one-stop shops display sufficiently clear information on all obligations for the user and the context for the tool, whilst the other two one-stop shops lack clear publicly available information online to determine whether they meet the success criteria. **This suggests that making a one-stop shop an informative website, that provides clear information on all obligations for the user, is a key and easy element to have.**

The 'single process' element - to avoid the repetition of processes – is another recurring feature. The EU VAT one-stop shop, The EU Single Window Environment for Customs, European Union Intellectual Property Office (EUIPO) and Traces allow economic actors to fill in a form once (per business requirement) which then applies across the entire EU or can be viewed by different actors across the EU who need to see the same documents. Where this element is not met, it is either non-applicable (e.g. the one-stop shop is used for processes that are typically individual, such as applying for a driving license) or remains unclear due to lack of online information. **This suggests that ensuring a single process is both an important and achievable trait for one-stop shops.**

Containing a one-stop shop within a single platform is the least met success element, with a couple of definitive 'no's. In the case of the Single Digital Gateway and the European e-Justice Portal, users are redirected, with the right information, and the right forms to fill in, to appropriate Member State authorities. **This lack of a 'single platform' may stem from the challenge of enabling all relevant Member State authorities to receive information from the one-stop shop.** This would require them to be online and connected to the one-stop shop. This will be a key challenge for any EPR-related one-stop shop, as such a tool would similarly have to coordinate data requests with PROs and national registers across the EU.

Successful examples were also suggested by interviewees, and align with the observations above. Two EU one-stop shops were pointed out in interview: the VAT one-stop shop (mentioned twice), and the EU Single Digital Gateway. ESBA described the EU Single Digital Gateway as providing information in one place and available in every language and with opportunities for feedback.¹⁰² Other 'one-stop shops' referenced were PRONEXA AG (former WEEE Europe), Deutsche Recycling, and PV Cycle.¹⁰³ European institutions sometimes perform customer satisfaction surveys on their platforms which provide an indication of their popularity. The EUIPO hit a record of 91% customer satisfaction in 2023 (from a survey of about 10% of its users).¹⁰⁴ A 2023 survey on Your Europe showed that 92.5% of citizen respondents and 90.3% of businesses found the portal satisfactory or better.¹⁰⁵

¹⁰² Interview with representatives from ESBA, 20 September 2024.

¹⁰³ Interview with representatives from WEEE Ireland, 19 September 2024.

¹⁰⁴ EUIPO, 'EUIPO Hits Record 91 % Customer Satisfaction in 2023 Survey', 2024, <https://www.euipo.europa.eu/en/news/euipo-hits-record-91-customer-satisfaction-in-2023-survey>.

¹⁰⁵ EU monitor, 'Annexes to COM(2023)534 - First Implementation Report on the Single Digital Gateway', 2023, https://www.eumonitor.eu/9353000/1/j4nvirkkr58fyw_j9vvik7m1c3gyxp/vm6fk20r6es5.

