

**Question for written answer E-004014/2026  
to the Commission**  
Rule 144  
**Stanisław Tyszką (ESN)**

**Subject:** The PPWR – a burden for small enterprises

Article 45(3) of Regulation (EU) 2025/40 requires traders engaged in specific cross-border sales to appoint authorised representatives for extended producer responsibility in their target Member States. Micro and small enterprises take the biggest hit from the fixed administrative costs, as these are set in stone regardless of order numbers.

Traders from Poland and other EU Member States report halting foreign shipments entirely. Instead of reaping the benefits of the single market, they are abandoning it under the weight of bureaucratic costs, which large operators, by contrast, are able to spread across millions of shipments.

The Commission identified this barrier in its May 2025 single market strategy and proposed suspending the obligation in December of the same year in COM(2025)982. The Council broke off negotiations in June 2026. While the institutions sit around debating competitiveness, it is companies that are left paying the price.

1. On the basis of which specific analyses did the Commission conclude during the PPWR drafting phase that the obligation to appoint a representative in each country of sale is proportionate, even for companies shipping just a handful of orders to those markets every year?
2. What action will it take, and in what time frame, to secure an urgent suspension of the obligation, without holding out for a comprehensive system overhaul?
3. Given its own admission that the rule acts as a barrier to the single market, why is the Commission only proposing to suspend the obligation until 2035 instead of permanently scrapping it for EU traders?

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