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**COVER NOTE**

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From: General Secretariat of the Council

To: Delegations

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Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) 2023/1542 and Regulation (EU) 2024/1244 as regards simplification of some requirements and reduction of administrative burden [16778/25 – COM(2025) 981 final]

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL suspending the application of the rules on the appointment of an authorised representative for extended producer responsibility for batteries and waste batteries and packaging and packaging waste [16753/25 – COM(2025) 982 final]

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL suspending the application of the rules on the appointment of authorised representatives for extended producer responsibility for waste, waste electrical and electronic equipment and single use plastic waste [16754/25 – COM(2025) 983 final]

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on speeding-up environmental assessments [16755/25 + ADD 1 – COM(2025) 984 final]

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Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2007/2/EC as regards simplification of certain requirements for the establishment of the Infrastructure for Spatial Information in the Union [16773/25 – COM(2025) 985 final]

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directives 2008/98/EC, 2010/75/EU, (EU) 2015/2193 and (EU) 2024/1785 of the European Parliament and of the Council as regards simplification of some requirements and reduction of administrative burden [16771/25 + ADD 1 + ADD 2 – COM(2025) 986 final]

- Opinion of the European Committee of the Regions

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Delegations will find enclosed the opinion of the European Committee of the Regions<sup>1</sup> on the above.

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<sup>1</sup> <https://dm-publicapi.cor.europa.eu/v1/documents/VAQWXHKVTXAD-1275017477-6759/download>



**European Committee  
of the Regions**

**ENVE-VIII/013**

**171st plenary session, 6-7 May**

## **OPINION**

### **Simplification of administrative burdens in environmental legislation**

#### THE EUROPEAN COMMITTEE OF THE REGIONS (CoR)

- acknowledges the European Commission's intention to simplify environmental legislation and reduce administrative burdens, but stresses that simplification must strengthen implementation, facilitate compliance and enhance clarity both for public authorities and economic actors, must respect the principle of non-regression in environmental protection, and cannot be used as a justification for shifting responsibilities to public administrations; stresses that simplification must not only reduce administrative burdens but also act as a catalyst for innovation, investment and implementation capacity, enabling cities and regions to function as place-based ecosystems where public authorities, industry, academia and citizens co-develop and deploy solutions for the green and digital transition;
- welcomes the fact that the proposed changes aim to strengthen the competitiveness and resilience of EU industry while stressing that simplification efforts must not hinder the achievement of the EU's environmental objectives; expresses concern that some proposed changes risk lowering environmental standards or weakening safeguards; reaffirms its strong commitment to the EU's zero-pollution ambition; stresses that any simplification measure must fully respect the 'do no significant harm' principle and must comply with the precautionary principle and the principles of preventive action, rectification at source and polluter pays, as laid down in Article 191(2) TFEU; reiterates that the EU must maintain high standards in areas such as chemicals policy, pollution control, biodiversity protection, waste management and industrial emissions;
- calls for strengthened multi-level governance in future simplification processes; underlines that LRAs must be systematically involved from the outset, while territorial impact assessments and structured dialogue should become standard practice;
- opposes restrictions on access to justice, including the introduction of substantial preclusion, which would be in conflict with the Aarhus Convention;
- calls for maintaining robust environmental management systems and preserving indicative transformation plans to facilitate site-level risk management and long-term decarbonisation strategies while securing economic prosperity, competitiveness and resilience;
- warns against the announcement to repeal or suspend the SCIP database or associated hazardous substance information obligations unless and until a fully functional and interoperable digital product passport (DPP) system providing at least the same level of traceability, accessibility and enforcement capacity is operational across the EU.

**Rapporteur:**

Nadia PELLEFIGUE (FR/PES), Vice-President of the Region of Occitanie

**Reference documents:**

Communication – Simplifying for sustainable competitiveness – COM(2025) 980

Proposal for a Regulation amending Regulation (EU) 2023/1542 and Regulation (EU) 2024/1244 as regards simplification of some requirements and reduction of administrative burden – COM(2025) 981

Proposal for a Regulation suspending the application of the rules on the appointment of an authorised representative for extended producer responsibility for batteries and waste batteries and packaging and packaging waste – COM(2025) 982

Proposal for a Directive suspending the application of the rules on the appointment of authorised representatives for extended producer responsibility for waste, waste electrical and electronical equipment and single use plastic waste – COM(2025) 983

Proposal for a Regulation on speeding up environmental assessments – COM(2025) 984

Proposal for a Directive on simplification of certain requirements for the establishment of the Infrastructure for Spatial Information – COM(2025) 985

Proposal for a Directive on simplification of some requirements and reduction of administrative burden – COM(2025) 986

**Opinion of the European Committee of the Regions – Simplification of administrative burdens  
in environmental legislation**

**I. RECOMMENDATIONS FOR AMENDMENTS**

**Proposal for a regulation of the European Parliament and of the Council on speeding-up  
environmental assessments – COM(2025) 984**

**Amendment 1**

Recital 20

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>With view to streamlining the decision-making process while ensuring effective and timely consultations of the public concerned and of the authorities likely to be concerned by the plan, programme <b>and</b> project by reason of their specific environmental responsibilities or local and regional competences, such consultations <b>should</b> be run in parallel. Member States should ensure that <b>the</b> consultations are conducted in the most effective way <b>to conduct these consultations</b>. Member States should not <b>expressly and generally require that the authorities likely to be concerned by the project by reason of their</b> specific environmental responsibilities or local and regional competences <b>are consulted</b> before the public concerned. At the same time, Member States shall ensure that the public concerned is consulted on all the essential elements of a plan, programme or project, that would significantly impact the environment or human health.</p>	<p>With <b>a</b> view to streamlining the decision-making process while ensuring effective and timely consultations of the public concerned and of the authorities likely to be concerned by the plan, programme <b>or</b> project by reason of their specific environmental responsibilities or local and regional competences, such consultations <b>may</b> be run in parallel. Member States should ensure that consultations are conducted in the most effective way. <b>While</b> Member States should not <b>be required to systematically consult authorities with</b> specific environmental responsibilities or local and regional competences before the public concerned, <b>they should ensure that their involvement takes place at a stage that allows their expertise and knowledge of local and regional conditions to effectively inform public participation and the decision-making process</b>. At the same time, Member States shall ensure that the public concerned is consulted on all the essential elements of a plan, programme or project, that would significantly impact the environment or human health.</p>

<i>Reason</i>
<p>Effective public participation relies on timely consultation and high-quality information. LRAs and environmental authorities provide vital place-based knowledge that supports informed participation and sound decision-making, preventing parallel consultations from weakening environmental assessments.</p>

**Amendment 2**

Recital 24

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<i>In order to ensure a high level of environmental protection, legal certainty and administrative efficiency, Member States should have the option within their respective national systems to require that all relevant arguments are raised during the administrative stage of the procedure leading to the authorisation of a project prior to any potential judicial review, thereby enabling competent authorities to address them during the decision-making to avoid excessive delays in the permit granting process, without prejudice to the right of access to justice.</i>	

<i>Reason</i>
The proposal is contrary to the existing rules on the right of access to the courts and may entail environmental risks for the municipality concerned. The proposal risks prolonging permit procedures if the court has to reject the application instead of the documentation being completed.

### **Amendment 3**

Recital 26

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<i>In order to reduce costs for project developers in complying with their environmental obligations, Member States should be encouraged to bear the administrative costs (levies) associated with the environmental assessments for a given project, in particular in the case of smaller developers. The costs for the preparation of environmental assessment reports should still be borne by the project developer. This possibility offered to Member States aims to facilitate the practical application of Union legislation by smaller developers and strengthen the competitiveness and sustainability of the Union economy.</i>	

<i>Reason</i>
The proposal that the public should bear the costs arising from developers' environmentally hazardous activities is contrary to the polluter-pays principle. Under the proposal, this would probably cover many of the developers seeking permits for new mines or new industrial facilities in many Member States.

### **Amendment 4**

Recital 28

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>(28) In order to ensure that the tasks allocated to the authorities under this Regulation are performed at a sufficiently high quality Member States should ensure that the environmental single point of contact and all competent authorities responsible for any step along the screening and environmental assessments processes, including all procedural steps, have a sufficient number of qualified staff and sufficient financial, technical and technological resources necessary.</p>	<p>(28) In order to ensure that the tasks allocated to the authorities under this Regulation are performed at a sufficiently high quality Member States should ensure that the environmental single point of contact and all competent authorities responsible for any step along the screening and environmental assessments processes, including all procedural steps, have a sufficient number of qualified staff and sufficient financial, technical and technological resources necessary. <b><i>As local and regional authorities are key actors in the implementation of EU environmental legislation, any additional responsibility arising from this Regulation or from simplification measures should be accompanied by adequate, tailored, predictable and proportionate financial, technical and administrative support, in particular for smaller municipalities, including through cohesion policy, and should not result in a shift of administrative burden between levels of government.</i></b></p>

<i>Reason</i>
<p>Local and regional authorities play a key role in the implementation of EU environmental legislation and will bear a large share of responsibility under this Regulation. Simplification measures should not lead to additional administrative burdens without adequate, predictable and proportionate financial, technical and administrative support, especially for smaller municipalities, which face capacity and resource constraints. Any new responsibility must be accompanied by sufficient support to ensure a reliable and high - quality environmental assessment.</p> <p>Cohesion policy plays an essential role in strengthening local capacity, supporting digitalisation and ensuring effective implementation on the ground. The next Multiannual Financial Framework should safeguard and strengthen funding accessible to local and regional authorities to implement EU environmental legislation.</p>

**Amendment 5**  
Article 3 paragraph 1

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>1. By [OP please insert – 6 months after the entry into force of this Regulation], Member States shall establish or designate environmental single points of contact at the relevant administrative level for environmental assessments. Each single point of contact shall be responsible for facilitating and coordinating all aspects of <i>the</i> environmental assessments under this Regulation, including for providing information on when an application is considered to be completed in accordance with Article 7 of this Regulation.</p>	<p>1. By [OP please insert – <b>18</b> months after the entry into force of this Regulation], Member States shall establish or designate environmental single points of contact at the relevant administrative level for environmental assessments <b><i>in accordance with the allocation of competences within each Member State.</i></b> Each single point of contact shall be responsible for facilitating and coordinating all aspects of environmental assessments under this Regulation, including for providing information on when an application is considered to be completed in accordance with Article 7 of this Regulation. <b><i>The designation and functioning of the single point of contact shall be accompanied by adequate human, technical and financial resources, and shall ensure effective coordination with local and regional authorities where they are competent for parts of the assessment or permitting process. The single point of contact should also facilitate access for project developers, including SMEs and innovation actors, by providing guidance on regulatory requirements, available data, and links to relevant research and innovation infrastructures, thereby supporting the acceleration of strategic investments.</i></b></p>

<i>Reason</i>
<p>The CoR supports the establishment of a single point of contact (SPOC) as an important simplification and coordination tool that can increase transparency and efficiency for applicants and authorities. However, the establishment and operation of one-stop shops could entail new tasks and an additional workload for public authorities, often at regional or local level. It may also require some more time for such structures to be set up. Simplification measures for project promoters leading to more complexity and higher costs for local and regional authorities are not simplification. Explicit provision of adequate resources to the one-stop shops and structured coordination with local and regional authorities can prevent a shift in the administrative burden and ensure that simplification leads to better implementation rather than hampering it or creating more uncertainty. The SPOCs should act as the interface for project developers, innovation actors and local and regional authorities.</p>

## Amendment 6

Article 4 – paragraph 4

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>4. Competent authorities shall consult the public concerned by the environmental decision-making procedure relating to a plan, programme or project subject to an assessment in accordance with paragraph 1 <b>at the same time as they consult</b> the authorities likely to be concerned by that plan, programme or project by reason of their specific environmental responsibilities or local and regional competences referred to in Article 6(2) of Directive 2001/42/EC and Article 6(1) of Directive 2011/92/EU.</p>	<p>4. Competent authorities shall consult the public concerned by the environmental decision-making procedure relating to a plan, programme or project subject to an assessment in accordance with paragraph 1 <b>and</b> the authorities likely to be concerned by that plan, programme or project by reason of their specific environmental responsibilities or local and regional competences referred to in Article 6(2) of Directive 2001/42/EC and Article 6(1) of Directive 2011/92/EU <b>in a coordinated manner to ensure a holistic approach. In a coordinated and flexible manner, they shall also consult the authorities likely to be affected by that project in order to ensure a holistic approach and high-quality assessment, respecting the powers of local and regional authorities.</b></p>

<i>Reason</i>
<p>Requiring that public consultation and consultation of competent authorities always take place strictly at the same time is unnecessarily rigid and may reduce the quality and usefulness of both processes. LRAs can benefit from input received from communities and civil society before or during their own assessment, and conversely the public may benefit from structured information provided by authorities.</p>

## Amendment 7

Article 5 – paragraph 1

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>1. Changes or extensions of projects, such as repurposing of pipelines or of industrial sites, and extension of their operation period and modifications to ensure decarbonisation, shall only be subject to screening by the competent authorities in order to determine if they are likely to have significant effects on the environment. Those changes or extensions shall be subject to an environmental assessment only where they involve <b>major</b> works that represent risks <b>that are similar to or greater than, in terms of their</b> effects on the environment, <b>to those posed by the original project.</b></p>	<p>1. Changes or extensions of projects, such as repurposing of pipelines or of industrial sites, and extension of their operation period and modifications to ensure decarbonisation, shall only be subject to screening by the competent authorities in order to determine if they are likely to have significant effects on the environment. Those changes or extensions shall be subject to an environmental assessment only where they involve works that represent risks <b>which have significant</b> effects on the environment. <b>The environmental impact of changes and extensions without</b></p>

	<p><i>significant effects are not subject to an environmental assessment.</i></p> <p><i>Cumulative effects of multiple minor works and current environmental conditions shall be taken into account when determining the level of risk requiring an assessment.</i></p>
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<b>Reason</b>
<p>The text of the proposal risks not covering changes which could have significant impacts. Changes made to an original high impact project may not be ‘comparable’ to the original project but nevertheless have significant negative consequences. This amendment proposes an alternative wording to ensure consistency in the environmental assessment. Measures that would require an assessment should be subject to it both when they are part of the original project and when they relate to a subsequent amendment.</p> <p>The cumulative impact of several minor changes could amount to major ones and current environmental conditions should also be taken into consideration.</p>

### **Amendment 8**

#### Article 6

<b>Text proposed by the European Commission</b>	<b>CoR amendment</b>
<p><b>Article 6</b></p> <p><b>Substantial preclusion</b></p> <p><i>In the context of judicial proceedings relating to environmental assessments within the meaning of this Regulation, Member States may preclude arguments from being raised before a court of law where they were not raised during the administrative stage, as long as the competent authority made available the necessary information in due time so that those arguments were known or could have been known and reviewed during the administrative stage leading to the authorisation of the project, without prejudice to the right of access to justice.</i></p>	

<b>Reason</b>
<p>This provision presents significant risks that public authorities, communities or stakeholders might not be able to study the necessary information or identify potential problems that might not be immediately clear and then be prevented from acting later.</p> <p>These risks are particularly relevant at local level, where interested local parties might not have resources to fully assess projects and their implications.</p> <p>This issue should be also considered in connection with other proposed measures that might reduce the time available.</p>

## Amendment 9

### Article 7 – paragraph 1

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>1. Where a project falls within the scope of Directive 2011/92/EU Member States shall ensure that:</p> <p><i>(a) for projects subject to screening</i>  <i>[...]when the respective administrative act is expected.</i></p>	<p>1. Where a project falls within the scope of Directive 2011/92/EU, Member States shall ensure that <i>screening and environmental assessments are carried out within time limits that are appropriate, predictable and ensure a high level of quality.</i></p> <p><i>Member States shall set these time limits in national legislation, taking into account the nature, scale, location and complexity of the project, as well as the administrative capacity of the competent authorities, including local and regional authorities, and the need to ensure meaningful public participation.</i></p> <p><i>Member States shall also establish conditions under which extensions are permitted, including where it is necessary to guarantee the completeness of the information, the coordination of authorities with environmental responsibilities or local and regional competences, or the protection of public participation rights in line with the Aarhus Convention. These time limits should ensure not only flexibility but also predictability and transparency for project developers and investors, as these are essential conditions for accelerating investments in climate-neutral, circular and digital transition projects.</i></p>

<i>Reason</i>
<p>The CoR supports efforts to accelerate procedures, but fixed EU-level deadlines for each assessment step do not reflect the diversity of territorial capacities or project complexities and risk putting pressure on LRAs. This amendment strengthens the subsidiarity principle and ensures that simplification does not shift complexity or costs to the local or regional level.</p> <p>Rigid timelines may undermine quality, weaken meaningful public participation and create legal uncertainty when deadlines cannot reasonably be met. Replacing EU-set deadlines with nationally defined, transparent time limits, together with conditions for justified extensions, ensures procedures remain timely while safeguarding environmental credibility, legal certainty and public participation in line with the Aarhus Convention. While maintaining flexibility and respecting subsidiarity, this amendment introduces the need for predictability and transparency for project developers and investors. Clear and reliable timelines are essential for accelerating private and public investments.</p>

## Amendment 10

Article 7 – paragraph 3

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>3. In cases where a plan, programme or project is subject to a joint or coordinated procedure for assessment under both Directive 2001/42/EC and Directive 2011/92/EU, <i>the deadlines set out in paragraph 1 shall apply.</i></p>	<p>3. In cases where a plan, programme or project is subject to a joint or coordinated procedure for assessment under both Directive 2001/42/EC and Directive 2011/92/EU, <i>the national time limits established pursuant to paragraph 1 shall apply. Where justified by the specific characteristics of the case, Member States may provide for extensions to preserve the quality and completeness of the assessment and to ensure effective participation of the public and of authorities with local and regional competences.</i></p>

### *Reason*

Following the same reasoning as for paragraph 1, applying nationally defined time limits in joint SEA-EIA (Strategic Environmental Assessment-Environmental Impact Assessment) procedures ensures coherence with existing national frameworks and avoids shifting complexity or costs onto local and regional authorities. Allowing justified extensions is essential to preserve the quality and completeness of assessments and to guarantee meaningful participation

## Amendment 11

Article 8

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p><b>Article 8</b> <b>Protected species</b> <b>1. When the implementation of plans or when the construction, operation or decommissioning of projects result in the occasional killing or disturbance of birds protected under Directive 2009/147/EC or other species protected under Directive 92/43/EEC, such killing or disturbance of protected species shall not be considered to be deliberate within the meaning of Article 5 of Directive 2009/147/EC and Article 12(1) of Directive 92/43/EEC, provided that the plan or project has adopted appropriate and proportionate mitigation measures and considering the best available technologies to avoid such killing and to prevent disturbance.</b> <b>2. When assessing whether those mitigation measures are appropriate and proportionate to</b></p>	

<p><i>comply with Article 5 of the Birds Directive and Article 12(1) of the Habitats Directive, the competent authority shall take into account whether they ensure that significant adverse impacts on the population of the species concerned is avoided, despite the possible existence of negative impacts on individual specimens of those species. Member States shall ensure that those measures are applied and their effectiveness is monitored and that, in the light of the information gathered, further measures are taken as required to ensure that there are no significant adverse impacts on the population of the species concerned.</i></p>	
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<p><b>Reason</b></p>
<p>This provision would add a level of complexity and administrative burden since it creates a system of exceptions to the Habitats and Birds directives that overlaps partially with the current system. Authorisations of plans or projects that might negatively affect protected species are already possible with the use of derogation systems under both directives. It is advisable to focus on improving implementation of derogations rather than adding new exceptions.</p>

**Amendment 12**  
Article 11

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p><i>Administrative costs of environmental assessments</i> <i>Member States shall endeavour to waive administrative charges and fees associated with environmental assessments for developers falling within the definition of small mid-cap enterprises under Recommendation (EU) 2025/1099 or within the definition of small and medium-sized enterprises under Recommendation 361/2003/EC.</i></p>	

<p><b>Reason</b></p>
<p>The proposal that the public should bear the costs arising from developers' environmentally hazardous activities is contrary to the polluter-pays principle. It would probably cover most developers seeking permits for new mines or industrial facilities. Charges and fees are decided nationally; superfluous.</p>

## Amendment 13

### Article 12

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
<p>Article 12</p> <p>Resources and training</p> <p>Member States shall ensure that the environmental single point of contact and all competent authorities responsible for any step in the screening and environmental assessments procedures, including all procedural steps, have a sufficient number of qualified staff and sufficient financial, technical and technological resources necessary, including, where appropriate, for up-skilling and re-skilling of staff, for the effective performance of their tasks under this Regulation and under the Directives referred to in Article 1.</p>	<p>Article 12</p> <p>Resources and training</p> <p>Member States shall ensure that the environmental single point of contact and all competent authorities responsible for any step in the screening and environmental assessments procedures, including all procedural steps, have a sufficient number of qualified staff and sufficient financial, technical and technological resources necessary, including, where appropriate, for up-skilling and re-skilling of staff, for the effective performance of their tasks under this Regulation and under the Directives referred to in Article 1.</p> <p><b><i>This support should include digital tools, interoperable data systems and skills development enabling local and regional authorities to implement innovation-driven and data-based approaches in environmental assessments and permitting.</i></b></p> <p><b><i>Within one year from the entry into force of this Regulation, the Commission shall prepare a guidance document on the implementation of this Regulation, with particular attention to its coordination with the Directives referred to in Article 1 and including a specific section tailored to the needs of local and regional authorities. The guidance document shall be available in all official languages of the Union.</i></b></p>

<i>Reason</i>
<p>The CoR strongly welcomes the explicit acknowledgment that competent authorities, including LRAs, must have adequate resources to implement accelerated and more complex procedures. This is essential to avoid unintended burden shifting. Given that this regulation interacts with several existing directives (EIA, SEA, Water Framework, Birds, Habitats), the resulting system is complex to understand and apply, particularly for smaller municipalities and regions. A clear, multilingual guidance document with dedicated sections for LRAs would provide practical support, facilitate uniform application across the EU and help maintain legal certainty and environmental credibility. Effective implementation of simplified procedures requires strengthening the use of digital tools and interoperable data systems. Innovation-oriented skills will enhance the capacity of local and regional authorities to deliver efficient, high-quality and forward-looking environmental assessments.</p>

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**Amendment 14**

## Article 14

<i>Text proposed by the European Commission</i>	<i>Amendment</i>
<p>1. The provisions set out in the Annex shall apply where existing sectorial Union legislation defines strategic sectors or categories of strategic projects and aims to speed up permitting, provided that those projects contribute to <b>resilience and decarbonisation or resource efficiency</b>. The Commission is empowered to adopt an implementing act identifying strategic projects for the construction and renovation of residential affordable or social buildings, as well as the necessary infrastructure that directly serves those buildings. The provisions set out in the Annex shall apply to those projects.</p> <p>2. The provisions set out in the Annex shall also apply to strategic sectors or categories of projects defined in future Union legislation which refers to this Regulation, provided that those projects contribute to <b>resilience and decarbonisation or resource efficiency</b>.</p>	<p>1. The provisions set out in the Annex shall apply where existing sectorial Union legislation defines strategic sectors or categories of strategic projects and aims to speed up permitting, provided that those projects contribute to <b>the Union energy and climate targets as defined notably in Regulation (EU) 2021/1119</b>. The Commission is empowered to adopt an implementing act identifying strategic projects for the construction and renovation of residential affordable or social buildings, as well as the necessary infrastructure that directly serves those buildings. The provisions set out in the Annex shall apply to those projects.</p> <p>2. The provisions set out in the Annex shall also apply to strategic sectors or categories of projects defined in future Union legislation which refers to this Regulation, provided that those projects contribute to <b>the Union climate and energy targets as defined notably in Regulation (EU) 2021/1119</b>.</p>

**Proposal for a Directive on simplification of some requirements and reduction of administrative burden – COM(2025) 986**

**Amendment 15**

Article 1 – paragraph 2

Directive 2008/98/EC

Article 9

<i>Text proposed by the European Commission</i>	<i>Amendment</i>
<p><b>2. Article 9 is amended as follows:</b></p> <p><b>(a) paragraph 1 is amended as follows:</b></p> <p><b>(i) point (i) is replaced by the following:</b></p> <p><b>‘(i) promote the reduction of the content of hazardous substances in materials and products, without prejudice to harmonised legal requirements concerning those materials and products laid down at Union level;’</b></p> <p><b>(ii) the following point (ia) is inserted:</b></p>	

*‘(ia) ensure that any supplier of an article as defined in Article 3, point 33 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council\* provides the information pursuant to Article 33(1) of that Regulation to the European Chemicals Agency from 5 January 2021 until [date of entry into force of this Directive];’*

*(b) paragraph 2 is replaced by the following:*

*‘2. The European Chemicals Agency shall maintain the data submitted to it pursuant to paragraph 1, point (ia).’*

*(c) paragraph 7 is replaced by the following:*

*‘7. The Commission shall, by 31 March 2019, adopt an implementing act to establish a common methodology to report on re-use of products. That implementing act shall be adopted in accordance with the examination procedure referred to in Article 39(2).’*

*‘\*Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30.12.2006, p. 1, ELI: <http://data.europa.eu/eli/reg/2006/1907/oj>).’*

#### **Reason**

Repealing the SCIP database would remove the only EU-wide, publicly accessible tool providing structured information on hazardous substances in products, weakening traceability for waste operators and LRAs. No impact assessment has evaluated the potential consequences, and repealing SCIP before the digital product passport and related datasets under the Ecodesign and REACH frameworks are fully operational and provide at least equivalent traceability would create regulatory uncertainty.

#### **Amendment 16**

Article 2 – paragraph 1 – point 1

Directive 2010/75/EU

Article 14 a

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
(1) <i>Article 14a is replaced by the following: 'Article 14a Environmental management system (...)</i>	

<i>Reason</i>
<p>The CoR warns about potential problems created by revising a key element of the directive soon after the last revision, without the time to implement the new provisions and assess their impact. The risks for local environments appear disproportionate to the advantages in terms of burden reduction of the proposed changes.</p> <p>Installations need specific EMS, tailored to their structure. The common ownership itself does not diminish such a requirement. Monitoring use of hazardous chemicals should be regulated in connection with a potential revision of REACH to ensure an overall functioning system.</p>

### **Amendment 17**

Article 2 – paragraph 1 – point 2

Directive 2010/75/EU

Article 27 d

<i>Text proposed by the European Commission</i>	<i>CoR amendment</i>
(2) <i>Article 27d is deleted;</i>	

<i>Reason</i>
<p>Transformation plans require certain energy-intensive installations to set out indicative trajectories for 2030-2050, showing how they will contribute to a sustainable, climate-neutral and circular economy. The CoR has previously supported indicative transformation plans, as they bring valuable information to LRAs for planning and infrastructure policies.</p>

## **II. POLICY RECOMMENDATIONS**

### THE EUROPEAN COMMITTEE OF THE REGIONS (CoR)

1. acknowledges the European Commission's intention to simplify environmental legislation and reduce administrative burdens, but stresses that simplification must strengthen implementation, facilitate compliance and enhance clarity both for public authorities and economic actors, must respect the principle of non-regression in environmental protection, and cannot be used as a justification for shifting responsibilities to public administrations; stresses that simplification must not only reduce administrative burdens but also act as a catalyst for innovation, investment and implementation capacity, enabling cities and regions to function as place-based ecosystems where public authorities, industry, academia and citizens co-develop and deploy solutions for the green and digital transition;

2. warns that several EU proposals risk shifting administrative, financial or enforcement responsibilities to local and regional authorities (LRAs); points out that LRAs are responsible for the implementation of much of the EU's environmental *acquis*, and underlines that, in line with the polluter pays principle (Article 191(2) TFEU), no transfer of responsibilities or costs to local and regional authorities may take place without adequate and predictable financial compensation and support. Stresses that such support should be direct, predictable and proportionate, with particular attention to smaller municipalities and regions facing structural capacity constraints in implementing EU environmental legislation;
3. welcomes the fact that the proposed changes aim to strengthen the competitiveness and resilience of EU industry while stressing that simplification efforts must not hinder the achievement of the EU's environmental objectives; expresses concern that some proposed changes risk lowering environmental standards or weakening safeguards; reaffirms its strong commitment to the EU's zero-pollution ambition; stresses that any simplification measure must fully respect the 'do no significant harm' principle and must comply with the precautionary principle and the principles of preventive action, rectification at source and polluter pays, as laid down in Article 191(2) TFEU; reiterates that the EU must maintain high standards in areas such as chemicals policy, pollution control, biodiversity protection, waste management and industrial emissions;

#### **Using an omnibus approach as a legislative tool**

4. notes that the proposal was presented without a dedicated impact assessment and was prepared on the basis of a very limited consultation process, which weakens its legitimacy and robustness; stresses the importance of ensuring that simplification initiatives continue to be underpinned by robust evidence and meaningful stakeholder engagement which would also allow for a proper evaluation of their compliance with the principle of subsidiarity in line with the principles and standards of better regulation;
5. stresses that the omnibus approach raises methodological concerns, as bundling many legislative changes with limited coherence creates legal uncertainty, risks inconsistencies and may complicate implementation; reiterates that hastily developed omnibus packages undermine the quality of decision making<sup>2</sup>;
6. highlights that legal certainty and environmental credibility are preconditions for competitiveness; points out that all stakeholders need predictable, stable rules and adequate transition time to plan investments and deliver on long-term objectives such as climate neutrality, circularity and zero pollution; highlights the value of regulatory stability and of allowing time to assess how recently adopted legislation is working in practice, as this helps provide clarity for investors and supports effective implementation by public administrations;
7. calls for strengthened multi-level governance in future simplification processes; underlines that LRAs must be systematically involved from the outset, while territorial impact assessments and structured dialogue should become standard practice;

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<sup>2</sup> A simpler and faster Europe.

## **On environmental assessments**

8. supports the introduction of single points of contact (SPOCs) to coordinate multiple assessments, and digitalising procedures; warns, however, that genuine simplification will only be effective if accompanied by adequate human, technical and financial resources for all competent authorities, including LRAs and if SPOCs are formally coordinated with those authorities where they exercise assessment or permitting competences; underlines that the establishment and operation of such single points of contact must not alter the existing division of competences between environmental and sectoral authorities;
9. supports efforts to set up faster, more predictable and coordinated permitting procedures to accelerate private and public investments in strategic projects, including climate-neutrality, clean energy, circular economy and industrial decarbonisation initiatives, in particular those linked to EU Missions and place-based transition pathways; emphasises, however, that speed must not undermine quality; expresses strong concern that uniform EU deadlines for screening and environmental assessments do not adequately reflect the diversity of territorial capacities and administrative structures; also underlines that particularly in complex procedures such as environmental impact assessments, overly short time limits may undermine legal protection and ultimately delay decision making due to increased litigation; calls on Member States to set realistic and predictable yet flexible national procedures and time limits, which take into account the nature, scale, location and complexity of projects, as well as the administrative capacity of competent authorities, and which integrate civil protection and risk prevention aspects, social impacts, workers' rights and community concerns in order to ensure timely decisions while safeguarding meaningful public participation, coordination across levels and robustness of assessments;
10. opposes restrictions on access to justice, including the introduction of substantial preclusion, which would be in conflict with the Aarhus Convention;
11. considers that revisions concerning protected species should not be introduced through an omnibus simplification procedure; suggests improving the implementation of the current derogation system, and – if necessary, after the planned stress test – considering a targeted amendment through a dedicated and coherent revision of the relevant directives;

## **On industrial emissions**

12. calls for maintaining robust environmental management systems and preserving indicative transformation plans to facilitate site-level risk management and long-term decarbonisation strategies while securing economic prosperity, competitiveness and resilience;

## **On waste and circular economy**

13. warns against the announcement to repeal or suspend the SCIP database or associated hazardous substance information obligations unless and until a fully functional and interoperable digital

product passport (DPP) system providing at least the same level of traceability, accessibility and enforcement capacity is operational across the EU;

14. highlights the central role of LRAs in the circular economy and underlines that any modification to EPR rules must preserve the polluter-pays principle, ensure traceability and avoid creating free-riding risks or shifting enforcement burdens to local authorities;
15. stresses that circular economy policy should be designed not only as a compliance framework but also as an innovation and investment framework, enabling cities and regions to pilot new circular solutions, attract private partners and scale successful place-based practices, while maintaining strong environmental safeguards and traceability requirements;

### **On INSPIRE**

16. supports efforts to streamline INSPIRE to reduce duplication but calls on the Commission to ensure that the removal of detailed technical obligations does not result in the gradual fragmentation of spatial data, across Member States and regions; stresses the importance of maintaining a limited set of common reference elements, notably for data themes with high cross border relevance, adequate metadata and light technical coordination mechanisms; reminds that interoperable data systems, digital platforms and AI-enabled tools are essential for public authorities and end users to improve the efficiency, predictability and quality of environmental assessments and the scaling of innovative solutions in areas such as climate adaptation, mobility, circular economy and energy systems;

### **Empowering cities and regions as innovation and investment ecosystems**

17. stresses that the success of Europe's climate and industrial transition depends on legislation that provides predictable legal standards, clear pathways for the transition and which is simple to implement; underlines in this context that connecting EU legislation more systematically with mission-oriented local and regional action, including Climate City Contracts, smart specialisation strategies and other place-based innovation instruments that translate European objectives into real-life implementation is of crucial importance; insists that Local Green Deals as practical instruments for implementation in synergy with EU Missions and local transition portfolios can also play a key role, not least in providing important feedback for future simplification efforts and to make sure that EU legislation supports the scale up of innovative solutions; is convinced that financial and regulatory frameworks must therefore be designed in a way that enhances the attractiveness of mission-related projects for private investors and supports replication and scaling-up across Europe, including in less developed regions;

### **Practical guidance and funding for LRAs**

18. insists that simplification must be accompanied by adequate funding, staffing and multilingual training for LRAs, as well as practical guidance documents in all official languages, model procedures and user-friendly digital tools, especially for smaller municipalities, which often face structural, capacity and resource constraints; calls on the Commission to prepare implementation

guidance specifically tailored to the needs of local and regional authorities within one year of the entry into force of the relevant measures;

19. stresses that current simplification drive and a reopening of recent legislation risk creating legal uncertainty for LRAs, businesses and investors; therefore calls on the Commission to avoid changing recently revised environmental legislation before sufficient time has been given to implement, monitor and evaluate its impact, unless clear evidence demonstrates an urgent need for targeted corrections;
20. considers that the proposals as they stand do not raise subsidiarity concerns as they build on existing EU legislation, but notes that some of them may have unintended subsidiarity implications if they entail shifts in responsibility between different levels of governance; expresses, however, concerns regarding the proposals' compliances with the principle of proportionality, notably where simplification measures risk shifting administrative, financial or enforcement burdens to local and regional authorities, which would be disproportionate to the stated benefits.

Brussels, 7 May 2026.

*The President  
of the European Committee of the Regions*

Kata TÜTTŐ

*The Secretary-General  
of the European Committee of the Regions*

Petr BLÍŽKOVSKÝ

### III. PROCEDURE

<b>Title</b>	Simplification of administrative burdens in environmental legislation
<b>Reference(s)</b>	COM(2025) 980, COM(2025) 981, COM(2025) 982, COM(2025) 983, COM(2025) 984, COM(2025) 985, COM(2025) 986
<b>Legal basis</b>	Mandatory, Art. 307(1)
<b>Procedural basis</b>	Art. 43 of the Rules of Procedure
<b>Date of Council/EP referral/Date of Commission letter</b>	COM (2025) 980: EC (11/12/25) COM (2025) 981: Council (20/03/26), EP (17/12/25), EC (11/12/25) COM (2025) 982: Council (20/03/26), EP (18/12/25), EC (11/12/25) COM (2025) 983: Council (20/03/26), EP (18/12/25), EC (11/12/25) COM (2025) 984: Council (20/03/26), EP (16/12/25), EC (11/12/25) COM (2025) 985: Council (20/03/26), EP (17/12/25), EC (11/12/25) COM (2025) 986: Council (20/03/26), EP (16/12/25), EC (11/12/25)
<b>Date of Bureau/President's decision</b>	19/12/2025
<b>Commission responsible</b>	ENVE-VIII – 8th Mandate – Commission for the Environment, Climate Change and Energy (ENVE)
<b>Rapporteur</b>	Nadia PELLEFIGUE (FR/PES), Vice-President of the Region of Occitanie
<b>Discussed in commission</b>	22/4/2026
<b>Date adopted by commission</b>	N/A
<b>Result of the vote in commission (majority, unanimity)</b>	N/A
<b>Date adopted in plenary</b>	7/5/2026
<b>Previous Committee opinions</b>	<ul style="list-style-type: none"> <li>• <a href="#">Cities' and regions' contribution to the simplification agenda</a></li> <li>• <a href="#">A simpler and faster Europe</a></li> </ul>
<b>Subsidiarity reference</b>	Subsidiarity check – Yes Subsidiarity compliance – Yes