

Ms Ilze Juhansone
Secretary-General
European Commission
Rue de la Loi 200
B-1049 Brussels

Brussels, 22 June 2020

Subject: **Postponement of certain policy initiatives**

Dear Ms Juhansone,

In the wake of the COVID-19 crisis, EUROCHAMBRES on 3 April wrote to you requesting the postponement of certain policy initiatives, particularly those that were at consultation stage around the time that confinement measures were introduced. Thank you for your response of 4 May, in which you highlighted certain actions taken by the Commission in line with our request, notably in relation to the revision of the 2020 work programme and adjustments to certain public consultations.

Building on this, we have – based on feedback from the Chamber network - identified a small number of legislative and non-legislative dossiers that we believe should be postponed as a knock-on effect of the crisis and in order to support the recovery process. You can find the relevant list of dossiers in annex to this letter.

Thank you in advance for considering this request.

Yours sincerely,



Ben Butters
Deputy CEO, EUROCHAMBRES

ANNEX I

Revision of the Non-Financial Reporting Directive

For a swift economic recovery after the Corona pandemic, additional administrative burden for companies, especially SMEs, must be avoided under all circumstances. The Directive has been postponed to 1st quarter 2021 with revised WP 2020 but it would be better to ask for further postponement.

Action Plan to fight tax evasion and make taxation simple and easy

The Action Plan needs to reflect the Covid-19 crisis and its longer-term effects on growth, jobs and investment. The action plan could set out concrete measures to simplify and modernise tax rules in the Single Market, in particular VAT rules, and provide more assistance on understanding EU tax rules. The dossier has been postponed by 1 Q, but EUROCHAMBRES and its network ask for further postponement.

New Circular Economy Action Plan

The “Legislative proposal to empower consumers in the green transition” and the “Legislative proposal on substantiating green claims” have been postponed to 2021 with the revised 2020 EC WP. However also the “Mainstreaming circular economy objectives in the context of the rules on non-financial reporting, and initiatives on sustainable corporate governance and on environmental accounting” action shall be postponed as it may come up in the context of Non-financial disclosure regulation and Renewed Sustainable Finance Strategy again.

Proposal for a Regulation on the establishment for a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (COM/2018/353 final; 2018/0178 COD)

Ensure transition period for all to achieve sustainability. The sustainable finance taxonomy has a role in the recovery of economy, but it has to be avoided it becomes an additional burden for conventional industries and their transition efforts.

To this aim the postponement of the delegated acts for the technical screening criteria of the two climate objectives (Art 10 paragraph 6; Art 11 paragraph 6) would be crucial; these have to be adopted by 31 December 2020 according to the agreement by EP and Council, which may prove difficult given the current situation. There needs to be sufficient time and opportunities for stakeholders to participate in expert groups and to sufficiently support the Commission in taking its decision.

Climate Policy (ETS)

2030 Climate target plan (Impact Assessment)

The impact assessment should be postponed to take into account the real effects of the COVID crisis. In consideration of the effects of the impact assessment on other legislative and non-legislative dossiers, the following shall be adapted/postponed accordingly: Energy Efficiency Directive, Renewable Energy Directive, Energy Performance in Buildings Directive, ETS Directive and, potentially, the Energy Market Directive and Regulation

In line with the above mentioned proposed postponement of the 2030 Climate target plan (Impact Assessment), the ETS Directive shall be postponed as well as it is a dossier that will most probably be affected by the outcomes of the impact assessment.

Directive (EU) 2018/851 amending Directive 2008/98/EC on waste (Waste Framework Directive)

Industry considers the database requirements far beyond the scope of the Directive and sees delays in the database implementation and difficulties to provide information in the required timeframe. A 12 months postponement of the application date is needed as this dossier is linked with other dossiers concerning the circular economy for which a postponement is requested.

Binding pay transparency measures

The feedback and input from companies is crucial for this consultation, due to its extensive implication on operations. In the current situation, and since the consultation has been already open, the Chambers network has not been able to consult its members effectively. Furthermore, business support organisations also are overwhelmed with other priorities

Revision of the energy tax directive

In view of the current crisis and the long-term effect on the transport sectors of aviation and maritime, the EC needs to re-evaluate the timing of a proposal that will make the cost of transport more expensive.