

## RREUSE's answer to the Commission's Call for Feedback on the Environmental Omnibus

RREUSE takes the opportunity of the Commission's Call for Feedback on the 8th Omnibus Package on the Simplification of administrative burdens in environmental legislation to reiterate its firm opposition to the Commission's proposal, which risks weakening key environmental safeguards under the guise of administrative simplification. Our feedback focuses on the revision of Extended Producer Responsibility (EPR) requirements.

### Absence of impact assessment

First, the absence of a thorough impact assessment is worrying. Revising core environmental legislation without robust evidence risks undermining long-standing environmental protections and creating economic uncertainty for stakeholders. Changes to these policy frameworks should not be introduced without a thorough analysis of their environmental, social, and economic impacts. In particular, measures presented as administrative simplification must be carefully assessed to ensure that they do not, in practice, reduce transparency, weaken enforcement, or limit the availability of data needed to monitor progress towards EU environmental and circularity objectives.

### Need for legislative consistency

RREUSE also stresses the importance of ensuring coherence across EU legislative processes. Several of the legal acts targeted by the proposed Omnibus are already scheduled for review through other ongoing or forthcoming initiatives. Addressing these issues through parallel or overlapping processes risks creating fragmentation, duplication, and confusion for stakeholders. For example, issues related to the Waste Framework Directive (WFD) could be more coherently addressed within the Circular Economy Agenda (CEA). The Commission itself acknowledges that input gathered for the Environmental Omnibus will inform other ongoing processes, such as the CEA. This underlines the need to avoid piecemeal amendments and to ensure that any legislative changes are developed through the most appropriate channels

### Risks associated with suspending the obligation to appoint an Authorised Representative

The European Commission's proposal to suspend the obligation to appoint an authorised representative (AR) under EPR schemes is concerning for several reasons. Firstly, the AR plays a key role in ensuring compliance with EPR requirements, including EPR fee payment. Without an AR, there would automatically be an increase in free riding and, therefore, a decrease in the EPR fees available. This would considerably impact the waste management sector (including collection, sorting, preparing for reuse and recycling), which could ultimately be underfunded.

Furthermore, eliminating the AR would severely impact product traceability. This would allow products that do not comply with EU standards to flood the EU market, making reuse operations more expensive due to the influx of poorly designed, non-reusable products.

Suspending the AR obligation could cause issues with the enforcement of upcoming legislation, such as the new EPR requirements expected under the CEA, since there would no longer be a compliance mechanism in place to ensure that marketplaces and other stakeholders comply with it. Finally, as the Commission will not be in a position to introduce new regulations in the near future, removing the obligation would simply create a regulatory gap that they will be unable to fill.

## Risks associated with cutting reporting obligations

Reducing the reporting obligations under EPR schemes by limiting the scope of data that producers are required to provide, as well as restricting reporting frequency to once per year, is also concerning. Robust reporting requirements are essential governance tools. Reliable, high-quality, and comparable data are crucial for:

- Setting, monitoring, and enforcing targets;
- Identifying sector-specific challenges;
- Ensuring transparency and accountability;
- Responding effectively to crises, as illustrated by the current difficulties in textiles and plastics.

Weakened reporting obligations would undermine evidence-based decision-making and prevent the effectiveness of environmental policy instruments such as EPR. Rather than scaling back reporting requirements, we call for smarter, more harmonised, and more efficient reporting systems, including:

- A clearer delineation of responsibilities for reuse traceability within EPR schemes;
- Interoperable and integrated producer registries across EU Member States;
- User-friendly, digital reporting tools that reduce administrative burdens while improving data quality.

Such improvements would meaningfully streamline procedures without compromising the level of ambition needed to achieve Europe's environmental and circularity objectives.

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