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**Communication from the Commission to the European Parliament, the Council, the  
European Economic and Social Committee and the Committee of the Regions  
Simplifying for sustainable competitiveness**

**[Mandatory element]**

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## Table of contents

1. INTRODUCTION.....	4
2. STAKEHOLDER INPUTS .....	5
2.1. OVERVIEW OF CONSULTATION ACTIVITIES.....	5
2.2. CALL FOR EVIDENCE .....	6
2.3. BROAD STAKEHOLDER VIEWS .....	6
3. SCOPE OF THE PROPOSAL.....	7
4. SIMPLIFICATION MEASURES .....	7
4.1. REPORTING OF CHEMICALS OF CONCERN (SCIP DATABASE).....	7
4.2. WASTE REPORTING UNDER THE WASTE FRAMEWORK DIRECTIVE .....	9
4.2.1. IMPLEMENTING ACT ON INDICATORS ON WASTE PREVENTION.....	9
4.2.2. DATA QUALITY REPORTS.....	9
4.3. EXTENDED PRODUCER RESPONSIBILITY .....	10
4.3.1. AUTHORISED REPRESENTATIVES .....	10
4.3.2. REPORTING BY PRODUCERS (REDUCING/HARMONISING THE FREQUENCY).....	12
4.4. BATTERIES REGULATION.....	13
4.5. REQUIREMENTS FOR ENVIRONMENTAL MANAGEMENT SYSTEMS UNDER THE IED .....	14
4.5.1. DETAILED ANALYSIS OF COST SAVINGS.....	15
<u>ERROR! HYPERLINK REFERENCE NOT VALID.15ERROR! HYPERLINK REFERENCE NOT VALID.16ERROR! HYPERLINK REFERENCE NOT VALID.17ERROR! HYPERLINK REFERENCE NOT VALID.174.6. PERMITTING OF IRON PRODUCTION UNDER THE IED .....</u>	<u>18</u>
4.7. PERMITTING OF OXY-FUEL COMBUSTION.....	18
4.8. PERMITTING OF HYDROGEN COMBUSTION .....	19
4.9. TRANSITIONAL PROVISIONS FOR CERTAIN IED PROVISIONS APPLICABLE TO INDUSTRIAL INSTALLATIONS .....	19
4.10. SIMPLIFICATION FOR LIVESTOCK FARMS UNDER THE INDUSTRIAL EMISSIONS DIRECTIVE.....	20
4.11. LIVESTOCK AND AQUACULTURE OPERATORS REPORTING TO THE INDUSTRIAL EMISSIONS PORTAL.....	20
4.12. BACK-UP GENERATORS.....	21
4.13. SPATIAL INFORMATION REQUIREMENTS .....	22
4.14. ENVIRONMENTAL ASSESSMENTS STREAMLINING AND ACCELERATION .....	24
4.14.1. SECTORS FOR PRIORITY ACTION .....	24
4.14.2. “SINGLE POINT OF CONTACT” AND COMBINED ENVIRONMENTAL ASSESSMENTS .....	24
4.14.3. “REASONABLE ADMINISTRATIVE COSTS FOR PERMITTING” .....	25
4.14.4. MAXIMUM DURATION OF ASSESSMENTS, TIMELINES.....	25
4.14.5. CROSS-BORDER DIMENSION .....	27
4.14.6. DIGITAL SUBMISSIONS.....	27

<b>4.14.7. EFFECTIVE JUDICIAL PROCEEDINGS .....</b>	<b>28</b>
<b>4.14.8. PRIORITY FOR STRATEGIC SECTORS .....</b>	<b>28</b>
<b>4.14.9. ASSESSMENT OF IMPACTS .....</b>	<b>28</b>
<b>4.15. OVERALL IMPACTS .....</b>	<b>31</b>
ANNEX 1: PROCEDURAL INFORMATION .....	33
ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT) .....	35
ANNEX 3: LIST OF MAIN SUGGESTIONS FOR SIMPLIFICATION MADE VIA THE CALL FOR EVIDENCE.....	52
ANNEX 4: WHO IS AFFECTED AND HOW? .....	63

## 1. Introduction

The [Political Guidelines 2024-2029 | European Commission](#) highlight simplification and better implementation of EU rules as core to making business easier and faster in Europe. The Commission has made simplification, reducing the reporting burden and simplifying legislation its [top priorities for the next five years](#). The Political Guidelines also underline that EU must and will stay the course on all of our goals, including those set out in the European Green Deal<sup>1</sup>.

As highlighted in his report on ‘The Future of European Competitiveness’, Mario Draghi emphasised that the transition to a low-carbon, resource-efficient, and circular economy will also be essential for securing the EU's long-term economic prosperity, resilience, and competitiveness.<sup>2</sup> However, to unlock the full potential of this transition, a cohesive and well executed strategy will be crucial, including fostering the role of public and private finance in supporting the transition. With the Competitiveness Compass for the EU, the Commission presented this strategy for the next five years.<sup>3</sup>

The Compass identifies the policy changes that are needed for the EU to step up to the new realities and develop novel ways of working together to increase the speed and quality of decision-making. A pivotal point to achieve this will be the simplification of the regulatory environment and the reduction of burden. The Compass, therefore, sets the target of cutting administrative burden by at least 25% for all companies and at least 35% for small and medium-sized enterprises (SMEs) without undermining the respective policy goals.

Meeting the goal requires cutting recurring administrative costs by EUR 37.5 billion by the end of the mandate with dedicated measures for SMEs. Since February 2025, the Commission has put forward seven omnibus proposals and other simplifications proposals bringing over EUR 10 billion annual administrative costs savings in areas of key interest for businesses including sustainability reporting, investments, small mid-caps, agriculture, defence, chemicals and digital. These proposals include specific measures to relieve SMEs and are currently being negotiated by the co-legislators.

The Commission is therefore pursuing an ambitious programme, to make Europe an even more desirable place to live, work and invest. This includes measures to lighten the regulatory load for people, businesses and administrations. This package is meant to ensure that environmental policies are easier and cheaper to implement, and so to ensure that they happen on the ground. Simplifying and improving EU policies and laws, will make rules clearer and easier to understand and faster to implement.

This Staff Working Document (SWD) accompanies a simplification Omnibus package related to administrative obligations in the environmental field, and managed by the Directorate-General for the Environment, and covers: (1) the input and feedback received from stakeholders during the consultation process; (2) the legislation covered; (3) the simplification measures to streamline the regulatory framework, while maintaining the objectives of the legislation and removing unnecessary complexity, along with a quantification of the expected savings.

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<sup>1</sup> [The European Green Deal - European Commission](#)

<sup>2</sup> [The Draghi report on EU competitiveness](#)

<sup>3</sup> Communication from the Commission to the European Parliament, the European council, the Council, the European Economic and Social Committee and the Committee of the Regions, COM (2025) 30 final: A Competitiveness Compass for the EU.

## 2. Stakeholder inputs

The need for simplification has been actively raised by many stakeholders both in the EU and outside, public authorities and business. The Commission engages with these stakeholders - industry, and national authorities as well as NGOs - with a view to receiving their feedback and suggestions to improve the functioning of legislation.

### 2.1. Overview of consultation activities

The Commission is in frequent dialogue with stakeholders about new and existing legislation. Much of the legislation under the scope of this proposal has been subject to an evaluation or fitness check or an impact assessment, also based on public consultations, in accordance with the Commission's Better Regulation agenda<sup>4</sup>. These are published together with the evaluation reports or proposals they accompany and can be accessed from the Have Your Say portal<sup>5</sup>. As the issue of simplification and reducing administrative burden has been subject to considerable discussion, the Commission has received numerous position papers and inputs including as feedback to a call for evidence on simplification covering all legislation.

This initiative is of potential interest to relevant industrial/economic actors, including SMEs, public bodies (e.g. administrations in charge of implementing environmental legislation), non-governmental organisations (such as environmental groups or consumer bodies), international organisations, and academia. The consultation activities aimed to reach all interested stakeholder groups.

The Commission has also considered the consultation activities carried out by the consultants working on the ongoing study<sup>6</sup> on environmental reporting and other administrative obligations. The study will be published in early 2026, while consultation activities as part of the study were relevant for this initiative and were taken into account. The study also includes analyses of some of the measures included in this proposal and sets out the assumptions in further detail.

The following consultation activities have been carried out to prepare this omnibus package:

- An online webinar on environmental reporting (carried out by the consultant) on 13 February 2025 and an online survey of the participants to the above webinar who had agreed to be contacted for its purpose.
- A call for evidence<sup>7</sup> for the environmental omnibus open for feedback from 22 July 2025 to 10 September 2025.
- A high-level roundtable on simplifying environmental laws on 2 October 2025.
- An Implementation dialogue with Commissioner Roswall on Environmental Assessment and Permitting on 10 April 2025, and an Implementation dialogue with Commissioner Jørgensen on permitting in the clean energy transition; public consultations for the Grids and Industry Accelerator acts (concerning environmental permitting aspects).
- An online meeting of the EIA/SEA Expert Group on environmental assessments and permitting on 13 June 2025.

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<sup>4</sup> [https://commission.europa.eu/law/law-making-process/better-regulation\\_en](https://commission.europa.eu/law/law-making-process/better-regulation_en)

<sup>5</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say_en)

All evaluations, fitness checks, and impact assessments of policy proposals by the Commission are published together with the results of the associated public consultations and any policy proposal on the Have Your Say portal.

<sup>6</sup> [Environmental Reporting and Simplification - Trinomics](#)

<sup>7</sup> [Simplification of administrative burdens in environmental legislation](#)

- A Call for evidence<sup>8</sup> on the revision of the Inspire Directive (GreenData4All initiative), open for feedback from 26 February 2024 to 25 March 2024.
- A public consultation<sup>9</sup> on the revision of the Inspire Directive from 05 February 2025 to 30 April 2025.
- Meetings and exchanges with stakeholders concerning simplification in the area of environmental policy, reported in the EU Transparency Register.

Overall, consultations about simplification of environmental legislation drew a lot of attention, including from the wider public, while the consultations on the Inspire Directive drew a more specialised audience.

The online workshop held on 13 February 2025 had 500 registrants and more than 300 active participants<sup>10</sup>. The follow-up targeted consultation led to more than 500 inputs, many of a specific nature. Several of the proposed simplifications in the omnibus respond to the input received.

The call for evidence on environmental simplification drew considerable attention (see below). A detailed report on all consultation activities is provided in annex 2 (synopsis report).

## 2.2. Call for evidence

The Commission published a call for evidence on the environmental simplification package on the Have-Your-Say website: [Simplification of administrative burdens in environmental legislation](#). The feedback period was from 22 July 2025 till 10 September 2025. As the call began during July 2025, the feedback period was extended from the standard 4 weeks to 7 weeks to compensate for partially running in the Summer. All feedback is published on the Have-Your-Say website.

There were 190 998 contributions, of which 189 751 (99.3%) came from citizens with many of these prompted via campaign websites (mainly linked to a #handsoffnature campaign). There were 1 247 contributions from entities other than citizens, including businesses and business associations, non-governmental organisations (environmental and other), public authorities and academics. There were 622 attachments, mainly position papers, attached to these submissions, which often included specific suggestions.

## 2.3. Broad stakeholder views

From a business perspective, there is support for less burdensome regulation that leaves business with flexibility to deliver both growth and sustainable production. There is a perception of administrative obligations that are too prescriptive, and do not provide value added. Yet, business stakeholders largely underline that they agree with goals of EU environmental laws but urge that they should be achieved in a simplified way.

On the side of civil society, there is support for a simplification that makes it easier to protect the environment and human health standards and avoid deregulation, for example by removing redundancies and avoiding excessively detailed regulations. The numerous citizens expressed concerns that efforts to simplify regulations could undermine environmental protections, emphasising the current legal framework's importance and success. They urged the EU to focus on enforcing existing laws rather than creating new simplifications. Citizens also expressed

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<sup>8</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information_en)

<sup>9</sup> [GreenData4All – updated rules on geospatial environmental data and access to environmental information](#)

<sup>10</sup> [Environmental Reporting and Simplification - Trinomics](#)

concerns about transparency and democratic processes in regulatory simplifications, with calls for transparent decision-making, adequate consultation, and maintaining rigorous impact assessments.

### 3. Scope of the proposal

This omnibus package covers legislation in the area of the environment, specifically:

- Directive 2008/98/EC on waste, hereafter referred to as the Waste Framework Directive<sup>11</sup>,
- Regulation (EU) 2023/1542 concerning batteries and waste batteries, hereafter referred to as the Batteries Regulation<sup>12</sup>
- Directive 2010/75/EU on Industrial and Livestock Rearing Emissions<sup>13</sup> as amended by Directive (EU) 2024/1785, hereafter referred to as the Industrial Emissions Directive<sup>14</sup>
- Regulation (EU) 2024/1244 on reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal<sup>15</sup>, hereafter referred to as the Industrial Emissions Portal
- Directive (EU) 2015/2193 on the limitation of emissions of certain pollutants into the air from medium combustion plants, hereafter referred to as the Medium Combustion Plants Directive<sup>16</sup>
- Directive 2007/2/EC establishing an Infrastructure for Spatial Information in the European Community, hereafter referred to as INSPIRE<sup>17</sup>

The environmental omnibus simplification package also includes a proposal for a Regulation on speeding up environmental assessments, that will speed up permitting and cut costs.

### 4. Simplification measures

This section provides a description of the change being made, an analysis of the associated reduction in costs and the safeguards to environmental performance.

#### 4.1. Reporting of chemicals of concern (SCIP database)

SCIP is the database for information on Substances of Concern In articles as such or in complex objects (products) established under the Waste Framework Directive (WFD)<sup>18</sup>.

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<sup>11</sup> Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives as last amended by Regulation (EU) 2023/1542.

<sup>12</sup> Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC.

<sup>13</sup> Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control).

<sup>14</sup> Directive (EU) 2024/1785 of the European Parliament and of the Council of 24 April 2024 amending Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC on the landfill of waste.

<sup>15</sup> Regulation (EU) 2024/1244 of the European Parliament and of the Council of 24 April 2024 on reporting of environmental data from industrial installations, establishing an Industrial Emissions Portal and repealing Regulation (EC) No 166/2006.

<sup>16</sup> Directive (EU) 2015/2193 of the European Parliament and of the Council of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants.

<sup>17</sup> Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 establishing an Infrastructure for Spatial Information in the European Community (INSPIRE).

<sup>18</sup> Article 9(1)(i) and 9(2) of the Waste Framework Directive, as amended by Directive (EU) 2018/851, mandates the European Chemicals Agency (ECHA) to establish a database of substances of very high concern. The Articles include a reference to Article 33(1) of the REACH Regulation.



The SCIP notification obligation for companies applies from January 2021 and was intended to help waste operators and recyclers to safely manage hazardous substances in products at the end of their life. The obligation falls on an enterprise that produces, assembles, imports or distributes an article that contains substances of very high concern (SVHCs) on ECHA's Candidate List in a concentration above 0.1 % by weight. In these cases, the enterprise needs to notify them to the SCIP database maintained by the European Chemicals Agency (ECHA). The data covers the concentration range and location of the Candidate List substances present in the article, and information that allows its safe use – notably information to ensure the article is properly managed once it becomes waste. The information in the SCIP database is made publicly available, in particular to waste operators and consumers.

Stakeholders expressed doubts about the usefulness and effectiveness of the SCIP database for waste operators and consumers<sup>19</sup>. They note that relatively little use is made of the database, with the number of online 'hits' being low. This may reflect the data being too complex to be meaningful for the target audience and a perception that it provides little added value over and above other means of information provision (such as labels). The data is also seen as duplicating REACH Article 33(1) on obligations and so creating disproportionate burdens without benefit especially for space products and B2B transactions. It is noted that the database was not part of the Commission's original proposal, and the amendment by the co-legislators was not subject to an Impact Assessment prior to its inclusion in the final legal text.

Apart from the provision of data through REACH, there are also other changes that will provide this information better in the future. The progressive rollout of the digital product passport under the ESPR from 2027, as well as under other legislation (e.g. Toys Regulation) will provide some of this information in a more impactful manner. With the adoption of the One Substance, One Assessment legislative package, work is ongoing to set up by 2030 a Common Data Platform on Chemicals. This will make information on substances of very high concern and the web portal for data in the digital product passport easily available. Thanks to data reported by the Member States' authorities and by businesses this information will also be better organised and more easily accessible. The use of the digital product passports and in the future more comprehensive ESPR labels will further limit the future additional benefit of the database. Overall, **the environmental and health impact of repealing the database seems negligible.**

Whilst not fully in operation or at full compliance yet, the number of submissions to the SCIP database is increasing. Data from March 2022 showed 24 million notifications from 7 600 entities, with a small number of companies responsible for a large share of the volume of notifications. Around 500 000 entities could have to submit information to the SCIP database, though not every year. It is unclear how many notifications would be required as this depends on the use of chemicals by product, and speed of change in the market: a conservative estimate is that around 10 000 entities would annually submit data, each making notifications related to around 1 500 articles<sup>20</sup>. However, the number of notifications is uncertain and some estimates of the number of notifications per company are higher.

Based on current experiences and economies of scale leading to improved efficiency, each submission can be assumed to take half an hour. The costs are estimated on the basis of business survey and feedback to be EUR 30 per hour and an average half an hour per submission, with this reflecting investment costs for enterprises in specialized software and dedicated teams or consultancy for data collection, formatting (XML/IUCLID), and submission processes. Some

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<sup>19</sup> European Chemicals Agency, "First ex-post Evaluation of SCIP"

<sup>20</sup> Based on European Chemicals Agency, "First ex-post Evaluation of SCIP", 2022 and subsequent analysis



companies will have to notify fewer articles but may take more time for notification while companies notifying many articles probably obtain some economies of scale.

Companies with very few notifications will have relatively high investments costs (costs related to IT systems integration and software development range between EUR 1,000 and EUR 250,000 per company) to put a management-system into place (with associated training costs), the direct notification costs are relatively low. With a growing number of notifications, the investments costs for the management-system will constitute a shrinking share of the overall costs. However, the direct notification costs will rapidly with the number of notifications.

Overall, the avoided cost for business is estimated to be **EUR 225 million per annum** but could be higher in future years. In addition, the costs for ECHA of running the SCIP database are already several million Euro, and likely to increase.

## **4.2. Waste reporting under the Waste Framework Directive**

### **4.2.1. Implementing act on indicators on waste prevention**

Article 9(7) of the Waste Framework Directive, as amended by Directive (EU) 2018/851, empowers the Commission to adopt implementing acts to establish indicators to measure the overall progress in the implementation of waste prevention measures but there is no requirement for the Member states to use the indicators. This empowerment will be deleted, and no implementing act will be adopted.

This will have no environmental impact, as the Member States have established national corresponding indicators, and relevant data that is required will continue to be reported on the basis of the requirement in Article 9(3) of the Waste Framework Directive and collected by the European Environment Agency. Moreover, Article 9(3) would not have required the Member States to use the indicators specified in the implementing act.

There will be a cost saving for public authorities from this rationalisation of reporting, but the amount saved will be very low as relevant data will continue to be reported, but a possible duplication is removed.

### **4.2.2. Data quality reports**

Several pieces of legislation<sup>21</sup> require the Commission to review data reported and publish a report on the results of its review, for example, within a set number of months or with a set frequency. In practice, this provision has been too prescriptive and meant that analysis is required at the wrong time and only covers part of the information. For example, a report may need to be published out of synch with evaluations undertaken in line with the Commission's better regulation guidelines. In response, these requirements will be deleted and replaced with a more flexible requirement for the Commission to review information.

This will have no environmental impact as the relevant data will continue to be collected and analysed and the Commission could decide to publish a report in a more flexible manner or make the same type of assessment in the context of the evaluation and revision processes.

There will be a cost saving for the Commission and for public authorities from this proposal to rationalise reporting, but the amount saved will be very low as relevant data will continue to be reported. The data will be more flexibly reviewed which would allow for better use.

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<sup>21</sup> For example, Article 37(6) of the Waste Framework Directive, Article 76(4) of the Battery Regulation.

### **4.3. Extended Producer Responsibility**

Extended producer responsibility (EPR) stands for the responsibility of a producer to cover the costs of the product's management at its end of life. Rules on EPR are based on the Waste Framework Directive, which contains general minimum requirements. Specific EPR rules per product group exist in the Packaging and Packaging Waste Regulation, the Regulation on batteries and waste batteries, the Waste Electronic and Electrical Equipment Directive on and the Single Use Plastics Directive as well the Directive on end-of-life vehicles (currently under review, co-decision ongoing). In addition to EU mandated EPR for certain products, Member States can have national rules on EPR for additional products, provided the rules comply with the minimum requirements in the Waste Framework Directive.

#### **4.3.1. Authorised representatives**

An authorised representative for EPR, under these pieces of legislation, acts on behalf of a producer who sells products covered by EPR, in a Member State where the producer is not established. The precise requirements differ across Member States, which impacts on their costs. The purpose is to ensure that the producer, who is not established in the Member States where the product is made available, complies with EPR rules, ensuring that the costs of managing the waste from these products are covered. The logic of placing products on the market in a single EU-27 jurisdiction is not mirrored in waste management legislation, where EPR obligations are circumscribed to the territory of each Member State where producers make available products.

In the May 2025 Communication on the Single Market Strategy<sup>22</sup>, the Commission pointed out that complexity in the implementation of the EPR rules is one of the barriers to the internal market, in particular the possibility (and in some legislations) obligation for a producer to have an authorised representative for EPR.

The proposal provides flexibility for producers established in the Union as to whether they appoint an authorised representative for extended producer responsibility, by suspending provisions that make the appointment mandatory or leave a margin of discretion for Member States.

Where the relevant legislation is a Directive (as opposed to a Regulation), Member States may have made use of Article 193 TFEU, which allows them to maintain or adopt more ambitious rules. This will affect the response to changes in the Directives, but the proposal encourages all Member States to suspend such obligations.

The administrative burden arising from the appointment of up to 26 different authorised representatives for EPR for producers established in another Member State than the one where they are selling products will be alleviated by giving such producers the option to choose whether they appoint an authorised representative for EPR or to fulfil their EPR obligations by themselves.

Producing an estimate of the cost saving from this increased flexibility is challenging. The costs of EPR vary considerably between product groups, the volume placed on the market, Member States, and the services offered. For example, the costs of EPR for batteries differ depending on the waste management approaches of each Member State, which may reflect the collection and recycling infrastructure. The cost of appointing an authorised representative may be affected by these differences in EPR, which affect the services that the authorised representative needs to provide. Furthermore, the number of firms using an authorised

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<sup>22</sup> [The Single Market: our European home market in an uncertain world - Internal Market, Industry, Entrepreneurship and SMEs](#)

representative is unclear as companies can also be established in multiple countries: accordingly, and as an example, in Germany, around 40% of batteries producers and around 66% of WEEE producers use an authorised representative. At the same time, in Germany there would be a registration by producer per sub-category and brand with the average number of active registrations being 3 per producer or authorised representative.

There are two elements to be taken into account: fees for the registration of the authorised representative in the national register of a Member State, which are not always arising; and costs for the services provided by the authorised representative, which are part of a private contract. Related costs to the overall financing of the EPR system in place in Member States might be impacted but are challenging to quantify.

The fees paid as part of EPR schemes related to the environment in the EU is around EUR 15 to 20 billion per annum<sup>23</sup>. The cost of authorised representatives would be much lower than this. Fees for individual firms to appoint an authorised representative will usually vary between several hundred Euro to several thousand Euro and across the EU total perhaps a billion or two billion Euro a year. This is based on uncertain estimates of the number of producers involved and the cost for each producer.

This is based on survey results to questions about the annual cost of authorised representatives across all Member States, related to registration and membership fees, and staff resources, which give totals that range between 260 EUR (for a micro-enterprise) to EUR 400 000 for a large company with higher turnover.<sup>24</sup> One firm, selling to 15 Member States, estimated they paid a total of EUR 6 000 Euro per year for authorised representatives. In feedback to the call for evidence a figure of EUR 2 000 was quoted, for example, for Spain and Ireland. Many companies offering authorised representative services advertise online, and their quoted prices usually start at several hundred Euro and increase by size and depend on the country in question.

This proposal will make the market for authorised representatives more flexible, offering EU producers a choice to make use of authorised representatives in the countries where they make their products available by suspending the obligation. Companies will be able to choose whether to do the tasks themselves, or to pay the authorised representatives to fulfil the administrative requirements including service provision and assumption of liability. Different companies will make different decisions in this context: a company may decide not to use an authorised representative and so save that cost at the expense of carrying out those services itself. Clearly, for some, it will be easier to comply with EPR obligations through an intermediary and so they will continue to use an authorised representative.

The market value for authorised representatives for EPR is probably worth between one and two billion Euro a year. Against this baseline figure, the benefit of the improved flexibility is difficult to estimate. Notably, it depends on the decisions of Member States and the choices of businesses reflecting their savings from not using an authorised representative compared to the cost and difficulty of meeting the obligations themselves. For example, if the obligation is removed from a Directive, Member States may still choose to require an authorised representative in their national legislation ie go beyond EU requirements in line with the environmental legal base. Whilst the behavioural response of firms is unclear, the net savings for business (so the reduced expenditure on authorised representatives but the increased expenditure by business on undertaking these services internally) could be one-fifth with 20%

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<sup>23</sup> “EPR – Smart regulation or stealth tax? A global long-term view on Extended Producer Responsibility across key materials”, Roland Berger, 2025

<sup>24</sup> [https://ecommerce-europe.eu/wp-content/uploads/2025/06/EPR-Administrative-Burden-Study\\_v5.0-CLEAN.pdf](https://ecommerce-europe.eu/wp-content/uploads/2025/06/EPR-Administrative-Burden-Study_v5.0-CLEAN.pdf)

of existing costs saved: this is based on feedback about the current value added of the authorised representative function, including feedback to the Call for Evidence. Based on the mid-range of the market size (i.e. EUR 1.5 billion annually) the benefits are estimated at **EUR 300 million per annum**.

The environmental obligations of producers will remain unchanged. The flexibility about appointing an authorised representative could create some concerns that it will hinder enforcement but is already the case for many other producer requirements and will ensure proportionate requirements including for SMEs.

Ensuring traceability and enforcement is more challenging when it relates to producers established in third countries compared to those operating within the Union, as such producers fall outside the territorial scope of Member States' enforcement powers and are not covered by the Union administrative and judicial cooperation mechanisms that enable the enforcement of obligations and judgments within the internal market. The existing provisions on the appointment of an authorised representative for extended producer responsibility for producers established in third countries are therefore unchanged.

EPR requirements are unchanged, and so in principle there should be no impact on the environment, unless freeriding increases and enforcement is negatively affected. European producers, falling in the scope of EPR, selling in multiple Member States would still be required to have representation in each Member State where they sell by means of importers and distributors. It is possible that firms taking advantage of the increased flexibility will primarily be SMEs.

This measure is consistent with an option that will be considered in the impact assessment for the Circular Economy Act (due in 2026), related to harmonised EPR schemes and one stop shops.

#### **4.3.2. Reporting by producers (reducing/harmonising the frequency)**

Producers are required to report on their sales volumes, notably to determine the extent of the EPR fees to be paid by the producer to cover the cost of the waste management of the product the producer has sold. In waste legislation laid down in Directives, Member States have maintained the competence to determine the reporting frequency. This has led to a lack of alignment in the reporting periods for EPR between Member States.

Waste legislation laid down in Regulations, such as the Batteries Regulation and the PPWR, align the reporting frequency to once each calendar year. The proposal harmonises the reporting frequency across relevant legislation and moves towards a harmonised date for the yearly (preceding financial year) reporting obligations. This would be especially valuable for businesses that operate in multiple Member States and produce products falling into several waste categories (hence multiple reports). By limiting the reporting frequency to maximum once per year, the proposal will reduce the administrative burden and the adverse impacts on the functioning of the internal market, in particular for producers which sell products in multiple Member States and for SMEs.

This will have no environmental impact as there would only be a change in the frequency of reporting.

There will be a cost saving for producers and the entities concretely reporting from this rationalisation of reporting.

#### 4.4. Batteries Regulation

The proposal clarifies under the Batteries Regulation that a manufacturer, importer or distributor or other natural or legal person that sells batteries in a Member State and is established in another Member State or in a third country, qualifies as a producer, irrespective of the selling technique used, including by means of distance contracts.

This simplification addresses an unintended loophole in the producer definition in the legal text of the Batteries Regulation. The change is to include all selling techniques in the definition of producer under Art.3(47)(d), instead of only means of distance contracts and this ensures that economic operators established outside the Member State where they make batteries available on the market qualify as producers. In consequence, the obligations under Chapter VIII of the Batteries Regulation apply to such producers. This ensures that batteries placed on the Union market will be collected once they become waste and are treated according to the provisions in Chapter VIII of the Regulation.

This simplification will provide regulatory clarity and ensure a level playing field, with a clearer and fairer sharing of costs and some savings for EU producers. The increased clarity on responsibilities will lead to environmental benefits through avoiding negative environmental impacts of batteries which become waste.

Furthermore, Article 13 of the Batteries Regulation requires that batteries should bear a label indicating the presence of hazardous substances. However, the definition of those substances for labelling is unclear since the corresponding recital specifies that batteries should be labelled with the amount of certain hazardous substances present. Therefore, the proposal adds further precision on the scope of the substances that need to be labelled by referring to substances of very high concern identified in accordance with Regulation (EC) No 1907/2006 and Regulation (EC) 1272/2008. As a result, a much reduced number of chemical substances will need to be reviewed for being labelled under the Batteries regulation.

More specifically, from the end of 2027 an obligation for labelling would have applied to potentially more than 20 000 hazardous substances. Doing so would be impractical, costly and also not an efficient means of communicating risk. The change will lead to battery labelling for Substances of Very High Concern, a smaller and more focused set of substances, not exceeding 1000 chemicals.

#### 4.5. Requirements for Environmental Management Systems under the IED

Directive 2010/75/EU on Industrial and Livestock rearing emissions (the Industrial Emissions Directive)<sup>25</sup> covers large industrial installations and intensive livestock farms, with the revised directive expanding its scope to include more installations like large-scale battery production and mining of metals<sup>26</sup>.

The IED requires operators to have an **environmental management system** ('EMS') for each installation in the scope of its Chapter II. Article 14a(1) specifies a range of requirements that the EMS must comply with, and with a view to simplifying such requirements and reducing the induced administrative burden while maintaining high standards as regards the protection of human health and the environment, the following changes are proposed to this Article:

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<sup>25</sup> Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control) (Recast) as last amended by Directive (EU) 2024/1785; OJ L 334 17.12.2010, p. 17.

<sup>26</sup> Following the 2024 revision of the IED, 37,000 industrial installations and 38,500 pig and poultry farms will be in scope, once the transposition period has ended (1.7.26).



- a. Allowing several installations in the same Member State, either under the control of the same operator or belonging to the same company, to be covered by a single environmental management system. It will have a negligible environmental impact, while reducing administrative burden for industrial operators with associated annual savings between EUR 12 million to EUR 90 million with **central estimate of EUR 24 million.**
- b. Repealing the requirement to include in the EMS a chemical inventory of the hazardous substances present in or emitted from the installation, a chemical risks of the impact of such substances on human health and the environment, and an analysis of the possibilities for substituting them with safer alternatives or reducing their use or emissions. This risks an environmental impact but most substances are already covered by similar requirements under other legislation. It will reduce administrative burden for industrial operators with associated annual savings of **EUR 50 million on average.**
- c. Repealing the empowerment for the Commission to adopt an Implementing Act on which information from the EMS is relevant for publication. This will have a negligible environmental impact since the requirement to make the relevant information set out in the EMS available on the internet would stay untouched.
- d. Repealing the auditing requirement for EMS. This will have a negligible environmental impact as other environmental management system schemes such as EMAS or ISO 14001 already contain provisions regarding regular internal and external auditing. Stakeholders had also identified a lack of auditing capacity that may make compliance difficult. It will reduce administrative burden for industrial operators with associated annual savings between EUR 10 million to EUR 44 million **with central estimate of EUR 24 million.**
- e. Repealing the requirement to develop installation-level indicative transformation plans to be included in EMS. This will have a medium environmental impact as transformation plans are indicative and do not contain mandatory targets. Moreover, similar plans are required at corporate level under other EU law, e.g. CSRD. The associated savings are between EUR 20 million and EUR 50 million (one-off), without considering the savings associated to the implementation of the plans **with central estimate of one-off savings of EUR 35 million.**
- f. Giving more time to operators to prepare and implement the EMS in accordance with the revised Article 14a, by postponing the deadline from 2027 to 2030. This measure will result in cost saving for industrial operators.

Additionally, repealing the requirements to include a chemical inventory and the indicative transformation plan would align IED Article 14a requirements on the EMS with the requirements of Regulation No 1221/2009 (Eco-management and audit scheme – EMAS). With this proposed simplification, IED operators who are already EMAS-compliant would be automatically compliant with EMS requirements of IED Article 14a, and so contribute to the reduction of the administrative burden.

The changes to Environmental Management Systems (EMS) under the IED (the deletion of the chemical inventory, the deletion of auditing requirements, and allowing operators to have only one EMS covering all their installations in the same Member States) leads to savings with the central estimate of **EUR 98 million per annum plus EUR 35 million of one-off savings, equivalent in total to around EUR 100 million per annum.** The environmental obligations remain unchanged.

#### 4.5.1. Detailed analysis of cost savings

##### **Simplification: Allowing for one EMS to cover multiple installations in a MS, under the control of the same operator or belonging to the same company**

The analysis of cost savings reflects:

- Number of installations concerned by the simplification (i.e. all IED installations, belonging to a company made of at least 2 installations, and excluding intensive rearing): 20 000 to 25 000 installations, with a central estimate around 21 000 installations
- Estimated costs saving resulting from the simplification (for industry): Annual savings are approximately EUR 12 to EUR 90 million per year (with a central estimate of EUR 24 million).
- Number of installations concerned by EMS requirements: ~ 38 000

The IED requires operators to have an environmental management system ('EMS') for each installation in the scope of its Chapter II. Article 14a(1) specifies a range of requirements that the EMS must comply with. Under this measure, operators would be able to apply a single EMS across multiple installations in the same Member State.

The methodology for estimating the number of IED installations belonging to the same company considers:

- Regarding the available data from the dataset on industrial information:
  - Most of the information contained in the dataset of industrial installation is available at installation level only.
  - Information regarding the grouping of two or more installation as belonging to the same facility, or the same company, is not reported consistently by MS.
  - It is considered that the set of installations under the control of the same operator (i.e. belonging to the same facility) are included in the set of installations belonging to the same company. Therefore, it is sufficient to estimate the number of installations belonging to the same company in order to evaluate the impact of this simplification.
- Regarding the data analysis:
  - The estimation of the number of IED installations belonging to the same facility or company was conducted using the data from a representative sample of ~ 28 000 installations from 8 MS (DE, IT, FR, PL, ES, NL, BE, FI).
  - These installations represent ~75% of IED installations concerned by EMS requirements (i.e. intensive rearing activities, which are not required to establish and EMS, are excluded from the sample).
- Caveats
  - It is assumed that installations belonging to companies with a similar name belong to the same company. It is not possible to verify whether these installations belong in fact to the same company or are under the control of the same operator.
  - It is assumed that the sample taken is representative. It is not possible to ensure that the extrapolation to the rest of EU installations is exact.

##### **Simplification: Deletion of the chemical inventory requirement**

The analysis of cost savings reflects:

- Number of installations concerned by the chemical inventory requirement: ~ 32 000
- Total number of installations concerned by the simplification: ~ 20 000



- Estimated costs saving resulting from the simplification (for industry): EUR 7M in the cases where only inventories of chemicals are maintained by all installations to EUR 130 million in the case of inventories, software packages and substitution assessments are performed for all installation on average each year (with a central estimate of EUR 50 million per year reflecting a mix of simple inventories for smaller users and chemicals through to inventories, software packages and substitution assessments for major users / producers)

The IED requires operators to have an environmental management system ('EMS') for each installation in the scope of its Chapter II. Article 14a(1) and (2) specify a range of requirements that the EMS must comply with. This includes under 14(a)(2)(d) a chemical inventory of the hazardous substances present in or emitted from the installations, and a risk assessment of the impact of such substances on human health and the environment. Additionally, an analysis of the possibilities of substituting hazardous substances with safer alternatives or reducing their use or emissions is required. Under this measure, this requirement would be deleted.

The assessment considers:

- Using data from the Industrial Reporting Hub from the EEA the installations for which a chemical inventory requirement has been included in BAT Conclusions already and for which removal of the obligation in the Directive would have no noticeable effect. This includes Ferrous Metal processes (3 817 installations), Slaughterhouses (1 277 installations), smitheries and foundries (1 660 installations), and textiles (289 installations).
  - Most of the information contained in the dataset of industrial installations held by the EEA allows the identification of the approximate number of installations falling under the industrial activities noted above.
- Also using the EEA data to distinguish between those installations that are involved in the manufacture / production of chemicals and for which a chemical inventory is expected to take significant effort (between EUR 1 090 and EUR 18 736 per installation), and those that are users of chemical products but are not producers of chemical products where the obligation would be less costly (between EUR 335 and EUR 6 160 per installation).

### **Simplification: Deletion of the obligation to adopt a delegated act on EMS information relevant for publication**

Article 14(a)(4) specifies that in relation to the relevant information to be made available on the internet in relation to EMS that the Commission shall adopt an implementing act on which information is relevant. Under this measure this provision would be deleted. This would have no direct impact on IED installations. The deletion of the delegated act is a simplification for the Commission services and the Member States, who will not have to participate in the elaboration of the act. It will also provide flexibility to Member States to determine what information is required to be published online.

### **Simplification: Deletion of the audit requirement**

The analysis of cost savings reflects:

- Total number of installations concerned by the audit requirement and by the simplification: ~ 13 500 installations
- Estimated costs saving resulting from the simplification (for industry): EUR 7.5 million to 33 million on average each year (with a central estimate of EUR 18 million per year)

The IED requires operators to have an environmental management system ('EMS') for each installation in the scope of its Chapter II. Article 14(4) requires the EMS to be audited for the first time by 1 July 2027 and then at least every three years by an accredited conformity assessment body. Under this measure the requirement for such audits would be deleted.

The assessment considers:

- The total number of IED installations taken from the Industrial Reporting Hub from the EEA.
- The installations for which a certified EMS has already been adopted and for which auditing is already required under those certification schemes, most notably ISO 14001 (14 489 IED installations already certified) and EMAS (1 000 installations already certified). The savings for removing EMS auditing for such installations would be zero.
- The installations for which BAT conclusions specify internal and external auditing of an EMS (being FDM, FMP, SA, SF, TXT and WI) totalling 9 000 installations but recognising that approximately half of these will have ISO 14001 or EMAS in place, thereby the actual total to discount is 4 500.
- Distinguishing between the complexity of the audits to be performed – limited complexity, medium complexity and highly complex.
- Reflecting on the higher cost of a first audit and the lower costs of subsequent audits (2/3 cost of first audits).
- Annualising the costs of the above.

### **Simplification: Deletion of the transformation plans**

The analysis of cost savings reflects:

- The number of installations concerned by the simplification is the same as the number of installations concerned by EMS requirements, but operators had already the possibility to mutualise the transformation plan at company level).
- Total number of installations concerned by the simplification: 20 000 to 25 000 installations, with a central estimate around 21 000 installations
- Estimated costs saving resulting from the simplification (for industry): EUR 20 to 50 million as a one-off cost. The costs of implementing the transformation plan are not considered in this figure

The IED requires operators to have an environmental management system ('EMS') for each installation in the scope of its Chapter II. Article 14a(1) and (2) specify a range of requirements that the EMS must comply with. This includes under 14(a)(2)(f) a transformation plan containing information on how the operator will transform the installation during the 2030-2050 period to contribute to the emergence of a sustainable, clean, circular, resource-efficient and climate-neutral economy by 2050. Under this measure, this requirement would be deleted. The costs are those reflected in the original IED impact assessment.

### **4.6. Permitting of iron production under the IED**

Annex I of the Directive [2010/75/EU](#) on Industrial and Livestock rearing emissions covers in activity 2.2, "Production of pig iron or steel (primary or secondary fusion) including continuous casting, with a capacity exceeding 2,5 tonnes per hour". Pig iron is produced through the conventional process of smelting iron ore in a blast furnace. Several, more recent and innovative iron ore processing techniques are not producing pig iron as such but lead to an intermediate product used to produce steel.

Concerns and doubts have been raised on whether these other processes are covered by activity 2.2 IED. Removing the word 'pig' in this activity would align the activity with the same activity

under the EU's Emissions Trading System (ETS, Annex I to Directive 2003/87/EC) and clarifies the scope of application of the activity under IED, thereby supporting the permitting of new and cleaner techniques expected to replace the conventional iron and steel production process steps, such as direct reduction plants. As such it would have a positive environmental impact.

In terms of cost savings, these would be small in macro terms but would promote more innovative iron ore processing techniques and would be material for the firms affected.

#### **4.7. Permitting of oxy-fuel combustion**

To support decarbonisation of industrial processes, the use of oxy-fuel combustion - whereby oxygen-enriched combustion air facilitates capture of carbon dioxide - should be supported. The higher the oxygen content in the injected air used for combustion, the lower the volume of air needed; and the concentration of pollutants would therefore be increased even if the quantity of pollutant (in mass) is not higher than for combustion with air. The use of oxygen-enriched combustion air was however not considered at the time when limits were set for pollutant emissions in the Industrial Emissions Directive and the Medium Combustion Plants Directive, whereas such technology may be used to facilitate carbon capture. Concerns have been raised over the Industrial Emission Directive and the Medium Combustion Plants Directive hampering decarbonisation in relation to the use of oxy-fuel combustion.

The Commission proposes providing competent authorities with flexibility to assess compliance with emission limit values so as to ease permitting of installations using oxy-fuel combustion covered by the Industrial Emission Directive and by the Medium Combustion Plants Directive. The proposal would facilitate permitting of large and medium combustion plants using oxygen-enriched combustion air, which would facilitate capture of carbon dioxide, thereby lowering emissions overall. The cement sector would be the likely primary beneficiary of this proposal in the short term, while more sectors might benefit in medium-long term.

The proposed simplification aims at removing the legal barrier to apply this technology, thereby contributing to decarbonisation. There would be a positive environmental impact. Overall, carbon emissions will be reduced and in a worst case scenario other pollutants will remain the same in terms of mass emissions,

In terms of cost savings, these would be small in macro terms but would promote technological neutrality and could be material for the firms affected, which are growing in numbers. There would also be cost savings for competent authorities who would face less difficulties in permitting these plants.

#### **4.8. Permitting of hydrogen combustion**

To support the transition towards clean energy and low carbon technologies, the deployment of hydrogen-based industrial processes should be supported, as hydrogen combustion does not produce CO<sub>2</sub>. However, when the hydrogen content of the fuel increases, NO<sub>x</sub> emissions also increase, whereas the limit values for NO<sub>x</sub> emissions currently set out in the Industrial Emission Directive and the Medium Combustion Plants Directive do not take yet into account this increase of the use of hydrogen and the formation of NO<sub>x</sub> so induced.

Stakeholders raised concerns over the directives as hampering decarbonisation in relation to the use hydrogen as a fuel. Creating a specific exemption from compliance with certain emission limit values for combustion plants firing gas with more than 20 % (by volume) of hydrogen would ease permitting of installations within the scope of the Industrial Emission Directive and the Medium Combustion Plants Directive using hydrogen combustion. The

inclusion of specific safeguards in respect to NO<sub>x</sub> emissions from hydrogen combustion will avoid the potential negative environmental impacts of such a change.

The simplification removes the legal barrier to apply this technology, thereby contributing to decarbonisation and so should have a positive environmental impact.

In terms of cost savings, these would be small in macro terms but could be material for the installations affected which are growing in numbers. There would also be cost savings for competent authorities who would face less difficulties in permitting these plants.

#### **4.9. Transitional provisions for certain IED provisions applicable to industrial installations**

Three provisions contained in Directive (EU) 2024/1785 trigger the need to start revising all IED permits in July 2026 (as this is the deadline for transposing this directive and no transitional provision is applicable).

- The revised Article 14(1)(ab) of the IED requires Member States to ensure the permit includes the requirement to assess the need to prevent or reduce emissions of hazardous substances. This is a new requirement under the revised IED.
- The revised Article 16(2) of the IED requires monitoring at least once every 4 years for groundwater and 9 years for soil, thus with higher frequencies compared with the previously applicable ones (i.e. 5 years for groundwater and 10 years for soil).
- The revised Article 16(3) of the IED requires quality control of laboratories performing the monitoring to be based on CEN standards or, if CEN standards are not available, ISO, national or other international standards which ensure the provision of data of an equivalent scientific quality. This is a new requirement under the revised IED.

Concerns have been raised on the lack of transitional provisions for the application of the revised Article 14(1)(ab), Article 16(2) and 16(3) IED. The Commission proposes to establish transitional provisions so that the application of the above-mentioned Articles can be better phased in as from July 2026. With the introduction of transitional periods, the above provisions would apply to specific installations where their permits are updated due to the reasons specified in Articles 3(2) and 3(4) of Directive (EU) 2024/1785.

In terms of environmental impact, the overall environmental standards and legislation would not be changed but more time would be allowed to meet the new requirements as with several other new provisions included in the revised IED.

There would be a cost saving for both public authorities and for installations as without the new transitional provision, Member State authorities would need to update all relevant existing permits as from July 2026. However, a quantification is not possible since estimating the cost savings from avoiding a capacity constraint for public authorities is not straightforward.

#### **4.10. Simplification for livestock farms under the Industrial Emissions Directive**

Directive 2010/75/EU currently exempts organic pig farms from the scope of the Industrial Emissions Directive, while it includes organic poultry farms in its scope. It also establishes conversion rates for the calculation of the Livestock Unit level of installations, among which for the category “Piglets  $\leq 20$  kg” for which a conversion rate of 0,027 is established.

Concerns have been raised on organic poultry farms being included in the scope and about unweaned piglets being counted in addition to the sows.

The Commission proposes exempting organic poultry farms from the scope of the directive, with a view to ensuring a coherent approach for the organic livestock sector and given that

they are already subject to specific legislation. Given that unweaned piglets are only causing low emissions, it is appropriate to exclude them for the calculation of the installation capacity.

In terms of environmental impact, the overall goals of the IED will not be affected, given the low number of organic poultry farms that will be excluded from the scope of the directive. The exclusion of unweaned piglets will also not negatively impact the environment, given the low emissions they produce. These changes will alleviate the burden of farmers.

#### **4.11. Livestock and aquaculture operators reporting to the Industrial Emissions Portal**

Operators under the scope of the IEPR are required to report to competent authorities data on the use of water, energy and relevant raw materials. It has been estimated that, after the latest revision, more than 38000 pig and poultry rearing installations will be subject to IED rules. Whilst Article 6(9) allows Member States to report on behalf of livestock and aquaculture operators in respect of releases to air, water and land, the same flexibilities are not provided for the resource use measures. This means that the burden on reporting on use of water, energy and relevant raw materials falls directly, and arguably unnecessarily, on the operators concerned.

Some Member States and stakeholders have questioned the feasibility of, and burden associated to, the requirement for livestock and aquaculture operators to report on the use of water, energy and relevant raw materials. In response, the Commission proposes exempting livestock and aquaculture operators from reporting on water, energy and materials use.

Moreover, the Commission suggests allowing Member States to exempt operators of livestock production and aquaculture installations from reporting on off-site transfers of waste, off-site transfers of pollutants in wastewater, production volume and number of operating hours, provided Member States gather this information on the basis of other data sources. As a result, Member States would be allowed to report more information on top of the information that they already provide now, i.e. on releases to air, water and land on behalf of individual livestock and aquaculture operators.

There would be no environmental impact associated with this change which is about decreasing burden for livestock and aquaculture operators by relying more on Member States action for gathering relevant information and improving the process for reporting.

The cost savings associated with the measure would be for livestock and aquaculture operators, who would face reduced reporting requirements and are expected to be of the order of **EUR 70 million per year** for all livestock and aquaculture installations across the EU. Some of the data would be supplied by Member States who will have this information available through their standard agricultural analyses, so can provide it at no additional cost.

This cost saving is based on analysis from the Industrial Reporting Hub from the EEA and the IED impact assessment, which gives a total of approximately 38 500 installations that would be affected by the measure. Taking an estimated administrative cost of one hour per week per installation to record the information subject to this obligation leads to an average annual cost saving of EUR 1 852 per installation per year resulting from its deletion (adjusted for inflation from the original 2022 impact assessment that placed the value at EUR 1 700 per installation).



#### 4.12. Back-up generators

Under Directive (EU) 2015/2193, Member States are allowed to exempt certain existing or new medium combustion plants used only occasionally as back-up generators during emergency situations and power outages and which do not operate more than a limited number of hours per year, from compliance with relevant emission limit values. Under those circumstances, such back-up generators are still submitted to periodic measurements in relation to their SO<sub>2</sub>, NO<sub>x</sub>, dust and CO emissions, even if such measurements are not used to assess compliance against the relevant emission limit values. In addition, the periodicity of such measurements does not distinguish between more recent - and thus more energy efficient back-up generators - and older ones.

In order to reduce the administrative burden, the Commission proposes removing the requirement for operators of back-up generators to monitor SO<sub>2</sub>, CO and NO<sub>x</sub> emissions at least every 500 hours for the more recent back-up generators. Instead, it is proposed that they are subject to monitoring after every 1 500 hours of operation or every 5 years.

Specifically, reporting requirements arising under Directive (EU) 2015/2193 in relation to SO<sub>2</sub>, NO<sub>x</sub>, dust and CO emissions currently apply to back-up generators. In this measure we would reduce the monitoring frequency for those back-up generators that have a rated thermal input equal to or greater than 20 MW, and that comply with emission limits values applicable to non-road mobile machinery, category NRG in respect of Stage V controls, set by Annex II to Regulation (EU) 2016/1628 by two-thirds (every 1 500 hours of operation rather than every 500 hours).

This suggestion was made in the call for evidence by companies likely to operate large data centres. They identified an issue with unclear legislation leading to testing requirements for data centre back-up generators that vary across EU member states, creating an inconsistent compliance environment for organisations operating across multiple Member States.

In terms of environmental impact, the overall environmental standard and legislation would not be changed. The cost savings associated with the measure would be around **EUR 3 million per year** (EUR 3 551 per installation concerned).

The analysis of cost savings reflects the total number of installations concerned being around 2 560 and the following analysis:

- The IEA estimates<sup>27</sup> there are currently more than 8 000 data centres globally, with about 33% of these located in the United States and 16% in Europe equating to 1 280 data centres. In its proposal for a Cloud and AI Development Act<sup>28</sup> the Commission will propose the Cloud and AI Development Act, with the aim to at least triple the EU's data centre capacity within the next 5 to 7 years and fully meet the needs of EU businesses and public administrations by 2035. By 2032 this could, in theory, lead to an additional 2 560 data centres being installed in the EU in comparison to today's figures. Those installations are likely to install back-up generators for which this measure would impact on some of those sites.
- The costs for periodic measurement of combustion gases are provided in the JRC Reference Report on Monitoring of Emissions to Air and Water from IED

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<sup>27</sup> [Electricity 2024 - Analysis and forecast to 2026](#)

<sup>28</sup> [Cloud computing | Shaping Europe's digital future](#)

Installations<sup>29</sup>. The estimates are approximately EUR 700 for dust monitoring and EUR 3 700 for the other pollutants concerned in total. As these values are 2018 values, when adjusted for inflation the cost would be EUR 5 327. The proposal effectively reduces these costs by two thirds (as monitoring would be required every 1 500 hours rather than every 500 hours) meaning a saving of EUR 3 551 over every three years (the averaging period concerned), meaning an annual saving of EUR 1 184 per installation concerned.

- Note that this assumes a single measuring campaign for a single back-up generator. In case of multiple blocks of engines the costs of monitoring (and, therefore, savings) would be higher.

#### **4.13. Spatial information requirements**

Directive 2007/2/EC of the European Parliament and of the Council (the INSPIRE Directive) was adopted to establish an infrastructure for spatial information in Europe, building upon infrastructures for spatial information operated by the Member States, to support EU environmental policies, and policies or activities which may have an impact on the environment. The INSPIRE Directive has improved the sharing of geospatial data and significantly contributed to the capacity building of Member States in managing such data. By introducing common standards and online access, the INSPIRE Directive enabled public authorities, businesses, researchers, and citizens to use geospatial information that had previously not been publicly available. This has led to better cooperation between Member States. and the development of new tools to improve environmental monitoring and protection.

Despite these achievements, the technical requirements for harmonisation of geospatial datasets have proven to be complex and expensive to implement. As a result, the system is less effective and more costly than intended.

The evaluation of the Directive and subsequent analysis provide a good evidence base. For example, only about 42% of spatial datasets documented in INSPIRE metadata are actually available for viewing and downloading, and geospatial data makes up just 8.8% of all data currently shared under environmental rules. In the call for evidence, stakeholder feedback showed that 75–85% of respondents believe that aligning INSPIRE with the Open Data Directive would reduce administrative burden as well as cost and make more data more accessible. These figures highlight why simplifying the rules of the INSPIRE Directive and updating the technology behind INSPIRE is necessary: the current framework for the infrastructure does not deliver the level of access or efficiency that was originally intended.

To address these issues, the European Commission is proposing amendments to Directive 2007/2/EC (INSPIRE). The proposal aims to modernise the EU's environmental data sharing framework by aligning it with more recent cross-cutting EU data legislation such as the Open Data Directive, the Data Governance Act, and the Interoperable Europe Act. Key changes include replacing complex harmonisation requirements with more flexible, standards-based approaches, eliminating obsolete technical requirements and consolidating data access through a single EU open data portal ([data.europa.eu](https://data.europa.eu)). Redundant network services, outdated interoperability rules, and duplicative reporting obligations will be removed, while essential coordination mechanisms and metadata quality standards will be retained. Leveraging existing

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<sup>29</sup> [JRC Reference Report on Monitoring of Emissions to Air and Water from IED Installations - Industrial Emissions Directive 2010/75/EU \(Integrated Pollution Prevention and Control\)](#)



open data infrastructure will reduce administrative burden and ensure that environmental data is accessible through a single, user-friendly portal, rather than parallel systems.

The proposed amendments will benefit a wide range of stakeholders, including public sector data providers, national and regional authorities, businesses, research institutions, SMEs, and civil society organisations. Public sector data providers will see reduced administrative burden and simplified compliance, while businesses and data users will enjoy improved access to high-value environmental data through open licensing and modern application programming interfaces (APIs). A 12-month transition transposition period is proposed to allow Member States to adapt their infrastructures and to maintain service continuity during the migration to the new framework. The annual baseline costs for INSPIRE implementation across EU-27 are estimated at EUR 4.967–48.926 million. The proposed measures are expected to reduce administrative burdens by 24–64% compared to the current baseline. The lower bound of 24% reflects the more conservative estimates derived from stakeholder feedback during the validation workshop, which captured an immediate and pragmatic assessment of the potential impact. In contrast, the upper bound of 64% corresponds to the cost reductions identified through the full alignment scenario with the Open Data Directive (ODD). Taken together, these two assessments are considered to represent the realistic range of expected savings from the combined measures, particularly those linked to the annual update of harmonised datasets and the operation of publication and web services. This translates into annual savings of roughly EUR 6.36–16.96 million, based on the average annual cost component for updating and maintaining datasets and services under INSPIRE. On average across the projected range, this corresponds to approximately a 44% annual administrative cost reduction, or about **EUR 12 million** in yearly savings. These savings are achieved by removing the complex harmonisation requirements, leveraging mainstream web technologies, and consolidating infrastructure.

Environmental safeguards remain within the simplified framework. The proposed amendments preserve the core function of a spatial data infrastructure for environmental policy, maintain high-quality metadata standards, and ensures cross-border interoperability through straightforward, simpler, technology-neutral approaches. Member States may continue to limit access to spatial data if it will affect the protection of the environment. By aligning environmental data sharing with horizontal EU data legislation, the proposal aims to ensure that regulatory simplification does not compromise, but rather enhances, environmental objectives and policy effectiveness.

#### **4.14. Environmental Assessments Streamlining and Acceleration**

Stakeholders outline that environmental permitting takes too long and is not sufficiently predictable. This concerns environmental assessments required under the Environmental Impact Assessment Directive (EIA), the Strategic Environmental Assessment Directive (SEA), the Habitats and Birds Directives and the Water Framework Directive during the permitting procedures. The Implementation dialogue on environmental assessments and permitting held with Commissioner Roswall on 10 April, the implementation dialogue held on 11 June, on permitting and renewables with Commissioner Jørgensen as well as recent studies on implementation of the EIA<sup>30</sup> and the SEA Directives<sup>31</sup> provide useful data and insights. Input from stakeholders was also received in response to the call for evidence on environmental simplification, calls for evidence and public consultations concerning the Grids package and the Industry Accelerator Act. The proposed Regulation will streamline and accelerate

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<sup>30</sup> [https://environment.ec.europa.eu/law-and-governance/environmental-assessments/environmental-impact-assessment\\_en#publications](https://environment.ec.europa.eu/law-and-governance/environmental-assessments/environmental-impact-assessment_en#publications)

<sup>31</sup> [Study supporting the preparation of the report on the application and effectiveness of the SEA Directive \(Directive 2001/42/EC\) - Publications Office of the EU](#)

environmental assessments procedures for all projects, and include measures for priority sectors, while maintaining the integrity of the environmental acquis.

The proposed Regulation focuses on six core elements to support project developers: prioritising sectors for fast permitting, establishing one-stop shops and combining assessments, limiting costs for permitting for certain operators, establishing timeframes for assessments, addressing the cross-border dimension and digital submissions. The following sub-sections set out the proposed changes.

#### **4.14.1. Sectors for Priority Action**

EU requirements on environmental assessments (notably Environmental and Strategic Impact Assessment Directives, Water Framework Directive, Habitats and Birds Directives.) provide a high standard of protection of the environment by ensuring that environmental considerations are taken into account before decisions to approve plans or projects are taken. These provide a framework for ensuring that environmental impacts of economic developments are assessed before authorisation, and that the various interests at stake are well balanced.

Based on the need to speed up the roll out of projects in certain transformative sectors, which contribute to decarbonisation goals, the proposed Regulation will provide for further accelerations in strategic sectors at EU level, in particular in view of accelerating the decarbonisation of European industry, support clean and digital transition while strengthening competitiveness.

In itself, this measure will have no impact on costs or on the environment, rather these impacts are delivered through the subsequent components.

#### **4.14.2. “Single point of contact” and combined environmental assessments**

Previous and ongoing initiatives have sought to require Member States to establish environmental “Single points of contact” (SPOC), and some Member States may have already established them on their own initiative, for project developers to facilitate and co-ordinate permit-granting processes as a whole.<sup>32</sup> Where those initiatives do not already provide for such SPOC for the overall permit granting process, the proposed regulation will require Member States to establish a SPOC for all environmental assessments relating to a plan, programme or project.

Moreover, an obligation regarding bundling or streamlining of environmental assessments has also been established in previous and ongoing initiatives. This could be made applicable across all sectors covered by the Act. It would aim at, following the Net Zero Industrial Act model, extending the current obligation under the Environmental Impact Assessment Directive (EIA)<sup>33</sup> by obliging Member States to set-up joint or coordinated procedures (respectively with or without SPOC) for all environmental assessments, including the EIA Directive, Habitats Directive (HD), Strategic Environmental Assessment Directive (SEA), Water Framework Directive (WFD). Several Member States have already introduced combined (joint/coordinated) procedures for assessments under these EU directives.

This measure will reduce costs for business, and potentially also for public authorities.

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<sup>32</sup> Article 16(3) of European Renewable Energy Directive III (“Member States shall set up or designate one or more contact points. Those contact points shall, upon the request of the applicant, guide and facilitate the applicant during the entire administrative permit-application and permit-granting procedure”).

<sup>(33)</sup> The Strategic Environmental Assessment Directive (SEAD) could be included, although it would probably have limited added value given that it relates to plans and programmes and not to projects. In NZIR, SEAD is added to the list. In CRMR it is not.

#### **4.14.3. “Reasonable Administrative Costs for Permitting”**

In order to reduce costs for project developers across the covered priority projects, Member States shall endeavour to bear the administrative charges and fees associated with the environmental assessments for a given project for small and medium-sized enterprises (SMEs) and small mid-caps. The costs for the preparation of the EIA report or the assessments reports in the context of the Habitats Directive and/or Water Framework Directive would still be borne by the project developer.

This is a measure that has not so far been included in any of the sectoral permitting legislations. It will target specifically SMEs as well as small mid-caps. This would be a measure that, where taken up by Member States, would reduce costs for developers, while not as such accelerating the assessments.

This measure will shift costs from business to administrations.

#### **4.14.4. Maximum Duration of Assessments, Timelines**

Timelines and shortened duration of different procedural steps have been proposed to streamline impact assessments. Rules and benchmarks for duration of the overall permitting process, as well as of various steps of environmental assessments have already been set out in a number of ways, across sectoral and environmental legislation.

Overall, the average duration of the EIA process is estimated to be around 20.6 months based on information covering the period 2017-2023 in the implementation studies. Compared to data collected from Member States in 2010, the average duration based on current data is almost twice as high. It is important to note that the increase in the reported duration of the overall EIA procedure does not come from an increase in EU legal requirements between the two periods, or from an increase in the number of projects, which suggests an insufficient capacity at Member States level to process them efficiently.

On Strategic Environmental Assessment (SEA), the 2025 implementation report assessed the different national timelines in each procedural step, including the scoping, screening, adoption of environmental report, public consultation and adoption of final results and overall timeframes to conclude an SEA in different Member States. Based on these national regulatory timeframes, the proposal aims to set up maximum duration of each procedural step, while also setting a minimum timeframe for public consultations.

The timelines proposed are based on an average defined relying on the time-frames established in Member States, using the information gathered via the EIA and SEA Implementation studies as referenced above.

Recently adopted/proposed sectoral legislation has established maximum timelines for the overall permitting process. Critical Raw Materials Regulation provides for a differentiated timeline running from 12 to 27 months<sup>34</sup>. Net Zero Industry Act foresees a differentiated (extendable) 12 or 18 months<sup>35</sup>. The revised European Renewable Energy Directive (state of transposition [here](#)) differentiates between renewable projects located inside or outside “renewables acceleration areas”: inside 12 months, outside 2 years. These timelines would normally include environmental assessments where required, including those under the EIA Directive, Habitats and Birds Directives, Water Framework Directive. The duration is counted from the point of “acknowledgment of completeness” of a permitting application, and it excludes the preparation by the developer of an EIA report (this being outside the responsibility

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<sup>(34)</sup> Article 11 (1) and (2) Critical Raw Materials Regulation.

<sup>(35)</sup> Article 9 Net Zero Industry Act

of the administration)<sup>36</sup> differentiates between renewable projects located inside or outside “renewables acceleration areas”: inside 12 months, outside 2 years.

The proposed regulation introduces maximum timeframes for the specific steps for conducting environmental assessments under the EIA and in case of joint or coordinated assessments under the Strategic Environmental Assessments, Water Framework Directive, Habitats Directive and Birds Directive, such as:

- a. for projects subject to screening, a maximum duration for screening of 60 days; and for changes or extensions of projects, a maximum duration for screening of 45 days;
- b. an opinion on the scope and level of detail of the information to be included in an environmental assessment report within a period of maximum 30 days;
- c. consulting the public of between at least 30 and a maximum of 90 days;
- d. an acknowledgment of the completeness of the information by the authority within 30 days, and within a reasonable timeframe, allowing the developer to provide the necessary additional information, if needed;
- e. a reasoned conclusion on the environmental assessment of the project within maximum 90 days.

As regards planning and strategic environmental assessments specific timeframes are also proposed with a view to significantly reduce the duration of the planning stage, with an ambitious target on average to conclude within a year, so almost halving duration.

This measure will significantly reduce costs for business. Given the wide range of average timeframes found between Member States and even within them (e.g. different regions in Germany or Poland show very wide differences in average times for similar projects), there is no indication that this speeding up of processes will have any negative environmental impact. On the contrary, it is expected that this measure will benefit a wide range of stakeholders, including project promoters, national, regional and local authorities, SMEs, and the general public.

#### **4.14.5. Cross-border dimension**

Particular attention should be given to plans, programmes and projects with a cross-border dimension. While this may not be an issue for most plans/projects, it is more likely to be an issue for electricity grids as lines are often built through at least two countries, as well as potentially for certain type of transport infrastructure projects.

In those cases, divergent application of existing rules on environmental assessments may delay projects if the right mechanisms are not in place. As an example, a given project extending over the territory of two countries may be considered by a Member State as an Annex II project under the EIA Directive (only subject to a screening) whilst it may be considered to fall under Annex I in the neighbouring Member State (requiring full environmental assessment from the start). It would, however, be impossible to reach a level of granularity in project definition at legislative level to avoid such situation in all cases. Moreover, this would also remove all margin of manoeuvre for Member States to adapt the Directives to the national circumstances, and yet, some rules may be explored to ease the way forward when those situations arise.

Therefore, increased harmonisation is especially relevant for plans and projects with a cross-border dimension that are likely to have transboundary impacts, as developers and authorities of different Member States are required by the SEA and EIA Directives to exchange

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<sup>36</sup> [Directive - EU - 2023/2413 - EN - Renewable Energy Directive - EUR-Lex](#)

information and comply with (some of) their respective – and often differing – requirements. Developers involved in transboundary projects would be the first to benefit from a harmonisation of practices within the EU in relation SEAs and EIAs. The gap between national projects and transboundary ones, in terms of administrative and wider economic costs, would be reduced.

Furthermore, the Commission would assume a facilitator role in case Member States would request such a facilitating role to be performed by the Commission. This is considered useful, in view of ensuring that the procedures are compatible with relevant EU rules and would build on available good practices in Member States.

#### **4.14.6. Digital Submissions**

Digitalisation has been raised in the Implementation Dialogue on Environmental Assessments and Permitting as a key enabler for accelerating environmental permitting and permitting processes in general<sup>37</sup>. Some Member States have already introduced digitalised procedures for assessments under EU directives. The proposed Regulation specifies that project developers should be allowed to submit their applications in electronic form<sup>38</sup>. Under this Regulation developers and the public will also have an online access to certain information of environmental assessments such as the designated SPOCs, the progress of the steps of the procedures and reports.

This measure will reduce costs for business and could also be associated with reduced costs for public authorities.

#### **4.14.7. Effective judicial proceedings**

The proposal governs urgency procedures for the settlement of disputes and any litigation concerning the environmental assessment-related processes including, where applicable, alternative dispute resolution mechanisms, as well as priority treatment of such procedure. Giving priority where such a procedure exists under national law is not considered to create additional burden, based on the assumption that the same resources can be utilised as the ones that are currently available, by giving priority to these cases and deprioritising other types of cases.

The proposal also aims to accelerate and streamline judicial procedures by enabling Member States to preclude those substantial arguments from the judicial proceedings where there was also an opportunity to make these arguments known and have them reviewed during the environmental assessment process already at the stage of the public consultation but that was not done. This provision could potentially reduce the number, complexity and duration of disputes that arise due to third party complaints about environmental assessment procedures. Legal disputes where the national procedures are slow and inefficient may lead to protracted legal proceedings, hence a reduced number of disputes and more effective management of such cases would translate into reduced legal proceeding costs both for developers and authorities.

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<sup>(37)</sup> Digitalisation of the overall permitting procedure is a general call by stakeholders across the board, e.g. also at the implementation dialogue on permitting by Commissioner Jørgensen. From exchanges in the EIA/SEA expert group we note that countries and projects with shorter timelines in their environmental assessments tend to be those with a high level of digitalisation of the process.

<sup>(38)</sup> Article 6(4) of NZIR (“Project promoters shall be allowed to submit all documents relevant to the permit-granting process in electronic form.”). Article 9(6) of CRMR (“Project promoters shall be allowed to submit all documents relevant to the permit-granting process in electronic form.”).



#### **4.14.8. Priority for strategic sectors**

This proposal establishes a toolbox for strategic sectors or categories. In certain cases, due to the strategic nature of certain plans, programmes and projects, the latter should be considered of public interest, and may be considered to have an overriding public interest when balancing the interests at stake, giving specific consideration to the strategic nature of the project. They will also benefit from tacit approvals under certain conditions and priority in judicial proceedings.

#### **4.14.9. Assessment of impacts**

The average duration of the EIA process is estimated to be around 20.6 months based on information covering the period 2017-2023. Compared to data collected from Member States in 2010, the average duration based on current data is almost twice as high. The increase in the reported duration of the overall EIA procedure does not come from an increase in EU requirements between the two periods, or from an increase in the number of projects.

On SEA the 2025 Implementation study found that the time taken to prepare the final environmental report based on the SEA Directive varies greatly depending on the complexity of the plan or programme, from three to six months for simpler cases to several years for more complex plans.

Therefore, the proposal sets out timeframes at planning and project level for strategic projects (for screening, scoping, public consultation and reaching a reasoned conclusion on the environmental impact) would reduce the costs related to delays, facilitate investments by providing a stable legal framework for investors to plan their investments ahead and reduce the likelihood of unforeseen delays. Moreover, clear timeframes will improve governance, as it will increase the transparency of the overall environmental assessment process, allow for sufficient time for public consultation and improve the visibility of developers. Setting maximum timeframes improves overall visibility over the SEA and EIA process and helps developers better forecast the whole duration of the project lifecycle, reducing the likelihood of unforeseen delays. This contributes to improving the overall economic environment for developers and constitutes a positive sign for investment.

In addition, the introduction of coordinated or integrated/joint procedures for environmental assessments will reduce the delays resulting from the overall development consent (permitting) process.

Making a clear estimate about the impact of the proposed Regulation is complex, but analysis of the implementation of the EIA<sup>39</sup> identified an average of 6 000 EIAs per annum, and a typical cost of EUR 100 000, meaning the typical EU spend would be EUR 600 million per annum. The changes should both cut the cost per project and speed up each project, which is difficult to account for in monetary estimates. The study also points to the fact that project developers and competent authorities in several cases identified as factors having a significant impact on the costs and duration of EIA procedures the volume and complexity of the assessments to be carried out for the environmental report. The proposed solution of single points of contact aims to alleviate this burden.

Furthermore, ongoing discussion in the context of data centres and related upcoming instrument as regards simplification of permitting procedures finds that national authorities face one-off adjustment costs to design and implement harmonised procedures, designate and staff a single point of contact and establish common workflows, however, it is considered that

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<sup>39</sup> [https://environment.ec.europa.eu/law-and-governance/environmental-assessments/environmental-impact-assessment\\_en#publications](https://environment.ec.europa.eu/law-and-governance/environmental-assessments/environmental-impact-assessment_en#publications)

restructuring of the available resources to also serve as single point of contact will not entail additional costs. This analysis also found that setting up an e-permitting tool servicing data centres amounts to a one-off cost of EUR 2 million for each Member State. However, as the measures introduced aim to merge the different procedures, while shortening the deadlines, will not result in additional human resources costs.

The costs associated with SEAs could be of a similar magnitude. The cost of an SEA varies depending on whether it is for a small or large plan (for example, local vs national level) and on the plan complexity. Broadly, there appear to be two categories of SEAs according to the implementation studies – those estimated to cost less than roughly EUR 20 000 and those costing 10 times that amount.

Given these different estimates, and the substantial speeding up of the process and significant improvements to efficiency, a careful assumption of a 15 per cent efficiency improvement implies **savings for project developers would be EUR 180 million per annum**, alongside savings from speeding up processes and increasing regulatory certainty. Given experience across the EU, this seems achievable.

The EIA cost as a percentage of the total project cost did not exceed 0.5% in case studies. In their reporting, Member States also often reported estimates below 1%, suggesting that the EIA procedure represents a small part of the costs of the project development. The implication is that projects costing more than **EUR 30 billion per annum** will be sped up.

An analysis<sup>40</sup> of the permitting related to projects under Chapter III of Regulation (EU) 2022/869 found that ‘streamlining environmental assessment procedures means enhancing their coordination to reduce unnecessary administrative burden, creating synergies and shortening the time needed to conclude the assessment, while ensuring a high level of environmental protection in accordance with EU law’. The same study found that:

- ‘establishing a digital platform for electronic submission would reduce duplication, improve coordination, and allow authorities to monitor progress, speeding up the process. Early detection and correction of administrative errors would also help to avoid delays and ensure accurate information.’<sup>41</sup>
- establishing a joint procedure for all types of environmental assessments and adopting an integrated environmental assessment is an option that should be followed. While linkages between EIA and SEA or with other environmental assessments are indicative of an effort to streamline the process, this solution would foster greater streamlining.<sup>42</sup>

As described also under the SWD on the Net Zero Industry Act as regards training and resources, the increase in ambitions for speeding up and making permitting more efficient means that Member States will be required to allocate sufficient, and possibly additional, resources, as well as adequately qualified staff. This poses a challenge to many Member States and hence the EU will continue to support in these efforts.

Recent studies and impact assessments have addressed costs and related burdens related to permitting and assessment of impacts. For instance, the Commission Staff Working Document/Impact Assessment Report Accompanying the Proposal for a Regulation of the

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40 page 71 under Study on national permit granting process applicable to energy transmission infrastructure projects with a focus on projects of common interest and projects of mutual interest under Chapter III of Regulation (EU) 2022/869 published in 2025 by Milieu Ltd (under Service Contract ENER/C4/2023-61/SI2.904818)

41 idem, page 71.

42 idem, page 74



European Parliament and of the Council establishing a framework for ensuring a secure and sustainable supply of critical raw materials (CRM) and amending Regulations (EU) 168/2013, (EU) 2018/858, 2018/1724 and (EU) 2019/1020<sup>43</sup> found some shortcomings on permitting in a CRM context, but also relevant under the scope of the proposal:

*‘The costs and time associated with associated procedures and the likelihood of obtaining a permit are key considerations underlying CRM investment decisions. Currently, the unpredictability of the length of national permitting processes and of the criteria for the assessments and documentation required are often reported as barriers to increased investment.’*

*‘One reason for unpredictable timelines is that the procedure for performing the necessary environmental assessments is not consistently implemented. (...)’*

*‘The “one-stop shop” concept allows applicants to interact with a single authority and facilitates efficient coordination among authorities (...). Streamlining permitting for plans, programmes and projects will substantially reduce the administrative burden on companies benefiting from those measures. The provisions around single point of contact, digital, the fixed durations, streamlined environmental assessments and planning provisions have a direct impact on administrative cost reduction.’*

The single point of contact that coordinates the entire permit-granting procedures and avoids lengthy and costly exchanges with many other authorities involved in the process. The timelines regulated clearly and explicitly shall also provide a detailed schedule to the project, creating clarity from the start and reducing costs that would otherwise be spent by the project in planning the entire permitting procedure. Digitalisation means that national authorities have to accept documents digitally and need to provide projects falling under the scope with business support services and other relevant information on-line and in a centralised manner.

Some of the savings for business would be offset by additional costs for public authorities. The EIA Implementation study found that ‘the main cost for project developers is the preparation of the environmental report, including all individual assessments that are required for various environmental impacts.’ It is considered that with the several proposals to improve the environmental assessments and where possible combine them, while also digitalising will significantly improve the regulatory conditions for developers, consequently also reducing the costs incurred by them.

Furthermore, the Commission would assume a facilitator role in case Member States would request such a facilitating role which would entail additional resource need from the Commission services, namely 4 FTEs.

In terms of the environmental impact, the proposed Regulation should not affect the balance of interests, or weaken the environmental standards so is considered environmentally neutral.

#### **4.15. Overall impacts**

This simplification omnibus is implementing on the overall Commission’s agenda to strengthen European competitiveness. It also delivers on the announcements of the [\*Simpler and Faster Europe\*](#) Communication, which sets out a new approach to boost prosperity and resilience and unleash new opportunities, innovation and growth. The Commission is proposing simplification measures in the area of environment to ensure that environmental ambitions are cheaper and easier to deliver.

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43 [commission staff working document impact assessment-1\\_EN\\_impact\\_assessment\\_part1\\_v5.pdf](#)

This Staff Working Document consolidates the analysis underpinning the different measures which form a focused set of adjustments to streamline procedures and clarify rules, while maintaining a high level of protection for the environment. It forms part of the commitment to stress test the full set of laws and deliver simplification, not deregulation, that improves the situation on the ground.

The omnibus package is designed to be consistent with existing environmental standards and objectives and current health legislation. It focuses on removing duplication, streamlining environmental procedures and allowing for a more considered implementation.

No measure is likely to pose significant risks to the environment, most are neutral and some are environmentally positive. The Commission has the requirement to assess the consistency of this proposal with the climate-neutrality objective set out in Article 2(1) and the Union 2030 and 2040 climate targets. The proposal is considered consistent with towards these objectives, as well as towards ensuring progress on adaptation as referred to in Article 5. In particular, the permitting measures will be beneficial in supporting the transition to low carbon technologies, and the environmental assessment proposal will prioritise sectors central to the green transition. The other measures will not lead to further greenhouse gas emissions: for example, those on authorised representatives and the SCIP database are not relevant in this context.

Overall, no measure is likely to pose significant risks to the environment, most are neutral and some are environmentally positive. Reflecting this, and the fact that environmental objectives are untouched, the **environmental impact should be close to neutral**.

The estimate of cost savings is subject to uncertainty, especially where assumptions need to be made about behavioural responses and the impact is more indirect. Where relevant, conservative estimates have been used, and where possible quantified estimates are provided:

- Repealing the SCIP database: at least EUR 225 million per annum
- Authorised representatives under waste Extended Producer Responsibility schemes: EUR 300 million per annum
- Simplification of environmental management systems for industrial operators: EUR 100 million per annum
- Simplification of reporting for livestock operators: EUR 70 million per annum
- Simplification of rules for back up operators: EUR 3 million per annum
- Simplification of data requirements under the INSPIRE Directive: EUR 12 million per annum
- Streamlining and accelerating environmental assessments: EUR 180 million per annum

In addition, there are measures that are not quantified in monetary terms and which will collectively contribute many tens of millions of Euro in saving (related to batteries, permits etc). Taken together, these initial estimates amount to a total reduction in administrative burdens of around **EUR 1 billion per annum** for the full omnibus package. It will be up to the co-legislators to consider and adopt the proposals reflecting the need for regulatory certainty for business and for cost savings to be actioned rapidly. Doing so will allow for the realisation of a potential reduction of administrative burdens by up to **EUR 3 billion under this mandate**, depending on the date of adoption.

**SMEs will benefit disproportionately**, even if they are not explicitly targeted by the measures. For example, larger companies are more able to navigate requirements on authorised representatives or to employ a team to fill in data in the SCIP database.

As well as the direct savings, there will be additional benefits such as an acceleration and simplification of environmental assessment, which will benefit **projects with an investment value of EUR 30 billion per annum**.

Furthermore, specific suggestions made as part of the consultation process for this omnibus will feed into the wider **stress testing of environmental policy**. For some of these suggestions, legislative change is not required, rather they require practical implementation support, for example through harmonised guidance. For other suggestions, more analysis and consultation are needed allowing them to be included in other proposals, such as the Circular Economy Act in 2026.

## **ANNEX 1: PROCEDURAL INFORMATION**

### **a) Lead DG and internal references**

This omnibus on environmental legislation is led by DG Environment. It covers the following entries in the Agenda Planning (AP) system:

- PLAN/2025/1545, related to administrative burdens in general including the Omnibus on accelerating and streamlining environmental assessments for certain sectors of the economy
- PLAN/2021/11441, related to the revision of the INSPIRE Directive, which is subsumed into this proposal.

An inter-service steering group (ISG) helped steer the file and included representatives from the Directorate Generals for Environment; Agriculture and Rural Development; Climate Action; Competition; Energy; Eurostat; Employment, Social Affairs and Inclusion; Health and Food Safety; Humanitarian Aid & Civil Protection; Internal Market, Industry, Entrepreneurship and SMEs; Joint Research Centre; Justice and Consumers; Maritime Affairs and Fisheries; Mobility and Transport; Regional and Urban Policy; Recovery and Resilience Task Force; Research and Innovation; Structural Reform Support; Taxation and Customs Union; Trade; Service for Foreign Policy Instruments, International Partnerships, Publication Office, Digital Services, Communication, Migration and Home Affairs, Translation, Financial Stability, Financial Services and Capital Markets Union, Human Resources and Security, Enlargement and the Eastern Neighbourhood, Communications Networks, Content & Technology, Office for the Administration and Payment of Individual Entitlement, the European Anti-Fraud Office, the Legal Service and the Secretariat General.

### **b) Better Regulation**

The proposed amendments will not affect environmental standards nor create additional new obligations for Member States and there is no consideration of alternative options to the existing rules. As the targeted simplification measures reduce administrative burden and bring administrative efficiencies in the existing rules, without considering other alternative options, an impact assessment is not deemed necessary, in line with the Commission's Better Regulation Guidelines<sup>44</sup>. Furthermore, some of the changes relate to recently adopted legislation, where an Impact Assessment has already provided a strong evidence base for decision-making. Accordingly, the Commission prepared this Staff Working Document assessing the impacts and including a summary of the stakeholder consultations.

### **c) Methodology and Analytical models used**

The analysis of costs has been undertaken in line with the Commission's Standard Cost Methodology<sup>45</sup>.

Administrative costs are a type of compliance costs incurred by enterprises, public authorities, and citizens in meeting administrative obligations. When a measure imposes administrative costs on business, citizens or public authorities, the EU Standard Cost Model should be applied

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<sup>44</sup> [Better regulation: guidelines and toolbox](#)

<sup>45</sup> Tool 58 of the Better Regulation toolbox.

to the extent that the underlying data is available. The model assesses the net cost of administrative obligations imposed by EU legislation. Administrative net costs are assessed by multiplying the average cost of the required administrative activity (Price) with the number of activities performed per year (Quantity). The average cost per activity is estimated by multiplying a tariff (based on average labour cost per hour including pro-rated overheads) and the time required per action.

Administrative costs consist of two different cost components: the business-as-usual costs and administrative burdens. The business-as-usual costs correspond to the costs resulting from collecting and processing information that would be done in the absence of any legislation. Administrative burdens stem from the part of the process which is done solely because of an EU legal obligation. The measures in this omnibus package reduce administrative burden.

Estimates of the saving of administrative burden will be an underestimate of the impact of the proposal on economic growth, where there are additional benefits. This would be the case, for example, where faster environmental assessments led to quicker project approval.

## ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

This synopsis report provides an outline of the consultation strategy, consultation activities undertaken, and the findings of consultation activities.

This annex should be regarded solely as an overview of contributions received during the stakeholder consultation activities. It cannot be regarded as the official position of the Commission or its services. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

1	CONSULTATION STRATEGY .....	36
2	CONSULTATIONS PERFORMED BY EXTERNAL CONSULTANT .....	37
2.1	Online webinar on environmental reporting .....	37
2.2	Survey on reporting cost .....	39
3	CALL FOR EVIDENCE ON SIMPLIFICATION OF ENVIRONMENTAL LEGISLATION .....	40
3.1	General overview .....	40
3.2	Overview of feedback .....	41
3.2.1	Citizens' feedback .....	41
3.2.2	Feedback from organisations .....	42
4	HIGH-LEVEL ROUNDTABLE ON SIMPLIFYING ENVIRONMENTAL LAWS (2 OCTOBER 2025) .....	45
5	IMPLEMENTATION DIALOGUE WITH COMMISSIONER ROSWALL ON ENVIRONMENTAL ASSESSMENT AND PERMITTING (10 APRIL 2025) .....	46
6	AD HOC MEETING OF EIA/SEA EXPERT GROUP ON ENVIRONMENTAL ASSESSMENTS AND PERMITTING .....	48
7	CONSULTATIONS REGARDING THE INSPIRE DIRECTIVE .....	49
7.1	Call for evidence .....	49
7.2	Public consultation .....	50

## Consultation strategy

The main objective of the stakeholder consultations is to collect information, data, evidence and opinions on whether there are unnecessary administrative obligations in EU legislation managed by DG Environment.

This initiative is of potential interest to relevant industrial/economic actors, including SMEs, public bodies (e.g. administrations in charge of implementing environmental legislation), non-governmental organisations (such as environmental groups or consumer bodies), international organisations, and academia. The consultation activities aimed to reach all interested stakeholder groups.

This synopsis report also covers the consultation activities carried out by the consultants working on the ongoing study on environmental reporting and other administrative obligations. The study is expected to finalise early 2026, but part of the consultation activities is relevant for this initiative.

The synopsis report covers the following consultation activities:

- An online webinar on environmental reporting carried out by the consultant on 13 February 2025.
- An online survey carried out by the consultant of the participants to the above webinar who had agreed to be contacted for its purpose.
- A call for evidence<sup>46</sup> that was open for feedback from 22 July 2025 to 10 September 2025.
- A high-level roundtable on simplifying environmental laws on 2 October 2025.

Specifically for environmental assessments:

- An Implementation dialogue with Commissioner Roswall on Environmental Assessment and Permitting on 10 April 2025.
- An Implementation dialogue with Commissioner Jørgensen on permitting in the clean energy transition; public consultations for the Grids and Industry Accelerator acts (concerning environmental permitting aspects).
- An online meeting of the EIA/SEA Expert Group on environmental assessments and permitting on 13 June 2025.

Specifically for the revision of the INSPIRE Directive:

- A Call for evidence<sup>47</sup> that was open for feedback from 26 February 2024 to 25 March 2024.
- A public consultation<sup>48</sup> from 05 February 2025 to 30 April 2025.

It should be noted that the Commission is in frequent dialogue with stakeholders about new and existing legislation. Much of the legislation under the scope of this proposal has been subject to an evaluation or fitness check or an impact assessment, also based on public consultations, in accordance with the Commission's Better Regulation agenda. These are published together with the evaluation reports or proposals they accompany and can be accessed from the Have Your Say portal. As the issue of simplification and reducing administrative burden has been subject to considerable discussion, the Commission has

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<sup>46</sup> [Simplification of administrative burdens in environmental legislation](#)

<sup>47</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information_en)

<sup>48</sup> [GreenData4All – updated rules on geospatial environmental data and access to environmental information](#)



received numerous position papers and inputs including as feedback to a call for evidence on simplification<sup>49</sup>[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13990-Administrative-burden-rationalisation-of-reporting-requirements\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13990-Administrative-burden-rationalisation-of-reporting-requirements_en), covering all legislation.

## Consultations performed by external consultant

An external consultant is currently carrying out a study on reporting and other administrative obligations in the environmental legislation<sup>50</sup>. In this context, various consultation activities were carried out.

## Online webinar on environmental reporting

An online webinar for stakeholders on assessment of environmental reporting and the potential for simplification took place on 13 February 2025. The webinar's primary objectives were to share and validate the study's initial findings on business reporting obligations and to exchange views on the principles of good reporting. It also aimed to gather stakeholder input on legislative acts where streamlining reporting requirements could lead to more effective and efficient regulation.

The agenda of the webinar was structured around three sessions on the following topics:

- Session 1: Review of reporting obligations
- Session 2: Principles of good environmental reporting
- Session 3: Good and smart reporting – how to reduce burden and improve efficiency?

During the webinar, different means of engagement were used to obtain as much information as possible from the audience in the limited time available. This included contributions of “lightning commentators” for the substantive sessions to inspire contributions by the audience, participation in online polling through the Slido app, written contributions in the Q&A function of the webinar with some contributions responded to in writing and some orally, as well as oral contributions by participants.

The webinar was open to everyone and was promoted on the websites of the Commission and of the consultant. A total of 319 participants (excluding the project team) attended the webinar. An overview of the workshop participants per stakeholder type is shown in the figure below.

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<sup>49</sup> [Administrative burden – rationalisation of reporting requirements](#)

<sup>50</sup> [Environmental Reporting and Simplification - Trinomics](#)

Figure 1: Webinar one participants by type



Session 1 reviewed research on EU business reporting obligations (excluding other administrative obligations). Initial findings from the study were presented to the audience. Governance had the highest number of reporting obligations, followed by waste legislation, industrial emissions, and then products. However, audience perception differed, with most expecting industrial emissions and products to have the most obligations.

SMEs were said to be particularly affected by high burdens from the Green Claims Directive and CSRD. Also, the lack of EU harmonization was mentioned. Key burdens in reporting were linked to data collection & aggregation (most time-consuming) and data storage costs.

Key Takeaways from the session were the need for clearer reporting distinctions, better cost calculations, and support for SMEs.

Session 2 focussed on the principles of good reporting. Participants suggested the following:

- Proportionality: Avoid overburdening SMEs with abstract/voluminous EU regulations; prefer EU-wide solutions over fragmented platforms.
- Once-only: Prevent duplicate reporting by aligning data definitions/units across regulations.
- Coherence & Necessity: Ensure reporting is non-redundant and data is collected only if unavoidable.

Additional suggestions covered the integration of digital-ready legislation principles for data-driven reporting, allowing SMEs to input data in their native language with localized interfaces, leveraging AI and best-practice operating models. The session underscored the need for streamlined, standardized, and user-friendly reporting to support the Green Deal and effective environmental governance.

Session 3 was dedicated to the question how reporting burden could be reduced and efficiencies improved. Based on previous stakeholder input, several areas had been identified that stakeholders usually regarded as burdensome, such as:

- unclear instructions for data collection and transmission;
- lack of comprehension of the number of data points;
- inefficient data or information transmission solutions;

- multiple reporting of the same data to different institutions;
- frustration about the level of quality of data available to the user;
- frustration about the burden associated with the collection of data;
- feeling that the information required is not useful; and
- failure to exempt businesses where it is disproportionate e.g., SMEs.

On the question which legislative act stakeholders found most urgent to simplify, respondents reiterated those that they had seen of priority importance to them, namely the EUDR and REACH followed by CSRD, PPWR, waste legislation, and the IED. Overlapping plans (e.g., sustainability plans), the SCIP database and the Green Claims Directive were also mentioned.

## Survey on reporting cost

Following the webinar the consultant launched a survey with a view to collecting information on business and Member States reporting costs as well as ideas for improving the efficiency and effectiveness of reporting. The survey was open from 24 February 2025 to 24 March 2025. The survey was distributed amongst registrants to the webinar who had granted consent to be contacted for additional consultation activities in the future.

The table below indicates the number and share of responses per stakeholder category, including the totals.

Table 2: responses received per stakeholder group to the Trinomics survey

Category	Count	Share
Public authority	58	11%
Business – SME	64	13%
Business – other	266	53%
Business representative (responding on behalf of multiple companies)	103	20%
Non-governmental organisation	11	2%
Private individual	3	1%
<b>Total</b>	<b>505</b>	<b>100%</b>

The table shows the number of contributions; the same stakeholder could send more than one contribution, as the survey allowed one contribution per piece of legislation.

Respondents typically seek simplification through digital consolidation, harmonised EU-wide standards, and proportionate data collection. Stakeholders' suggestions aim to keep reporting effective for environmental oversight while removing unnecessary administrative load, especially for SMEs and smaller operators.

The survey collected numerous suggestions for simplification covering the scope of environmental legislation and even beyond. The consultant prepared a consolidated summary<sup>51</sup> of suggestions for simplification (which only encompasses those responses where owners have granted the right to publication).

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<sup>51</sup> [Environmental Reporting and Simplification - Trinomics](#)

The survey results are still being analysed in the context of the ongoing study on environmental reporting and other administrative obligations. They serve to identify the main administrative burdens for environmental legislation and the most promising measures to alleviate this burden.

In addition, the suggestions made during the survey have been compared to the suggestions advanced by stakeholders in their feedback to the call for evidence (see below) to establish their relevance for this simplification initiative (that aims to produce rapid results).

## Call for evidence on simplification of environmental legislation

### General overview

The Commission published a call for evidence on the environmental simplification package on the Have-Your-Say website: [Simplification of administrative burdens in environmental legislation](#). As the call began during July 2025, the feedback period was extended from the standard 4 weeks to 7 weeks to compensate for partially running in the Summer. The feedback period closed on 10 September 2025. All feedback is published on the Have-Your-Say website.

There was considerable interest in the call for evidence and the Commission received a high number of reactions from individual citizens. A campaign mounted by environmental organisations WWF, EEB, ClientEarth and BirdLife produced 187 612 replies that were channelled via a campaign website. At the closing of the feedback period, there was a backlog of 71 455 responses that the campaign website had received but had not been able to transmit to the Have-Your-Say website because of technical issues. The Commission services agreed to have these responses transmitted in a batch and added them to the Have-Your-Say website<sup>52</sup>. It should be noted that the contributions via the campaign website were not all identical responses (and hence not necessarily a “campaign” in the sense of the Better Regulation Guidelines); while the campaign website suggested (IA-generated) text with similar content, many individual contributors chose to introduce their own (sometimes quite detailed) comments.

The Commission received in total 190 998 contributions:

- 189 751 or 99.3% came from citizens, and
- 1 247 or 0.7% came from organisations other than citizens.

### *Citizen replies*

187 612 of the 189 751 replies were received via campaign websites (mainly linked to the #handsoffnature campaign by WWF, EEB, ClientEarth and BirdLife).

The geographical breakdown of the 189 751 citizen replies is as follow:

Country	Number of contributions	Percentage of total citizens
Germany	61 956	32.7 %
France	30 394	16.0 %
The Netherlands	22 650	11.9 %
Belgium	18 944	10.0 %
Spain	8 752	4.6 %
Italy	8 414	4.4 %
Sweden	5 019	2.6 %
Other EU Member States	31 772	16.7%

<sup>52</sup> These 71 455 responses do not include 8 497 contributions that were invalidated because the text box was left empty (as acknowledged by WWF)

Non-EU citizens	1 850	1.0 %
Total	189 751	100%

### *Non-citizen replies*

The Commission received 1 247 contributions from organisations other than citizens. The breakdown is as follows:

<b>Organisation type</b>	<b>Number of contributions</b>	<b>Percentage of total organisations</b>
Businesses and business associations	853	68%
NGO (environmental and other)	236	19%
Public authorities (national and regional)	40	3%
Academic	23	2%
Other	95	8%
Total	1247	100%

## Overview of feedback

### *Citizens' feedback*

Citizens' responses received through the campaign and directly on HaveYourSay are in essence quite similar: a strong, pan-European rejection of any dilution of existing environmental safeguards.

Comments repeatedly praise the EU's current nature conservation, water- quality, air quality- and biodiversity directives — highlighting tangible successes such as thriving nature reserves, cleaner rivers, and improved public health.

Citizens are worried that the simplification drive could weaken our environmental protection, they find that the existing legal framework is essential and successful. They prioritise implementation over new simplifications: the EU should focus on enforcing the already existing legislation.

Many citizens cite specific legislation: of specific concerns are the fates of the Nature Restoration Law (keep it intact and apply it fully), the preservation of biodiversity (enforce the Habitats and Birds Directives), the EU Deforestation Regulation (apply fully without delays), the chemicals regulation REACH (preserve the precautionary principle, keep registration and restriction procedures strong; avoid “simplifying” that would let hazardous substances stay on the market), the freshwater and air-quality protection legislation and the waste legislation.

Some citizens refute the claim that environmental regulation is a burden on business, arguing instead that it drives sustainable innovation and long-term economic stability.

Some contributions also highlight worries about transparency and better regulation processes. Simplifying should not reduce transparency and not limit citizens' ability to access information and take part in decision-making. Some complain about the expedited consultation or absence

of consultation for the various simplification omnibuses. The recurring demands are for transparent, democratic law-making, targeted support for vulnerable actors, and the retention of rigorous impact assessments and precautionary principles.

#### *Feedback from organisations*

Feedback from businesses, NGOs, academic and public authorities is more heterogeneous, covering in scope the whole EU acquis and beyond. 622 attachments, mainly position papers, were attached to the submissions.

The graph below gives an overview of the most mentioned topics by businesses, NGOs, academic and public authorities. 44% of these submissions mentioned and/or discussed the EU Deforestation Regulation (EUDR). Furthermore, packaging and packaging waste, industrial emissions, the Waste Framework Directive, Extended Producer Responsibility, the SCIP database, the REACH regulation and nature restoration are among the most cited topics of the submissions.



#### *Concerns about environmental protection*

Many submissions (146) in the “non-citizens” category expressed concerns about the initiative and the fear of lowering environmental standards, echoing the views expressed by most of the numerous individual citizens responding to the call for evidence. Such concerns were mainly expressed by non-governmental and environmental organisations and academics, but also by



some companies, business associations, public authorities and trade unions. They argued that simplification should not be used as a pre-text for deregulation and that weakening environmental protections would breach the principle of non-regression, create legal uncertainty, and damage the EU's credibility internationally. Across the board, these stakeholders say the real problem is poor implementation and therefore call for better enforcement, digital tools, and better guidance.

Combined with the overwhelming citizens feedback, these views convey the message that the present simplification initiative should clearly focus on administrative simplification that does not weaken the environmental standards and that also simplifies and strengthens enforcement of EU environmental law.

#### *Suggestions for administrative simplification*

Stakeholders made numerous suggestions for the simplification of administrative obligations in environmental legislation. A list of the main suggestions is given in annex 3. Suggestions cover almost all the environmental legislation:

- **EU Deforestation Regulation (EUDR):** Citizens and environmental NGOs overwhelmingly oppose weakening or repealing the EUDR and call for timely implementation and stricter enforcement. Many small forest owners and SMEs view the EUDR as an instrument imposing a disproportionate administrative burden and call for the repeal or significant simplification. The EUDR has been addressed by a dedicated initiative. On 21 October 2025, the Commission proposed targeted solutions to ensure a smooth implementation of the EU Deforestation Regulation (EUDR)<sup>53</sup>. With the proposal, the Commission wants to make sure that the IT system is fully operational to address the EU's contribution to the global challenge of deforestation. At the same time, the proposal will simplify reporting obligations, notably for micro and small primary operators from low-risk countries worldwide, while maintaining a robust tracking mechanism. Moreover, to provide clarity and simplify compliance for businesses and third countries, [updated guidance](#) and [Frequently Asked Questions](#) have been published to support implementation. The Commission has also finalised the country benchmarking system through an Implementing Act.
- **Extended Producer Responsibility (EPR):** The Omnibus addresses the suggestions on Extended Producer Responsibility (EPR) by proposing to clarify the rules that apply to authorised representatives for EPR and limiting the reporting obligations linked to EPR to a maximum frequency of once every 12 months, for each full preceding calendar year. Further simplification and harmonisation will be considered as part of the Circular Economy Act.
- **Industrial emissions:** Several suggestions have been addressed in the omnibus package, insofar they do not endanger environmental standards. The proposal contains targeted amendments to the Industrial Emissions Directive, Industrial Emissions Portal Regulation, and the Medium Combustion Plants Directive that concern the Environmental Management Systems (EMS), the chemical inventory and the transformation plans, or that simplify permitting of decarbonisation and innovation projects. The proposal on environmental assessments also covers some of the suggestions on industrial emissions (e.g. one-stop shop, clarification of the scope for livestock installations or specific timelines).
- **SCIP database:** the many comments on the SCIP database, in particular the request to repeal the database, are directly addressed in this proposal.

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<sup>53</sup> [Commission proposes targeted measures to ensure the EU Deforestation Regulation](#)

- **Waste Framework Directive:** The omnibus targets the WFD only for the EPR provisions on authorised representatives (see above). Other suggestions, insofar they do not endanger environmental standards, are being considered in the ongoing Impact Assessment process for the Circular Economy Act<sup>54</sup>.
- **Batteries:** The proposed environmental omnibus addresses the issue of Authorised Representatives under the Batteries Regulation (see above).
- **Single Use Plastics:** The SUP Directive is not in the scope of the omnibus and the suggestions made by stakeholders will be considered in the ongoing evaluation of the SUP Directive<sup>55</sup>.
- **Environmental assessment/permitting:** The suggestions are addressed in the omnibus package (see main part of this SWD).
- **REACH:** Apart from the comments on the SCIP database (see above), stakeholders also argue for simplification, for example, by streamlining the restriction and authorisation processes. While the discontinuation of the SCIP database will be included in the omnibus, the other suggestions are taken into consideration under the ongoing revision of the Regulation<sup>56</sup>. The revision aims at simplifying the legislation by streamlining the authorisation process, by relying less on authorisations and more on broader restrictions, early and transparent planning, lighter rules on information passed through the supply chain and by better enforcement.
- **Nature Restoration Regulation (NRR):** Most citizens and many organisations support effective and urgent implementation of the NRR, considering the level of deterioration of key ecosystem services, on which the EU economy depends. The nature of the simplification suggestions advanced by stakeholders goes beyond the purely administrative aspects and the NRR is therefore not included in the scope of the omnibus.
- **Ecodesign for Sustainable Products Regulation (ESPR):** The suggestions made by stakeholders (see annex 3) mainly relate to future delegated acts and will be considered in the preparation of such acts.
- **Birds and Habitats Directives:** Citizens support simplification of administrative processes but not at the expense of nature protection. Stakeholder groups representing interests of certain economic sectors mainly expressed the need for proportionate impact assessment procedures, flexible derogations, and the need for support to address the socio-economic impacts of implementation.
- **Water Framework Directive:** Most suggestions relate to core elements of the Water Framework Directive that go beyond mere administrative obligations. Moreover, as part of the just agreed revision of the Water Framework Directive, the Environment Quality Standard Directive and the Groundwater Directive (the ‘water pollutants proposal’), simplification elements have been agreed including flexibility elements that already address some of the issues raised by stakeholders<sup>57</sup>.
- **Urban wastewater treatment:** Most suggestions made go beyond the administrative scope of the omnibus and touch upon core provisions of the Directive.
- **Waste shipments:** The Waste Shipments Regulation is quite recent (it entered into force in May 2024) and most suggestions were already considered in the context of the adoption and the implementation of the waste shipments regulation.

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<sup>54</sup> [Circular Economy Act](#)

<sup>55</sup> [Rules on single-use plastics and fishing gear \(evaluation\)](#)

<sup>56</sup> [Chemicals legislation – revision of REACH Regulation to help achieve a toxic-free environment](#)

<sup>57</sup> [Water pollution: Council and Parliament reach provisional deal to update priority substances in surface and ground waters - Consilium](#)

- **Waste electrical and electronic equipment Directive (WEEE):** The suggestions will be considered in the context of the revision of the WEEE as part of the ongoing impact assessment for the Circular Economy Act<sup>58</sup>.
- **Nitrates Directive:** Comments on the Nitrates Directive are considered as part of the ongoing evaluation of the Directive<sup>59</sup>.

In response to the call for evidence, stakeholders also sent suggestions regarding pieces of legislation which are outside the remit of the DG Environment (e.g. on sustainability reporting, emission trading, Digital Passport, etc.). These suggestions have been transmitted to the responsible services for analysis but are not being considered for the environmental omnibus.

## High-level roundtable on simplifying environmental laws (2 October 2025)

On 2 October, Commissioner Roswall met with business representatives, civil society and think tanks in Brussels to discuss the results of the call for evidence on an environmental simplification package.

**Commissioner Roswall** introduced the meeting, reiterating the Commission's commitment to simplification as an engine of our competitiveness, and to make it easier and simpler for businesses to uphold our high environmental standards. This roundtable is part of the dialogue on the omnibus, following up on the large response to the Call for Evidence – ca 190,000 replies from citizens, businesses, civil society, public authorities, academics and more. The purpose is to deepen the conversation and to gather stakeholders around the table – to hear views, to share expertise and ideas, and to discuss the best path forward. It was also stated that simplification is not only about the Omnibus. We are stress testing our rules and when proposing new legislation, such as the Circular Economy Act, will be mindful of simplification.

Participants were asked to identify three key actions to reduce administrative burden while maintaining environmental objectives.

Overall, there was a convergence of views on the fact that simplification should not lead to deregulation but should be a support in the implementation.

**Business representatives** called for simplification, harmonisation, digitalisation, one-stop shops across themes covering authorised representatives, extended producer responsibility, packaging waste, industrial emissions and permitting. They pushed for pragmatic timelines and proportionate approaches to deforestation and nature restoration.

**Environmental groups** on the other hand, warned against deregulation. They insisted on implementing recently agreed laws (such as EUDR, NRR, IED). They supported digitalisation only as an enforcement/enabling tool, not to dilute environmental obligations.

### The following topics were discussed:

- **Authorised Representatives (AR)** in packaging and batteries regulations: businesses called for a simplification of the AR obligations, with suggestions for a single AR for the EU or a one-stop shop.
- **Extended Producer Responsibility (EPR):** businesses expressed the need for harmonisation for EPR, possibly a one-stop shop, and some saw the Digital Passport as a potential compliance enabler.

<sup>58</sup> [Circular Economy Act](#)

<sup>59</sup> [Protecting waters from pollution caused by nitrates from agricultural sources - Evaluation](#)

- **SCIP Database:** while some business representatives called for the discontinuation of the SCIP database, other business representatives and the environmental groups stressed the importance of the SCIP database for the information it makes available and they prefer to retain and improve the database rather than discontinuing it.
- **Industrial emissions:** businesses called for simplification, streamlined corporate-level compliance, longer cycles, faster permitting and harmonisation to avoid “gold-plating” by Member States. Environmental groups were opposed to reopening the Industrial Emissions Directive as it already provides flexibility reducing burden.
- **Deforestation Regulation (EUDR):** businesses (incl. farmers) stated that the regulation is unclear, creates disproportionate burden (especially for low-risk areas) and conflicts with other laws. Member States struggle with implementation, funding, and inadequate guidance on the EUDR. Environmental groups considered that the regulation should be implemented as agreed, unchanged.
- **Nature Restoration Regulation:** representatives of farmers and landowners considered that the regulation is inconsistent with other laws, and it causes disproportionate burden. Environmental groups recalled that the regulation is very recent and should now be implemented.
- **Packaging & Packaging Waste Regulation (PPWR):** business representatives stressed the need for clear and harmonised definitions. The reporting is said to be fragmented and needs to be streamlined across regulations.
- **Digitalisation & Digital Solutions:** there was a broad consensus among participants that digitalisation can help to reduce burdens while improving implementation. Topics mentioned were centralised digital permit systems, digital reporting, digital product information via QR codes, digital one-stop shops and digital permitting procedures.
- **Permitting/ environmental assessments:** businesses called for faster, harmonised and digitalised permitting procedures, strict EU-level timelines and exemptions for low-impact projects. Environmental groups warned against weakening environmental standards; the EU should address the lack of administrative capacity in the Member States and provide more funding for implementation. Centralized digital permit systems and interoperable reporting systems would also help.

**Commissioner Roswall** thanked the participants for their engagement. Simplification is important – need to stay the course – green transition and competitiveness go hand in hand. At the roundtable, the purpose was to listen and hear what needs to be done. The Commissioner noted that Single Market and harmonized rules are important, and there is pressure for more efficient permitting, including by responding to issues at the national level. On water, implementation is key. Furthermore, she noted the need for more use of digital tools.

## Implementation dialogue with Commissioner Roswall on Environmental Assessment and Permitting (10 April 2025)

The Implementation Dialogue on environmental assessments and permitting featured an open and fruitful exchange with several stakeholders, including business and industry, civil society, public authorities and judges.

All actors expressed the need to balance different interests including the need to advance on decarbonisation objectives, ensure energy security and a high level of protection of the environment and human health.

There was broad consensus on the need to step up efforts on implementation of existing EU legislation in this area. Participants underlined the need for digitalisation of environmental assessments and permitting procedures; improving data quality and data sharing on environmental assessments to accelerate procedures and save costs. There was a broad call for the Commission to clarify certain aspects of environmental assessment procedures and permits by way of guidance documents, to further support Member States' capacity building, including where possible through funding, and to facilitate dissemination of best practices across Member States' authorities and stakeholders.

Commissioner Roswall stressed her keen intention to work and deliver on simplification objectives, considering the views of stakeholders, in close cooperation with Executive Vice-President Séjourné and Commissioner Jørgensen, and their respective services as concerns the areas of their competence.

The main findings can be summarised as follows:

- Potential for Implementation and Simplification
  - There was broad consensus among the participants on the need to accelerate permitting procedures, whilst calling for caution regarding reopening EU legislation and insisting on the need to maintain environmental safeguards.
  - Most participants emphasised the need for better implementation of EU rules on the ground. Several challenges were flagged, such as delays in procedures.
- Best practices
  - Best practices were shared by stakeholders including on digitalisation and one-stop-shops. Digitalisation was flagged as an essential element to speed up permits and assessments, whilst allowing for cost sharing between public and private actors and across Member States and regions. The stage of scoping in environmental assessments was signalled as a key to reduce the duration of the overall procedure and address challenges along the permitting process.
  - Most stakeholders underlined that focus should be on digitalisation, availability of up-to-date data, including access to existing data, addressing shortage of qualified staff and experts, deadlines, and poor quality of application documents.
- Obstacles
  - Some business stakeholders mentioned a perceived uneven playing field between different Member States, impacting competitiveness. Some felt that it was too easy to overturn decisions of expert authorities; some mentioned overlaps between different rules and lack of clear definitions that could be addressed through guidance by the Commission.
  - Public authorities and civil society participants cautioned against short deadlines regarding public participation during environmental permitting procedures, as this may lead to decisions that will be appealed and could prolong the process.
- For next steps and possible future initiatives, stakeholders suggested the Commission to act as regards:
  - Support quality of data and data sharing across borders, ensuring accessibility of all businesses and public to environmental assessments and geological data.



- Support specialisation in Member States for better application of EU rules and making the most of streamlining and acceleration possibilities within the existing legal framework.
- Clarify the notion of “project” for purposes of environmental assessments, including as regards energy grids infrastructures.
- Clarify interaction between the Industrial Emissions Directive and allegedly conflicting other permitting obligations.
- Provide more precise guidance on key legal terms from permitting legislation and on relevant developments of the case law of the Court of Justice of the EU, in all EU languages.
- Clarify the use of overriding public interest clauses used in EU legislation.
- Build on the permitting provisions under the Net-Zero Industry Act to the industrial decarbonisation sector.

Commissioner Roswall concluded that the Implementation Dialogue showed a very broad consensus that the environmental assessment and permitting procedures should be simple, effective and faster, while safeguards on environment and human health maintained. An effective implementation of EU laws and, where necessary, simplification of their application is key. She also noted that stakeholders asked for digital solutions, better data, addressing shortages of qualified staff in competent authorities to ensure efficient environmental permitting as well as for more guidance from the European Commission. Commissioner Roswall, in cooperation with other Commissioners, will follow up with concrete actions to help address the challenges of environmental assessments and permitting raised by stakeholders at the implementation dialogue.

## **Ad hoc meeting of EIA/SEA Expert Group on environmental assessments and permitting**

This meeting with national experts took place online on 13 June 2025. The meeting was called ad hoc to discuss possible EU measures to simplify, accelerate and better integrate environmental assessments and related permitting. The Commission recalled the main take aways from the Implementation Dialogue on this matter hosted by Commissioner Roswall on 10 April 2025 where broad consensus on the need to accelerate permitting procedures was established, whilst calling for caution with regard to reopening EU legislation, and insisting on the need to maintain environmental safeguards.

Member State experts expressed a strong interest in discussing future developments of EIA/SEAs and permitting processes with COM:

- Most national experts expressed a preference for further guidance on certain definitions, such as ‘plans and programmes’, indicating that legislative amendments on this, including the consolidation of definitions already implemented in different sectoral legislation, could be risky.
- They concurred on the need to adopt a holistic and horizontal approach with regards to environmental assessments rather than a sectoral approach. Most national experts reported the use of EIA and SEA in the adaption to specific sectoral regimes that have been introduced through new legislation (i.e. RED III, NZIA, and CRMA). They expressed some frustration on the difficulty to know which rules applied when, and



having to navigate sectorial legislation to perform the different stages of the assessments.

- While some national experts currently have timeframes for certain steps within the EIA/SEA processes, they agreed that establishing global timeframes for the entire process could have a negative impact and cause more rejections of the overall application; the consequences of potential delays would remain uncertain (further litigation?).
- The experts agreed that legislative amendments to OPI related provisions are not needed. The concept of OPI is sufficiently flexible.
- DG ENV presented possibilities for digital solutions and EU funding to be explored by Member States. Some national experts showcased their digital systems for conducting EIAs and permits and raised that a shared digital platform through EU funding could be beneficial.

## Consultations regarding the INSPIRE Directive

The revision of the INSPIRE Directive within the environmental simplification omnibus constitutes the legal component of the GreenData4All initiative, which addresses the growing need for better sharing of environmental data. In line with the Commission's focus on reducing administrative burden and streamlining regulation, the initiative's legal component entails a simplification of the INSPIRE Directive. The legislative framework governing environmental data will be modernised and aligned with the evolving horizontal EU data policy landscape. By removing outdated obligations and technical specifications, the revision responds to Member States' requests for a lighter implementation model, while safeguarding the Directive's essential objectives of ensuring the accessibility, quality and interoperability of environmental spatial data. This proposed revision represents the first phase of the GreenData4All initiative and provides the foundation for subsequent non-legislative actions and practical tools to support smart and efficient reuse of environmental data across the Union.

## Call for evidence on the INSPIRE Directive

The Call for evidence<sup>60</sup> was open for feedback from 26 February 2024 to 25 March 2024. Input was received from 61 respondents and is published on the Have-Your-Say website.

The list below presents the main suggestions made by stakeholders. Modernization of the data sharing framework and ensuring data accessibility were the most emphasized takeaways.

- Modernize and simplify INSPIRE Directive.
- Ensure FAIR (findable, accessible, interoperable, reusable) data.
- Include a wider range of environmental data.
- Establish clear governance and data ownership guidelines.
- Implement transparent processes.
- Leverage knowledge from EU-funded research.
- Address legal implications and protect property rights.
- Advocate for user-friendly data access.
- Align objectives with EU environmental legislations.

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<sup>60</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13170-GreenData4All-updated-rules-on-geospatial-environmental-data-and-access-to-environmental-information_en)

## Public consultation on the INSPIRE Directive

The Public Consultation<sup>61</sup>, which ran from 5 February - 30 April 2025, sought evidence and views on the issues identified in the evaluation of the INSPIRE Directive, the challenges of the fast-evolving European data landscape and the possible ways to address these issues. The Public Consultation received 375 valid responses, and primarily called for a simplification and modernisation of the INSPIRE Directive.

The stakeholder composition was diverse: public authorities formed the largest group (40%), followed by EU citizens (30.1%), academic and research institutions (10.7%), companies and businesses (7.2%), environmental organisations (2.4%), business associations (2.1%), NGOs (1.9%), non-EU citizens (1.6%) and other actors (4%). Public authorities were mainly national-level bodies, while among organisations, 61% were large entities with over 250 employees.

In terms of geographical distribution, the majority of respondents came from Belgium (20.5%), followed by Germany (12.5%) and France (11.2%). Other countries with notable representation included Portugal (7.2%), Spain (6.9%), and Finland (6.7%). Several other EU Member States contributed smaller shares, such as Austria (3.7%), the Netherlands (3.5%), Sweden (3.5%), Denmark (2.7%), and Latvia (2.7%). The remaining respondents originated from a wide range of countries including Italy (2.1%), Czechia (1.9%), Croatia, Ireland, Poland, and Switzerland (each around 1.3%), as well as Hungary, Lithuania, Slovakia, and the United Kingdom (each around 1.1%). A small number of responses were also received from Greece, Iceland, Norway, Estonia, Romania, and several non-EU countries such as Colombia, Ecuador, and the United States.

Respondents engaged with green data in multiple roles. A total of 258 identified as data users, 195 as producers, and 143 as hosts or providers. Green data is primarily used for research and development (188 mentions), public awareness and education (185), territorial and environmental planning (183), policymaking (170), compliance and reporting (169), business decision-making (92), corporate due diligence (76), and sustainability reporting (35). The most accessed data types included land use and land cover (258), climate and weather data (209), water quality and quantity (181), biodiversity (181), hydrology (171), forestry (165), agriculture (160), and soil quality (153). Data is most commonly accessed through downloading processed files (33.1%), viewing services (27.2%), and raw/API access (24.5%).

Respondents overwhelmingly recognised the importance of making public environmental and geospatial data more accessible: 89.1% rated improved access for public authorities, civil society, research, and business as very important. However, perceptions of current data availability and usability were mixed: 44% agreed that existing data meets their needs, while 25.4% disagreed, and 26.1% remained neutral. The most significant barriers to reuse were fragmentation across producers (41.3%), incompatible formats and standards (39.2%), and incomplete geographic or thematic coverage (33.3%). Additional issues included metadata quality, lack of comparability, insufficient machine-readability, inconsistent APIs, and language barriers.

Participants strongly supported prioritising improved access to water (221 mentions), climate (205), land (200), biodiversity (182), air quality (173), soil (172), agriculture (163), and hydrology (161) data. A proposed common European portal or marketplace for reference, monitoring, thematic and analytical data was viewed as very beneficial by 61.6% of respondents and somewhat beneficial by 25.1%. Extending such a portal to include research data, non-open data, and citizen-generated data also received majority support, with over half

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<sup>61</sup> [Ibid](#)

considering it very beneficial. Respondents also expressed strong demand for support services such as a central platform for datasets, data integration and harmonisation services, real-time access and APIs, visualisation tools, and secure exchange mechanisms.

Among the 375 respondents, 227 continued to Part B, focused on revision of the INSPIRE Directive. Regarding alignment between INSPIRE and the Open Data Directive (ODD), there was strong agreement that such alignment would promote wider accessibility and reuse (133 strongly agreed), simplify data-sharing rules (128), and reduce administrative burdens (111). On governance, a clear majority supported integrating INSPIRE under a common EU governance framework linked to horizontal legislation: 33.5% strongly supported this and 43.6% supported it, while only 9.7% were neutral and fewer than 10% opposed. However, many emphasised the need to safeguard geospatial expertise, data quality, and interoperability standards.

On the involvement of data intermediaries in the creation of harmonised High-Value Datasets, 31.3% viewed it as very beneficial and 33.5% as somewhat beneficial. Respondents saw potential benefits in standardisation, quality assurance and scalability through APIs and cloud services. Concerns centred on transparency, governance, accountability, security, and the need to preserve public oversight and avoid reliance on opaque private platforms. Regarding the continued value of INSPIRE as a standalone instrument if fully aligned with horizontal legislation, views were mixed. While 40.1% considered it highly or somewhat valuable, 27.3% saw limited or no value, and 15.4% remained uncertain. Many noted that INSPIRE's technical framework—metadata standards, harmonised data models, interoperability rules—remains essential to geospatial and environmental data governance.

25 individual attachments supplemented the consultation, of which 22 were directly relevant. These contributions highlighted persistent issues such as uneven portal usability, inconsistencies in data quality, and cross-border access barriers. Many advocated for a federated but coherent European platform built on national nodes, cautioning against commercialisation or paywalls. Divergent opinions were expressed on citizen-generated data, with support contingent on clear quality and validation frameworks. Contributors also stressed the importance of funding, capacity-building, secure exchanges, and maintaining geospatial coherence within broader EU data legislation (such as the Open Data Directive and the Interoperable Europe Act).

**In conclusion, the consultation shows strong demand for greater coherence, interoperability, usability and quality in environmental data governance. Stakeholders support simplification and integration at EU level but insist on retaining core geospatial standards to ensure that future frameworks remain both practical and scientifically robust.**

## ANNEX 3: LIST OF MAIN SUGGESTIONS FOR SIMPLIFICATION MADE VIA THE CALL FOR EVIDENCE

As mentioned in the synopsis report, stakeholders submitted numerous suggestions to simplify environmental legislation. This annex lists the main suggestions. Note that not all suggestions are purely of administrative nature and may touch upon core parts of the legislation and hence go beyond the scope of the omnibus initiative. This list does not necessarily imply that the listed suggestions will indeed be considered for this or future proposals.

### Contents

<i>EU Deforestation Regulation (EUDR)</i> .....	53
<i>Packaging and Packing Waste Regulation (PPWR)</i> .....	53
<i>Industrial emissions</i> .....	54
<i>SCIP database</i> .....	55
<i>Waste Framework Directive (WFD)</i> .....	55
<i>Extended Producer Responsibility (EPR)</i> .....	56
<i>Batteries</i> .....	57
<i>Single Use Plastics</i> .....	57
<i>Environmental assessment / permitting</i> .....	57
<i>Nature Restoration Regulation (NRR)</i> .....	58
<i>Ecodesign for Sustainable Products Regulation (ESPR)</i> .....	59
<i>Birds and Habitats Directives</i> .....	59
<i>Water Framework Directive</i> .....	60
<i>Urban wastewater treatment</i> .....	60
<i>Waste shipments</i> .....	60
<i>Waste electrical and electronic equipment (WEEE) Directive</i> .....	61
<i>Nitrates Directive</i> .....	61

## *EU Deforestation Regulation (EUDR)*

- Proportionality
  - Limit due diligence requirements to the first placer of a product on the market.
  - Exempt SMEs from polygon mapping and allow collective reporting.
  - Allow cadastral references instead of polygons; remove strict GPS requirements.
  - Introduce a de minimis rule excluding small forest owners (e.g. <4 ha).
  - Recognise sectoral specificities (e.g. publishing, chemicals, cosmetics, automotive)
    - based on the argument that in these sectors, relevant commodities are negligible fractions.
- Risk-based differentiation
  - Create a “zero-risk” category for countries with negligible deforestation risk.
  - Accept national legality regimes in low-risk countries as proof of compliance.
  - Reduce/eliminate due diligence statements for primary producers in zero-risk countries (minimal documentation duty only).
  - Recognise certification schemes (PEFC, FSC) as valid compliance evidence.
  - Shift from country-level to commodity-level benchmarking.
  - Enable a use of regional reference numbers.
- Rollout and implementation
  - Improve digitalisation, harmonised templates, and interoperable IT systems.
  - Introduce phased rollout starting with high-risk products.
  - Provide grace periods for SMEs and non-punitive enforcement in the first year.

## *Packaging and Packing Waste Regulation (PPWR)*

Regarding Extended Producer Responsibility (EPR):

- Change the application date of the producer definition to 1 January 2027.
- Implement an EU-reporting portal with harmonised reporting intervals and one common language interface.
- Remove the requirement of appointing an authorised representative in each Member State and introduce an obligation for producers established in third countries to appoint an authorised representative in the EU.
- Provide relief for micro-companies through de minimis-limits and exemptions from EPR obligations.

Further suggestions made regarding PPWR:

- Definitions: Clarify definitions and obligations.
- National flexibilities: Remove provisions allowing Member States to maintain or introduce national sustainability or information requirements.
- PFAS: Issue a guidance document on the PFAS restriction. Exclude pharmaceutical packaging. Adjust the restriction to only “intentionally added” PFAS.
- Recycled content: Add more flexibility for the use of un-recycled plastics. Align the methodology for minimum plastic recycled content in PPWR to the SUPD.
- Minimisation: Delete the maximum limit for most common packaging types.
- Waste sorting labels: Provide flexibility for industry to use different waste sorting labels.
- Reuse targets: Make more lenient re-use targets for transport packaging. Provide an exemption from the re-use targets for beverages if they are part of a DRS.

- Declaration of conformity: Specify that technical documentation can be submitted only in English. Remove the requirement to draw up a written declaration of conformity for each packaging type or set a de minimis threshold.

## *Industrial emissions*

- Environmental management system (EMS):
  - Delete the EMS requirements entirely as it duplicates other regulatory frameworks within the EU without additional benefits.
  - Recognise existing environmental management systems that meet internationally accepted standards like ISO 14001 or EMAS as sufficient.
  - Align EMS requirements across existing legislation (IED, CSRD, CS3D, EU ETS, REACH) to avoid duplication and high reporting costs.
  - Introduce exemptions or simplified EMS requirements for small and medium-sized enterprises (SMEs) to reduce compliance burdens.
  - Remove obligations for EMS to be publicly available or audited every three years by accredited verifiers.
  - Permit site-wide or company-wide systems instead of requiring separate EMS for each installation, especially for multi-site companies.
- Chemical inventory:
  - Delete the chemical inventory requirements: some stakeholders propose removing the chemicals inventory requirement entirely due to it being seen as a redundant and costly measure. The main rationales are that the chemicals inventory duplicates existing regulations under REACH and occupational health and safety rules, resulting in additional administrative burdens without improving environmental or employee health protection.
  - Simplify and streamline the legal requirements concerning the chemicals inventory to reduce bureaucracy and operational burdens.
  - Limit the scope of the inventory: limit the chemical inventory to substances of very high concern only, given that hazards are already covered by other regulations.
- Transformation plans:
  - Minimise the level of detail of the Transformation Plans, by ensuring alignment with other legislation requiring transition plans or by deleting the provision altogether.
  - Align between pieces of legislation by making the IED to be the only piece of legislation to require a transformation plan.
- Other suggestions:
  - Amend the scope of the revised IED in relation, e.g. to temporary storage of hazardous waste, semiconductors, production of pig iron and the farm sizes.
  - Simplify the deployment of hydrogen-firing power plants by adapting existing requirements to this emerging low-carbon process; as well as the use of oxygen-enriched combustion air, which facilitates capture of carbon dioxide.
  - Speed up permitting, including by putting in place one-stop-shop, digital permitting and specific timelines and better coordination with EIA.
  - Address specific monitoring issues for back-up generators in data centres.
  - Use the entire BAT-AEL range instead of the lower end of the range.



- Intensive agriculture: delayed implementation of the uniform conditions for operating rules beyond 2030 and other suggestions aimed at deleting substantial requirements.
- Amend derogation requirements in view of enhancing flexibility (e.g. by deleting Annex II of the IED or postponing its implementation).
- Make environmental performance levels not mandatory.
- Modify monitoring provisions in relation to compliance with environmental quality standards.
- Enable simpler, harmonised, and digital environmental reporting.
- On the Industrial Emissions Portal Regulation (IEPR), the main items covered by stakeholders' suggestions are aimed at simplifying reporting by farmers and aquaculture operators under the IEPR by exempting livestock and aquaculture operators from reporting on water, energy and materials use, and allowing Member States to report more information than releases to air, water and land on behalf of individual farmers and aquaculture operators.

### *SCIP database*

- The repeal of the SCIP database (Substances of Concern In articles as such or in complex objects (Products))
- Revision and improvement of the database's usability (e.g., search functions, reporting requirements) or merging it with the DPP

### *Waste Framework Directive (WFD)*

- Address inconsistent waste classification and List of Waste (LoW) codes across EU Member States.
- Establish a unified digital platform for waste traceability (art. 35 WFD) with standardized documentation, replacing fragmented national systems; harmonise the 'transfer note obligations' (art 35 WFD) across the EU.
- Standardize waste storage durations within the WFD to ensure consistent and environmentally sound waste management practices across Member States.
- Exempt from waste permitting for shredding data- and IP-bearing electronic equipment, aligning with GDPR and reducing regulatory burdens while ensuring secure data destruction.
- Address overlapping requirements across different frameworks such as the IEPR, national annual waste declarations in certain Member States, and the Eurostat annual survey on packaging and packaging waste.
- Digitalise and further finetune waste documents (in particular R4 Recycling/reclamation of metals and metal compounds).
- Recognise sludges and solid wastes from the processing of food, beverages and feed commonly used as input materials for digestate (and compost) and further incentivise under the EU Waste Framework Directive and the EU Fertilising Products Regulation. These waste streams are typically less contaminated and more consistent in quality than separately collected household biowaste, making them a reliable resource. Recognising their comparability would help promote their recycling and support the circular economy.
- Remove the 10% landfill target from the Landfill Directive (LD).
- Facilitate the reuse of materials on construction sites (WFD, Art. 3 & Art. 5 + European Protocol on Construction Waste Management).
- On end-of-waste criteria:

- Address fragmentation and inconsistency of end-of-waste and by-product criteria (calling for mutual recognition of end-of-waste status and of national criteria, speeding up adoption process, create a list of products that are ‘deemed to be considered as by-products’ throughout the EU), as well as the different level of contaminants allowed for in types of so-called "green listed" waste.
- If the protection objectives for human health and environment can be met in substances or a product legislation, an end-of-waste statute should be granted quasi “automatically” (e.g. if materials streams have been registered under REACH).
- Introduce harmonised time limits and simplified procedures for the recognition of end-of-waste status (Article 6) at EU level. Allow the launch of recovery operations within 90 days of notification, unless objections are raised by the competent authority, and provide for the possibility of simplified general authorisations for non-hazardous waste

### *Extended Producer Responsibility (EPR)*

- Deploy a unified, interoperable EU level digital portal where producers register once, submit all EPR data (fees, volumes, material composition, etc.) and make payments a single time. The platform should use standardized templates, be machine readable, and automatically share data with national authorities, customs and enforcement bodies while safeguarding confidential commercial information.
- Remove the obligation for producers to appoint separate authorised representatives in every Member State. Designate a single EU based authorised representative for all non-EU producers, replacing the current requirement for a separate AR in each Member State.
- Apply scaled reporting and fee obligations based on company size, turnover and risk profile, granting SMEs lighter duties (e.g., thresholds of 10–30 products per year per country).

Other comments include:

- Establish a unified EU oversight body for EPR.
- Standardise EPR Reporting Formats and Timelines Across the EU.
- Establish Clear, Harmonised Producer Responsibilities and Obligations and Introduce a Digital, One-Stop-Shop for EPR Reporting.
- Harmonise EPR Fee Structures and Calculation Methodologies.
- Harmonise the definition of ‘producer’ across EU Member States.
- Align EPR Scope with the Polluter-Pays Principle and Proportionality, including for SMEs.
- Accelerate and Strengthen Implementation of EPR Systems.
- Assess the functioning of existing EPR and assess possible new ones.
- Protect Confidential Business Information Within EPR Reporting.
- Create a Unified Authorized Representative (AR) Regime for Non-EU Producers.
- Integrate EPR Data with the Digital Product Passport (DPP).
- Ensure EPR Fees Are Reinvested Into Waste-Management and Innovation.
- Allow for Sector-Specific Adjustments Within a Harmonised EPR Framework.
- Do not allow PROs having an operational role in the same market that they operate and ensuring PROs to be not-for-profit.

## *Batteries*

- Make more use of digital means to fulfil legal obligations in the Batteries Regulation, such as labelling.
- Postpone the date of application of specific Articles, such as Article 11 or the Battery Passport, or introduce amendments for specific legal obligations which are considered difficult to be fulfilled.
- Clarify certain obligations, such as those for battery modules and packs, and EPR obligations for reused batteries.
- Harmonise due diligence obligations across the Batteries Regulation and related directives (DG GROW in the lead).

## *Single Use Plastics*

- Harmonize the Definition of “Single-Use Plastic products” and Plastic Content Thresholds with Packaging and Packaging Waste Regulation (PPWR).
- Remove the Requirement to Reduce the Consumption of Single-Use Plastic food containers and cups for beverages.
- Remove the Requirement for a Separate Litter-Related Marking (the "Turtle Logo").
- Remove Producers’ Liability for Litter Clean-Up Costs.
- Simplify the Calculation Method for Recycled Content Targets.
- Harmonize Definitions and Reporting Requirements Related to Recycled Content.
- Exempt chemically modified Natural Polymers that are Biodegradable from the Plastics Definition.

## *Environmental assessment / permitting*

### **Streamlining/digitalization/administrative capacity**

- Better coordination between the Strategic Environmental Assessment (SEA) and the Environmental Impact Assessment (EIA) procedures.
- Procedures under the Industrial Emissions Directive (IED) should be completely exempt from the EIA. Or, if an EIA screening shows no material impact, omit IED permitting.
- Generalised one-stop shop for all permitting procedures, including one single permit application, and joint processing of permitting.
- Digitalization of permitting procedures, through the creation of electronic permitting systems.
- Address lack of resources and lack of knowledge on complex assessments regarding environmental legislation, at national authorities, as well as poor coordination between authorities and insufficient financial resources.

### **Duration of procedures**

- Target maximum duration for the permit-granting process and subsequent legal actions (maximum 2-3 years in total) and setting clearer timelines for responses by public authorities, e.g. for screening.
- Allow for sufficient time and quality in early-stage planning and environmental assessments.
- Tacit approvals for environmental permitting procedures in case of smaller projects with no expected significant environmental impact (certain stakeholders express caution against tacit approvals though).

## **Access to justice**

- Introduce “substantive preclusion” in EU environmental procedural law, i.e. the applicant is no longer heard in the judicial proceedings with a specific argument, unless he has already submitted this in the administrative procedure.
- Member States should ensure that applicants have access to a straightforward /simpler dispute settlement process to prevent excessive delays caused by abusive litigation.
- Limit access to justice to public actually affected by the project (based on immediate local impact), and to a single initial phase of decision-making, preferably during zoning procedures. Initiation of a review should be a reasoned request (not an appeal) to the competent administrative authority.
- Limiting the right for late appeal under the Aarhus Convention. Allow minor procedural errors to be remedied without remanding the case.

### **Prioritization of sectors/types of projects**

- Recognize Energy Infrastructure as a matter of Overriding Public Interest; fast-Track Scheme for Critical (Energy) Infrastructure Projects with MSs taking the final decision to classify a project as critical; streamline the EIA process for hydrogen infrastructure, including hydrogen pipelines in Annex II of the EIA Directive; specific treatment for pumped hydro.

### **Specific suggestions on EIA/SEA**

- Require Member States to set screening only through specific thresholds or criteria (such as the location, size or type of project) instead of a case-by-case analysis, to determine whether an EIA is needed.
- Extend the flexibility for Member States to apply exemptions of environmental directives for defence projects (e.g. under EIA, SEA) to other sectors and for other Directives (e.g. Habitats, Birds, Water Framework)
- Assume that there will always be a baseline environmental impact for critical (energy) infrastructure projects avoiding years of data collection and assessments aimed at ruling out any likelihood of environmental impact and focus the process in offsetting the impacts it effectively.
- The EIA Directive should be amended so that an assessment in accordance with the directive is not necessary in cases where the assessment has already been conducted with sufficient accuracy as part of the SEA process. Avoid duplications between SEA and EIA.
- As in the IED, a water electrolysis activity should be introduced and a production-related threshold should be introduced in Annex 1 of the EIA Directive. The threshold should be based on the corresponding threshold set out in Annex 1 to the IED.

### ***Nature Restoration Regulation (NRR)***

- Delay by one year the deadline for MS to submit National Restoration Plans, to ensure better stakeholder involvement and to consider lack of resources in Member States.
- Support stakeholders engaging in or affected by restoration measures, notably if property and land use rights are affected, and provide sufficient and dedicated funding for stakeholders (farmers, forest owners etc) and MS to implement the NRR.
- Allow for flexibility to take into account i) local ecological and economic conditions; ii) force majeure and natural disasters; iii) lack of data; iv) climate change impacts; v) overriding public interest.

- Minimise administrative burden, by providing guidelines for NRP preparation, streamlining and digitalising reporting obligations, publishing guidelines to clarify and harmonise concepts and science-based methodologies, etc.
- Sector specific suggestions (some key ones): i) review peatland rewetting targets to safeguard agriculture in certain regions; ii) take into account climate change trends in forest management; iii) clarify concepts for urban ecosystems; iv) provide methodologies for restoration of extraction sites.

### *Ecodesign for Sustainable Products Regulation (ESPR)*

- Substances of concern (SoC): to harmonize reporting on substances of concern, avoid overlap with or give prominence to REACH and some suggest to remove the obligation to provide information on substances of concern (SoC) as stipulated in the ESPR Regulation (Article 5).
- Time predictability: Ensure clear and predictable timelines by setting a strict 36-month minimum transition period, instead of 18 months (Article 4 (4)) and eliminating the option to shorten it “in duly justified case”.
- Ban on destruction of unsold goods: a) to align the application of Article 24’s reporting obligation on destruction of unsold goods with the implementation timeline of the harmonised disclosure format introduced in the implementing act, for instance by postponing the reporting obligation to 2027–2028, when the harmonised format and product categorisation will be fully applicable, b) inclusion of a derogation for the recycling of unsold consumer products in cases where it represents the option with the least negative environmental impacts.
- Exclusion of some products groups/sectors and articulation with other sectoral legislation: a) to remove components and subassemblies of finished products already regulated by delegated acts from the scope of ESPR, also when they are placed on the market as spare parts for finished products that are already regulated by delegated acts, b) to exclude packaging from the scope as packaging is already regulated by the PPWR, c) to exclude aerospace sector from the scope —including intermediate products and supply - chain elements - in line with the established exclusion of ‘means of transport’ under the previous Ecodesign Directive.
- Textiles: Life Cycle Assessment (LCA) and Product Environmental Footprint (PEF), require critical reassessment. LCA would focus narrowly on environmental harm and fail to account for the environmental impact delivered by natural fibres and sustainable farming systems, advantaging fossil-based textiles.

### *Birds and Habitats Directives*

Stakeholder groups representing interests of certain economic sectors mainly expressed the need for proportionate impact assessment procedures, flexible derogations, and the need for support to address the socio-economic impacts of implementation. Among the suggestions, these are most prominent:

- Appropriate assessments under Article 6(3) of the Habitats Directive should be clearer, faster, and avoid unnecessary duplication with EIA/SEA procedures.
- Authorities and operators need clearer EU-level guidance on acceptable mitigation and compensatory measures under Article 6 of the Habitats Directive.
- There should be better financing and stronger stakeholder engagement in the management of Natura 2000 sites.

- The need for fair compensation and incentives for farmers, foresters, and landowners managing Natura 2000 sites.
- The species protection regime should allow flexible derogations and clearer rules on managing wolves and other species to balance biodiversity with farming and rural interests.

### *Water Framework Directive*

While providing general support for the Water FD and its objectives some stakeholders suggest:

- Introduction of a definition of “deterioration” to enhance legal clarity.
- Extending the deadline for achieving the objectives beyond 2027 (either by setting a new deadline or by amending the time-related extensions foreseen under article 4(5).
- In addition, mining and metal processing industry associations, call for the possibility to allow for increasing water pollution and to introduce significant derogations to the principle of non –deterioration, to allow for:
  - temporary deterioration.
  - relocation of pollutants.
  - deterioration of chemical status.

### *Urban wastewater treatment*

- The cosmetics and pharmaceutical sectors call for putting on hold/freezing the implementation of the Extended Producer Responsibility (EPR) in articles 9, 10 and Annex III of the UWWTD, while re-assessing its cost and the toxic load of polluting sectors and afterwards revising the Directive. Some suggest setting a cap on EPR contributions.
- Chemicals companies/ associations call notably for common criteria for products not generating micropollutants and replacing the EPR system by a tax per person/household.
- Chambers of commerce propose to restrict quaternary treatment to drinking water areas, call for a fairer cost attribution between polluters and a simplification of reporting obligations.

Other suggestions by the above-mentioned stakeholders include:

- the change from a sector-based EPR to a substance-based scheme
- the development of a dynamic EU positive list of micropollutants
- the clarification of some definitions (e.g. micropollutants; non-domestic wastewater)
- the need to ensure a harmonised implementation of EPR
- the allocation of EPR contributions with a risk-based methodology
- the need to clarify the interface between the UWWTD and REACH

On the other side of the spectrum, the water industry as well as cities and municipalities defend the EPR provisions, and the polluter pays principle. They defend keeping the Directive as it is – they are against revising the Directive. They are keen to ensure its timely implementation and to avoid undermining the objectives of the recent Water Resilience Strategy. They also underline that, without EPR, investments in quaternary treatment would imply higher water tariffs, impacting public budgets.

### *Waste shipments*

Simplification of the digital procedures and DIWASS (Digital Waste Shipment System):



- Postpone the mandatory use of electronic means/provide for +1 year transition.
- Ensure interconnection with corporate software and outside EU.
- Provide clear guidance and training to economic operators on the new regulations and digital tools to ensure compliance and ease of use.

Stakeholders also propose simplification of the pre-consented facilities:

- Consent for shipments to a pre-consented facility up to 5 years (compared to 3 years now).
- Allow multiple waste producers in the case of pre-consented facilities.
- Establish a centralized EU-wide pre-consent mechanism for recovery facilities, so a single approval is valid across Member States, eliminating multiple national procedures.
- Automatically recognize pre-consent status across the Union once a single Member State grants it.
- Introduce a fast-track notification procedure + introduce a transparent, step-by-step, EU-wide procedure for revoking pre-consent to reduce uncertainty and safeguard business continuity.

### *Waste electrical and electronic equipment (WEEE) Directive*

- Guarantee coherence between the WEEE Directive and the future Circular Economy Act.
- Harmonise various European systems or mutual recognition of waste electrical and electronic equipment (WEEE).
- Build a single digital EU reporting portal for WEEE data using harmonized formats and annual reporting.
- Abolish the requirement for Authorized Representatives for WEEE.
- Adopt a single EU-wide definition of “placing on the market” for WEEE.
- Revise Annex VI of the WEEE Directive to differentiate used equipment from waste.

### *Nitrates Directive*

- Processed manure: Allow for RENURE products above the manure application limit, allow digestates without further treatment above the manure application limit, remove all processed manure from manure application limit.
- Derogations from manure application limit: simplify derogation process, replace separate allowances for manure and chemical fertilisers with one single overall limit.
- Reduce burdens on farmers without shifting core focus: uniform reporting tools for nutrients to reduce burden and increase compliance, simplify regimes for some farmers and less prescriptive rules via technological tools and recognition of precision farming, reduce pace of change in national measures by aligning regulatory cycles of the Nitrates Directive with the investment horizons typical for on-farm improvements.
- Adapt measures to address issues such as calendar farming and the effects of climate change.
- Replace blanket measures with targeted actions in high-risk catchments.
- Streamline reporting by Member States.
- Focus on implementation as amending the directive would bring unnecessary uncertainty. Many of the issues raised by stakeholders are related to implementation

rather than specific legal provisions. Many stakeholders underlined the need for better implementation.

## ANNEX 4: WHO IS AFFECTED AND HOW?

### Summary of costs and benefits

The following table presents a summary of the reduction in administrative burdens associated with the different measures. Not all of the measures included in the proposal are easily quantified, and so the estimate of savings needs to be considered as an initial and central estimate within a broad range. For example, the savings associated with the streamlining and acceleration of environmental assessments are based on an efficiency increase of 10 per cent, which is arguably conservative, ie an underestimate, of the likely savings. Also, a number of measures are relatively small individually in terms of cost savings and so were not quantified, but are still likely to be several million Euro per year and of particular relevance to the benefiting sectors. Reflecting this, the overall impact is likely to be higher than the sum of the measures that were individually quantified (EUR 890 million per annum), with the other measures assumed to provide many tens of million of Euro per annum of savings. Overall, the total estimated reduction of administrative burdens is estimated to be around EUR 1 billion per annum.

The reduction in administrative burdens is relevant for the Commission's one-in-one-out estimates.

The impact on the environment is likely to be close to neutral, reflecting the climate consistency check and the analysis of other environmental impacts.

The Commission has the requirement to assess the consistency of this proposal with the climate-neutrality objective set out in Article 2(1) and the Union 2030 and 2040 climate targets. The proposal is considered consistent with ensuring progress on adaptation as referred to in Article 5. In particular, the permitting measures will be beneficial in supporting the transition to low carbon technologies. The other measures will not lead to further greenhouse gas emissions.

Overview of Benefits		
Description	Amount	Comments
<i>Direct benefits – per annum values</i>		
Overall benefits - consisting of the elements below	EUR 1 billion per annum of administrative burden reduction plus other benefits, notably speeding up of permitting	Overall benefits associated with the proposal, mostly for business but also for public authorities, which will generally be passed on to business

Reporting of chemicals of concern (section 4.1)	At least EUR 225 million per annum	Benefits primarily for business
Waste reporting (section 4.2)	Not quantified	Benefits primarily for public authorities
Authorised representatives (section 4.3)	EUR 300 million per annum	Benefits primarily for business
Methodology for digital packaging (section 4.4)	Not quantified	Benefits primarily for business
Environmental Management Systems under the IED (section 4.5)	EUR 100 million	Benefits primarily for business
Permitting of iron production under the IED (section 4.6)	Not quantified	Benefits primarily for public authorities
Permitting of oxy-fuel combustion (section 4.7)	Not quantified	Benefits primarily for business
Permitting of hydrogen combustion (section 4.8)	Not quantified	Benefits primarily for business
Transitional provisions for certain IED provisions applicable to industrial installations (section 4.9)	Not quantified	Benefits primarily for public authorities
Simplification for livestock farms under the Industrial Emissions Directive (section 4.10)	Not quantified	Benefits primarily for livestock installations
Livestock and aquaculture operators reporting to the Industrial Emissions Portal (section 4.11)	EUR 70 million per annum	Benefits primarily for livestock and aquaculture installations
Back-up generators (section 4.12)	EUR 3 million per annum	Benefits primarily for business (large data centres)
Spatial information requirements (section 4.13)	EUR 12 million per annum	Benefits primarily for public authorities and business
Environmental Assessments Streamlining and Acceleration (section 4.14)	EUR 180 million per annum	Benefits primarily for business
Environmental impacts	The measures overall have an environmental impact close to neutral.	

Application of the ‘one in, one out’ approach – Preferred option			
	One-off (annualised total net present value over the relevant period)	Recurrent (nominal values per year)	Total
<b>Businesses</b>			
New administrative burdens (INs)		None	
Removed administrative burdens (OUTs)		EUR 1 billion per annum	EUR 1 billion per annum
<i>Net administrative burdens*</i>		Reduction of EUR 1 billion per annum	Reduction of EUR 1 billion per annum
<b>Total administrative burdens***</b>			Reduction of EUR 1 billion per annum

Overview of relevant Sustainable Development Goals – Preferred Option(s)		
Relevant SDG	Expected progress towards the Goal	Comments
SDG numbers 8 and 12 – related to sustainable industry, economic growth and responsible consumption and production	The measures will support the competitiveness and productivity of European industry by reducing the administrative costs they incur during sustainable production.	
SDG numbers 12 and 13 – related to climate action and responsible production and consumption	The measures will support the environmental performance of the EU by facilitating greener production and consumption. By making implementation easier and cheaper, without compromising overall standards, the environmental impact will be close to neutral.	Climate consistency check undertaken.