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Initial proposal for simplification of administrative burdens in environmental legislation (Environmental Omnibus)

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INTRODUCTION

This document has been prepared by the CCIS- Association of Chemical Industries of Slovenia (ZKI), representing companies from the chemical, pharmaceutical, plastics and rubber industries in Slovenia.

It outlines key implementation challenges identified by the chemical industry in relation to selected EU environmental legislation and proposes possible solutions to address them.

The document has been prepared in English to facilitate communication with EU institutions and other stakeholders.

Some of the topics include specific aspects that may not be equally relevant for other sectors (e.g. the Urban WasteWater Treatment Directive – see point 11). At the same time, several issues are of broader relevance, while the chemical industry or parts of it may hold specific views on their implementation.

We kindly invite you to review the document and help ensure that the issues raised are brought to the attention of the relevant bodies, with the aim of reducing the regulatory burden for companies. We would appreciate your support in promoting these proposals as part of Slovenia's position at the EU level.

ZKI will update this document if needed. Should you require further information or clarification, please contact us:

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Table of Contents

1. Lengthiness of permitting procedures 4
2. Separate obligations for environmental review or improvement in different environmental compartments 5
3. Not defined procedure to apply for setting a higher value of emission limit value 5
4. Transformation plans under the IED Directive 6
5. Environmental management system under the IED Directive 7
6. Multiple overlapping reporting obligations 9
7. Transboundary shipment of plastics waste 10
8. Vague criteria for the end-of-waste and by-products status 11
9. Complex and burdensome requirements deriving from the new Packaging and Packaging Waste Regulation 12
10. Disproportionate burden from the extended producer responsibility under Waste Framework Directive 14
11. Disproportionate cost burden from the extended producer responsibility under the Urban Wastewater Treatment Directive 14
12. Burdensome “one-out-all-out” and “non-deterioration” principles under the Water Framework Directive 15
13. The definition of substance of concern under the Ecodesign for Sustainable Products Regulation 16
14. Reporting obligations under the Ecodesign for Sustainable Products Regulation 17
15. Digital product passport under the Ecodesign for Sustainable Products Regulation 18
16. NATURA 2000 – outdated legal framework 19

1. Lengthiness of permitting procedures

Short problem / burden description	Proposal for simplification / burden reduction
Permitting procedures are far too long. There is an urgent need for an appropriate timeframe for granting permits. In practice, authorization procedures remain paper-based, fragmented across several authorities, and lack standardized formats. This leads to delays, higher costs, and legal uncertainty. While the need to reduce emissions as much as possible is undisputed, it is equally important to ensure that the path toward this goal does not impose unnecessary administrative burdens. Such burdens lead to additional costs and resource strain for both industry and competent authorities, without offering tangible environmental or health benefits. Moreover, authorization procedures under the IED Directive[1] often trigger the need for an environmental impact assessment (EIA) under the EIA Directive[2]. Both frameworks require the publication of reports and public participation. However, because the procedures and timelines under the IED Directive and EIA Directive are not always aligned, operators may	- The Commission could e.g. implement measures to ensure that permitting timeframes are reasonable and that a decision on a permit application does not take longer than one calendar year. - The European Union should promote integrated permitting processes to reduce repetition and accelerate decision-making. The procedures under the IED Directive and EIA Directive should be better coordinated. Where an EIA has already been carried out, it should be formally recognized as fulfilling the environmental reporting and public consultation obligations under the IED Directive. - The electronic permitting systems could be introduced. A single online platform at national level should allow operators to submit applications, track progress, and obtain permits. Harmonized templates and interoperability across would reduce administrative burdens, accelerate authorizations, and increase transparency. - The experience with shortened permitting timeframes under the Net-Zero Industry Act[3] has been positive. Companies submitting strategic "net-zero" projects can now benefit from shorter permitting periods, which vary between 9 and 18 months depending on the case. However, these advantages are granted exclusively to promoters

[1] Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control).

[2] Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.

[3] Regulation (EU) 2024/1735 of the European Parliament and of the Council of 13 June 2024 on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem and amending Regulation (EU) 2018/1724

need to submit overlapping information separately, resulting in administrative duplication, higher compliance costs, and unnecessary delays. Authorities must, of course, be given sufficient time to review permit applications, and in the context of EIA procedures, broad stakeholder consultation is essential. However, deadlines should be set to prevent unnecessary delays.	of "strategic" net-zero projects. This would need to be expanded to be of benefit to all.

2. Separate obligations for environmental review or improvement in different environmental compartments

Short problem / burden description	Proposal for simplification / burden reduction
Another permitting challenge resides in the separate obligations for environmental assessment or improvement in different environmental compartments. If one of those is not met, the permit cannot be granted. However, an improvement in one area (e.g. air quality) may involve a temporary or limited setback in another (e.g. soil quality).	- There is a clear need for an integrated environmental assessment, i.e. the evaluation of the net impact of a plan or program across multiple environmental components.

3. Not defined procedure to apply for setting a higher value of emission limit value

Short problem / burden description	Proposal for simplification / burden reduction
Pursuant to Article 15 of the IED Directive Member States must start from the lowest achievable emission limit value within the range as written in the BREF. If this lowest value cannot be achieved for technical and/or economic reasons, they may consider a higher value if it remains within the range and is supported by technical documentation justifying the proposed value. The procedure to apply for setting such a higher value should be clearly defined and simple to avoid unnecessary administrative burden and	- European-level guidelines for this procedure should be established to ensure its consistent application. - The reduction of emission limits should align with optimization across all environmental impacts, rather than maximizing performance for individual pollutants in isolation. Resource efficiency should also be considered in this context.

follow an integrated approach for environmental protection.	

4. Transformation plans under the IED Directive

Short problem / burden description	Proposal for simplification / burden reduction
IED Directive prescribes in Article 27d for the transformation towards a clean, circular and climate-neutral industry. In this respect Member States shall require that operators by 30 June 2030 include in their environmental management system an indicative transformation plan covering their activities as listed in points 1, 2, 3, 4, 6.1 a, and 6.1 b of Annex I. The transformation plan shall contain 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, including where relevant deep industrial transformation as referred to in Article 27e. As the legislation is written, Member States may interpret it very strictly and impose detailed descriptions which will only increase administrative burden. It would be more useful for companies to focus on their efforts to meet the lowest achievable emission levels, to reduce their need for water and raw material, lower the quantity of waste generated by their activities, contribute to the INCITE projects, engage in Deep Transformation activities, etc. It should also be noted that all the proposed changes in those plans will need many years to	- The delegated act to be issued by 2026 on the transformation plans will be key.

be implemented. By then, new energy generation systems and technologies may be available. Having a detailed plan for the long term will thus be a challenge, especially in these difficult economic times, and may create an unnecessary administrative burden.	

5. Environmental management system under the IED Directive

Short problem / burden description	**Proposal for simplification / burden reduction**
Article 14a of the IED Directive requires certain large industrial installations to introduce an environmental management system by 1 July 2027. However, rather than recognizing existing environmental management system frameworks (such as ISO 14001, ISO 50001, ECO - Management and Audit Scheme etc.), the directive introduces additional and more detailed requirements, including the development of chemical inventories, the definition of performance indicators, integration of Best Available Techniques (BAT), and the preparation of transformation plans. The foregoing creates unnecessary administrative burden for companies and is delaying permitting procedures without delivering additional environmental value (since all these aspects would have to be considered in the permitting procedures anyway) at a time when permitting periods across should be significantly shortened. The provision "*Member States shall require the operator to prepare and implement, for each installation falling within the scope of this*	- Delete the obligation under Article 14a. Alternatively, compliance with recognized systems (such as ISO 14001, ISO 50001, ECO - Management and Audit Scheme etc.) should be deemed sufficient to meet the environmental management system requirements. - The matrix certification established in practice with recertification audits every three years should be taken into account in environmental management system auditing in accordance with the IED Directive. It should be possible for the companies to harmonize their audit cycles, for example according to ISO 14001 and the IED, by means of sufficient implementation regulations. - The requirement to include the chemical inventory into the environmental management system should be deleted.

Chapter, an environmental management system" seems to imply that each installation must have its own environmental management system, and that Company-wide certifications or site certifications are not allowed. This would make the management of multi-site company installations or multi-installations sites already equipped with an integrated management system extremely burdensome. A separate system for each installation is not always feasible nor sensible and may cause bureaucracy-related costs in companies. Moreover, the IED Directive provides for the requirement to include the chemical inventory (including risk assessment and substitution check) into the environmental management system. The current provisions not only target potential industrial emissions, but also the presence of hazardous substances on site (including e.g. hand soaps and cleaning products). That presence, however, is covered by REACH[4] and by the occupational health and safety rules in place. Companies have their own chemical inventory linked to their safety management systems. Building a "parallel" IED-linked system to list hazardous substances and risk assessments of the impact on human health and the environment for substances of very high concern and authorized and restricted substances under REACH, is a comprehensive data assembling exercise. In practice, this example of double regulation will consist of copying existing data in a new system, probably	

[4] 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).

in a different form, only adding administrative burden without improving environmental and health protection, as the topics are already covered by REACH and occupational health and safety legislation.	

6. Multiple overlapping reporting obligations

Short problem / burden description	Proposal for simplification / burden reduction
The industry faces multiple overlapping reporting obligations across EU environmental legislation, including the IED Directive, Waste Framework Directive, Waste Shipment Regulations, REACH, CLP, and the Packaging and Packaging Waste Regulation, in addition to any additional environmental reporting obligations imposed by national authorities. There are also multiple tools to report environmental data. This duplication creates unnecessary administrative burden without delivering proportional compliance benefits. The industry must devote disproportionate resources to managing multiple IT platforms and reporting the same data in different formats. Opportunities for simplification reside in streamlining reporting of the same (type of) data via different pieces of environmental legislation.	- Mandating Member States to implement one online platform for the reporting of all environmental data (air emissions, water emissions, waste, permit compliance etc.) to relevant authorities at all levels can eliminate duplication of reporting, reduce administrative burden and minimise mistakes. The single online platform would also solve the issue of different systems requesting the same value to be expressed in different units (e.g. ppm versus µg/l). It will equally help identify and remediate some discrepancies in general agreements, e.g. which value to fill in when the measurement is below the Level of Quantification (LOQ). It should be avoided that for the BREF reporting, a value of '< LOQ' needs to be reported and the LOQ needs to be mentioned, whilst for the reporting of the Member States to the European Union, it is now proposed to have the number '0' mentioned when the LOQ is not reached. The latter is not only scientifically incorrect but also creates confusion. - Avoid reporting duplication on synthetic polymer microparticles losses in the form of pellets, flakes, and powders used in industrial sites related to Regulation (EU) 2023/2055 and the proposal for a Regulation on preventing plastic pellet losses to reduce microplastic pollution. A similar requirement is also present in the European Sustainability Reporting Standards. Calculation

	methodologies for losses should be harmonized across all reporting to avoid potential data misalignment, risk of errors (same site, same operators but different compliance methods), and unnecessary administrative burdens.

7. Transboundary shipment of plastics waste

Short problem / burden description	Proposal for simplification / burden reduction
The revised Waste Shipment Regulation[5] provides for new requirements for shipments of mixed plastic waste falling under the EU48 code. The application of prior written notification and consent procedure is envisaged for intra-EU waste shipments under the EU48 code even though this category refers to non-hazardous plastic with contamination exceeding the threshold, which may still be recycled in the European Union given the available technologies. Terms "almost exclusively" and "almost free of contamination" are not applied in the same way by all Member States and different Member States apply different contamination thresholds. The foregoing (-) increases the risk of different interpretations of the terms by the Member States, (-) increases administrative burden with consequent delays, (-) increases costs for a type of waste that is not even considered hazardous, and (-) hinders the free flow of mixed plastic waste.	- Shipment of plastics waste should be facilitated in general. There should be a simple and harmonized procedure to manage the administration related to the notification and consent between Member States, particularly for the intra-EU shipment of mixed plastic waste falling under EU48 code. - Terms "almost exclusively" and "almost free of contamination" should be applied in the same way by all Member States.

[5] Regulation (EU) 2024/1157 of the European Parliament and of the Council of 11 April 2024 on shipments of waste, amending Regulations (EU) No 1257/2013 and (EU) 2020/1056 and repealing Regulation (EC) No 1013/2006.

8. Vague criteria for the end-of-waste and by-products status	
Short problem / burden description	**Proposal for simplification / burden reduction**
There is no harmonization of by-products and end-of-waste status across Member States. Different competent authorities created different criteria and/or use different interpretations for similar criteria. Article 5(1) (a–d) of the Waste Framework Directive[6] sets forth the conditions under which a material may be considered a by-product rather than waste. However, the criteria remain vague and are implemented differently across Member States, leading to high compliance costs, and uncertainty for businesses. Article 6(1) of the Waste Framework Directive further complicates the situation, as the boundary between by-products and end-of-waste remains unclear. This legal uncertainty discourages circular solutions and often forces companies to classify valuable secondary materials as waste. Lack of clarity creates uncertainty, risks and an excessive administrative burden also for the transboundary shipments of waste. Uncertainty and the complex notification procedure for transboundary waste shipments could result in disposal in the country of generation even though the waste could be recycled in another Member State.	- Additional guidance on end-of-waste and by-product criteria could help provide clarity and reduce the likelihood of misalignment within the European Union. - Harmonized by-products and end-of-waste criteria, and consistency with substance and product regulations (REACH, RoHS, food contact materials, etc.), can resolve potential disconnects, complexity, and inconsistency of approach under the different pieces of legislation. - A key step will be to establish such criteria for chemical recycling, e.g, hydrocracking, pyrolysis, gasification, and depolymerisation technologies. - Introduce harmonized time limits and simplified procedures for the recognition of end-of-waste status at European Union level.

[6] Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives.

Moreover, the current end-of-waste procedures are excessively complex and slow. This time misalignment between technological innovation and bureaucratic procedures blocks investments and hinders the development of the circular economy.	

9. Complex and burdensome requirements deriving from the new Packaging and Packaging Waste Regulation (PPWR)	
Short problem / burden description	**Proposal for simplification / burden reduction**
The new Packaging and Packaging Waste Regulation[7] aims to harmonize packaging rules across Member States and promote sustainability and circularity. However, instead of providing companies with a practical and proportionate framework, the regulation introduces complex and burdensome requirements. This includes the proof of conformity, the technical documentation (to be held ready for a possible authority inspection), and the detailed data reporting obligations – all of which create administrative burdens for businesses. In addition, businesses face difficulties due to unclear definitions (e.g., the distinction between "manufacturer" and "producer"), uncertainty about permitted packaging materials, and duplicative registration obligations across Member States. Simplification and a reduction of bureaucracy in the Packaging and Packaging Waste Regulation are essential as several provisions	- The regulation should be thoroughly revised and adapted to ensure it is practical and feasible for application. - The Commission should clarify that technical documentation under Article 39 of the Packaging and Packaging Waste Regulation can be submitted solely in English, including the declaration of conformity requiring translation. - Quarterly reporting to extended producer responsibility systems under Article 44 should be replaced with annual reporting, as the effort required is essentially the same but multiplied fourfold. - The Commission should introduce a unified digital reporting system for all Member States. This system should serve as a single EU-level portal for compliance checks, extended producer responsibility declarations, and related reporting obligations. Such centralization would significantly reduce economic and administrative burdens on producers, enhance data comparability, and improve enforcement efficiency.

[7] Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC.

of the regulation do not match with an economic reality. The rules for reusable transport packaging in Article 29 (2) and (3) are not feasible, because the 100% quota in these subparagraphs is unrealistic. These requirements would not only mean repackaging/unpackaging products that are delivered in disposable packaging from third countries but also repackaging/unpackaging products in disposable packaging from Member States if these products are then passed on B2B within a Member State and cross-border in a group of companies. This would also mean that single-use transport packaging or sales packaging used for transport, such as intermediate bulk containers, pails, drums and canisters of all sizes and materials, must be repackaged if they are imported from another Member State or a third country and then passed on B2B as the 100% reusable obligation will apply even if the original packaging is fully functional and suited to transport needs. It makes no sense to repackage/refill packaged products just to fulfil the 100% reusable obligation. This generates more packaging (namely the necessary required re-usable packaging), unnecessary labor and costs and has no added value and no environmental benefit. In many cases, re-use systems are also neither technically feasible nor ecologically reasonable, as they would require excessive resource inputs (e.g., cleaning of buckets containing construction adhesives or paints).	- Delete or revise Article 29(2) and (3) to avoid repackaging solely for the sake of formal compliance and to reflect technical feasibility and ensure ecologically reasonable solutions. This must include more flexible and realistic re-use targets, particularly for B2B transport packaging, and the introduction of an exemption for goods imported in single-use packaging, both from third countries and other Member States if Article 29(2) and (3) is retained. Conduct a robust, science-based impact assessment to verify the environmental and economic viability of reusable packaging options across different sectors and packaging formats. Where reuse is not demonstrably superior, the Packaging and Packaging Waste Regulation should prioritize full recyclability and the use of recycled content as more scalable and immediately impactful pathways to circularity.

10. Disproportionate burden from the extended producer responsibility under Waste Framework Directive	
Short problem / burden description	**Proposal for simplification / burden reduction**
Product-specific extended producer responsibility schemes can play an essential role in efficient waste management and optimization of recycling; however, they need a certain level of harmonization, simplification, and digitalization.	- Establish a harmonized "one-stop shop" registration system for extended producer responsibility compliance at EU level, enabling producers to register only once across the EU (similar to the existing VAT system). This would streamline procedures and reduce administrative costs. - Ensure mutual recognition of authorized representatives across Member States, potentially through a central EU register.
11. Disproportionate cost burden from the extended producer responsibility under the Urban Wastewater Treatment Directive (UWWTD)	
Short problem / burden description	**Proposal for simplification / burden reduction**

The revised Urban Wastewater Treatment Directive[8] aims to reduce environmental impacts of municipal wastewater and wastewater from certain industrial sectors. A central requirement is the mandatory introduction of a fourth treatment stage in large wastewater plants to remove "micropollutants".
 	
Under Article 9, the full costs are to be borne by the pharmaceutical and cosmetics industries through extended producer responsibility.
 	
This approach is problematic for several reasons.
 	
The preparatory impact assessment identified pharmaceutical and cosmetic ingredients as
	- Immediate temporary stop of the implementation of the EPR scheme (Art. 9 and 10) - "stop the clock".
	- Carry out new thorough and transparent impact study assessing the actual burden of micropolutants (EU level) and the real costs of quarternary wastewater treatment.
	- Revision of the EPR scheme to ensure:
	  - scientifically justified cost allocation reflecting actual environmental impact and
	  - proportionate method of financing broader distribution of costs as in the previous three cleaning stages, so that all dischargers (households, hospitals, businesses) should bear the additional costs according to the Polluter Pays Principle. Polluter Pays Principle which is not limited exclusively to

[8] Directive (EU) 2024/3019 of the European Parliament and of the Council of 27 November 2024 concerning urban wastewater treatment.

primary sources of micropollutants, which is factually questionable. Common substances (e.g. caffeine) have multiple sources, many unrelated to these sectors. Overestimation of the cosmetics and pharmaceutical products contribution to the total toxic load creates a critical financing gap in funding of quaternary treatment. The defined extended producer responsibility scheme is not substance-based, but sector-based, and hence is not aligned with European Union's Polluter Paya Principle. Due to regulated prices in the pharmaceutical sector, producers cannot adjust prices to absorb these new costs. Non-EU suppliers may exit the market entirely, worsening already fragile medicine supply chains. Remaining EU manufacturers would shoulder a growing burden, endangering availability of essential medicines, as their competitiveness is undermined.	producers but may also include other polluters, users of products. - Reduce costs by restricting mandatory implementation of the fourth treatment stage to locations where drinking water reserves are demonstrably at risk due to micropollutants. This would reduce costs while ensuring safety.

12. Burdensome "one-out-all-out" and "non-deterioration" principles under the Water Framework Directive

Short problem / burden description	Proposal for simplification / burden reduction
The "one-out-all-out" and "non-deterioration" principles under the Water Framework Directive[9] have created significant obstacles for companies seeking water-related permits. With watersheds only rarely reaching good chemical status, permitting becomes a challenge for all, authorities and industries alike.	- Amend Article 4(1)(a)(i) in the Water Framework Directive to allow for a local deterioration of water status in cases where a broader range of socio-economic or other environmental benefits justify the decision. - Simplify the use of exemptions under Article 4(7) by introducing clear *de minimis* thresholds,

[9] Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy.

The "one-out-all-out" classification system, established under Annex V, means that if just one environmental quality element (e.g. biological, chemical) fails to meet the required status, the entire water body is downgraded, even if all other indicators are in good condition. Similarly, the "non-deterioration" requirement in Article 4(1)(a)(i) prohibits any deterioration in the status of a water body. This was further complicated by the European Court of Justice in the "Weser ruling" (C-461/13), which concluded that even a minor deterioration in status class is not permissible unless the exemptions in Article 4(7) apply. In practice, this has led to a situation where permitting procedures are frequently delayed or blocked. Moreover, the Environmental Quality Standards, which set very low pollutant thresholds, are often unattainable due to diffuse and ubiquitous pollution, further complicating compliance.	allowing minor deteriorations or negligible impacts to be permitted without extensive justification. - Delete or reform the "one-out-all-out" approach under Annex V by introducing a graduated or weighted classification system that better reflects the overall status of water bodies, rather than downgrading based on a failing parameter. - Reintegrate the principle of subsidiarity into EU water law and fully implement tools for local decision-making. Local authorities should be enabled to carry out a balancing of interests through amended provisions in EU water law, allowing them to develop the best possible solutions on site in a legally secure and practical manner.

13. The definition of substance of concern under the Ecodesign for Sustainable Products Regulation

Short problem / burden description	Proposal for simplification / burden reduction
Article 2(27) of the Ecodesign for Sustainable Product Regulation[10] contains a broad and dynamic definition for the term Substance of Concern (SoC). For chemicals safety aspects, REACH shall be the main regulatory framework.	- The definition of substances of concern should be more precise and linked to the evolution of recycling technologies. - Harmonization of the term "SoC" across regulations is key to avoiding unnecessary administrative burden. The term SoC occurs in e.g., the Plant Protection Products Regulation, the

[10] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC.

Replacing the expression "negatively affecting" with "impeding" will also bring more clarity, as the current definition is vague and substances that "impede" recycling or reuse should be considered as a SoC. Since the aim of the Ecodesign for Sustainable Product Regulation is to improve circularity and sustainability of products placed on the EU market, a SoC should a) be identified as SVHC under REACH Regulation or, b) meet some hazard classifications under CLP Regulation or, c) be identified as a Persistent Organic Pollutant (POP) and d) impede the reuse and recycling of materials in the product in which it is present. This will ensure that the definition of Substances of Concern focuses on hazardous substances that impede reuse and recycling of products, which is in line with the focus of the Ecodesign for Sustainable Product Regulation.	Biocidal Products Regulation, the Ecodesign for Sustainable Products Regulation, the EU Taxonomy Regulation for sustainable activities, and others.

14. Reporting obligations under the Ecodesign for Sustainable Products Regulation

Short problem / burden description	**Proposal for simplification / burden reduction**
Mandatory reporting of SoCs under Article 7(2) of the Ecodesign for Sustainable Products Regulation may require more than 4,500 substances to be tracked and documented in detail, down to product components. This level of granularity will require significant testing capacity, expert knowledge, and infrastructure, which is currently unrealistic for many producers. The reporting/tracking of SoCs throughout the entire value chain as foreseen under the Ecodesign for Sustainable Products Regulation	- The reporting scope under Article 7(2) should be limited to Substances of Very High Concern (SVHCs), as defined under REACH Article 33. - Implementation should begin with a pilot phase using a limited, priority list of SVHCs. This would allow sectors to gradually develop the necessary processes, technical capacity, and infrastructure. - With respect to reporting on destruction of unsold consumer goods we recommend to revise and pay special attention to the feasibility of the proposed rules in the impact assessment and to understand that the costs of reporting and obligatory reuse or refurbishment will ultimately

can potentially lead to duplication of reporting and contradicting requirements. Moreover, the proposed rules on the reporting on destruction of unsold consumer goods also pose challenges. According to Article 24(1) of the Ecodesign for Sustainable Products Regulation, large companies, and from 19 July 2030 also medium-sized companies, that directly dispose of unsold consumer products or have them disposed of on their behalf must annually report the number and weight of such products, the reasons for their disposal, the proportion sent for waste treatment, and the measures taken to prevent such destruction. These new reporting obligations represent a significant administrative burden. Existing reporting requirements on waste already provide all necessary statistics.	have to be borne by consumers resulting in extra costs. Flexibility in reporting metrics must be ensured, given the variation in how products are tracked across sectors (e.g. by weight, volume, or number of items). - Introduce *de minimis* threshold for discarded products below which companies would be exempt from the reporting obligation, regardless of company size. This would ensure that the rule only applies to significant amounts of discarded products, preventing overregulation.

15. Digital product passport under the Ecodesign for Sustainable Products Regulation

Short problem / burden description	Proposal for simplification / burden reduction
Ecodesign for Sustainable Products Regulation introduces the Digital Product Passport (DDP); an electronic system for registering, processing, and sharing product-related information across the entire value chain, from raw materials to end-of-life. The DPP will be used by market surveillance authorities, customs (for third-country imports), and business partners, and will serve as proof of compliance with ecodesign requirements. Every product subject to delegated acts under the Ecodesign for Sustainable Products	- Information on substances that will be included in the DDP needs to be manageable, understandable, and useful for the target audience (consumers, recyclers/repairers, market surveillance and customs authorities). It should not go beyond what is already required in Safety Data Sheets (SDS), when it comes to substances and mixtures, and should focus on those relevant substances present in the final article/product. It is neither realistic nor scientifically justified to track all Substances of Concern.

Regulation will require a passport detailing relevant performance and information criteria. The introduction of the DDP represents an internal data collection burden for businesses, which may require detailed product-level data (possibly down to individual units), imposing a disproportionate administrative and financial burden, particularly for complex global supply chains.	

16. NATURA 2000 – outdated legal framework	
Short problem / burden description	**Proposal for simplification / burden reduction**
The Birds[11] and Habitats[12] Directives, which together form the legal basis of the Natura 2000 network, often delay or complicate permitting procedures. While they represent cornerstone legislation for EU nature protection, their rigid frameworks often no longer reflect current ecological, economic, and social conditions. These directives offer limited flexibility for Member States and competent authorities to adapt species protection to local realities, reducing the ability to align environmental goals with the broader transition of the economy. Moreover, environmental impact assessments under Article 6 of the Habitats Directive are often lengthy and overly complex, particularly for projects located near protected sites. These assessments tend to focus exclusively on ecological impacts, without sufficiently	- Adopting a modern nature protection legal framework. This framework should preserve the existing Natura 2000 network while modernizing procedures, improving legal coherence, and enabling more flexible responses at national and regional levels. - Simplify nature impact assessments for projects within or at the immediate borders of designated protection areas under Article 6. Especially for low-impact projects, a streamlined procedure must be introduced. The Commission should also formulate instructions at European Union level on the (simplified) format of an appropriate assessment, making it a workable and affordable tool. - Introduce *de minimis* thresholds and simplify the procedure for applying derogations under Articles 6 and 16 of the Habitats Directive and Article 9 of the Birds Directive, particularly for projects with minor impacts or located in non-sensitive areas. In addition, it should be possible to allow

[11] Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

[12] Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

considering socio-economic or energy transition needs. Applying for derogations under Articles 6 and 16 of the Habitats Directive and Article 9 of the Birds Directive involves burdensome requirements. Following rulings from the European Court of Justice (e.g., C-674/17, C-88/19, C-900/19), authorities must base decisions on the best available scientific evidence at the time of the decision, often leading to repeated updates and studies in lengthy permitting processes. Moreover, protected areas under both the Birds and Habitats Directives cannot be de-designated or changed, even if the area is not suitable anymore to fulfil the protection purpose of the directives. Existing protected areas should be modifiable in terms of their boundaries and their protective provisions, particularly where ecological conditions have changed (e.g., climate change) or where adjustments are required to address pressing economic or social needs.	temporary deterioration of a perspective of "net environmental quality", provided it is scientifically substantiated. - Introduce a mechanism allowing landowners or authorities to request the revision or de-designation protected areas if the site no longer fulfils the conservation objectives of the directives.