

(English version)

**Priority question for written answer P-003269/26
to the Commission
Pascal Arimont (PPE)
(12 August 2026)**

Subject: PPWR: obligation to appoint an authorised representative — transitional arrangements and proportionality for EU and non-EU micro-enterprises

Since 12 August 2026, companies that are not established in a given Member State have had to appoint an authorised representative in that Member State for reasons of extended producer responsibility. Practical experience suggests that the fixed costs of doing this are in the low four-figure range per Member State, even for just a few dozen kilograms of packaging per year. Micro-enterprises are therefore ceasing deliveries to other Member States.

As part of the environment omnibus, the Commission has proposed suspending this obligation for EU-based companies. The Council has wound up its discussions; a vote in Parliament is still pending. Until then, the obligation continues to apply.

A Swiss-based business owner who wants to sell, in the EU, small quantities of a product that she has developed herself would not be covered by the proposed suspension, as it is intended to apply only to companies based in the EU.

1. What transitional arrangements is the Commission envisaging until the end of the legislative process, and how will it ensure that no sanctions are imposed during this period?
2. How does the Commission justify limiting the planned relief to EU-based companies, and what proportionate solutions are there for micro-enterprises based outside the EU?
3. Is it considering an EU-wide registration body, a consolidated annual report, fees that are proportional to the quantities concerned, and a *de minimis* rule for very small quantities?

Submitted: 12.8.2026

**Answer given by Ms Roswall on behalf of the European Commission
(6 October 2026)**

The Commission has proposed in the Environmental Omnibus proposal ⁽¹⁾ to suspend the application of the obligation for producers to appoint an authorised representative when they conduct direct sale to end users in other Member States.

The Commission has repeatedly called upon the European Parliament and the Council to adopt the proposal as quickly as possible and stands ready to work on it as a matter of urgency.

In the meantime, the Commission has invited Member States to take a constructive and pragmatic approach and to avoid disproportionate enforcement.

The Packaging and Packaging Waste Regulation (PPWR) ⁽²⁾ does not oblige a producer in third countries to appoint an authorised representative, when it makes packaging available in a Member State. For this reason, the suspension is restricted to the mandatory appointment of an authorised representative for EU-based producers.

The PPWR leaves the competence for the concrete design and enforcement of the 27 existing national extended producer responsibility (EPR) schemes to the Member States.

However, an implementing act is in preparation in order to streamline the EPR registration and reporting in all Member States. This act will simplify the reporting for companies making only small amounts of packaging available.

As part of the planned Circular Economy Act ⁽³⁾, the Commission is preparing a broader reform of EPR schemes, focusing on simplification, harmonisation and digitalisation, which will bring structural relief from such obligations.

⁽¹⁾ <https://circulareconomy.europa.eu/platform/en/news-and-events/all-news/environmental-omnibus-has-been-published>.

⁽²⁾ Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, OJ L, 2025/40, 22.1.2025.

⁽³⁾ https://environment.ec.europa.eu/strategy/circular-economy_en.