



Fecc
EUROPEAN ASSOCIATION OF
CHEMICAL DISTRIBUTORS

Rules for national registers of producers under PPWR

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European Association of Chemical Distributors (Fecc) welcomes the European Commission's initiative to establish **common rules for national registers of producers under the Packaging and Packaging Waste Regulation (PPWR)**. A more harmonised approach has the potential to reduce administrative fragmentation and facilitate compliance for companies placing packaged products on the EU market, particularly those operating across several Member States.

For the chemical value chain, the practical effectiveness of the future framework will depend on whether registration and reporting requirements can be applied consistently across Member States, while reflecting how packaging information is generated, shared and used between different actors in the value chain.

Against this background, Fecc highlights the following practical considerations.

1. Consistent registration requirements across Member States

The introduction of a common format for national registers is an important step towards reducing fragmentation. For companies operating in several Member States, the benefits will depend on the extent to which the same information, definitions and data fields are applied consistently.

Fecc suggests that the common format should be supported by consistent definitions, data fields and technical specifications across national registers. This would help avoid situations where companies are required to provide substantially the same information in different formats or according to different national interpretations.

2. Proportionate information requirements and data availability

Fecc supports the availability of sufficiently detailed information to support the objectives of the PPWR. At the same time, the information requested through national registers should remain proportionate to its regulatory purpose and take account of how data is generated and exchanged within the chemical value chain.

Packaging information may originate with packaging manufacturers or chemical producers and subsequently be transferred through distributors or other intermediaries. Not every actor will therefore have direct access to all technical details concerning packaging materials or individual components.

Fecc suggests that the registration framework should distinguish between information reasonably available to the registering producer and information that can only be obtained from another actor in the value chain. This would help ensure that companies are not required to recreate or independently verify information that is already available further upstream.

Similarly, a proportionate approach to minor packaging components could avoid disproportionate administrative effort where additional granularity provides limited regulatory value.

3. Interoperability and reuse of data

Fecc welcomes the PPWR's emphasis on interoperable, open and machine-readable formats. For this to translate into practical benefits, information should be capable of being transferred and reused across systems and along the value chain without requiring companies to repeatedly collect or reformat the same data.

Fecc suggests that the common format should facilitate the reuse and transfer of standardised data across national registers and between relevant actors in the value chain, supported by common technical specifications and data fields.

This could help prevent unnecessary duplication of information and support more efficient data flows, while also reducing the administrative burden associated with maintaining multiple reporting processes. This is particularly relevant for SMEs, which may have limited resources to develop dedicated data-management systems.

4. Cross-border activities and SMEs

Companies across the chemical value chain may operate or supply products in several Member States, while the underlying packaging and business activities remain the same. Different registration procedures or national interpretations could therefore continue to create administrative fragmentation despite the introduction of a common EU framework.

Fecc suggests that the harmonised framework should facilitate the management of registrations across Member States, including updates to company and packaging information, without creating parallel administrative processes.

Practical guidance and examples covering common value-chain situations, including cross-border activities and cases where packaging information is obtained from an upstream supplier, could further support consistent implementation and reduce reliance on individual interpretations or external compliance support.

Fecc supports the objective of establishing a more harmonised and interoperable framework for national producer registers. From the perspective of the chemical value chain, the effectiveness of the system will largely depend on consistent national implementation, proportionate data requirements and the ability to reuse reliable information across systems and between value-chain actors.

Fecc suggests that these principles are reflected in the final framework, helping ensure that harmonisation delivers tangible reductions in administrative complexity while maintaining the information needed for effective implementation of the PPWR. This would support companies operating across several Member States and help ensure that the new requirements remain workable and proportionate, particularly for SMEs.

To access the Fecc's response on EU Commission's website, please click [here](#).

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