

Question for written answer E-003448/2026
to the Commission
Rule 144
Sunčana Glavak (PPE)

Subject: PPWR compliance costs for micro and small enterprises

Under Regulation (EU) 2025/40, producers operating across borders may be subject to registration, reporting and Extended Producer Responsibility (EPR) obligations in each Member State concerned. For micro and small enterprises with occasional or low-volume sales, these fixed compliance costs can exceed the value of their sales in that market. Although the Regulation refers to the principle of proportionality and provides for simplified reporting below certain thresholds, it does not establish a genuine de minimis exemption from the registration obligation, nor a single EU-wide registration procedure.

1. Has the Commission assessed the fixed annual compliance costs, broken down by Member State, borne by micro and small enterprises? If so, in how many cases were these costs found to exceed the value of their annual turnover in that Member State?
2. Will the Commission consider establishing a single EU access point or a ‘once-only’ registration system and a genuine de minimis regime, including reduced, limited or abolished fixed fees for very small-scale cross-border sales?
3. Given the delay in adopting the implementing act laid down in Article 44(14), how will the Commission ensure legal certainty and proportionate implementation?

Submitted: 2.9.2026