

Recommendations for the establishment of a digital, EU-wide One-Stop Shop for Extended Producer Responsibility under the Circular Economy Act proposal

In the last two years, an informal Coalition of organisations with an interest in addressing fragmentation in the Extended Producer Responsibility (EPR) landscape in the EU has been discussing concrete solutions to meet the challenges related with EPR compliance and enforcement across product streams and Member States. For example, the administrative burden, cost and resource allocation required to comply with a fragmented EPR landscape across the EU are diverting companies' time and capacity away from developing more sustainable and circular products¹. In parallel, the lack of efficient, systematic and coordinated enforcement at the EU level is eroding the level playing field and depriving national waste management infrastructures of needed resources.

The Coalition has been busy defining the concept of a digital EU-wide One-Stop Shop (OSS), whose main objectives are to simplify EU-wide EPR compliance and facilitate efficient and effective enforcement across borders and product groups. While a digital OSS would significantly reduce administrative burdens, it should complement, not replace, continued efforts towards greater harmonisation of EPR requirements across Member States.

With a view to the formalisation of the Circular Economy Act (CEA) by the European Commission, the Coalition for a digital EU EPR OSS urges the executive to propose the establishment of a digital, EU-wide One-Stop Shop for EPR as part of the abovementioned legislative initiative.

Drawing on the discussions within the Coalition, we lay out our vision on the concept of the OSS and its functionalities. Subsequently, we formulate our recommendations on its design.

What is a One-Stop Shop for EPR

The precise definition of a One-Stop Shop is closely interlinked with its specific model and use. However, the OECD summarises the concept as 'a streamlined and easy-to-use interface between government and citizens or business' and 'a very effective way to communicate regulatory requirements more clearly'². The OECD also concedes that One-Stop Shops 'do not offer a single solution but are part of an overall network'³.

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 and more traceable for entities running EPR schemes and monitoring EPR compliance. It is undeniable that the insufficient levels of harmonisation across product streams and EU countries as regards registering, reporting, and paying of fees, as well as eco-modulated fee structures, and the lack of interoperability between registers render both compliance and enforcement difficult and costly.

Consequently, a **One-Stop Shop (OSS) for EPR is a single digital platform allowing (1) the input of EPR-relevant data by producers (and/ or other actors acting on their behalf) making available products subject to EPR schemes in up to 27 Member States, and (2) the pulling of that data,**

¹ Ecommerce Europe, [Extended Producer Responsibility Administrative Burden and One Stop Shops](#), April 2025. According to a survey conducted as part of this report, the average staff hours required to comply with EPR obligations across products and countries on a yearly basis, ranges from 1 staff hour to 4,000 staff hours (the equivalent of 500 workdays). Costs can be attributed to paying staff to oversee complex EPR compliance (from 200 EUR to 400,000 EUR on a yearly basis).

² OECD, [One-Stop Shops for Citizens and Business](#)

³ *Ibid.*

after its validation and harmonisation through translation, by PROs and Member States' registers and authorities.



The OSS is:	The OSS is NOT:
<p>A single digital platform that connects producers, PROs, national registers, and authorities through one interface. Its use by producers is optional but incentivised when producers offer products covered by different EPR schemes and/ or make those available in multiple Member States</p>	<p>A replacement for national EPR registers. National systems remain in place and continue to hold aggregated compliance data</p>

<p>An intermediary digital layer that acts as a gateway to securely transmit information between producers, Authorised Representatives, online marketplaces, PROs, auditors, national registries, and authorities via Application Programming Interface (API) connections and standardised data formats (XML, JSON, CSV)</p>	<p>A central European EPR register. It does not centralise or permanently store all EPR compliance data in one database</p>
<p>A functional platform where producers can register, report across EU Member States and be updated on latest official information on EPR</p>	<p>A simple website with EPR-related information or hyperlinks redirecting to national EPR schemes procedures</p>
<p>A compliance facilitation tool that helps producers understand and meet their EPR obligations, supported by digital technology and AI where possible</p>	<p>A regulatory or enforcement body. The OSS does not set rules, interpret law, or enforce EPR obligations and national authorities retain full enforcement powers</p>
<p>A platform that issues a single EU-wide EPR registration ID mapping to all national registration numbers</p>	<p>A substitute for direct relationships. Producers retain direct communication channels with national registers and authorities</p>

Uses and benefits for producers (and those acting on their behalf)

Whether the products are made available online and/ or in physical stores, producers, their Authorised Representatives, or providers of online marketplaces acting in the stead of sellers using their platform, shall be able to use the digital EU EPR OSS platform to perform the necessary steps to fulfil compliance with EPR rules in up to 27 Member States. Concretely, producers and those acting on their behalf should be able to:

- Obtain straightforward, tailored and up-to-date **information on national EPR requirements**, information on country-specific rules and criteria, including fee modulation criteria, and product classification.
 - Benefits: optimisation of the resources spent to understand applicable EPR obligations.
- **Register** with the relevant national registers and PROs by providing pertinent and accurate data only once.
 - Benefits: prevention of multiple submissions and/ or data adjustments to fill different templates and interactions with different national interfaces and procedures.
- **Facilitate** the transfer or update of registration information for producers already registered in one or more Member States when expanding or adapting their EPR obligations across the EU.
 - Benefits: reduced administrative burden for businesses already complying with EPR requirements and easier expansion into additional Member States.
- **Report** compliance data directly through the platform to national PROs and/ or national registers.
 - Benefits: prevention of multiple submissions and/ or data adjustments to fill different templates, no need to interact with different national interfaces and procedures.
- Obtain a **single registration ID for EPR**.
 - Benefits: checking and tracking EPR compliance across product streams and EU Member States.

Uses and benefits for PROs

PROs shall be able to use the digital EU EPR OSS to audit and verify producers' data in a more efficient way across product categories and countries, while engaging with producers and registers in a more collaborative environment. Via the platform, PROs should be able to:

- Offer producers services allowing fulfilment of **registration, reporting and compliance** in multiple Member States.
 - Benefits: ability to communicate regulatory changes to producers in a streamlined fashion.
- Receive more accurate **registration and reporting** data for multiple Member States from producers through one centralised channel and in a standardised form (e.g., registration evidence, product data).
 - Benefits: accurate waste reporting and potentially higher eco-fee collection

Uses and benefits for registers and authorities

Authorities enforcing EPR and/ or running national registers shall be able to use the digital EU EPR OSS to check compliance cross-borders, thanks to increased digitalisation and interoperability which the OSS will bring about. Specifically, authorities should be able to:

- Monitor **compliance** across borders in the EU (e.g., identification of obligated producers, confirm registrations, and cross-check reporting).
 - Benefits: more efficient enforcement and systematic collection of fees, reduction of free riding practices due to alleviation of compliance burdens.

How should a functional digital EU EPR OSS be designed

To deliver on the abovementioned objectives, we demand the European Commission to design the digital EU EPR OSS in accordance with the following recommendations.

- **Format of the legislative instrument.** The digital EU EPR OSS should be established via a proposal for a Regulation setting out its essential requirements (general provisions, services and structure of the platform, governance, security, responsibilities). The proposal for a Regulation should be accompanied by an Annex listing the minimum technical specifications for the OSS (i.e., platform architecture). A public tender could be launched at the end of the legislative procedure to develop the technology supporting the OSS.
- **Content of the proposal for a Regulation establishing the digital, EU-wide One-Stop Shop for Extended Producer Responsibility.**
 - Services of the platform
 - **Education on EPR obligations.** Provide clear, plain-language information on EPR schemes across Member States, including a dedicated section guiding online marketplaces on how third-party sellers can meet their EPR obligations.
 - **EPR registration and reporting.** Collect data and information required by national EPR schemes/registers in a safe environment managed by the owner of the platform, that is, either the European Commission or a neutral party which can guarantee the confidentiality of the captured data and is independent of private interests, and support digital authorisations/signatures.
 - Consolidate all collected information and request any additional data needed to meet national eco-modulation rules.
 - Populate customised registration templates for producers.
 - Verify completed templates and allow granular registration/reporting options, including registration without pre-declaring product volumes or, where required, simultaneous registration and declaration of expected quantities.
 - **EPR compliance.** Forward registration templates to the appropriate national entities (PROs, independent register managers, or authorities) and ensure validation is only possible when PRO contracts are in place.
 - Issue a unique EU-wide EPR registration ID and map all national EPR numbers to this single identifier.
 - Notify sellers of their compliance status, including expiry of registration numbers, inactivity, de-registration, reporting deadlines, required digital signatures, and any changes in obligations.
 - Structure of the platform

- The platform could be either set up and maintained by the European Commission (or a European authority) or by a neutral party which can guarantee the confidentiality of the captured data and is independent of private interests.
- Member States must ensure that national registers are interoperable with the OSS.
- PROs should actively facilitate data entry for the producers in their countries.
- The use of the OSS platform should be free of charge.
- The platform should be available in all official languages of the EU.
- Security and data protection
 - Data and potential financial flows hosted or facilitated by the platform shall be secured against unlawful access and unauthorised disclosure by means of strong safeguards and explicit access rights.
 - Access to information such as single registration ID shall be regulated by means of security measures (e.g., two-factor authentication)
 - All personal data and sensitive government information shall be processed and stored exclusively within the EU or EEA, with documented controls preventing data transfer outside these jurisdictions.
 - The platform shall implement encryption for data in transit and at rest using industry-standard cryptographic protocols, including SSL certificates to secure data transmitted between users and the server.
 - The platform operator should hold relevant security certifications such as ISO/IEC 27001, SOC 2 Type II, or equivalent recognised standards. If processing payments, the platform must be compliant with PCI standards. The platform must comply with GDPR.
 - The platform shall implement role-based access controls and comprehensive audit logging of all access to data and system configurations.
 - The platform must implement redundant systems with automated failover mechanisms, regular automated backups, and clear recovery protocols to ensure business continuity.

List of signatories:

Amazon



Back Market



Bevh (Bundersverband E-Commerce und Versandhandel)



Comeos



Computer & Communications Industry Association (CCIA Europe)



Ebay



Ecommerce Europe



Ecosistant



Edana



EURATEX



European Community of Consumer Cooperatives (Euro coop)



European Recycling Platform (Landbell Group)



EUROPEN



Fesi (Federation of the European Sporting Goods Industry)



Independent Retail Europe



Osapiens



Toy Industries of Europe

