

1 **Note to the European Commission: Fragmentation in EPR Packaging registration and opportunities to** 2 **harmonize**

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4 Under the Packaging and Packaging Waste Regulation (PPWR), Regulation (EU) 2025/40, producers must
5 register in each Member State where they first make packaging available (Single Producer Registration),
6 and Online Marketplaces (OMP) must validate producer's EPR compliance before listing. Similar obligations
7 apply to Fulfilment Service Providers (FSPs) that also must validate producer's EPR compliance before
8 providing their services. Article 44(14) requires the European Commission to adopt implementing acts
9 establishing a harmonized registration and reporting format, ensuring uniform EU-wide conditions, and
10 Member States must establish national digital registers and processes that follow these unified standards.
11 The implementing acts offer an opportunity to streamline registration across countries, reduce friction for
12 producers and online marketplaces, eliminate duplication, lower administrative burden, improve data
13 quality, and enable cross-stream interoperability (e.g., packaging, batteries, WEEE).

14
15 To understand the current state of EPR packaging registration and identify harmonization opportunities,
16 we conducted a comprehensive analysis of registration requirements in 10 Member States: Germany,
17 France, Spain, Ireland, Netherlands, Portugal, Sweden, Poland, Italy, and Belgium. We went through the
18 end-to-end registration process using sample credentials to document registration data requirement and
19 compared these requirements to PPWR Implementation Act Annex I to identify where further alignment is
20 needed at country level. We also documented key barriers producers will face to successfully register and
21 for OMPs to validate producers' compliance against national registers.

22 **Important note:**

- 24 1. This document only covers fragmentation in registration requirements. Fragmentation in reporting
25 requirements is expected to be greater and requires separate analysis.
- 26 2. Registration for four countries (Spain, Sweden, Poland, and Belgium) has been partially captured.
27 Spain, Sweden, and Poland require national electronic identification (eID) systems for portal access,
28 while Belgium uses an offline process. Italy also required eID, but we completed registration using
29 credentials. Therefore, for these four countries, we could not proceed with registration beyond a
30 certain point, suggesting potentially more fragmentation than what is documented in this note.
- 31 3. This research was commissioned by Amazon. The findings were developed in an advocacy context to
32 inform public policy discussions.

33 **Key Findings**

- 34 **1. Producers face excessive registration requirements** (see Table 1 and 3). Our research identified 64
35 unique registration fields with significant variation across the 10 countries. Of these, 51 fields (80%)
36 are mandatory in at least one country, 10 fields (16%) are conditional, and 3 fields (4%) are optional.
37 Several fields exceed producer identification objectives, requesting information better suited for
38 reporting or duplicating existing data.
- 39 **2. Countries have highly fragmented registration requirements** (See Table 2 and 3):
 - 40 a. On average, countries require 15 fields (87% mandatory). Requirements range from 11 fields (BE
41 and ES) to 21 fields (Sweden).
 - 42 b. 35 fields (55%) are country-specific, requested by only one of the ten countries, while 83% of
43 fields are asked by an average of just 3 countries, highlighting extreme fragmentation across
44 countries.
- 45 **3. Low alignment with PPWR Implementation Act Annex 1 (see table 3):** Only 27% of fields (17 fields)
46 align with PPWR IA Annex I Parts A, B, or C. This means 73% of fields (47 fields) currently required by

47 countries are not covered in PPWR IA, representing significant opportunity to reduce registration
48 burden through harmonization.

- 49 **4. Field removal recommendations (see table 4):** We recommend removing 37 fields across the 10
50 countries analysed. Rationale for removal is based on (i) PPWR IA Annex I does not require the
51 information; (ii) registration should focus on producer identification, not reporting-stage data; (iii)
52 fields are redundant or duplicate existing information; (iv) fields are asked by specific countries with no
53 EU-wide trend/need.
- 54 **5. Opportunity for OMP-facilitated producer registration:** OMPs potentially hold most producer
55 identification data required for registration (e.g., through KYC, Catalog systems). This enables OMPs to
56 help producers register by collecting missing information, validating all data, and submitting
57 registration information directly to PROs and registries (with producer consent) through streamlined,
58 automated processes. After registration, OMPs can share the ERN with producers. This approach uses
59 OMPs' existing data, reduces friction for small producers, efficiently handles high volumes for PROs,
60 and maintains individual producer accountability while ensuring proper registration.

61 **Other registration challenges for producers and OMPs**

- 62 1. **Time to Register:** Registration timelines vary between 2 and 6 weeks based on the country. In some
63 countries this may be longer due to dual registration requirements (with registry and with PRO).
- 64 2. **High Registration Costs:** Registration costs through service providers are high, especially for non-
65 resident sellers requiring Authorized Representatives (AR). For producers operating across multiple EU
66 markets, these upfront costs create substantial barriers to market entry, particularly for small and
67 medium-sized enterprises.
- 68 3. **Varying login and authentication processes across countries (Electronic ID (eID) Authentication vs**
69 **Email):** 4 countries (Spain, Sweden, Poland, Italy) mandate national eID systems to complete the
70 registration process, while other countries use email-based authentication with activation links and
71 verification codes.
- 72 4. **Restrictions on who can complete the registration:** Many countries limit registration to producers or
73 Authorized Representatives only. In DE, a third party is not allowed to complete registration. This is not
74 in line with recent EU legislative developments, where in December 2025, the EU Commission
75 presented two legislative proposals - *COM(2025) 982 (batteries and packaging)* and *COM(2025) 983*
76 *(general waste, WEEE, and single-use plastics)*, providing for suspension of mandatory AR appointment
77 for EU-based producers selling products in other Member States until January 2035 and suggests
78 providing "alternative options" to traditional AR requirements for third-country producers. This EU
79 policy direction signals clear recognition that the traditional AR model creates disproportionate burden
80 and that innovative approaches are necessary for effective cross-border EPR compliance.
- 81 5. **Dual registration requirements (PRO + National Registry):** In several countries, producers must
82 register with both a Producer Responsibility Organization (PRO) and a national registry, thereby
83 duplicating effort and increasing time.
- 84 6. **Offline registration processes:** Belgium requires offline registration via email to Valipac, followed by
85 manual forms and signed contracts. This prevents digital, scalable marketplace-facilitated registration
86 and causes weeks of delays.
- 87 7. **Excessive fields at registration stage:** 73% of fields (47 fields) exceed PPWR minimum requirements.
88 Countries request reporting-stage data (packaging volumes, material breakdowns, turnover figures) at
89 registration. This conflates registration (proving identity and right to operate) with reporting
90 (demonstrating compliance), requiring sellers to provide data they often lack at the time of
91 registration.
- 92 8. **Non-digitized registers and lack of API access:** National registries lack API access or bulk verification
93 capabilities and do not provide ERN expiry dates or expiry reasons. This prevents online marketplaces

- 94 from programmatically checking seller compliance status or facilitating bulk registrations, and limits
95 producers' and OMPs' ability to proactively maintain compliance.
- 96 9. **No Auto-renewal of ERN in some countries:** Some countries (Sweden, Poland, Ireland) require annual
97 registration renewal even when sellers operate continuously and report on time.
- 98 10. **Language Barriers:** Registration portals in 8 countries are only available in local languages, creating
99 barriers for non-native speakers.

Recommendations

Registration Process

- **Standardize login and authentication processes across countries.** Currently 4 countries require national eIDs to complete registration, while other countries follow email-based login methods. Harmonizing this would reduce registration friction for producers selling across multiple countries.
- **Eliminate dual registration requirements:** Consolidate registration into single touchpoint (PRO or registry, not both) to reduce duplication and timelines.
- Member states should adopt **online-only registration processes** through portals and avoid offline processes.
- **Allow OMPs to facilitate registration on behalf of producers without being designated as ARs.** Considering point 5 in the Key Findings section, OMPs should be allowed to collect registration information from producers and submit directly to registries or PROs through streamlined processes and automated data sharing (with producer consent and robust validation processes) to facilitate individual producer registration. This approach leverages OMPs' existing producer data, reduces registration friction especially for small producers, and handles high volumes efficiently for PROs while maintaining individual producer accountability.
- **Auto-Renew ERNs based on reporting Compliance:** ERNs should automatically renew when producers submit timely reports and have paid necessary fees; eliminate manual renewal requirements.

Registration Information

- Registration requirements must be limited to PPWR IA Annex 1 fields. Member States seeking additional data must justify necessity and demonstrate compliance with Single Market objectives and proportionality principles.
- Registration data should be limited to essential data points necessary to verify producer status and obligations, leveraging already-verified sources (like KYC).
- Redundant and excessive information fields that do not support producer identification should be removed. Data relevant to reporting like product-level data, packaging volumes, and operational details should be deferred to the reporting stage. Table 4 provides detailed analysis with specific field removal recommendations, including rationale for removal.

National Register:

- Member States must establish a mandatory national register as a single source of truth. Member States should build upon existing EPR registries to become their national packaging registry, as opposed to creating a new one.
- National registers must be digitized and provide Application Programming Interface (API) access for automated data exchange, seamless registration, and compliance verification checks by OMPs and FSPs. Where API access is unavailable, bulk download capabilities should serve as a minimum for compliance checks at scale. Registries should publish the entire list of producers – both in-country and out of country producers. Registries should clearly communicate how often their data is refreshed and the lag time between a seller's PRO registration completion and when that registration is published and visible in the registry. Registries must also offer flexible, non-case-sensitive search functionality and make the following fields publicly accessible for accurate validation and proactive compliance: EPR registration number, business legal name, registered company address, Tax ID, brand name, ERN expiry date and reason, AR details, and PRO details. English language accessibility is essential to allow OMPs and OOC sellers to navigate registries effectively across jurisdictions.

101 **Appendix**

102 **Table 1: Breakdown of 64 fields unique fields**

Category	Number of Fields	% of Total
EPR-Specific Information - Product & Packaging	18	28%
Company Identification Details	10	16%
Process/Administrative Fields	8	13%
Declarations & Confirmations	8	13%
Financial Information	6	9%
Contact Person Information	5	8%
Company Operational Details	5	8%
Authentication and Access	4	6%

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104 **Table 2: Distribution of Registration Fields Across Countries**

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106 Only 4 fields (6%) are required universally across all 10 countries: (1) Company/Legal Entity Name, (2) Registered Company Address, (3) Contact Phone
 107 Number, and (4) Contact Email Address. 35 fields (55%) are country-specific, requested by only one of the ten countries, while 83% of fields are asked by
 108 an average of just 3 countries, highlighting extreme fragmentation across countries.

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Number of Countries Requiring Field	Number of Fields	% of Total Fields	Cumulative %
1 country	35	55%	55%
2-3 countries	18	28%	83%
4-7 countries	6	9%	92%
8-9 countries	1	2%	94%
All countries (10)	4	6%	100%
TOTAL	64	100%	-

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112 **Table 3: Country-level registration complexity and PPWR IA Harmonization Opportunity**

- 113 • On average, **countries require 15.7 fields** with ~87% mandatory (13.7 fields); Requirements range from 11 fields (BE and ES) to 21 fields (Sweden).
- 114 • Out of 64 total unique fields, **17 fields (28%) are covered in PPWR IA Annex I. 47 fields (72%)** are not covered in PPWR IA, highlighting significant
- 115 scope to reduce registration burden.

Country	Total Fields	Mandatory Fields	Conditional	Optional	Included in PPWR IA Annex 1	Excess Fields (not covered in PPWR IA Annex 1)	List of fields in the country's registration process that is not covered in PPWR IA Annex 1
Sweden	21	14 (67%)	7 (33%)	0 (0%)	7 (33%)	14 (67%)	eID (BankID/Freja/Foreign eID) Transporter involved Transport company name Transport company organisation number Transport method Transport frequency Hazardous waste type EWC code Estimated annual quantity (waste) Storage method Storage location Data accuracy/veracity confirmation Summary overview (automated process step) Submission date (automated process step)
Belgium	11	11 (100%)	0 (0%)	0 (0%)	7 (64%)	4 (36%)	Registration initiation (offline) Company identification sheet document Signed contract document Initial packaging declaration
Ireland	18	15 (83%)	2 (11%)	1 (6%)	7 (39%)	11 (61%)	Invoice/billing address Contact person title/salutation Contact person position/job title Turnover/revenue information and Relevant range turnover for last year Invoice email address Invoice delivery method Bank details

Country	Total Fields	Mandatory Fields	Conditional	Optional	Included in PPWR IA Annex 1	Excess Fields (not covered in PPWR IA Annex 1)	List of fields in the country's registration process that is not covered in PPWR IA Annex 1
							Packaging volume/weight estimates Compliance declaration Signature Business sector/activity description
Poland	15	14 (93%)	1 (7%)	0 (0%)	7 (47%)	8 (53%)	eID (Trusted Profile) Secondary registration number (REGON) Business sector/activity description Distance/foreign seller flag Start date/year of first activity Type of registration (administrative) Supporting documents/ attachments Marshal Office selection (auto populated)
Netherlands	16	15 (94%)	0 (0%)	1 (6%)	9 (56%)	7 (44%)	Contact person position/job title Invoice/billing address (if different) Secondary registration number (RSIN) Legal form/entity type Start date/year of first activity Invoice email address Data accuracy/veracity confirmation
France	17	14 (82%)	0 (0%)	3 (18%)	9 (53%)	8 (47%)	Affiliation year and Forecast year Contact person title/salutation Contact person position/job title Activity Description Main products category (CN code) Packaging volume/weight estimates Billing company (if different) Terms & conditions acceptance
Germany	17	15 (88%)	1 (6%)	1 (6%)	11 (65%)	6 (35%)	Language preference (process step – not an issue) Optional data - previous registration numbers

Country	Total Fields	Mandatory Fields	Conditional	Optional	Included in PPWR IA Annex 1	Excess Fields (not covered in PPWR IA Annex 1)	List of fields in the country's registration process that is not covered in PPWR IA Annex 1
							Optional data - areas company is active Optional data - primary sales channels Takeback obligation confirmation Data accuracy/veracity confirmation Third party registration confirmation Brands under which placed on market
Italy	17	17 (100%)	0 (0%)	0 (0%)	10 (59%)	7 (41%)	eID Legal form/entity type Producer role/economic role Distance/foreign seller flag Start date/year of first activity Membership/registration fee Terms & conditions acceptance
Spain	11	10 (91%)	1 (9%)	0 (0%)	8 (73%)	3 (27%)	eID (Digital Certificate login) Producer role/economic role Start date/year of first activity
Portugal	14	12 (86%)	2 (14%)	0 (0%)	9 (64%)	5 (36%)	Password setup (process step – not an issue) Language preference (process step – not an issue) Producer role/type Packaging volumes/weight estimates Start date/year of first activity
Average	15.7	13.7 (87%)	1.4 (9%)	0.6 (4%)	8.4 (55%)	7.1 (45%)	

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117 **Table 4: Detailed analysis of 64 registration fields with recommendations to keep/remove fields**

118 Note:

- 119 1. This table groups similar fields from various countries. For example, Contact Person Full Name is registered as one field in the table below even if certain
120 countries may capture the information as two different fields (i.e. First Name, and Last Name separately).
- 121 2. P0 and P1 – High priority to remove; P2 – Medium priority to remove.

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#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional / Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
1	Authentication and Access	Electronic ID/Login Method	ES: Digital Certificate login SE: Login method BankID/Freja/Foreign eID); PL: Login with eID/Trusted Profile; IT: Login method (SPID/CIE/CNS/eIDAS)	Electronic identification system required to access national registry portals	Mandatory in ES, SE, PL, IT	ES, SE, PL, IT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P0), Not a requirement in PPWR IA Annex 1. Requiring eID to complete registration adds significant burden for both domestic and out of country sellers.
2	Authentication and Access	Account Password Setup	PT: Password	Password creation for portal access account	Mandatory in PT	PT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep
3	Authentication and Access	Language Preference	DE: Language of email communication; PT: Language	Seller's preferred language for communications from registry/PRO	Mandatory in DE, PT	DE, PT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep
4	Authentication and Access	Registration Initiation (Offline process in BE)	BE: Registration initiation	Initial contact with Valipac via email/phone to request membership forms	Mandatory in BE	BE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1), use an online process like in other countries.
5	Company Identification Details	Company/Legal Entity Name	DE: Legal entity name; FR: Company name; ES: Legal entity name; IE: Company Registered Name; NL: Company name; PT: Legal entity name; SE: Organisation name; PL: Legal entity	Official registered legal name of the producer company	Mandatory across all countries	All (DE, FR, ES, IE, NL, PT, SE, PL, IT, BE)	Included	"Name of producer" (Annex I Part A)	Keep

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
			name; IT: Legal entity name; BE: Company legal name						
6	Company Identification Details	Trading/Brand Name (Company Level)	DE: Trading name / brand owner name; IE: Trading As	Trading name used in commerce (distinct from legal entity name)	Mandatory in DE; Optional in IE	DE, IE	Included	PPWR asks for Name(s) under which the producer makes its packaging, including packaging of packaged products, available on the territory of the Member State.	Keep
7	Company Identification Details	Brand Names (on Products/Packaging)	DE: Brands under which placed on market	List of brand names appearing on products or packaging	Mandatory in DE	DE	Excluded	PPWR asks for Name(s) under which the producer makes its packaging, including packaging of packaged products, available on the territory of the Member State.	Remove (P1); Recommend to make it optional. An OOC seller may be selling under several brand names. As long as all the products across all brands are reported under the producer/company's unique identification number it is enough. Not asked by any other country.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
8	Company Identification Details	VAT Number	DE: VAT number / taxpayer number; FR: EU VAT ID; ES: NIF/VAT number; NL: VAT number; PT: NIF/VAT number; IT: VAT number; BE: VAT number	Tax identification number (VAT/TIN) used to identify the producer for tax purposes	Mandatory in DE, FR, ES, NL, PT, IT, BE	DE, FR, ES, NL, PT, IT, BE	Included	"European or national tax identification number" - TIN or VAT number (Annex I Part A)	Keep
9	Company Identification Details	National Business Registration Number	DE: National identification number (HRB/HRA); FR: Registration ID (SIREN); IE: Company Registration Number (CRO); NL: KvK number; SE: Organisation number; PL: NIP; IT: Tax code (Codice Fiscale); PT: NIF/NIPC	National company registration identifier (e.g., Companies House, Handelsregister, Chamber of Commerce number)	Mandatory in DE, FR, IE, NL, SE, PL, IT (if applicable); Conditional in PT	DE, FR, IE, NL, SE, PL, IT, PT	Included	"National identification code" - Identification code/number when registering in business register (Annex I Part A)	Keep
10	Company Identification Details	Secondary Registration Numbers	NL: RSIN; PL: REGON	Additional national statistical or legal entity identifiers required in specific countries	Mandatory in NL, PL	NL, PL	Partially Included	PPWR mentions "National identification code" but doesn't specify multiple IDs (Annex I Part A)	Remove (P1); consider limiting to only VAT and company business registration number
11	Company Identification Details	Foreign Company ID	SE: Foreign company ID	Non-Swedish registration number for entities not	Conditional in SE (if non-Swedish entity)	SE	Included	"Other identification information" - For producers in third countries,	Remove (P1); consider limiting to only VAT and company business registration number. Not asked by any other country.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
				established in Sweden				official registration code/number (Annex I Part A)	
1 2	Company Identification Details	Registered Company Address	All countries: Street name, Street number, City, Postal code, Country, Province/State (where applicable)	Full legal registered office address of the producer	Mandatory across all countries	All (DE, FR, ES, IE, NL, PT, SE, PL, IT, BE)	Included	"Legal address of producer" with components: Street name, Street number, Postal code, City, Province (if available), Country (Annex I Part A)	Keep
1 3	Company Identification Details	Correspondence Address (if different)	NL: Correspondence Address	Operational address for correspondence if different from registered address	Mandatory in NL	NL	Partially Included	PPWR includes only registered legal address. If contact person varies from producer, asks for contact address (if not same as the producer)	Remove (P1); Redundant information. Can default to registered company address.
1 4	Company Identification Details	Invoice/Billing Address (if different)	IE: Invoice/Billing Address; NL: Invoice Address	Address for financial invoicing if different from registered address	Mandatory in IE, NL (though often same as registered)	IE, NL	Excluded	PPWR includes only registered legal address. If contact person varies from producer, asks for contact address (if not same as the producer)	Remove (P1); Redundant information. Default to registered company address in line with PPWR IA

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
15	Contact Person Information	Contact Person Full Name	FR: First name, Last name; IE: First Name, Last Name; DE: Contact person name; NL: Contact person name; BE: Contact person name; SE: Contact person; PL: (implicit in legal entity); IT: (derived from SPID login)	Name of individual responsible for EPR compliance	Mandatory in DE, FR, IE, NL, BE, SE	DE, FR, IE, NL, BE, SE	Included	"Contact person (if not the same as the national person): First name, Last name" (Annex I Part A)	Keep
16	Contact Person Information	Contact Person Title/Salutation	FR: Salutation; IE: Contact Title	Formal title of contact person	Mandatory in FR, IE	FR, IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep
17	Contact Person Information	Contact Person Position/Job Title	FR: Job position; IE: Position; NL: Position	Job title or role of the contact person	Mandatory in FR, IE, NL	FR, IE, NL	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Excess information; Not a requirement in PPWR IA Annex 1
18	Contact Person Information	Contact Phone Number	All countries: Telephone number, Phone, Contact phone number, Phone number	Business telephone number for regulatory contact	Mandatory across all countries	All (DE, FR, ES, IE, NL, PT, SE, PL, IT, BE)	Included	"Phone number of producer" / "Contact person: Phone number" (Annex I Part A)	Keep
19	Contact Person Information	Contact Email Address	All countries: Contact email, Email, E-mail address	Business email for compliance communications and portal access	Mandatory across all countries	All (DE, FR, ES, IE, NL, PT, SE, PL, IT, BE)	Included	"E-mail address of producer" / "Contact person: E-mail address" (Annex I Part A)	Keep
20	Company Operational Details	Website/Website Address	FR: Website;	Company website URL	Optional in FR;	FR, DE	Included	"Web address (if available)" (Annex I Part A)	Keep as optional

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
21	Company Operational Details	Country of Establishment	PL: Country of establishment; IT: Country of establishment	Country where the legal entity is officially established	Mandatory in PL, IT	PL, IT	Included	Implicitly covered in "Legal address of producer: Country" (Annex I Part A)	Remove (P2); Redundant information; already asked in registered address
22	Company Operational Details	Legal Form/Entity Type	NL: Entity type (company vs tax entity); IT: Legal form	Legal structure of the company	Mandatory in NL, IT	NL, IT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Not a requirement in PPWR IA Annex 1
23	Company Operational Details	Producer Role/Economic Role	ES: Producer role; IT: Economic role; PT: Type of producer/embalador	Role in the supply chain (manufacturer, importer, distributor, seller)	Mandatory in ES, IT, PT	ES, IT, PT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Not included in PPWR IA Annex 1
24	Company Operational Details	Business Sector/Activity Description	IE: Business Sector; PL: Business activity type; FR: Activity description	Industry sector or description of business activities	Mandatory in IE, PL; Optional in FR	IE, PL, FR	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Excess information for producer identification; Not in PPWR IA Annex 1
25	EPR-Specific Information - Product & Packaging Information	Main Products Category (CN Code)	FR: Main products category sold	Combined Nomenclature product category code	Mandatory in FR	FR	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C; belongs in reporting, not registration	Remove (P1); Excess information at registration stage, can be provided at reporting stage in line with PPWR IA Annex 1. Not asked by any other country.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
26	EPR-Specific Information - Product & Packaging Information	Authorized Representative (AR) Details	DE: Authorised Representative details (AR name, AR ID, email, address, mandate/PoA, start date); ES: Representation details; PT: Representative (if non-resident)	Information about the AR for non-established producers including name, contact, mandate documents	Conditional in DE, ES, PT (if producer not established in country)	DE, ES, PT	Included	Full section "Part C: Registration of the authorised representative" including name, address, contact, national ID, tax number (Annex I Part C)	<p>Keep;</p> <p>It should be simple for producers to delegate AR responsibility to relevant third party without requiring a formal mandate (Power of Attorney with noratization).</p> <p>Recommend that (i) sharing producer's AR details should suffice to complete registration; and (ii) if legal authorization proof is required, we recommend that it be an online click wrap agreement and not require a formal mandate (Power of Attorney with noratization).</p> <p>OMPs should be allowed to facilitate registration of producers by providing registration information and the producer's AR details. Do not make it mandatory for the AR to complete the registration process.</p>
27	EPR-Specific Information - Product & Packaging Information	PRO/Compliance Scheme Selection	DE: PRO membership (scheme name, member number, start date); ES: SCRAP/SIRAP scheme affiliation; PT: Enquadramento - gestor escolhido; IT: CONAI	Selection of Producer Responsibility Organization or compliance scheme	Mandatory in DE, ES, PT, IT, BE	DE, ES, PT, IT, BE	Included	"Person or operator entrusted with carrying out the extended producer responsibility obligations" - including PRO name, contact,	Keep

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
			membership; BE: Valipac contract					authorization ID (Annex I Part B)	
28	EPR-Specific Information - Product & Packaging Information	Distance/Foreign Seller Flag	PL: Distance seller flag; IT: Foreign operator flag	Indicates whether entity is engaged in remote/distance selling or established outside the country	Mandatory in PL, IT	PL, IT	Excluded	Not explicitly mentioned in PPWR IA Annex I, but implicitly covered by requiring AR for non-resident producers	Remove (P2); Redundant information that can be derived from registered address
29	EPR-Specific Information - Product & Packaging Information	Packaging Types/Categories Sold	ES: Packaging types placed; NL: Packaging categories and Year; PT: Products/Packaging placed on market; IT: Packaging activity type; DE: Details about the packaging	Categories of packaging products being placed on market	Mandatory in ES, NL, PT, IT, DE	ES, NL, PT, IT, DE	Included	"Packaging category by use" with options: Single use household, commercial, industrial, beverage, reusable, hazardous, ecommerce (Annex I Part B)	Remove (P1); Excess information at registration stage. It can be provided at reporting stage instead.
30	EPR-Specific Information - Product & Packaging Information	Start Date/Year of First Activity	FR: Affiliation year, Forecast year; ES: Year of first packaging placed; PT: Date of first placement; IT: Start date of activity; NL: Year from which started;	Year or date when producer first placed packaging on market in the country	Mandatory in FR, ES, PT, IT, NL, PL	FR, ES, PT, IT, NL, PL	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P2); Not a requirement in PPWR IA Annex 1

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
			PL: Date activity started						
31	EPR-Specific Information - Product & Packaging Information	Optional Data (Previous Registrations, Sales Channels)	DE: Optional data - Previous registration number(s), Areas company is active, Primary sales channels	Optional information about previous registrations and sales channel mix	Optional in DE	DE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep as optional. Not asked by any other country.
32	EPR-Specific Information - Product & Packaging Information	Packaging Volume/Weight Estimates	FR: Estimated packaging volumes (forecasted tonnage by material); PT: Weight/quantities; IE: Relevant Tonnage for Last Year	Estimated or historical packaging volumes placed on market	Mandatory in FR, PT, IE	FR, PT, IE	Excluded	Not in Part A registration; volume reporting covered in Annex II "Information to be submitted for reporting"	Remove (P1); Excess information at registration stage, can be provided at reporting stage in line with PPWR IA Annex which includes this field in Annex II "Information to be submitted for reporting"
33	Financial Information	Turnover/Revenue Information	IE: Last Year Turnover, Relevant Range Turnover for Last Year	Total company turnover or revenue bands	Mandatory in IE	IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Excess information at registration stage for producer identification. Not asked by any other country.
34	Financial Information	Billing Company (if different)	FR: Billing company differs	Indicates if billing entity differs from producer	Optional in FR	FR	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep as optional. Not asked by any other country.
35	Financial Information	Invoice Email Address	IE: Invoicing Email (if different); NL: E-mail invoice	Email address for financial invoicing	Conditional in IE; Optional in NL	IE, NL	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P2), can default to primary contact details already provided.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional / Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
36	Financial Information	Invoice Delivery Method	IE: Invoice Sent By	Method for receiving invoices (email, post, etc.)	Mandatory in IE	IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P2), can default to email. Not asked by any other country.
37	Financial Information	Bank Details	IE: Bank details (Method of payment, Debtor Name, Bank Name, BIC, IBAN, Account Name)	Banking information for direct debit or payment processing	Mandatory in IE	IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep.
38	Financial Information	Membership /Registration Fee	IT: Membership fee (one-time CONAI joining fee)	One-time fee for joining PRO or registry	Mandatory in IT	IT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep.
39	Declarations & Confirmations	Data Accuracy/ Veracity Confirmation	DE: State data veracity; NL: Declaration confirmation; SE: Confirmation of correctness	Checkbox confirming that information provided is accurate and complete	Mandatory in DE, NL, SE	DE, NL, SE	Excluded	Not explicitly in PPWR IA Annex I, but data accuracy is implicit responsibility	Remove (P2) considering data accuracy is an implicit responsibility under PPWR.
40	Declarations & Confirmations	Legal Authorization to Sign	FR: Legal authorisation to sign	Confirmation that contact person has legal authority to sign on behalf of company	Mandatory in FR	FR	Partially Included	Partially included; PPWR IA Annex I Part C on Registration of the AR requests only for basic identification requirements related to the AR	It should be simpler for producers to delegate AR responsibility to relevant third party without requiring a formal mandate (Power of Attorney with notarization). Recommend that (i) sharing producer's AR details should suffice to complete registration; and (ii) if legal authorization proof is required, we recommend that it be an online click wrap agreement and not require a formal mandate (Power of Attorney with notarization)

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
41	Declarations & Confirmations	Third Party Registration Confirmation	DE: State not a third party	Confirmation that registration is being done by the company itself, not a third party	Mandatory in DE	DE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove(P0); Third parties like ARs are allowed to complete registration for producers in all other countries except DE.
42	Declarations & Confirmations	Takeback Obligation Confirmation	DE: Take back obligation fulfilled	Confirmation that producer is fulfilling takeback obligations	Mandatory in DE	DE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Remove (P1); Excess information at registration stage, can be provided at reporting stage. Not a requirement in PPWR IA Annex 1. Not asked by any other country.
43	Declarations & Confirmations	Terms & Conditions Acceptance	FR: Acceptance of conditions (Léko contract & terms); IT: Acceptance of statutes & rules (CONAI statutes)	Acceptance of PRO or registry terms and conditions	Mandatory in FR, IT	FR, IT	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep, this is a country specific process step. Though this is not mandated by PPWR IA Annex 1
44	Declarations & Confirmations	Compliance Declaration	IE: Compliance Declaration	Legal attestation of compliance with regulations	Mandatory in IE	IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep
45	Declarations & Confirmations	Signature	IE: Signature	Written or digital signature for identity authenticity	Mandatory in IE	IE	Excluded	Not mentioned in PPWR IA Annex I Part A, B, or C	Keep

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46	Declarations & Confirmations	Acting on Behalf Confirmation	PL: Acting on behalf of entity; IT: (implicit via SPID login showing representative)	Confirms user acts for a company/represents the entity	Mandatory in PL, IT	PL, IT	Partially Included	Partially included; PPWR IA Annex I Part C on Registration of the AR requests only for basic identification requirements related to the AR	It should be simpler for producers to delegate AR responsibility to relevant third party without requiring a formal mandate (Power of Attorney with notarization). Recommend that (i) sharing producer's AR details should suffice to complete registration; and (ii) if legal authorization proof is required, we recommend that it be an online click wrap agreement and not require a formal mandate (Power of Attorney with notarization)
47	Country-Specific (Sweden - Transport & Waste)	Transporter Involved	SE: Transporter involved	Indicates whether waste is transported by third-party	Mandatory in SE	SE	Excluded	Not mentioned in PPWR IA Annex I; unrelated to producer registration	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
48	Country-Specific (Sweden - Transport & Waste)	Transport Company Name	SE: Transport company name	Legal name of transport provider	Conditional in SE (if transporter involved)	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
49	Country-Specific (Sweden - Transport & Waste)	Transport Company Organisation Number	SE: Transport company organisation number	National ID of transport company	Conditional in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
50	Country-Specific (Sweden - Transport & Waste)	Transport Method	SE: Transport method	Mode of transport used for waste	Conditional in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
51	Country-Specific (Sweden - Transport & Waste)	Transport Frequency	SE: Transport frequency	How often waste is transported	Conditional in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
52	Country-Specific (Sweden - Transport & Waste)	Hazardous Waste Type	SE: Hazardous waste type	Classification of hazardous waste handled	Mandatory in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
53	Country-Specific (Sweden - Transport & Waste)	EWC Code	SE: EWC code	European Waste Catalogue classification code	Mandatory in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
54	Country-Specific (Sweden - Transport & Waste)	Estimated Annual Quantity (Waste)	SE: Estimated annual quantity	Estimated amount of hazardous waste per year	Mandatory in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
55	Country-Specific (Sweden - Transport & Waste)	Storage Method	SE: Storage method	How waste is stored prior to transport	Conditional in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
56	Country-Specific (Sweden - Transport & Waste)	Storage Location	SE: Storage location	Physical location where waste is stored	Conditional in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1; Not asked by any other country.
57	Company Identification Details	Company Identification Sheet (Document)	BE: Company identification sheet	Official company identification document	Mandatory in BE	BE	Excluded	PPWR IA Annex I does not ask for any supporting attachment/documents	Remove (P1); Excess information; Use company ID already provided. Not asked by any other country.

#	Category of Registration Information	Common Field Name	Field Name by Country	Description	Mandatory / Optional/ Conditional	Countries	Included/Excluded in PPWR IA	Equivalent Field in PPWR IA	Recommendation with Rationale
58	Process/Administrative Fields	Signed Contract Document	BE: Signed Valipac contract	Physical or digital contract signed by company	Mandatory in BE	BE	Excluded	PPWR IA Annex I does not ask for any supporting attachment/documents	Make it an online process to complete contracting (for e.g. an online click wrap agreement). High registration friction for sellers. Not asked by any other country.
59	EPR-Specific Information - Product & Packaging Information	Initial Packaging Declaration	BE: First packaging declaration	Initial declaration of packaging volumes at registration	Mandatory in BE	BE	Excluded	Not in Part A registration; covered in Annex II reporting requirements	Remove (P1); Excess information at registration stage, Not a requirement in PPWR IA Annex 1. Not asked by any other country.
60	Process/Administrative Fields	Type of Registration (Administrative)	PL: Type of registration	Registration basis in BDO system (e.g., on application, automatic)	Mandatory in PL	PL	Excluded	Not mentioned in PPWR IA Annex I	Remove (P1); Not included in PPWR IA Annex 1. Not asked by any other country.
61	Process/Administrative Fields	Marshal Office Selection	PL: Marshal Office selection	Regional authority handling the registration case	Mandatory in PL (auto-assigned)	PL	Excluded	Not mentioned in PPWR IA Annex I	Keep, auto assigned
62	Process/Administrative Fields	Supporting Documents/Attachments	PL: Supporting documents	Documents required by authority (e.g., Power of Attorney)	Conditional in PL	PL	Excluded	PPWR IA Annex I does not ask for any supporting attachment/documents	It should be simpler for producers to delegate AR responsibility to relevant third party without requiring a formal mandate (Power of Attorney with notarization). Recommend that (i) sharing producer's AR details should suffice to complete registration; and (ii) if legal authorization proof is required, we recommend that it be an online click wrap agreement and not require a formal mandate

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									(Power of Attorney with notarization)
63	Process/Administrative Fields	Summary Overview (Read-only)	SE: Summary overview	Read-only view of entered data for final validation	Mandatory in SE	SE	Excluded	Not mentioned in PPWR IA Annex I	Keep, system generated
64	Process/Administrative Fields	Submission Date	SE: Submission date	Auto-generated date of registration submission	Mandatory in SE (auto)	SE	Excluded	Not mentioned in PPWR IA Annex I	Keep, system generated

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