

Brussels, 15 April 2026

EucoLight statement on the Environmental Omnibus (VIII)

EucoLight, the European Association of lighting WEEE compliance schemes, supports the objectives of the European Commission's Environmental package presented in December 2025 that aims to simplify rules and reduce administrative burdens for companies, including improved Extended Producer Responsibility (EPR) rules (aka Environmental Omnibus).

The present statement comments on two important aspects of the Commission proposal:

- The suspension of the authorised representative obligations for EPR
- The harmonisation of frequency of reporting for EPR

Maintain the authorised representative

As part of this simplification package, the European Commission released a proposal to amend Directive 2012/19/EU Waste from electrical and electronic equipment by suspending article 17 (2) related to the requirements an appoint authorised until 1 January 2035 (COM(2025 983).

EucoLight disapproves the suspension of the authorised representative, as it hampers tackling non-compliant online market sellers and present an evident threat to Producer Responsibility Organisations financing. Authorised representatives are necessary to be maintained both for EU-based producers and producers established in third countries.

Rationale:

Authorised representatives are necessary to the functioning of the Circular Economy. As an Important pillar of EPR, they contribute to the financing of the circular economy and waste management. By carrying full legal, operational, and financial responsibility on behalf of the producers they represent, authorised representatives ensure that non-established manufacturers fulfil their obligations to register, report, and contribute to end-of-life costs.

Weakening or suspending these mandatory responsibilities risks enabling free riders to evade compliance and shifts the environmental and financial burden onto responsible operators. Not only affecting financing of waste management but also disrupting the competition within the European single market. This is even more critical with the rise of online platforms and the increased number of non-compliant lamps, small luminaires and other WEEE sold on them. Online free riding continues to undermine the EPR system, as sellers frequently avoid WEEE fees and fail to register with Producer Responsibility Organisations.

The producer pay principle only works if the producers are clearly identifiable, the authorised representative system is essential for this. Mandatory registration of every producer putting products on the market is essential to market transparency. Without it, national authorities lose their most direct and reliable mechanism for enforcing eco-design rules, take-back obligations and financial contributions to WEEE schemes.

Our recommendations:

- Authorised Representatives (ARs) must carry full legal, operational and financial responsibility on behalf of the producers they represent:
 - ARs must be required to register every producer they represent, and 'very large' ARs for example, those representing more than 20 producers should be subject to specific scrutiny, with additional requirements to ensure transparency, accountability, and prevent market distortion.
 - ARs must be deemed financially liable when a producer fails to meet its financial responsibilities.
- Incoming legislation such as the Circular Economy Act, and the WEEE Directive revision must create stronger obligations for authorised representative and prioritise the financing of waste management over reducing administrative requirements.
- The environmental and economic cost of inadequate financing and proliferation of unregulated products is a far greater issue than administrative burden.
- Incoming legislation, such as the Circular Economy Act and the revision of the WEEE directive, should introduce stronger obligations for authorised representatives and prioritise the financing of waste management and address compliance over reducing administrative burden.
- Rather than suspended, authorised representatives requirements should be sharpened for the sake of compliance and fight against free riding.

Proposal for the harmonisation of reporting frequency for EPR

With the simplification package, the European Commission proposes to harmonize and reduce reporting frequencies. The proposal limits the reporting frequency for producers regarding the quantities of products placed on the market to a maximum of once per year.

EucoLight supports harmonisation of reporting obligations across the EU, but not at the expense of market surveillance, accuracy of financial contributions, the ability to identify free riders particularly in the context of online sales and the possibilities for PROs to make adequate financial planning.

For this reason, **EucoLight advocates for a quarterly reporting model as the standard minimum frequency** across Member States. EucoLight recognises that certain national systems may require more frequent reporting to maintain transparency, ensure alignment with specific financing mechanisms, or respond to market realities. Therefore, EucoLight supports **allowing Member States to implement monthly reporting** where such an approach is justified by substantiated reasons, such as the structure of national schemes and for seasonal or irregular sales patterns caused by online selling.

Our recommendation for the harmonisation of the frequency of reporting:

EucoLight calls for a change to Article 1(1) of the Regulation 2025/0394 to establish unified reporting windows across all Member States, rather than only a shared annual frequency. We propose the following amendment:

Commission Proposal: "(c) ensure that a reporting system is in place to gather data on the products made available for the first time on the market of the Member State by the producers of products subject to extended producer responsibility and data on the collection and treatment of waste resulting from those products specifying, where appropriate, the waste material flows, as well as other data relevant for the purposes of point (b), as well as that the producers or, if appointed by the producer, the producer's authorised representative for extended producer responsibility, are required to report, in accordance with the requirements of the first sentence of this point, at a maximum frequency of once every 12 months, for each full preceding calendar year;

Proposal for EucoLight position: "(c) ensure that a reporting system is in place to gather data on the products made available for the first time on the market of the Member State by the producers of products subject to extended producer responsibility and data on the collection and treatment of waste resulting from those products specifying, where appropriate, the waste material flows, as well as other data relevant for the purposes of point (b), as well as that the producers or, if appointed by the producer, the producer's authorised representative for extended producer responsibility, are required to report, in accordance with the requirements of the first sentence of this point, ~~at a frequency set between one month and 12 months, no later than 30 April, for each preceding calendar year.~~ *On a quarterly basis, with the possibility for Member States to use monthly reporting, with substantiated justification.*