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Challenges for the adhesives & sealants industry under EPR for packaging

Introduction

The adhesives and sealants industry supports a wide range of value chains, including construction, packaging, automotive, electronics, furniture, hygiene products and consumer goods. Companies typically operate across multiple Member States, placing packaged products on the market through complex B2B and B2C supply chains.

While the industry supports the objectives of Extended Producer Responsibility (EPR), the increasing fragmentation of packaging EPR requirements across Member States creates significant administrative burdens, compliance costs and barriers to the functioning of the Single Market. These challenges are particularly acute for companies operating across multiple jurisdictions and for SMEs. This paper highlights the main challenges encountered by the industry and outlines potential solutions that could support a more efficient and harmonised EPR framework within the EU through the upcoming Circular Economy Act.

Challenge 1: complexity of EPR systems for industrial and chemical packaging

Most existing EPR systems were designed primarily around consumer packaging streams and do not adequately reflect industrial supply chains. Packaging used by adhesive and sealant manufacturers often includes:

- Multiple packaging layers: primary packaging for products; secondary packaging for logistics; and tertiary packaging for transport.
- Mixture of flows: B2B (industrial) and B2C (DIY, retail).
- Custom packaging and private labels per customer or distributor.
- Hazardous materials packaging which must comply with UN certification, limiting flexibility for recyclability. (Aerosoles)

As a result, companies face difficulties classifying packaging and determining whether packaging should be reported as household or professional packaging. Classification frequently relies on estimates or assumptions, as actual end-use cannot always be determined. Where packaging is supplied directly to professional users, however, the picture is very different.

Professional packaging systems often operate under conditions that differ significantly from consumer packaging streams. Professional packaging is typically supplied to a known and limited number of business customers under contractual arrangements. The packaging flow, waste holder and treatment route can therefore often be identified with a level of certainty that is generally not achievable in consumer markets. Companies can therefore organise collection and treatment directly with specialised waste operators, and these systems already deliver a high level of traceability and control. Applying the same reporting and financing mechanisms to such managed industrial systems may therefore generate administrative costs without delivering equivalent environmental benefits.

EPR requirements should take these differences into account and focus on ensuring transparency and reporting, while avoiding unnecessary duplication of systems which are already functioning effectively.

Expected costs & missed market opportunities

Illustrative company examples show that, an assessment of whether a legal entity is required to register with a PRO would cost between €2,000 and €3,500. Identifying the data gaps needed for registration would require a further €1,000 to €3,000. Both figures cover external advisory work only and exclude PRO registration fees.

FEICA members report significant differences in national rules for multi-material packaging as well. Some systems require the full weight to be reported under the dominant material, whereas others require an accurate split by material. Members also report divergent treatment of hazardous and commercial packaging. For example, hazardous packaging may be excluded from standard packaging reporting in markets such as Germany but reported through a separate authority or scheme in Poland. Similarly, commercial packaging may be treated differently for fee purposes across Member States. These differences increase complexity and should be addressed through greater harmonisation.

Applying and maintaining different national rule sets requires significant manpower and IT/programming capacity to set up and maintain while considering the own packaging data. Costs also extend to cautious reporting approaches, tending towards in-scope assignments or more expensive reporting classes, to prevent penalties for non-compliance.

Potential Solutions

- Establish harmonised EU definitions for household and professional/B2B packaging.
- Introduce simplified reporting for purely B2B industrial packaging.
- Recognise existing professional waste management systems when determining EPR obligations.

Challenge 2: data management and traceability burden

The management of packaging data is typically distributed across multiple departments inside one company, including procurement, R&D, manufacturing, logistics and regulatory affairs, leading to fragmentation, high administrative load in collecting all the right data and consolidating it (most of the time, manually) and risk of errors. Moreover, ERP and Bill of materials (BOM) systems are rarely structured to identify packaging by material type and destination country, and often not all packaging levels are managed within the BOM or even exist in the same IT system.

Moreover, packaging information often arrives from suppliers in different formats (PDFs, spreadsheets, emails), leading companies with an annual estimate of tens of thousands of supplier documents to process manually to support compliance activities.

Finally, national EPR schemes request different data sets and classifications, with IT systems that need to be customised country-by-country. While Article 44 PPWR establishes a framework for producer registration and reporting, the current PPWR draft Implementing Act focuses primarily on the format of data submission rather than on harmonizing the underlying reporting obligations, classifications and data requirements across Member States. As a result, substantial administrative complexity is likely to persist despite the introduction of common reporting templates.

A harmonized data format is an important first step, but it does not by itself eliminate the need for companies to navigate multiple national portals, reporting rules, classifications and compliance interpretations. The CEA should mandate a genuine EU Digital One-Stop Shop, structuring it as a binding legal obligation.

Expected costs & missed market opportunities

Under the current fragmented system, the cost of EPR data management seems to be depending more and more on how many national systems a company must comply with. A company selling packaged products in 15 or more Member States may be required to maintain multiple registrations, deal with numerous producer responsibility organisations (PROs) and submit substantially similar data through different national portals, each requiring its own data set and IT mapping. FEICA members report that costs rise significantly with every additional EPR country that has to be covered as a producer.

Illustrative company examples show what this issue means in practice:

- Starting investment: €100,000 to €400,000, depending on company size, in data platforms that support PPWR data management among other purposes.
- Internal staff: around 1.5 FTEs over two to three years to build such a platform and collect and improve the data, plus ongoing time for legal assessment, PRO management, report calculation, quality checks, and submission.
- External providers: six-figure costs for reporting and recyclability data calculations, with little room to switch provider, as each uses different software and data requirements to handle national approaches.

National conditions add further layers and costs. Members report, for example, a local VAT registration requirement in Spain, and reporting in Croatia and Hungary based on imports or intra-EU acquisitions rather than on the quantities actually placed on the national market.

The consequences go beyond company budgets. Resources spent navigating fragmented national rules are resources not invested in packaging redesign, recyclability improvements, recycled content or innovation, the very outcomes the PPWR and the Circular Economy Action Plan aim to deliver. A genuine EU Digital One-Stop Shop, where a single data submission is reused across all Member States, or even a harmonised reporting approach, would reduce the need for local staff and country-specific IT mapping, allow more consistent checks of reported figures and free up those resources.

Potential Solutions

- Harmonised reporting framework: a standardised EU reporting template should be established, limiting national deviations wherever possible.
- Digital interoperability: the development of future digital infrastructure should support structured exchange of packaging data where feasible.

Challenge 3: reporting burden and compliance costs

The industry faces significant burdens arising from:

- Multiple national registration systems,
- Different reporting formats and material codes,
- Multiple legal entity registrations,
- Different reporting frequencies,
- Divergent treatment of reusable and non-reusable packaging,
- Country-specific requirements for authorised representatives, leading to separate contracts, duplicate reporting and additional administrative layers.

As a consequence, companies face significant administrative and financial burdens linked to managing multiple registrations, reporting systems and authorised representative requirements. The lack of harmonisation across Member States leads to duplication of effort, increased compliance

costs and a higher risk of errors. For many companies, particularly SMEs, these requirements can act as a barrier to cross-border trade and divert resources away from innovation and sustainability investments.

Expected costs & missed market opportunities

FEICA members confirm that each national variation has to be handled separately, which means further investment in software, integration, or external services for reporting or fee calculation to match each Member State's requirements and timelines. Illustrative companies' examples assume that reporting across EU markets may require an additional 1 to 1.5 FTEs, at an annual cost of approximately €70,000 to €110,000.

Divergent national rules can also mean that the same packaging is paid for twice. PROs and national authorities do not always agree on when quantities must be reported, and some Member States base reporting on imports or intra-EU acquisitions rather than on the quantities placed on their national market. Packaging produced or first reported in one Member State and then sold into another may therefore have to be reported and paid for in both, sometimes by different actors in the supply chain, such as the manufacturer in one country and the distributor in the other.

Members report two outcomes. In some cases, the exported quantities can later be deducted and the fees refunded, but only after the company has pre-financed them, and the amounts initially reported can be several times higher than those ultimately intended for that market. In other cases, due to downstream distributors selling products to other markets and then reporting for EPR there, a double payment arises where no refund in the original market is possible due to a lack of transparency in complex supply chains. This results in a double payment where surplus funding remains in a market where the waste will no longer arise, thus running against the logic of the Single Market.

Potential Solutions

- EU Digital One-Stop Shop for EPR, as proposed by Ecommerce Europe, which would allow:
 - Single registration,
 - Single reporting interface,
 - Single EPR identifier,
 - Harmonised reporting formats,
 - Automated transmission to national systems.

It is worth mentioning Industry-led initiatives already in place that demonstrate the willingness of PROs to explore greater convergence. PROs from Belgium, Netherland, France and Luxembourg are examining how reporting systems could evolve towards greater alignment in the context of the PPWR. Such initiatives could help identify common principles, data requirements and technical solutions that could support the future development of an EU-wide Digital One-Stop Shop.

- Reduction of authorised representative requirements: for intra-EU operators, authorised representative obligations should only apply where there is a demonstrated enforcement need. Moreover, existing Single Market and market surveillance mechanisms should be assessed before imposing additional representation requirements.
- Parent company reporting: where multiple subsidiaries operate within the same Member State, consolidated reporting by the parent company should be permitted, potentially via the EU Digital One-Stop Shop for EPR.

Challenge 4: labelling and artwork management

Chemical packaging is already subject to extensive labelling obligations under CLP, ADR and REACH. Additional EPR labelling requirements create:

- Conflicts with hazard communication requirements (i.e. customers can no longer make sense of such communication, due to the wide variety of labelling)
- Multiple artwork versions
- Small label space constraints
- Increased multilingual requirements

Expected costs & missed market opportunities

Illustrative companies' examples show that the additional cost per company for artwork changes to incorporate new labelling requirement would be in the 640,000 – 1.9 million € range.

These figures go well beyond the graphic change itself. FEICA members' assessments show that even a simple label change involves at least nine internal departments in one organisation: regulatory affairs, graphic design, layout coordination, procurement, quality assurance, master data and IT, manufacturing, logistics and warehousing, and marketing and packaging design. The artwork modification (around €40) accounts for only 1% to 2% of the total cost. Indicative ranges per label change:

- Design and layout work: €840 to €1,830.
- Printer setup and minimum order quantities: €320 to €1,380
- Scrapping obsolete label stock: €110 to €1,600
- Production and master data updates: €610 to €12,100

This adds up to roughly €2,100 to €6,400 per label, or €640,000 to €1.9 million for a portfolio of 300 artworks. Where the new label does not fit the existing packaging, a full redesign adds €5,300 to €21,300. These costs multiply with every national variant and recur with every change made before EU harmonisation, while scrapped labels create avoidable waste.

Other costs are not yet reflected in these figures, such as explaining the changes to customers, distributors and internal staff so that updated labels are understood correctly and hazard communication remains clear.

Potential Solutions

- Accelerate harmonisation of EPR labelling requirements.
- Align timing with other labelling requirements laid down in other EU legislation, such as CLP and the Directive on empowering consumers for the green transition.
- Ensure EPR symbols do not conflict with safety labelling requirements.

Challenge 5: regulatory overlaps and contradictory requirements

The industry increasingly faces overlapping requirements between:

- EPR obligations
- Plastic taxes
- PPWR requirements
- CLP and ADR obligations
- REACH communication duties

With regards to the issue of regulatory compliance, for chemical packaging in particular, compliance obligations under CLP, ADR, REACH and UN transport legislation are often mandatory and non-negotiable. Packaging features requested to ensure safety, prevent leakage or guarantee legal compliance may inadvertently reduce recyclability scores or increase EPR fees. Companies should not be penalized under one framework for complying with requirements imposed by another.

With regards to the issue of financial contributions, future eco-modulation schemes should recognize situations where packaging characteristics are driven by legal safety requirements rather than by design choices. Packaging required to comply with hazardous-goods legislation, chemical safety regulation or food-contact regulations should not automatically be disadvantages in fee structures where those characteristics cannot realistically be altered without compromising regulatory compliance.

Potential Solutions

Better alignment and harmonisation between various EU regulatory frameworks is a must.

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