Brussels, November 2026

Joint industry call for a full suspension of the Authorised Representative requirement under Omnibus Environment VIII

Since August 2026, EU-based producers placing packaging or packaged products on the Union market have been required to appoint an Authorised Representative (AR) for Extended Producer Responsibility (EPR) in every Member State where they are not legally established. This obligation creates administrative burdens and fragmentation, discouraging cross-border trade by forcing businesses to appoint and manage ARs in multiple countries. At a time when the EU should be strengthening its competitiveness through a fully integrated Single Market, in line with the objectives of the One Europe, One Market Roadmap, such requirement run counter to this ambition.

With the European Parliament and the Council having now adopted their positions on the temporary suspension of this requirement, the file has entered a decisive phase. However, both positions fall short of the European Commission's proposal, which would suspend the obligation for all companies established in the Union, irrespective of their size or the volume of packaging they place on the market. The undersigned organisations therefore urge the co-legislators to uphold the Commission's level of ambition and suspend the Authorised Representative requirement for all EU-established operators until 1 January 2035.

A partial suspension would leave many businesses subject to the requirement, preserving the very barriers that the Omnibus proposal seeks to remove. Differentiating between companies based on their size or the quantities they place on individual national markets would add complexity, undermine the level playing field and make effective enforcement through interoperable national EPR registers more difficult, particularly as these registers facilitate registration checks, compliance monitoring, verification and enforcement. Most importantly, it would also undermine the EU's ambition to tackle the *Terrible Ten* barriers and deliver on the commitments set out in the One Europe, One Market Roadmap.

Companies operating across the Single Market urgently need legal certainty. We therefore call on the co-legislators to prioritise this file, uphold the Commission's proposal and conclude negotiations before the end of the year.

The undersigned organisations

AGMPM - Association of Greek Manufacturers of Packaging & Materials

AIM - European Brands Association

Becom

CCIA Europe - Computer & Communications Industry Association

CEMATEX

CEPI - The Confederation of European Paper Industries

CEC - European Footwear Confederation

CITPA - The International Confederation of Paper and Board Converters in Europe

Ecommerce Europe

EDANA - The Voice of the Nonwovens Industry

EKO-PAK - Packaging Industry Union of Employers

EURATEX

EUROPEN - The European Organisation for Packaging and the Environment

FEFCO - The European Federation of Corrugated Board Manufacturers

FEPE - Federation of European Producers of Envelopes and Light Packaging

FESI - Federation of the European Sporting Goods Industry

Intergraf - European Federation for Print and Digital Communication

TIE - Toy Industries of Europe