EUROCHAMBRES

INPUT ON THE ENVIRONMENTAL OMNIBUS

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Eurochambres input on the Environmental Omnibus

European businesses, particularly SMEs, are struggling with complex and burdensome requirements stemming from EU environmental legislation. Excessive documentation, reporting and authorisation obligations result in high compliance costs and legal uncertainty, undermining Europe's competitiveness. Eurochambres therefore welcomes the European Commission's plan to propose a simplification package for EU environmental law. To support this effort, the chamber network has compiled a list of burden reduction proposals. These aim to ensure a more proportionate and practical regulatory framework for businesses, reflecting operational realities on the ground.

1. Eurochambres message

As outlined in the Draghi report, the EU has adopted around 13,000 legislative acts between 2019 and 2024, more than three times as many as the United States. This comes in addition to national legislation passed in each member state. For businesses, this has resulted in an increasingly complex and fragmented regulatory landscape with burdensome and overlapping requirements, particularly in the area of environmental law.

Environmental legislation plays a key role in enabling a successful transition, but its rules and implementation must reflect the day-to-day realities faced by companies. According to estimates, businesses currently face over 110 environmental reporting obligations under roughly 40 EU directives and regulations in the areas of air, governance, industrial emissions, nature and soil, products, waste and water. These obligations are often overly technical and administratively burdensome, especially for SMEs, which often lack the resources to manage such complexity. Unsurprisingly, regulatory burdens were identified as one of the top challenges for entrepreneurs in the Eurochambres Economic Survey 2025.

Eurochambres therefore welcomes the Commission's commitment to reduce administrative burdens by 25%, and by 35% for SMEs, as outlined in the Communication "A Simpler and Faster Europe". Recent simplification packages, such as the Omnibus I on sustainability reporting, were steps in the right direction. The forthcoming Environmental Omnibus must now build on this momentum by delivering meaningful simplifications and reinforcing the "Think Small First," and the "Once Only" principles.

To support this effort, Eurochambres has prepared a list of over 60 simplification proposals across 13 EU environmental laws. Building on Eurochambres 60 regulatory burden reduction proposals published in December 2024, these recommendations target burdensome obligations in areas such as water, waste, industrial emissions and due diligence legislation – to ensure a competitive transition for all businesses, especially SMEs.

2. Proposals to simplify environmental legislation

Packaging and Packaging Waste Regulation (EU) 2025/40 (PPWR)

Problem description	Suggested improvements
General complexity and burden for SMEs The Packaging and Packaging Waste Regulation (PPWR) aims to harmonise 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 that disproportionately affect SMEs. 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.	The PPWR should be streamlined before its core obligations take effect in August 2026. Key definitions must be clarified, and requirements on technical documentation, recyclability, and reusability should be revised and made proportionate, especially for SMEs. Given the complexity and scale of the changes, the entry into application, including delegated and implementing acts, should be postponed by at least two years ("stop-the-clock") to allow sufficient time for revision and practical adjustment. The additional time would also allow businesses and authorities to prepare adequately, and would ensure the delegated and implementing acts are adopted and clarified well in advance.
Duplication of substances of concern compliance (Article 5) Article 5 requires businesses to demonstrate compliance regarding substances of concern in packaging through technical documentation. However, REACH already sets limits for substances of concern. This leads to duplication of regulatory requirements and unnecessary administrative burden without added environmental or safety benefit.	Since REACH already establishes limits for substances of concern and obliges companies to maintain technical documentation, Article 5 should be deleted, or the PPWR should recognise REACH compliance, including existing technical documentation, as sufficient proof, in line with the once-only principle.
Unnecessary chain of custody requirements (Article 6) Article 6 requires establishing a "chain of custody mechanism" to demonstrate that packaging is recycled at scale. However, this objective is already sufficiently ensured through existing packaging disposal systems, recycling quotas, and extended producer responsibility (EPR) schemes. Introducing a new mechanism creates unnecessary documentation obligations throughout the entire supply chain, adding disproportionate burden, especially for SMEs.	The requirement under Article 6 to establish a "chain of custody mechanism" should be deleted, as existing recycling systems and recovery quotas already ensure compliance without adding new bureaucracy.
Redundant documentation for transport packaging minimisation (Article 10 and Annex IV) The technical documentation required under Article 10 and Annex IV to prove packaging minimisation, particularly for transport packaging, represents a bureaucratic burden without measurable environmental benefit. In practice, businesses already minimise weight and volume for cost	Transport packaging should be exempt from the minimisation obligation under Article 10.

efficiency, making the obligation redundant, especially for B2B transport packaging.	
Fragmented Labelling Requirements (Article 12 and 13) The labelling requirements under Article 12 lack the clarity needed for consistent and harmonised implementation. Most labelling details are deferred to future implementing acts, and member states retain discretion over labelling languages and presentation. This legal uncertainty creates compliance risks and opens the door to diverging national labelling requirements. Similar risks also apply under Article 13, which governs labelling of waste receptacles.	The labelling requirements in Article 12 should be formulated more clearly. Harmonised rules at EU level must be ensured, and additional regulations in the member states should be prevented. Greater flexibility should be allowed for digital labelling solutions (e.g. QR codes as primary carriers of detailed information). Similar harmonisation principles should apply under Article 13 to avoid fragmentation in the labelling of waste receptacles.
Limited actions of authorised representatives (Article 17) The scope of actions authorised representatives (ARs) can legally carry out under Article 17 is limited, restricting their usefulness for companies seeking to centralise compliance tasks across the EU.	The actions that authorised representatives may exercise under Article 17 should be extended, and the PPWR should allow for the appointment of a single EU-wide authorised representative to act across multiple countries. Only then can companies effectively centralise compliance tasks across multiple countries, reducing costs and enabling businesses to streamline obligations more effectively.
Burdensome data storage requirement (Article 22(2)(b)) The data storage requirement under Article 22 (2) (b) creates an unnecessary administrative burden, particularly for small businesses. If the economic operator is a natural person, the data includes personal information subject to deletion under the General Data Protection Regulation (GDPR) after 5 or 10 years. This requires operators to classify all incoming and outgoing packaging as either single-use or reusable and delete the data once the retention period expires – a disproportionate effort, especially for microenterprises. Furthermore, the lack of interoperability between national systems forces companies to repeatedly report the same data in different formats.	Article 22 (2)(b) should be deleted, and a uniform retention period for both single-use and reusable packaging should be established. Alternatively, reporting obligations related to reusable packaging could be transferred to re-use systems, relieving individual economic actors of the need to make this distinction and reducing the overall tracking and compliance burden. In addition, a centralised EU-wide digital platform, or mandatory interconnection of national systems, should enable businesses to submit data once (“once-only principle”), with automatic recognition across jurisdictions.
Unrealistic re-use requirements for transport packaging (Article 29(2) and (3)) The re-use obligations in Article 29(2) and (3) place a disproportionate burden on businesses, especially in the context of B2B deliveries and intra-company shipments within and across member states. They effectively result in a 100% reusable packaging requirement for transport packaging by 2030. This includes products imported from third countries or other member states in single-use transport packaging or sales packaging used for transport, such as intermediate bulk containers, pails, drums and canisters of all sizes and materials. Such products would require repackaging solely to meet formal compliance requirements, even if the original packaging is fully functional and suited to transport needs. The result is unnecessary repackaging,	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.

increased waste, higher costs, 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).	
Lack of alternatives for certain packaging types (Article 29) The uniform application of the re-use targets under Article 29 fails to account for packaging formats where no viable reusable alternatives exist, such as plastic pallet wrapping or straps. These are indispensable in logistics due to their lightweight nature, compatibility with automated packaging systems and function in securing goods during transport.	Exempt packaging formats (e.g., plastic pallet wrapping or straps) from re-use obligations where no technically or economically feasible reusable alternatives exist.
Restriction on pooling for reuse (Article 29(12)(b)) Article 29(12)(b), which limits pooling of re-use obligations to a maximum of five final distributors, risks undermining long-established and well-functioning national re-use systems, such as Germany's reusable pools, e.g., for beer and mineral water glass bottles.	Delete or revise Article 29(12)(b) to allow flexible pooling arrangements with a higher threshold for the number of final distributors, reflecting national practices and safeguard well-functioning existing re-use systems.
Burdensome reporting obligations (Articles 30 and 31) The calculation rules under Article 30 and the reporting obligations under Article 31(1) impose a significant administrative burden, particularly for SMEs. Requiring individual economic operators to monitor and report on re-use compliance, especially in light of the differentiation of distribution channels concerning the re-use quota under Article 29 (2) and (3), as opposed to Article 29 (1), results in unnecessary complexity and cost.	Delete or simplify the verification and reporting obligations in Articles 30 and 31. Compliance should be demonstrated collectively at member state level. For instance, through aggregated reports from re-use systems or industry associations rather than by individual businesses. Therefore, the addressee of Articles 30 and 31 should be solely the re-use systems or industry associations, not individual economic operators.
Complex conformity assessment requirements (Article 35 onwards) The conformity assessment obligations introduced from Article 35 onwards are too complex and place a disproportionate burden on businesses, particularly SMEs. They require detailed technical documentation, certification procedures, and, in some cases, conformity assessments by notified bodies, which increase both administrative and financial pressure.	Simplify the conformity assessment and certification process, and provide SMEs and micro-enterprises with a streamlined procedure.
Duplicate national registration requirements (Article 44) Article 44 requires producers or authorised representatives to register in each member state where they place packaging on the market. This leads to duplicated administrative processes, fragmented data handling, and higher costs for cross-border businesses. In addition, AR registration	Establish a centralised EU-wide registration system to replace national registrations. A single digital access point for registration would significantly reduce administrative burdens, increase efficiency, and ensure a consistent experience for cross-border operators. At a minimum, interoperability and mutual recognition of registries across member states must

processes and requirements still vary significantly between member states and lack interoperability.	be ensured through a mandatory interconnection of national systems. This should enable businesses to submit data once ("once-only principle"), with automatic recognition across jurisdictions, thereby eliminating duplications, and reducing compliance costs.
Burdensome appointment of authorized representatives in other countries (Article 45) Article 45 requires producers to appoint authorized representatives in every country where they place packaging on the market, as it is already required for the distribution of electrical and electronic equipment. Given the much lower material value and the environmental impact of packaging, this appears to be disproportionate. This requirement is particularly burdensome for SMEs and low-volume operators, as the administrative and financial cost of appointing ARs across multiple countries may exceed the commercial value of their cross-border activities, discouraging participation in the internal market.	Delete the requirement to appoint authorised representatives in other countries. Instead, the PPWR should allow for the appointment of a single EU-wide authorised representative who can act across multiple countries. The appointment of ARs should also be optional, especially for low-volume operators and SMEs, ensuring proportionality and preserving access to the internal market.
Lack of proportionality While Article 29 (13) exempts certain microenterprises from the reuse targets if they place no more than 1,000 kg of packaging annually on the market, the PPWR still applies a wide range of obligations (e.g., registration, documentation) to all companies, regardless of their packaging volume. This disproportionately burdens microenterprises and low-volume operators, who may lack the resources to manage these requirements.	Introduce additional de minimis thresholds and exemptions for microenterprises, SMEs and low-volume operators, particularly for registration, documentation, and reporting obligations. This would ensure greater proportionality and reduce administrative burdens without undermining the core environmental goals of the regulation.

Waste Framework Directive 2008/98/EC

Problem description	Suggested improvements
Heterogenous definition of green waste from maintenance activities (Article 3) Green waste from maintenance of private gardens is classified differently depending on whether it is produced by households (municipal waste) or by enterprises (special waste). This creates unnecessary bureaucracy and high disposal costs for gardening SMEs, who cannot access municipal collection points.	Harmonise the classification of green waste at EU level, recognising its identical nature regardless of the producer, and allow SMEs in the gardening sector to deliver such residues to municipal collection centres under controlled conditions.
Vague criteria for by-products and end-of-waste status (Article 5 and 6) Article 5(1)(a–d) sets 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,	Clarify and harmonise the criteria under Articles 5 and 6 at EU level to ensure consistent recognition of by-products and end-of-waste materials across member states. Introduce standardised technical documentation and mutual recognition of national decisions, reducing administrative burdens and fostering circular economy practices.

leading to fragmentation, high compliance costs, and uncertainty for businesses. Article 6(1) on end-of-waste status 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. A specific example is construction and demolition waste in Italy, where national criteria are currently under revision. The coexistence of binding rules and pending changes creates legal uncertainty for both companies and authorities, while risking the presence of materials with different standards on the market.	Establish an EU-level fast-track procedure for setting common end-of-waste criteria for major waste streams such as construction and demolition. Until such EU criteria are adopted, member states should ensure transitional stability, avoiding situations where operators must comply with requirements that are about to change.
Burdensome end-of-waste procedures (Article 6) The current end-of-waste procedures remain excessively complex and slow in many member states. For instance, in Italy, the “end of waste” authorisation process under Article 184-ter of Legislative Decree 152/2006 can take up to five years. This time misalignment between technological innovation and bureaucratic procedures blocks investments and hinders the development of the circular economy.	Introduce harmonised time limits and simplified procedures for the recognition of end-of-waste status (Article 6) at EU level. Allow the launch of recovery operations within 90 days of notification, unless objections are raised by the competent authority, and provide for the possibility of simplified general authorisations for non-hazardous waste.
Generic food waste target across sectors (Article 9a(4)(b)) The recently revised Waste Framework Directive sets an aggregated food waste reduction target of 30% per capita by 2030, covering retail and other distribution of food, restaurants and food services, and households (Article 9a (4) (b)). However, these sectors operate under very different conditions and face distinct challenges when it comes to reducing food waste. Aggregating them into one target fails to reflect these differences and risks placing disproportionate burdens on certain sectors.	Revise the food waste prevention target in Article 9a(4)(b) by introducing separate, realistic reduction targets for retail, hospitality, and households. This would account for sector-specific conditions, support targeted prevention strategies, and enable a more proportionate and competitive transition for affected businesses.
Disproportionate burden from extended producer responsibility (Article 8a) The rules on Extended Producer Responsibility (EPR), set out in Article 8a of the Waste Framework Directive, impose obligations on all producers, regardless of their size or the volume of products placed on the market. SMEs and microenterprises that occasionally sell cross-border are disproportionately affected, as they must comply with diverse national EPR systems, including registration, reporting, and fee payments, even for minimal quantities. In practice, this often requires appointing an authorised representative in each member state where the producer is not established (Article 8a(5)). This generates high administrative costs, legal complexity, and paperwork, effectively discouraging	Establish a harmonised “one-stop shop” registration system for EPR compliance at EU level, enabling producers to register only once across the EU (similar to the existing VAT system). This would streamline procedures, reduce administrative costs, and support internal market participation, particularly for SMEs. Introduce an EU-wide de minimis threshold (e.g., 10-30 units per year and country), below which producers are exempt from full EPR obligations. This would ensure proportionality for very small-scale cross-border activity. Ensure mutual recognition of authorised representatives across member states, potentially through a central EU register. The appointment of an authorised representative should be optional, particularly for low-volume or cross-border sales.

SMEs from participating in cross-border trade within the internal market.	
Redundant SCIP database obligations (Article 9(1)(i)) The SCIP database requirement introduced by Article 9(1)(i) of the revised Waste Framework Directive obliges companies to notify ECHA when articles contain substances of very high concern (SVHCs) above 0.1% w/w, in accordance with Article 33 of the REACH Regulation. However, this obligation does not relieve companies from their separate duties to inform downstream users and consumers under REACH Article 33(1) and (2). This results in a duplicative and redundant reporting burden for businesses. In general, the practical value of the SCIP database remains limited for users. At the same time, its technical complexity, unclear data requirements, and reputational risks (e.g. from incorrect or incomplete entries) further increase compliance costs for businesses without tangible benefits.	Delete the SCIP database requirement under Article 9(1)(i), particularly in light of the upcoming Digital Product Passport (DPP) framework, which is expected to provide more integrated and accessible product information and may render SCIP obsolete. Ensure alignment of future information obligations with REACH to avoid duplication, reduce administrative burden, and support a more coherent and user-friendly regulatory framework.
Disproportionate sanctions and record-keeping (Articles 35(1), 35(4) and 36(1)) Article 35(1) requires businesses to maintain extensive records on the quantity, nature, origin, destination and treatment of waste, while Article 35(4) empowers member states to define detailed rules on the form, content and retention of such records. Article 36(1) obliges member states to impose sanctions for non-compliance. In practice, sanctioning regimes are often rigid and disproportionate: even minor delays or formal errors in record-keeping may lead to automatic fines. This creates excessive burdens for SMEs and undermines a cooperative compliance culture.	Introduce EU-level minimum criteria for proportionate sanctions under Article 36(1), ensuring that penalties reflect the severity of the infringement. Allow voluntary rectification (“self-remedy”) in cases of late or minor reporting errors, rather than immediate fines. Digitalisation and simplification of record-keeping obligations under Article 35(1) and Article 35(4) should also be prioritised, especially for SMEs, to reduce risks of purely formal non-compliance.

Waste from Electrical and Electronic Equipment 2012/19/EU (WEEE)

Problem description	Suggested improvements
Fragmented WEEE compliance systems The WEEE Directive requires specific labelling, registration, and reporting obligations for all electrical and electronic equipment (EEE) placed on the EU market, in addition to CE marking. However, national-level implementation varies significantly, particularly regarding labelling formats, registration procedures and compliance fees. Manufacturers must register separately in each member state where they sell products and adapt to national rules, even for identical products.	The EU should harmonise national WEEE implementation systems or, at a minimum, ensure mutual recognition of national registration, labelling, and disposal requirements to guarantee consistent rules for identical products across borders. Establish a central EU-wide registration system (similar to the VAT One-Stop Shop) to allow producers to register once for WEEE compliance across all member states, submit reporting through a single access point and eliminate duplicative national registrations.

This fragmentation creates disproportionate administrative burdens, especially for SMEs and low-volume producers. In many cases, the cost of compliance exceeds the commercial value of placing those products on the market, discouraging cross-border activity and undermining internal market integration.	

Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment 2011/65/EU (RoHS Directive)

Problem description	Suggested improvements
Uncertainty from frequent updates to list of substances and exemptions (Articles 5 and 6) The RoHS Directive regulates the use of certain hazardous substances in electrical and electronic equipment (EEE) and provides exemptions for certain applications. However, frequent updates to both the list of restricted substances (Annex II, under Article 6) and exemptions (Annexes III and IV, under Article 5) create significant uncertainty for companies. Components or finished products held in stock may suddenly become non-compliant, forcing companies to scrap usable goods. Additionally, there is concern over the possible phase-out of technically essential substances, such as lead in steel or copper alloys, where no viable alternatives exist. Overlapping compliance obligations under RoHS and the REACH Regulation further increase legal uncertainty and administrative burdens.	Introduce longer validity periods for exemptions listed in Annexes III and IV, as governed by Article 5, to ensure planning certainty and reduce compliance risks. Reduce the frequency of updates to the list of restricted substances in Annex II, as governed by Article 6, to allow for longer application periods, helping to lower manufacturing costs, avoid waste, and improve resource efficiency. Ensure continued authorisation of substances for which no technically or economically viable alternatives exist. Improve coordination between RoHS and REACH to eliminate duplication and streamline compliance.
Lack of predictability in exemption renewal process (Articles 5 and 6) The flow of information regarding the status of exemptions under the RoHS Directive is often unclear. If the original validity period has expired, an exemption may still remain in force if an application for renewal was submitted on time (in line with Article 5(5)). However, the decision-making process on these applications often take several years, leaving companies in a state of uncertainty. This legal ambiguity complicates planning and production, as companies do not know with certainty when or whether an exemption will be extended or withdrawn. Although Article 5(6) provides that an exemption remains valid for up to 18 months after a negative decision is published, this period is often insufficient to adjust complex supply chains or redesign products.	Introduce clearer and more transparent procedures for processing and publishing exemption decisions under Article 5(5), including a publicly accessible status tracker for exemption applications to allow companies to monitor progress and prepare accordingly. Establish maximum time limits (e.g. 12 months) for the Commission to adopt a decision following a renewal application, in line with the intention of Article 5(5), to ensure timely and predictable outcomes. Extend the transitional period beyond the current 18 months set in Article 5(6) following a negative decision, particularly for complex or long life-cycle products, to provide sufficient time for adjustment and redesign.

Single-Use Plastics Directive EU 2019/904 (SUPD)

Problem description	Suggested improvements
Fragmented national implementation The national implementation of the Single-Use Plastic Products Directive (SUPD), has resulted in fragmented and inconsistent rules across member states. Some countries have interpreted the directive more broadly than others, for example, by expanding the scope of product bans (Article 5) and by applying labelling requirements (Article 7) to product types not clearly defined at EU level. This regulatory divergence undermines the single market, as companies must comply with different national rules for identical products. The resulting legal uncertainty and administrative burden disproportionately affect businesses active in multiple EU markets.	The Commission should issue updated guidance under Article 12 to clarify the scope of the directive and ensure consistent interpretation across member states. In particular, the product list and definitions should be tightened and harmonised while national "gold-plating" practices that go beyond the directive's intent should be discouraged. The SUPD should also be reviewed in light of its interaction with related EU legislation, such as the Packaging and Packaging Waste Regulation (PPWR), to ensure coherence and avoid overlapping or contradictory obligations. A coordinated, harmonised implementation across the EU is essential to improve legal certainty and reduce unnecessary compliance costs and, particularly for SMEs and companies engaging in cross-border trade.

Ecodesign for Sustainable Products Regulation 2024/1781 (ESPR)

Problem description	Suggested improvements
Lack of proportionality in the ESPR framework The Ecodesign for Sustainable Products Regulation (ESPR) establishes a framework for setting ecodesign requirements for almost all physical goods placed on the EU market. These requirements may cover up to 16 product-specific criteria, including both performance thresholds (e.g. durability, reparability, recyclability) and information obligations (e.g. digital product passport, composition data). The ESPR will be operationalised through future delegated and implementing acts for different product groups, which are yet to be developed. However, the regulation currently lacks general exemptions or simplified procedures for SMEs, despite the potentially extensive administrative and technical burden this may create. The combined impact of new data collection obligations, performance criteria, and cross-legislative overlaps (e.g. CSRD, CSDDD, Taxonomy Regulation, EUDR) risks creating an excessive and duplicative compliance burden, particularly for smaller businesses with limited technical or reporting capacity.	The future delegated and implementing acts must ensure that ecodesign criteria are proportionate, technically feasible, and tailored to the specificities of each product group, with special consideration for SMEs. The data collection and reporting obligations should be aligned with existing and upcoming EU legislation (e.g. CSRD, Taxonomy Regulation, CSDDD, EUDR) to enable cross-compliance and avoid duplication, implementing the "data once-only" principle. Companies should be required to report only data reasonably available at their point in the value chain. For upstream or non-accessible lifecycle data, estimates or generic data should be considered sufficient to meet the ESPR obligations. In this context, the Commission should cover the cost of developing and providing free technical tools, templates, and reference databases to support SME compliance. Introduce simplified compliance procedures or exemptions for SMEs and microenterprises based on thresholds (e.g. turnover or product volumes) to avoid disproportionate impacts. This could include exemptions from certain ecodesign criteria or reduced reporting requirements to ensure proportionality.

Digital Product Passport (DPP) implementation challenges A central element of the ESPR is the introduction of the Digital Product Passport (DPP) – 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. The system is expected to impact up to 30 million companies in the EU, with around 1.5 billion product-level interactions. Every product subject to delegated acts under the ESPR will require a passport detailing relevant performance and information criteria. There are two major challenges: • the technical interoperability of DPPs across companies and supply chains, which depends on pending EU-wide IT and data standards. • the 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 SMEs and complex global supply chains. Feedback from SMEs indicate that a full adaptation cycle (planning, implementation, stabilisation) for the DPP will require over 24 months. In addition, as whole sectors will have to adapt, there is very likely foreseeable shortage of market consultants and specialist companies.	The European standard for DPP interoperability is currently under development. It was originally scheduled for finalisation by 31 December 2025 but has been postponed to Q1 2026, with formal Commission adoption now expected in Q3 2026. Companies can only begin adapting their IT systems once the standard is adopted. Therefore, sufficient transitional periods of at least 24 months from the adoption of the standard should be foreseen to allow for implementation and adjustment. The DPP framework must be designed in a way to minimise integration costs and include proportionate exemptions and de minimis thresholds, especially for SMEs. The granularity of required data must be proportionate, technically feasible and in line with securing competitiveness. In addition, the data collection should be based on the model or batch level, not individual product serial numbers, to avoid unnecessary complexity.
Unrealistic reporting obligations for substances of concern (SOCs) (Article 7(2)) Mandatory reporting of Substances of Concern (SOCs) under Article 7(2) of the ESPR 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.	To reduce complexity and align with existing EU chemicals legislation, 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. Such a phased approach would support smoother implementation and reduce early-stage compliance risks, especially for SMEs.
Reporting burden on the disposal of unsold consumer products (Article 24) According to Article 24(1) of the ESPR, 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.	Introduce a 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. 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

These new reporting obligations, as outlined in the implementing act on the disclosure of unsold consumer products, represent a significant administrative burden. In practice, products are not discarded without valid reasons, and the new requirements place additional pressure on companies that are already managing complex and overlapping EU compliance obligations. In addition, existing reporting requirements on waste already provide all necessary statistics. Therefore, any additional reporting requirements are superfluous. A clear distinction between unsold consumer business-to-consumer (B2C) products and business-to-business products (B2B) is important, as the legal and reporting consequences differ significantly. However, under the current regime, this distinction requires a high level of legal understanding and still creates major challenges for companies. The B2C definition in Article 2(2) of Directive 2019/771 basically draws the line at the intention of the buyer – as a 'consumer' (B2C) or 'in the course of their trade, business, craft or profession' (B2B). The same product (e.g. a piece of workwear) may be either a B2B product (e.g. when bought by an SME) or a B2C product (e.g. when bought by a DIY customer for private use). A clear distinction is therefore hard to draw if referring to the intention of the buyer. Companies' IT systems are set up in a way to follow the financial year. The start of data collection from any other date would require substantial reprogramming of IT systems and stocktaking.	items). For example, in sectors such as textiles or footwear, where weight and volume are difficult to determine accurately, reporting by number of units should be considered sufficient. Two-digit codes of the combined nomenclature should be used as far as possible to differentiate products/product categories (rather than four digit codes). To provide greater flexibility during the initial implementation phase, estimates alone should be sufficient to fulfil the disclosure obligations in the first year. Generally exempt companies who are subject to sustainability reporting from additional reporting on disposal of unsold goods. For the distinction between B2B and B2C products a clear, easy-to-use regime, including a comprehensive FAQ document, is essential. Streamline the reporting template under Annex I of the implementing act on the disclosure of unsold consumer products to further reduce unnecessary complexity: • Make the "description" field optional, as products are already identified through Combined Nomenclature (CN) codes. • Reconsider the obligation to report both number and weight of discarded products. Although Annex I permits estimating one based on the other, it still requires submission of both figures. • Limit the requirement to provide the "reason for discarding" to cases where the product falls under exemption categories in Article 25 of the ESPR (e.g. for safety, hygiene, or liability reasons). We recommend introducing reporting obligations only from the beginning of the financial year to align with existing business systems and avoid unnecessary IT reconfiguration.
Destruction of unsold consumer products and necessary exemptions (Article 25) The arguments for Article 24 ESPR can also be applied to the prohibition of destruction of certain unsold consumer goods. Just as under Article 24 ESPR the distinction between B2B and B2C is hard to draw and needs to be simplified substantially (see above). Companies' IT systems are set up in a way to follow the financial year. The start of data collection from any other date would require substantial reprogramming of IT systems and stocktaking.	All exemptions provided for should be based solely on an economic analysis of whether or not the product is suitable for re-use, repair, etc. The reference should be the available profit margin not the value of the product. The scope of the documentation (starting and content) must be kept practical. Clear short statements for reasons of destructions (e.g. codes) must be sufficient We recommend to only introduce reporting obligations for the beginning of the financial year.

	Retention periods for records should be kept up to a maximum of 5 years like for the EUDR. 10 years is unproportionate. For the distinction between B2B and B2C products a clear, easy-to-use regime, including a comprehensive FAQ document, is essential. We recommend to not use vague legal concepts (e.g. “reasonably be considered unacceptable for customer use”) for exemptions to the prohibition of destruction of consumer goods. They would otherwise have to be interpreted in greater detail by the ordinary courts with long cases individually.

Industrial Emissions Directive 2010/75/EU (IED)

Problem description	Suggested improvements
Redundant environmental management system requirements (Article 14a) Article 14a of the Industrial Emissions Directive (IED) requires certain large industrial installations to introduce an environmental management system (EMS) by 1 July 2027. However, rather than recognizing existing EMS frameworks such as ISO 14001 or EMAS, 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. This creates unnecessary administrative burden for companies already operating robust EMS frameworks. It also increases the workload for auditors and competent authorities, delaying permitting and enforcement procedures without delivering additional environmental value.	Delete the obligation under Article 14a. Alternatively, compliance with recognised systems such as ISO 14001 or EMAS should be deemed sufficient to meet the EMS requirements, thereby avoiding redundant or parallel obligations.
Disproportionate EMS obligations for SMEs (Article 14a) The obligation to introduce an environmental management system (EMS) under Article 14a of the IED applies uniformly to all affected installations, regardless of the size or capacity of the operator. As a result, SMEs that operate IED-regulated installations, such as brickworks, small metal processing plants, or regional waste facilities, are also subject to this complex and resource-intensive requirement. For these smaller operators, the implementation, certification, and continuous updating of an EMS is disproportionate and not feasible in practice, especially in the absence of dedicated in-house staff.	Introduce a size-based differentiation or threshold for EMS obligations under Article 14a. Only large-scale installations should be required to implement a full EMS, while smaller operators should benefit from exemptions or simplified requirements. This would ensure a more proportionate approach and reduce compliance burdens for SMEs.

Duplication between IED and EIA Directive procedures Authorisation procedures under the IED often trigger the need for an Environmental Impact Assessment (EIA) under the EIA Directive (2011/92/EU), particularly for installations listed in Annex I of the EIA Directive. Both frameworks require the publication of reports and public participation. However, because the procedures and timelines under the IED and EIA are not always aligned, operators may need to submit overlapping information separately, resulting in administrative duplication, higher compliance costs, and unnecessary delays.	To reduce duplication and administrative burden, the procedures under the IED and EIA Directive should be better coordinated. Where an EIA has already been carried out, it should be formally recognised as fulfilling the environmental reporting and public consultation obligations under the IED. The EU should promote integrated permitting processes to reduce repetition and accelerate decision-making. To further speed up authorisation and compliance checks, competent authorities should, as a first step, limit their review to a check for completeness and plausibility, particularly where the submission documents have been prepared by qualified planning offices or certified experts. The definition and accreditation criteria for such professionals should be clearly established in EU or national law to avoid ambiguity and ensure legal certainty. It must also be ensured that this provision accelerates procedures and does not result in unintended delays or bottlenecks. A full in-depth examination by authorities should only be required, when considerable objections by authorised parties to these proceedings are raised.
Inefficient authorisation procedures and digitalisation (Articles 4(1), 12(1), 24(1–2)) Article 4(1) establishes that no installation may operate without a permit under the IED, while Article 12(1) details the information required for permit applications and Article 24(1–2) ensures public participation. In practice, authorisation procedures remain paper-based, fragmented across several authorities, and lack standardised formats. This leads to delays, higher costs, and legal uncertainty, especially for SMEs that must submit different applications to multiple authorities at different levels of government.	Introduce a fully digitalised and standardised authorisation process under Articles 4, 12 and 24. A single online platform at regional or national level should allow operators to submit applications, track progress, and obtain permits. Harmonised templates and interoperability across member states would reduce administrative burdens, accelerate authorisations, and increase transparency.
Inconsistent environmental inspections and controls (Articles 23(4), 23(5), 23(6)) Articles 23(4)–(6) require member states to carry out environmental inspections, but in practice responsibilities are fragmented across several authorities at national and regional levels. This results in overlapping controls, inconsistent application of rules, and higher administrative costs for operators. SMEs in particular face multiple inspections from different bodies, often duplicating requirements already covered by recognised voluntary certifications (e.g. ISO 14001, EMAS).	Strengthen coordination of inspections under Article 23 by designating a single competent authority or establishing streamlined procedures at national or regional level. Voluntary certifications should be explicitly recognised as a basis for reducing inspection frequency. Greater reliance on digital tools such as an EU-interoperable electronic business file (in IT Fascicolo informatico d'impresa) would increase transparency and avoid duplication.

Water Framework Directive 2000/60/EC

Problem description	Suggested improvements
Burdensome "one-out-all-out" and "non-deterioration" principles (Article 4(1)(a)(i) and Annex V) The "one-out-all-out" and "non-deterioration" principles under the Water Framework Directive have created significant obstacles for companies seeking water-related permits. 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 (EQS), which set very low pollutant thresholds, are often unattainable due to diffuse and ubiquitous pollution, further complicating compliance.	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, 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. De 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.

Urban Wastewater Treatment Directive 2024/3019 (UWWTD)

Problem description	Suggested improvements
Disproportionate cost burden from extended producer responsibility (Article 9) The revised Urban Wastewater Treatment Directive (UWWTD), in force since 1 January 2025, 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." While environmental protection goals are shared, there are serious concerns about the Directive's approach to financing this fourth treatment stage. Under Article 9, the full costs, estimated at EUR 1.2 billion annually by the Commission (and likely much higher in practice), are to be borne by the	Restrict 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. Clearly define the actual polluters, instead of applying blanket attribution to entire sectors, to ensure that cost allocation reflects actual environmental impact. Distribute costs more fairly, in line with the approach already applied to the other three cleaning stages.

pharmaceutical and cosmetics industries through extended producer responsibility (EPR). This approach is problematic for several reasons: • The preparatory impact assessment identified pharmaceutical and cosmetic ingredients as primary sources of micropollutants, which is factually questionable. Common substances (e.g. caffeine) have multiple sources, many unrelated to these sectors. • The defined EPR scheme is not substance-based, but sector-based and hence, does not align with EU's polluter pays 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.	

Nature Restoration Regulation (EU) 2024/1413

Problem description	Suggested improvements
Unclear legal status of restored areas The business community supports the Commission's efforts to restore degraded habitats to protect biodiversity, as many economic and entrepreneurial activities rely on healthy ecosystems. However, the current regulation lacks clarity regarding the future legal status of restored areas, especially those outside the Natura 2000 network. It remains uncertain whether these areas will be granted strict protection levels similar to Natura 2000 sites, which would significantly limit land use options and increase regulatory burdens. The absence of a clear "protection claim" post-restoration creates legal uncertainty and planning risks for businesses and landowners. The non-deterioration principle, along with the large-scale expansion of biodiversity protection, must be carefully balanced against socio-economic needs. Blanket restrictions on land use could reduce the availability of land for infrastructure, agriculture, or industry, weakening Europe's competitiveness and economic resilience.	Clearly define the post-restoration legal status of restored areas outside the Natura 2000 network in the regulation. Applying the principle of non-deterioration to these areas would amount to a large-scale expansion of biodiversity protection and Natura 2000-like territorial restrictions, with the consequence of severely limiting land use options. Ensure that restored areas are not automatically subject to the same strict protection regime as Natura 2000 sites. Introduce a clear legal framework that balances ecological objectives with socio-economic needs, ensuring alignment with the principles of proportionality, subsidiarity, and legal certainty for landowners and economic actors – especially in light of the non-deterioration principle.
Missing reference to Article 17 of the EU Charter of Fundamental Rights (right to property) While the regulation references Article 37 of the EU Charter of Fundamental Rights (environmental	Introduce a reference to Article 17 of the EU Charter of Fundamental Rights to ensure full respect for property rights in the context of restoration measures.

protection), it does not mention the fundamental right to property (Article 17), despite the fact that the implementation of large-scale restoration targets and measures may interfere with the property rights of landowners and land users. Moreover, meeting these targets will require broad public support and active participation by private stakeholders. However, the current approach lacks sufficient emphasis on voluntary cooperation, structured consultation processes, and appropriate financial incentives or compensation.	Embed procedural safeguards, such as early stakeholder involvement, formal consultation obligations, and transparent impact assessments before imposing restoration obligations. These assessments must take into account factors such as socio-economic needs, local development strategies and the area's attractiveness as a business location. Promote voluntary cooperation and introduce clear provisions for funding support, fair compensation, and implementation flexibility to enhance stakeholder engagement. In this context, the EU Roadmap on Nature Credits could serve as a valuable tool to incentivise and compensate restoration through market-based approaches.
Unrealistic timelines for national restoration plans The regulation sets out ambitious timelines and demanding requirements for national restoration plans. This situation is further complicated by the fact that the preparation of a restoration plan should ideally rely on comprehensive, quality-assured data. However, such data is generally only available for priority habitat types and species listed under the Habitats Directive, resulting in significant data gaps. As a result, it becomes impossible to prepare restoration plans in a timely and comprehensive manner, even though they are essential for implementing restoration measures. In parallel, many member states already lack the capacity and resources to comply with existing environmental legislation.	Allow for more flexible and phased implementation timelines. Permit adaptive restoration plans that can evolve alongside improved data availability. Provide additional EU-level support, both financial and technical, for data collection, capacity building, and administrative implementation to ensure a fair and feasible transition across Europe.

NATURA 2000 (Birds Directive 2009/147/EC, Habitats Directive 92/43/EEC)

Problem description	Suggested improvements
Outdated legal framework for species and habitat protection The Birds and Habitats Directives, which together form the legal basis of the Natura 2000 network, often delay or complicate permitting procedures for infrastructure, energy, and industrial projects. 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.	Merge both directives into a single, modern Nature Protection Directive. This consolidated framework should preserve the existing Natura 2000 network while modernising procedures, improving legal coherence, and enabling more flexible responses at national and regional levels. The new directive should allow greater subsidiarity for member states. For example, by enabling adaptation of annexes (species/habitat lists) and site boundaries to reflect local ecological and socio-economic contexts.

Insufficient consideration of socio-economic factors (Article 2 Habitats Directive) The current system leaves insufficient discretion for the member states to find balance between the biodiversity targets and socio-economic necessities.	Article 2 should therefore specify that member states should be able to always take into account economic, social or cultural requirements as well as local or regional particularities when fulfilling obligations under the directive. A provision should allow for non-compliance in cases of force majeure, such as natural disasters or climate change, and impacts from neighbouring countries should be considered – in alignment with the Nature Restoration Regulation. As such, we propose to introduce a general proportionality test in Article 2 to permit derogations if compliance would require unreasonable measures or disproportional trade-offs.
Rigid interpretation of species protection rules (Article 5 Birds Directive) Strict species protection rules represent a major obstacle to the realisation of projects critical to the transition of the economy. In particular, the prohibition on the deliberate killing of bird specimens under Article 5 of the Birds Directive has been interpreted in an overly rigid manner. These rules often result in project delays or blockages, even when the impact on overall bird populations is negligible.	Clarify in Article 5 of the Birds Directive that strict protections, such as prohibitions on killing, should apply primarily to species of exceptional conservation concern. This reflects the opinion of advocate general Mrs Kokott in C-784/23 (February 6, 2025), who argued against transferring the individual-level protection approach from the Habitats Directive into the Birds Directive. Introduce a population-based approach to species protection, especially in non-critical areas and for low-risk projects, similar to Article 15c of the Renewable Energy Directive (RED III). This would allow for greater flexibility and reduce unnecessary delays, as shown by member states that have already implemented the provisions for accelerated permitting under RED III.
Complex nature impact assessments and derogation procedures (Articles 6 and 16 Habitats Directive, Article 9 Birds Directive) 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 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.	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. Inspiration can be drawn from the concept of acceleration zones under Article 15c of RED III. The Commission should also formulate instructions at EU level on the (simplified) format of an appropriate assessment, making it a workable and affordable tool Social and economic aspects as well as compensation concepts must be taken into account during the impact assessment. Allowing compensatory measures within Article 6(3) Habitats Directive, currently only permitted under Article 6(4) for indirect effects, should be explored. In this context, the potential use of nature credits under the EU Roadmap towards Nature credits should be assessed to streamline offset obligations. 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 temporary deterioration of a perspective of 'net environmental quality', provided it is scientifically substantiated.

	Establish binding cut-off dates in both directives, ensuring that the environmental baseline at the time of application is legally decisive. This would reduce the need for repeated reassessments in prolonged permitting procedures.
Overly strict deterioration prohibition (Article 6 (2) Habitats Directive) The deterioration prohibition provides member states with insufficient flexibility. The current requirement for all appropriate measures to prevent habitat deterioration or disturbance is overly restrictive, hinders policy discretions and impacts social and economic progress.	The deterioration prohibition should become a best-effort obligation to improve workability (align with the Nature Restoration Regulation). Introduce a harm threshold so that only 'significant' deterioration constitutes a violation.
Insufficient flexibility for projects of pubic and strategic interest (Article 6 (4) Habitats Directive) The current framework limits the approval of projects crucial to the green transition, as the narrow definition of overriding public interest does not provide sufficient flexibility.	A wider definition would be desirable, capturing other projects of public and strategic importance as well. Eliminate or relax the procedure requiring notification to the European Commission. Allow for compensatory measures or long-term quality improvement measures to be taken either in advance (for example, based on biodiversity credits) or after the project has been put into operation. Create the possibility of creating ‘areas of public and strategic interest’ (e.g. port territories)
No option to adapt or de-designate protected areas (Article 9 Habitats Directive) Currently, 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.	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. Existing protected areas must 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. Allow the possibility to have a cross border ecological and juridical solutions, with cooperation between member states.
Extension of species protection beyond Natura 2000 sites (Article 12 Habitats Directive) Species protection under Article 12 of the Habitats Directive is not limited to the designated Natura 2000 areas, causing significant complexity, legal uncertainty and planning burdens.	Amend Article 12 of the Habitats Directive to limit the application of strict species protection to designated Natura 2000 sites. At the minimum, introduce clear thresholds or de minimis criteria to exclude minor or negligible impacts outside protected zones. This would enhance proportionality and improve planning security for non-sensitive areas.

EU Deforestation Regulation 2023/1115 (EUDR)

Problem description	Suggested improvements
Need for no-risk category and extended timeline The commercial sector supports the objective of reducing deforestation and forest degradation. However, the EU Deforestation Regulation (EUDR), in its current form, creates legal uncertainty and places a disproportionate administrative burden on SMEs. It is especially problematic that significant administrative burdens fall uniformly on all operators, including those sourcing from countries with negligible or non-existent deforestation risk. This one-size-fits-all model fails to reflect the complexity of global value chains and undermines the practical enforceability of the regulation. Environmental protection and economic performance must go hand in hand, especially given the complex nature of value chains.	The forthcoming environmental omnibus must include a targeted revision of the EUDR to ensure a more proportionate framework that balances environmental ambition and economic viability. Most importantly, introduce a "no-risk" or "insignificant-risk" classification under the benchmarking system (Article 29) for countries with negligible or non-existent deforestation risk. Given the tight implementation timeline and the need to reassess practical consequences, Eurochambres recommends postponing the application by at least one additional year to ensure the framework is genuinely fit for purpose, particularly for SMEs. Alternatively, an additional 12-month "testing period" would help the companies to proper test their processes with feedback from the responsible authorities (as it was done with CBAM). This would provide companies with more legal certainty while regulators get direct feedback from operators.
Overly burdensome obligations for operators (Article 4) Article 4 of the EUDR imposes excessive obligations on operators. The complexity of today's global supply chains, combined with requirements such as plot-level traceability and a "one-size-fits-all" approach that does not consider commodity-specific realities, makes compliance particularly burdensome. This is especially problematic under Article 4(7), which requires operators to transmit all information necessary to demonstrate due diligence to downstream operators and traders for each product placed on the market or exported.	Amend Article 4(7): Operators should only be required to transmit the due diligence statement (DDS) reference number to downstream partners. This would streamline the flow of information and avoid redundant transmission of full documentation. Amend Article 4(8): The simplified due diligence procedure currently limited to SMEs should be extended to all market participants, regardless of company size. Amend Article 4(9): Remove the requirement to pass on detailed proof that due diligence was fulfilled. It should be sufficient that downstream operators collect and reference the upstream DDS number. In this context, Article 5(1) should be adapted to clarify that operators and traders further down the chain are not legally responsible for upstream misconduct or errors. Without such legal clarification, downstream partners may still request full documentation to protect themselves, undermining the intended simplification. An alternative to this approach would be to amend the definition of "operators" to apply only to those "making products available for the first time", thereby excluding all downstream companies. This would help avoid the need for additional amendments to Articles 8 to 12. Lastly, reference should be made to FAQ 3.4, which already clarified the limited obligations of downstream operators under Articles 4(9) and 9. However, since FAQs are not legally binding, this

	clarification should be incorporated directly into the regulation to ensure legal certainty.
Excessive data collection requirements (Article 9) Article 9 of the EUDR imposes extensive information obligations, which are particularly burdensome for operators managing complex or fragmented supply chains. Requirements include detailed data collection on product specifics (e.g. exact wood species, Latin names), geolocation, time range of production, quantity, supplier, and legality documentation. This challenge is further amplified by the broader scope of the EUDR compared to the EUTR, which now includes the placing of relevant products on the EU market, regardless of origin, as well as exports, multiplying the administrative effort.	Simplify Article 9 by allowing operators to provide information at the country or sourcing area level, rather than for each individual supplier or plot, based on national or local risk assessments. This approach should be especially explored for low-risk countries, as well as “no-risk” or “insignificant-risk” countries, if such a category is introduced. Streamline detailed product information requirements. Instead of requiring exact wood species and Latin names, rely on existing customs tariff numbers (HS codes), which offer a more practical and proportionate basis for identifying products under the EUDR. Reconsider the scope of the EUDR, particularly the inclusion of intra-EU market transactions and exports. Focusing due diligence primarily on imports into the EU would better align the regulation with its core objective: preventing deforestation associated with commodities entering the EU market. Limit operator disclosure obligations. Operators should be required to retain relevant information and provide it to competent authorities upon request, rather than mandating systematic disclosure to all downstream supply chain actors, which adds unnecessary administrative burden.
No recognition of existing third-party certification schemes (Articles 9 to 11) Many companies already rely on established third-party certification schemes (e.g., PEFC, FSC) that involve extensive audits and documentation to ensure sustainable sourcing. However, the EUDR does not recognise these certifications as sufficient evidence, creating a duplicative compliance layer and imposing unnecessary burdens on certified operators.	The EUDR should recognise credible third-party certification schemes (such as PEFC/FSC) as sufficient evidence of compliance with due diligence obligations under Articles 9 to 11, provided they meet robust standards. This would reduce administrative burdens, avoid duplication and leverage existing responsible sourcing infrastructure.
Complex risk assessment obligations (Article 10(2)) Article 10 of the EUDR imposes extensive and highly detailed risk assessment obligations on operators and traders. Operators must take into account a long list of criteria from points a) to n), many of which are not easily verifiable or applicable across all supply chains. This level of granularity creates legal uncertainty and disproportionate burden, particularly for SMEs and operators sourcing from complex global supply chains. Moreover, the full legal responsibility lies with the EU-based operator or trader, even if the risk of deforestation lies entirely outside the EU and beyond their direct control.	Reduce the complexity of the risk assessment under Article 10(2) by narrowing the list of mandatory criteria and introducing a clearer, more workable system.

Extensive obligations for establishing and maintaining due diligence systems (Article 12(2) and (3)) Article 12 of the EUDR sets out obligations for establishing and maintaining due diligence systems, including reporting and record-keeping. However, the requirement under Article 12(2) to review the due diligence system annually imposes an unnecessary bureaucratic burden, especially when no material changes occur in risk or sourcing. A similar burden arises from Article 12(3), which requires non-SME operators to publicly report "as widely as possible", including via the internet, each year on their due diligence system and the steps taken to comply with Article 8.	Revise Article 12(2) to require a review of the due diligence system at a minimum once every three years, unless changes within the supply chain require an earlier review. This would better reflect operational realities and reduce unnecessary bureaucracy. In the case of Article 12(3), the obligation to publish detailed information on due diligence systems annually should be removed or made optional, as it adds compliance burdens without significantly contributing to the objectives of the EUDR. Alternatively, the frequency to publish information should be raised to at least three years, and the requirement to publish "detailed" information should be revised to require only "basic" information, such as confirmation that a due diligence system is in place, whether it is verified by third parties, and contact details for further information.
No exemption for low-volume trade The EUDR requires a full due diligence system to be established and a due diligence statement to be submitted for each individual product placed on the market, even for minimal quantities (e.g. a single board or small batches of coffee beans). This creates a disproportionate administrative burden, especially for smaller operators.	Consider introducing practical de minimis thresholds that exempt small quantities from due diligence obligations under the EUDR (e.g., individual trees, harvest volumes up to 30 cubic metres or small batches of coffee beans) in order to ensure proportionality and reduce unnecessary bureaucracy for low-volume operators.
Insufficient simplification for low-risk (and no-risk) countries (Article 29) Although Article 29 of the EUDR establishes a risk-based benchmarking system, the current "low-risk" classification only partially reduces due diligence obligations. Companies sourcing from such countries, even those with negligible or non-existent deforestation risk, must still submit due diligence statements (Article 4) and collect detailed geolocation and supply chain data (Article 9). This creates an administrative burden that is disproportionate to the objectives of the EUDR.	Introduce a new "zero-risk" or "insignificant-risk" category under Article 29 for countries where there is no relevant deforestation risk, based on scientific evidence. This category should be open to both EU and non-EU countries. For such countries, the documentation requirements under the former European Timber Regulation (EUTR) should be considered sufficient, replacing the extensive data collection and due diligence requirements currently imposed by the EUDR. Moreover, a graduated simplification approach under Article 29 would reduce administrative burdens for operators sourcing from low- and standard-risk countries, while creating positive incentives for higher-risk countries to improve forest governance and traceability.
Challenging EU Information System (Article 33) The EU Information System introduced under Article 33 of the EUDR is technically complex, not user-friendly, and imposes a disproportionately high administrative burden, especially for SMEs. Much of the data must be entered manually, making the process time-consuming. A separate due diligence statement (DDS) must be submitted for every product shipment, and even internal transfers between subsidiaries of the same holding within the EU must be documented, even if the product	Ensure that the EU Information System is practically usable for all companies, regardless of size or IT capacity. While an API is already available for integration with SaaS platforms and company systems, additional functionality should be developed to support SMEs and smaller operators. For instance, through improved copying of previously entered data and pre-filled fields for recurring supplier/location info to reduce manual data entry. In addition, a continuous improvement process should be implemented, including a ticket system for companies' IT specialists to report functional errors and bugs.

remains unchanged. This generates unnecessary bureaucracy and results in redundant "data cemeteries" with no added value, while consuming energy and resources.	The user interface must be intuitive, and the registration process simplified. The Commission should provide clear guidance, including user manuals and training materials, in all official EU languages. This should be complemented by an easily accessible helpdesk to support companies in resolving technical or procedural questions. The regulation must ensure no duplication of procedures: once a DDS is created for a product, the information requirements should be considered fulfilled throughout the supply chain. A new DDS should not be required for each downstream operator, in line with the EU's once-only principle.
Legal uncertainty from substantiated concerns mechanism (Article 31) While Article 31 is intended to strengthen enforcement by allowing the submission of substantiated concerns, it also creates legal and administrative uncertainty. Operators may face repeated or unfounded allegations, leading to investigations and compliance costs even in the absence of credible evidence.	Delete Article 31 to reduce administrative burdens and legal uncertainty. At a minimum, introduce stricter admissibility criteria to ensure that only well-founded and evidence-based submissions trigger official investigations. This would help prevent misuse of the mechanism while maintaining its enforcement purpose.

Green Claims Directive (GCD) proposal

Problem description	Suggested improvements
Overly burdensome proposal The Green Claims Directive aims to promote accurate environmental claims while preventing misleading ones. However, instead of providing businesses with a practical and proportionate framework to communicate their sustainability efforts, the current proposal imposes substantial administrative and financial burdens. In particular, the excessive substantiation requirements, such as mandatory life-cycle assessments (LCA), and the ex-ante verification obligation add significant complexity and cost. As a result, companies, particularly SMEs, may refrain from making environmental claims altogether, a phenomenon referred to as *greenhushing*. Moreover, no comprehensive impact assessment or cost-benefit analysis has been conducted. In addition, the Directive on Empowering Consumers for the Green Transition (Directive 2024/825) has already introduced measures to ensure accurate claims. This raises the question of whether it would be more prudent to first assess the effects of the Empowering Consumers Directive, to evaluate whether the Green Claims Directive is necessary at all, before introducing additional rules.	In light of the ongoing simplification agenda and the experience that *prevention is better than cure*, the trilogue should not be concluded until substantial simplifications are made. In particular, the ex-ante verification requirement should be removed. Furthermore, a full impact assessment should be conducted before proceeding with the directive, including an evaluation of whether the Empowering Consumers Directive already addresses the intended objectives. If so, the Green Claims Directive should be reconsidered or withdrawn.

Excessive substantiation requirements The current draft of the directive relies on full life-cycle assessments (LCA) as the default method for substantiating environmental claims. This creates disproportionate financial and administrative burdens, particularly for SMEs, who often lack the resources to conduct such complex and costly assessments across their supply chains.	Make LCA optional where not appropriate. We support the Council's position to introduce a simplified procedure that allows companies to substantiate claims without a full LCA, when the nature of the claim permits it. To improve legal certainty, a "*where appropriate*" clause should be added to Article 3 to clarify that LCA is not the default requirement in all cases. Exempt SMEs and microenterprises from the LCA requirement for all types of environmental claims, not just climate-related ones. The Council's approach to allow SMEs to limit substantiation for climate-related claims to scope 1 and scope 2 emission is welcome, but this should be extended to other types of claims (e.g., water use, energy), to avoid requiring smaller companies to assess their entire supply chain. The chamber network strongly supports Article 12 of the Council's position, which obliges the Commission to provide guidelines and digital tools to support SMEs in complying with the directive. These tools must be free, tailored to business capacities and developed in collaboration with stakeholders.
Insufficient simplified procedure We support the Council's proposal to introduce a simplified procedure for certain environmental claims, representing a first step in reducing the administrative burden on businesses, in particular SMEs. However, major uncertainties remain. It is unclear what qualifies as a "simple" claim, and what level of substantiation is required under the Specific Technical Documentation. These issues are left to secondary legislation. Furthermore, the current criteria risk excluding widely used claims. For example, the claim "Reusable water bottle made from 100% recycled PET", references more than one environmental characteristic and could be deemed problematic under trade-off criteria (as the recycled PET may be diverted from a food-grade closed-loop recycling systems). This highlights the need to revise the eligibility criteria.	Revise the eligibility criteria by requiring a claim to satisfy either Criteria 2 or 3 (not both), while retaining Criterion 1 (no full LCA required). This would preserve environmental safeguards while improving practical usability for widely accepted, low-risk claims. Replace the *Specific Technical Documentation requirement* with the *summary of the substantiation assessment.* The summary must already be provided to consumers under Article 5 of the Council position and, hence, would reduce duplication and administrative burden. Remove the obligation to submit the Specific Technical Documentation to competent authorities. Since the summary of the substantiation assessment must already be made accessible to consumers (e.g., via a QR code on the product), an additional submission obligation adds little value under the simplified procedure. To improve legal certainty, a non-exhaustive list of eligible claims should be included directly in the directive. The Commission should also be empowered to extend this list via delegated acts. In case the list is provided through secondary legislation, a clear and timely version must be adopted within 18 months of the directive's adoption, to allow sufficient lead time for businesses.
Unacceptable ex-ante verification The ex-ante verification requirement is the most burdensome element of the directive. It is costly, time-consuming, and risks long delays before claims	The ex-ante verification requirement should be removed or significantly simplified. One practical approach would be to extend the simplified procedure to all claims. In this case, companies would still prepare the Specific Technical

can be made. The chamber network has also raised major practical concerns, as businesses will not be able to comply by the cut-off date, given that all claims, existing and new ones, would need to be verified.	Documentation and make it available to authorities before publishing the claim, but without undergoing prior verification. Authorities would retain the right to conduct random checks of the submitted Specific Technical Documentation, reducing the overall administrative burdens for both companies and authorities. Alternatively, ex-ante verification could be made mandatory only for environmental labelling schemes. If the ex-ante requirement remains, the process should not exceed 30 days, in line with the European Parliament's position. In any case, limiting the scope of claims requiring verification, e.g. by applying it only to new claims made after a certain date, or introducing a long phase-in period would give certification bodies sufficient time to process the backlog of existing claims as well as new ones.
Overambitious transposition periods European businesses are already struggling with a growing number of regulatory obligations. The complexity of the directive and the volume of claims to be reviewed require significant preparation time – both for businesses and for verifiers. In addition, the Commission will need sufficient time to develop the guidelines and digital tools to help SMEs to comply with the directive.	Adopt a phased implementation schedule that reflects the capacity of different company sizes: Large companies: Extend the transposition period to 42 months, including an 18-month transitional period. This will provide companies with sufficient time to prepare while allowing verifiers to manage the backlog of existing claims as well as new ones. SMEs: Extend the transposition period to 60 months, including an 18-month transitional period. SMEs need more time to familiarise themselves with the requirements and procedures, including the digital tools, provided under Article 12. Microenterprises: Exclude microenterprises from the directive altogether. While the Council's proposal to extend the period for microenterprises is welcome, it does not solve the core issue: the directive's requirements are simply not manageable for businesses with fewer than 10 employees. Without an exemption, they risk being entirely discouraged from making environmental claims, even when justified.

Eurochambres – the association of European chambers of commerce and industry – represents more than 20 million businesses through its members and a network of 1700 regional and local chambers across Europe. Eurochambres is the leading voice for the broad business community at EU level, building on chambers' strong connections with the grass roots economy and their hands-on support to entrepreneurs. Chambers' member businesses – over 93% of which are SMEs – employ over 120 million people.

Previous positions can be found here: https://bit.ly/ECHPositions

Contact:
Eurochambres Policy Advisor for Sustainability
Mr Levin Spiegel, Tel. +32 2 282 08 79, spiegel@eurochambres.eu

Eurochambres Press and Communication Manager
Mrs Karen Albuquerque, Tel. +32 2 282 08 72, albuquerque@eurochambres.eu

@Eurochambres
@eurochambres.bsky.social
www.eurochambres.eu