



**Par Jean Hornain**  
CEO of Citeo, France;

**Francis Huysman,**  
CEO of Fost Plus and Valipac,  
Belgium;



**Julien Dubourg,**  
Executive President of Citeo Pro;

**Claude Turping,**  
Director of Valorlux,  
Luxembourg;



**Hester Klein Lankhorst,**  
CEO of Verpact, Netherlands

## SIMPLIFICATION WITHOUT DEREGULATION: A NEW ERA FOR EPR IN THE EUROPEAN UNION

In 2025, the European Commission launched an ambitious agenda for simplification. This initiative comes at a time of growing pressure on the Union: fragmentation of the Single Market, intensifying geopolitical power dynamics, and an increased need for strategic autonomy. As Commissioner Stéphane Séjourné recently noted, **Europe is entering “a new era”, one in which it must both consolidate its internal market and strengthen its external borders to safeguard its interests.**

In this context, sectors linked to the circular economy and to **Extended Producer Responsibility (EPR)** are directly affected. The strategy for the Single Market, the Packaging and Packaging Waste Regulation (PPWR), and the upcoming Circular Economy Act place these ecosystems at the centre of policy discussions.

### **EPR: A historical pillar of economic and environmental performance**

Extended Producer Responsibility is a singular model. Initiated in the 1990s in Germany and France, it has spread across countries in Europe and beyond, and across sectors like packaging, textiles, electronics etc.

Built on a simple principle - **requiring producers to take responsibility for the end-of-life of their products** - EPR has, for decades, enabled the development of efficient waste management and recycling schemes across Europe. Producers allocate funds strategically to meet specific recycling goals, ensuring financial resources are directed towards effective recycling initiatives.

Along the years, the EPR model has constantly adapted itself to meet the industry and consumption trends, achieve the regulatory targets and support its clients and stakeholders. EPR has led to the development of modernized recycling systems, optimised collection schemes, making it easier for consumers to recycle. Decisions made by Producer Responsibility Organizations (PROs) emphasize efficiency and innovation, driving improvements in recycling processes.

PROs are drivers of change, capable of shaping the transition toward more sustainable and efficient resource management.

For packaging in particular, the model revolves around three now-essential actions: **reduce, reuse, recycle**. The objective is clear: to reduce environmental impact while ensuring the economic efficiency of a system that mobilizes producers, local authorities, operators, and citizens.

Yet this model is increasingly being questioned—not in its core principles, which have proven their worth, but in its ability to evolve in response to contemporary challenges: new reporting requirements, increasing waste flows, the need for greater harmonisation, cost pressures, and rising expectations for transparency and tangible results.

### **A European framework in transition: Harmonise, simplify, digitalise**

The European Commission has made its ambition clear: to **modernise the framework within which EPR systems operate**. The upcoming **Circular Economy Act** that the Commission will present in the second half of 2026 is expected to focus on two pillars: EPR and the internal market for secondary raw materials.

The Commission aims to reinforce the single market for secondary raw materials, increase the supply of high-quality recycled materials and stimulate the demand for those materials within the EU. It also aims to simplify, harmonise and digitalise EPR across the Union. In the Single Market strategy published in 2025, EPR is identified as one of the barriers to the single market because of its fragmentation.

The Circular Economy Act illustrates this desire for structural reform.

As **Producer Responsibility Organisations (PROs)**, we strongly support this direction—provided it is not conflated with deregulation.

The existing European frameworks—such as the Single-Use Plastics Directive (SUPD), the Waste Framework Directive (WFD), and the PPWR—were precisely designed to provide companies with a clear and stable regulatory environment. This clarity is essential to give businesses long-term visibility, enabling them to invest confidently and make strategic decisions. Conversely, lack of coherence between legislations, frequent rule changes, such as repeated omnibus amendments or postponements of implementing or delegated decisions, can generate uncertainty and hinder economic actors. In this sense, simplification should not be interpreted as a dismantling of the current framework, but rather as a way to make it more readable, more coherent, and more effective.

**EPR is a finely balanced system:** it works best when it is organised as non-profit, mandated by producers, and designed to deliver both economic and environmental performance. Ambitious environmental objectives are at the very heart of EPR's mission.

The need to adapt the model is now undeniable, and three priorities command broad consensus:

- **Simplification** of reporting obligations, to reduce excessive administrative burdens;
- **Harmonisation**, to prevent national divergences from further fragmenting the single market;
- **Digitalisation**, especially of reporting, to improve data quality, transparency, and overall system efficiency.

The PPWR clearly opens the door to these transformations.

It does not only set ambitious objectives on the 3R for all packaging: achieve reduction of packaging waste (5% by 2030, 10% by 2035 and 15% by 2040), reuse targets (eg 10% of reuse for beverages sales packaging by 2030) and recycling (70% for all materials, 55% for plastic in 2030). It is also setting reporting data harmonisation requirements for EPR and eco modulation principles on recyclability for instance.

Numerous national and cross-border partnerships are already proactively working on these issues.

This is why we, as PROs from Belgium, France, Luxembourg and the Netherlands, have chosen to join forces—to better serve our respective producers, many of whom operate across these markets.

**Our objective** is to collaborate more closely to better support our partner clients in their 3R strategies (reduction, reuse and recycling), within an ambitious European context for our sector.

## What are the advantages of this cooperation for common customers/producers?

- **Better anticipation and simplification of reporting obligations.**

We are working together to define a common data model and to make partner clients' declarations easier and more consistent across borders. The aim is to use a single point in the chain where key packaging data is defined - by the manufacturer. This data should flow, in a digitalised way, to the Producer, PRO, national authorities and the European Commission.

- **Knowledge sharing on 3R strategies specific to each country.**

By pooling our expertise (on different topics such as eco design, eco modulation, incorporation of recycled content etc), we amplify our collective impact and are able to offer an even wider range of solutions to our respective clients.

- **Enhanced traceability and transparency for commercial and industrial packaging.**

Building on the experience gained in the Benelux on this EPR scheme to anticipate and better implement the new regulation to come (PPWR).

## PROs: the driving force of the EPR system

In this period of transformation, every actor in the value chain plays a key role. PROs, however, act as the driving force of the EPR system. As the essential interface between producers and local territories and, in some cases, sorting and recycling partners, and converters, they ensure:

- the economic balance of the system,
- operational consistency across the territory,
- implementation of regulatory objectives,
- support for local authorities in collection and sorting activities,
- partnerships with sorting and recycling actors, and converters
- guidance for producers in compliance and eco-design.

PROs structure the value chains, ensure solidarity among producers, and guarantee that the ecological transition is carried out efficiently, coherently, and sustainably.

## Conclusion: a historic opportunity for EPR

We believe that the European simplification agenda is not a threat to EPR. On the contrary, it represents a unique opportunity: **to reaffirm a proven model, modernise its tools, and enhance the coherence of the single market.**

At a time when the European Union is redefining its strategic autonomy and reinforcing its economic borders, EPR must adapt - digitalising, harmonising, and evolving - while preserving its core foundations: producer responsibility, non-profit governance, transparency, and strong economic and environmental performance.

PROs, continuously connected with both producers and territories, will be decisive in making this next phase a success. Only then can EPR continue to fulfil its mission: to be a driving force of the circular economy, supporting a sustainable, competitive, and sovereign Europe.