



Federation of the European
Sporting Goods Industry

FESI Position Paper

Feedback on the Environmental Omnibus Proposal

April 2026

The Federation of the European Sporting Goods Industry (FESI) welcomes the opportunity to provide feedback on the European Commission's Environmental Omnibus proposal published in December 2025.

FESI represents approximately 1,800 sporting goods manufacturers across Europe, accounting for around 85% of the European sporting goods market. The sector employs over 700,000 people and generates an annual turnover of around €81 billion. A large majority of FESI members are small and medium-sized enterprises (SMEs).

FESI strongly supports the European Commission's objective of simplifying environmental legislation, reducing administrative burdens, and improving the coherence and effectiveness of EU rules while maintaining high environmental ambition.

The Environmental Omnibus represents an important step toward improving the workability of EU environmental legislation for companies operating across the Single Market. However, while the proposal addresses several long-standing concerns raised by industry, further improvements are needed to ensure a coherent and efficient framework for circular economy policies.

1. Positive elements of the Environmental Omnibus proposal

FESI welcomes several measures included in the proposal that respond directly to concerns previously raised by the sporting goods industry in its response last year.

a. Suspension of the obligation to appoint authorised representatives

FESI strongly supports the Commission's proposal to suspend the obligation for EU-based producers to appoint authorised representatives when placing products on the market of another Member State under Extended Producer Responsibility (EPR) frameworks.

The current requirement creates significant administrative burdens and introduces barriers to cross-border trade within the Single Market. The need to appoint national authorised representatives

generates additional costs and administrative complexity, particularly affecting SMEs and companies operating in multiple Member States.

The proposed suspension until 2035 represents an important step toward a more harmonised and workable compliance framework across the EU.

Industry organisations, including FESI, have also highlighted that national authorised representative requirements risk reinforcing market fragmentation and discouraging cross-border activity. A more effective approach would rely on digital and interoperable compliance tools at EU level rather than local representation requirements.

FESI therefore encourages the European Parliament and the Council to maintain this suspension during the legislative process.

b. Repeal of the SCIP database reporting obligation

FESI also welcomes the proposal to repeal the obligation to submit data on articles containing Substances of Very High Concern (SVHCs) to the SCIP database.

While the database was intended to improve transparency on substances of concern, it has proven to be an extremely burdensome exercise for many sectors, particularly those with complex global supply chains such as textiles, footwear and sporting goods.

In practice, SCIP reporting has resulted in duplication with existing obligations under REACH and emerging requirements under the Digital Product Passport (DPP). Removing the database requirement will reduce administrative burden without compromising the EU's chemical safety objectives, especially if relevant information is integrated into future digital product systems.

c. Harmonisation of reporting frequency

FESI supports the proposal to harmonise the reporting frequency for producers under Extended Producer Responsibility schemes to a maximum of once per year.

This change will help reduce administrative complexity and improve consistency across Member States, which is currently lacking due to diverging national requirements.

2. The proposal is a welcome first step but should be more ambitious

While the Environmental Omnibus addresses several key issues raised by industry, FESI believes the proposal remains relatively limited in scope.

Many structural challenges affecting the implementation of EU circular economy legislation remain unresolved. Addressing these issues will be essential to ensure that environmental legislation supports both sustainability objectives and the competitiveness of European industry.

FESI therefore encourages the European Commission, European Parliament and Council to further strengthen the proposal during the legislative process and to address the remaining issues through the upcoming Circular Economy Act and related legislative initiatives.

3. Priority areas that should still be addressed

a. Establishing an EU-wide EPR Digital One-Stop Shop

One of the most pressing challenges for companies is the growing fragmentation and complexity of Extended Producer Responsibility (EPR) systems across the EU.

Companies currently face multiple registration, reporting and payment obligations across Member States and waste streams. A company selling products across all 27 Member States may need to manage dozens of parallel compliance processes across packaging, textiles, batteries and electronics. This increasing complexity further highlights the need for a more ambitious and harmonised approach to EPR, including for textiles under the Waste Framework Directive.

FESI therefore strongly supports the creation of a free EU-wide digital one-stop shop for EPR information, registration and reporting.

Such a system would:

- provide a single point of entry for EPR obligations across the EU
- streamline registration and reporting processes
- facilitate digital data exchange with national registries and Producer Responsibility Organisations
- significantly reduce administrative burdens for companies

FESI encourages the Commission to include the legal basis for such a system in the Circular Economy Act.

b. Ensuring fair treatment of apparel and footwear within EPR schemes

FESI emphasises the importance of ensuring fair and proportionate treatment of apparel and footwear within Extended Producer Responsibility (EPR) schemes, particularly in the context of the upcoming EU textiles EPR framework under the Waste Framework Directive.

Apparel and footwear have distinct value chains, lifecycles, and sustainability challenges compared to other textile categories. These differences should be adequately reflected in the design and implementation of EPR systems to ensure that obligations remain fair, effective, and aligned with circular economy objectives.

In particular, policymakers should:

- recognise the specific characteristics of sporting goods, footwear, and performance apparel;

- ensure that eco-modulation criteria are based on ESPR ecodesign criteria, evidence-based, transparent, and appropriate to the sector;
- avoid disproportionate administrative and financial burdens, especially for SMEs;
- promote durability, reparability, reuse, and innovation in sustainable materials;
- ensure coherence and consistency across EU legislation.

A balanced and sector-sensitive approach will support environmental objectives while safeguarding competitiveness, innovation, and consumer choice within the European sporting goods industry.

c. Alignment of EPR fee structures and avoidance of double payment

FESI believes that the current system for eco-modulation of EPR fees lacks sufficient coordination with other EU legislation, particularly the Ecodesign for Sustainable Products Regulation (ESPR).

To improve coherence and predictability for companies, EPR fee modulation criteria should be aligned with ecodesign performance requirements defined under ESPR delegated acts.

In addition, mechanisms should be introduced to avoid double payment of EPR fees when products are placed on the market in one Member State but later sold in another.

FESI recommends applying the principle that EPR fees should be paid in the Member State where the product is most likely to become waste, supported by harmonised EU reporting tools.

d. Improving coherence between EU circular economy legislation

The rapid expansion of EU circular economy legislation has created overlapping obligations across several legislative frameworks, including:

- Waste Framework Directive (WFD)
- Ecodesign for Sustainable Products Regulation (ESPR)
- REACH Regulation
- Packaging and Packaging Waste Regulation (PPWR)

Greater alignment is needed between these frameworks, particularly regarding:

- the definition of producer
- definitions of substances of concern
- reporting requirements
- end-of-waste criteria
- data requirements under future Digital Product Passports.

Improving coherence across these instruments will reduce duplication and enhance legal certainty for companies operating across multiple markets.

e. Avoiding fragmentation caused by national labelling schemes and waste sorting instructions

FESI is increasingly concerned about the proliferation of national environmental labelling schemes and waste sorting instructions across the European Union, which risk undermining the integrity of the Single Market.

Divergent national requirements, particularly those related to consumer information on product disposal, recyclability, and material composition, create significant operational and financial burdens for companies placing products on multiple EU markets. These include varying rules on sorting instructions, recycling logos, colour codes, and labelling formats. As a result, companies are often required to adapt packaging, product markings, or accompanying documentation on a country-by-country basis, leading to increased costs, legal uncertainty, and logistical complexity.

For sectors such as sporting goods, textiles, and footwear, characterised by complex supply chains and high levels of cross-border trade, such fragmentation disproportionately affects small and medium-sized enterprises (SMEs) and risks discouraging innovation and market access.

Moreover, inconsistent national labelling systems may confuse consumers, reduce the effectiveness of waste sorting, and ultimately hinder the achievement of EU circular economy objectives.

To preserve the functioning of the Single Market and ensure regulatory clarity, FESI calls for:

- **Harmonised EU rules** on environmental labelling and consumer waste sorting instructions;
- **Mutual recognition or standardisation** of symbols and information requirements across Member States;
- **Alignment with existing and upcoming EU legislation**, including the Packaging and Packaging Waste Regulation (PPWR), the Waste Framework Directive (WFD), and the Ecodesign for Sustainable Products Regulation (ESPR);
- **The use of digital solutions**, such as the Digital Product Passport, to complement or replace physical labels where appropriate;
- **The prevention of additional national requirements** that duplicate or conflict with EU-wide systems;
- **Clear guidance from the European Commission** to ensure consistent implementation across Member States.

FESI therefore urges EU policymakers to prioritise harmonisation and avoid the introduction of divergent national measures that create barriers to trade. A coordinated EU approach will enhance consumer understanding, support efficient waste management, and safeguard the competitiveness of European industry while reinforcing the objectives of the circular economy.

f. Simplification of reporting obligations under the REACH microplastics restriction (Entry 78)

FESI also welcomes the planned simplification measures related to environmental monitoring and reporting systems (EMS), which are fully aligned with the objectives of the Environmental Omnibus proposal.

Under the REACH Regulation (EC) No 1907/2006, Annex XVII, Entry 78 on the restriction of intentionally added microplastics, annual reporting obligations have been introduced that also apply to industrial downstream users, notably under paragraph 11.

In practice, this requirement may lead to duplicate reporting along the value chain, as the relevant information, such as polymer identity, concentration, and function, is already generated by the manufacturer or first supplier. This creates unnecessary administrative burdens without delivering additional environmental benefits.

From FESI's perspective, this represents a clear example of an environmental reporting obligation that could be assessed under the Omnibus logic, in line with the "once-only" principle. Similar to other cases where environmental information duties originate from different legal frameworks, simplification would improve efficiency, reduce duplication, and enhance regulatory coherence across EU legislation.

For sporting goods and textile applications, relevance may arise in specific cases where formulations contain polymeric particles with a functional role. These include:

- effect or glitter particles;
- microcapsules used for functional finishes, such as fragrance or thermoregulation;
- thermoplastic powder applications where polymer particles are not fully fixed or transformed during processing.

To address these challenges, FESI encourages EU policymakers to streamline reporting obligations by ensuring that information is submitted only once along the value chain and can be reused by relevant authorities. Such an approach would maintain the environmental objectives of the microplastics restriction while significantly reducing unnecessary administrative burdens for industry.

g. Clarifying the relationship between product status and waste

The industry also continues to face legal uncertainty regarding the distinction between products and waste, particularly concerning unsold goods and product donations.

Clearer guidance on how Extended Producer Responsibility obligations apply in these situations would help avoid divergent interpretations across Member States and support the reuse and donation of products where appropriate.

h. Addressing the environmental impact of counterfeit products

Counterfeit products represent not only an intellectual property issue but also an environmental challenge.

Such products often fail to comply with EU chemical and product safety legislation and can contaminate recycling streams, undermining circular economy objectives.

FESI encourages the EU to strengthen measures preventing counterfeit goods from entering the internal market and to ensure their safe destruction.

4. Next Steps

FESI welcomes the Commission's announcement that further reforms of Extended Producer Responsibility systems will be addressed in the upcoming Circular Economy Act, expected in 2026.

This initiative presents a key opportunity to:

- establish an EU digital one-stop shop for EPR compliance
- further harmonise EPR systems across Member States
- improve coherence between circular economy legislation.

FESI stands ready to work with EU institutions and stakeholders to develop practical solutions that deliver environmental benefits while ensuring the competitiveness and scalability of European businesses.

Conclusion

FESI supports the Environmental Omnibus proposal as a constructive first step toward simplifying EU environmental legislation.

The suspension of authorised representative requirements, the repeal of the SCIP database, and the harmonisation of reporting obligations represent meaningful improvements for companies operating in the Single Market.

However, further action will be required to address the structural complexity of EU circular economy legislation.

FESI therefore encourages policymakers to build on the current proposal by addressing remaining issues in the ongoing legislative process and through the forthcoming Circular Economy Act.

A coherent, digitalised and harmonised framework will be essential to ensure that environmental legislation delivers both sustainability objectives and a competitive European economy.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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