

JBCE FEEDBACK ON RULES ON NATIONAL REGISTERS OF PRODUCERS UNDER THE PACKAGING AND PACKAGING WASTE REGULATION

INTRODUCTION

The Japan Business Council in Europe (JBCE) welcomes the European Commission's initiative to establish harmonised requirements for producer registration and reporting pursuant to Article 44 of the Packaging and Packaging Waste Regulation (PPWR)¹.

A harmonised framework has the potential to reduce administrative burden, simplify compliance procedures, improve consistency across Member States, and strengthen the functioning of the EU Single Market. These benefits are particularly important for companies operating across multiple Member States, as well as SMEs with limited compliance resources.

Administrative simplification measures should benefit all producers, irrespective of company size. While SMEs may face particular resource constraints, large and multinational companies operating across multiple Member States are also subject to significant administrative burdens arising from multiple registration systems, reporting obligations, reporting deadlines and data management requirements. Simplification and harmonisation measures should therefore be designed to reduce unnecessary administrative burdens across the entire value chain.

At the same time, ensuring an effective and practical framework requires more than reporting formats. It is equally important to prevent fragmentation across Member States, eliminate unnecessary duplication, and ensure that the framework supports the broader circular economy objectives of the PPWR.

¹ [Regulation \(EU\) 2025/40 on packaging and packaging waste \(PPWR\).](#)

KEY MESSAGES

- ❖ **Ensure EU Harmonisation Before National Implementation**
Finalise the common EU registration and reporting framework before PPWR-driven national requirements become applicable and avoid duplicative transitional procedures.
- ❖ **Eliminate Duplicate Reporting and Reduce Administrative Burden**
Allow collective EPR schemes and PROs to report on behalf of producers to avoid duplicate information submissions.
- ❖ **Reduce Compliance Burdens for Cross-Border Operators**
Simplify registration and Authorised Representative requirements for companies operating across multiple Member States.
- ❖ **Align Reporting Requirements with the Policy Objectives of the PPWR**
Ensure that reporting requirements support recyclability assessments and future eco-modulation mechanisms while avoiding unnecessary additional reporting obligations.
- ❖ **Ensure Practical Data Availability is Reflected in Reporting Requirements**
Base reporting obligations on data that companies can realistically collect and verify, while allowing flexibility where product-level reporting is not technically feasible.
- ❖ **Clear Separation Between Technical Documentation and EPR Reporting Obligations**
Ensure that Technical Documentation is not systematically used for producer registration or EPR reporting purposes.

1. Ensure EU Harmonisation Before National Implementation

JBCE supports the objective of harmonising producer registration and reporting requirements. However, the implementing regulation should ensure **the highest possible degree of harmonisation and minimise the scope for national deviations**. If Member States are allowed to introduce additional reporting elements or divergent requirements, businesses may face different data requirements and reporting approaches across the EU, thereby undermining the benefits of a common framework.

The Commission should therefore ensure a **harmonised set of packaging categories, reporting formats and data points across all Member States**. In addition, any additional

information requirements imposed by Member States should be limited to situations where they are objectively necessary and proportionate.

Harmonisation should cover not only the content and format of registration and reporting, but also the timing and sequencing of implementation across Member States. Article 44(1) of the PPWR envisages the establishment of national producer registers following the entry into force of the implementing act referred to in Article 44(14). Against this background, Member States should avoid introducing or expanding producer registration, reporting or related EPR administrative requirements in a manner that pre-empts the harmonised EU framework before that framework has been finalised and become operational. Companies should not be required to adapt first to transitional national requirements and subsequently modify their registrations, data structures and internal compliance processes again once the common EU framework becomes applicable. JBCE therefore calls for a coordinated sequence of implementation across Member States and an adequate transition period after the common EU framework has been established.

Furthermore, harmonisation of reporting formats alone may not sufficiently reduce the burden on companies operating across multiple Member States. Businesses would still be required to manage registrations, user accounts, reporting deadlines and compliance procedures separately in each jurisdiction. These duplicated compliance costs can represent a significant burden and may negatively affect operational efficiency and competitiveness, particularly for companies active in several Member States.

The Commission should explore the establishment of a **common EU registration and reporting platform as soon as possible**. Similar to the Poison Centre Notification system under the Classification, Labelling and Packaging Regulation², companies should be able to submit registration and reporting information through a single EU-level electronic system covering multiple Member States. Such an approach would contribute to administrative simplification, reduce compliance costs and strengthen the functioning of the EU Single Market. Avoiding unnecessary administrative costs would also help ensure that the implementation of the PPWR remains proportionate and cost-effective.

It is also important to adopt common EU definitions, packaging classifications, calculation methodologies, reporting formats and reporting periods, enabling the same packaging data to be reused across Member States. This would reduce the need for companies to repeatedly submit substantially identical information to different national systems, while improving consistency and reducing administrative burden.

The most significant burden for many companies often lies not in the reporting itself, but in the collection, maintenance and verification of packaging data across large product portfolios. The Commission should therefore promote the maximum re-use of packaging data across PPWR reporting, EPR obligations and future Digital Product Passport

² [Regulation \(EC\) No 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures \(CLP Regulation\)](#).

requirements. New reporting elements should only be introduced where there is a clear regulatory benefit and where the same information cannot reasonably be obtained from existing data sets.

In addition, consideration should be given to allowing producer registration and reporting to be submitted in English. Permitting the use of a common language would further reduce administrative burdens for companies operating across multiple Member States, improve consistency in reporting, and support the objectives of a harmonised EU framework.

2. Eliminate Duplicate Reporting and Reduce Administrative Burden

The regulation should explicitly allow collective EPR schemes and Producer Responsibility Organisations (PROs) to submit required information directly to national producer registers **on behalf of their member companies**.

Many producers already provide detailed packaging data to collective compliance schemes. Requiring companies to submit the same information separately to national authorities creates **duplicate reporting obligations**, increases administrative burden and raises the risk of inconsistencies between datasets.

Allowing PROs to report on behalf of producers would reduce duplicate reporting obligations, lower administrative costs for both producers and authorities, improve data quality and consistency, and facilitate a more efficient reporting process.

Experience in several Member States has already demonstrated the benefits of such an approach, with collective schemes verifying and submitting information on behalf of producers, thereby improving data accuracy and simplifying administrative procedures.

In addition, the framework should avoid requiring businesses to **re-submit information that has already been provided** through existing compliance mechanisms. Ensuring consistency between reporting systems and avoiding unnecessary duplication will be essential to reducing administrative burden and facilitating practical implementation.

3. Reduce Compliance Burdens for Cross-Border Operators

For companies operating across multiple Member States, registration obligations and Authorised Representative (AR) requirements continue to create significant compliance

burdens. This is particularly the case where a **single EU-established entity serves multiple national markets**.

In practice, many companies also continue to face difficulties in identifying the applicable registration procedures and obtaining the necessary guidance and support in some Member States. In several cases, registration requirements and processes remain unclear, creating additional compliance challenges and uncertainty for businesses operating across borders. Greater clarity, transparency and consistency across Member States would therefore facilitate compliance and help reduce unnecessary administrative burdens.

JBCE welcomes the Commission's review of AR requirements and encourages further simplification.

In addition, the availability and capacity of AR service providers may also become a constraint for timely compliance. As demand for such services continues to increase across multiple EU regulatory frameworks, companies may face difficulties in securing appropriate service providers and completing contractual arrangements within the required timelines.

For producers established within the EU, the need to appoint separate AR in each Member State should be reconsidered. Where appropriate, companies should be allowed to fulfil registration and reporting obligations directly.

For producers established outside the EU, consideration should be given to allowing a **single EU-established AR** to fulfil obligations across multiple Member States. Such measures would reduce unnecessary costs and complexity while preserving the regulatory objectives of the framework and improving the effective functioning of the Single Market.

To avoid the entrenchment of fragmented national registration systems and duplicative compliance burdens, the Commission should prioritise the establishment, as soon as possible, of a single EU-wide producer registration and reporting system. Requiring companies to register and report separately in up to 27 Member States would impose significant compliance costs on businesses. Such burdens would not merely increase costs for companies. An excessively complex and burdensome system could make compliance more difficult and increase the risk of non-compliance by some operators. This, in turn, could undermine a level playing field between companies that comply properly with the requirements and those that do not.

Furthermore, if companies are first required to register separately in each Member State, and if a single EU-wide system is subsequently established and companies are then required to migrate to it, they would have to adapt first to national systems and then again to the EU-wide system. This would effectively duplicate the administrative and system-related burdens.

In light of the above, the Commission should treat the EU-level integration of producer registration and Authorised Representative requirements as a priority, rather than merely as

a longer-term objective. In particular, consideration should be given to establishing a single EU-wide producer registration system and, where applicable, allowing a single EU-established AR to cover multiple Member States. Unnecessary differences in administrative requirements based solely on whether a producer is established within or outside the EU should also be avoided. Even if legislative changes are required to achieve such integration, this should not be used as a reason to delay efforts towards greater EU-level integration.

4. Align Reporting Requirements with the Policy Objectives of the PPWR

The PPWR aims to promote the transition towards a circular economy through measures including improved recyclability, the development of recycling technologies and infrastructure, increased use of recycled materials, and the promotion of bio-based materials.

JBCE believes that the reporting framework should also be designed in a manner that is **consistent with these policy objectives**. In particular, where the PPWR explicitly establishes links to recyclability assessments or broader circular economy measures, the reporting framework should be capable of collecting the information necessary to support such assessments and the future implementation of **eco-modulation mechanisms**.

At the same time, such information should be incorporated into the existing reporting framework wherever possible, rather than creating **additional reporting obligations** in the future. This would improve regulatory efficiency and help avoid unnecessary administrative burden for producers.

Conversely, reporting requirements should be limited to information that is clearly relevant to the objectives of the Regulation. With regard to composite packaging, technological development is increasingly moving towards **mono-material solutions** to improve recyclability, while Article 6 of the PPWR evaluates recyclability at the level of the **packaging as a whole**.

Against this background, it is difficult to determine to what extent the detailed declaration of all materials making up composite packaging contributes to improving recyclability or achieving broader circular economy objectives.

Moreover, even where certain information may be considered relevant from a policy perspective, its practical availability should also be carefully assessed. In many cases, producers do not currently have access to detailed information on specific plastic categories, such as PET, PE and PP, as such information is not systematically collected or reported under existing EPR schemes. Requiring the collection of such data may entail significant adjustments to internal systems and supply chain information flows. The

Commission should therefore assess data availability before introducing detailed reporting requirements, provide simplified reporting options where appropriate, and allow sufficient transition periods for implementation.

JBCE therefore encourages the Commission to carefully assess the **necessity and policy value** of such reporting requirements and to avoid imposing additional reporting burdens where tangible benefits cannot be clearly demonstrated

5. Ensure Practical Data Availability is Reflected in Reporting Requirements

Harmonised reporting requirements across the EU are essential to ensure consistency and reduce **compliance burdens**. However, reporting obligations should be based on data that companies can realistically collect, manage and verify through existing business processes.

In particular, certain packaging elements used in logistics, transport and warehousing operations may be difficult to track and allocate at **product level**, even where companies are able to monitor and verify such data accurately at **warehouse or facility level**. Reporting requirements should therefore allow sufficient **flexibility** where product-level reporting is not technically feasible, while maintaining transparency, auditability and an appropriate level of accuracy.

A harmonised EU approach to reporting methodologies would help ensure consistency across Member States and reduce unnecessary compliance burdens.

6. Clear Separation Between Technical Documentation and EPR Reporting Obligations

Recital 9 and Article 2(4) of the draft implementing regulation envisage the use of information contained in Technical Documentation for registration and reporting purposes. While the objective of improving data quality, consistency and administrative efficiency is understood, Technical Documentation and EPR reporting serve **different regulatory purposes** and should remain clearly separated.

Technical Documentation under the PPWR is intended to demonstrate compliance with product-related requirements, whereas producer registration and EPR reporting are designed to support the implementation and financing of EPR schemes. These obligations may involve **different economic operators** within the supply chain and rely on different sources of information.

Using Technical Documentation as a systematic source for registration or reporting purposes could create significant **administrative burdens** and operational complexity, particularly for companies operating across multiple Member States. It may also raise concerns regarding the protection of **confidential business information and intellectual property**. The objectives, scope and information requirements of these instruments should therefore remain **clearly differentiated**.

CONCLUSION

JBCE supports the Commission's objective of establishing a harmonised producer registration and reporting framework under the PPWR.

To deliver the intended benefits of harmonisation, the framework should minimise **national deviations, avoid duplicate reporting obligations, reduce administrative burdens** for companies operating across multiple Member States, and facilitate the **re-use of data** across regulatory requirements. Reporting obligations should remain proportionate, reflect practical data availability, and avoid creating unnecessary links between Technical Documentation and EPR reporting requirements. Particular attention should be given to practical implementation, including the **availability of required data, proportionality of reporting obligations**, and the need for **adequate transition periods**.

In designing the framework, due consideration should be given to both the effective functioning of the **EU Single Market** and the achievement of the PPWR's **circular economy objectives**. A **harmonised, practical and future-proof system** will support compliance, improve regulatory efficiency and contribute to a more competitive and sustainable European economy.

ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 115 multinational companies. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceuticals, textiles, and glass products.

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