

CALL FOR EVIDENCE FOR AN INITIATIVE (without an impact assessment)

TITLE OF THE INITIATIVE	Simplification of administrative burden in environmental legislation
LEAD DG – RESPONSIBLE UNIT	DG Environment – Unit 01 (Strategy, Digitalisation, Better Regulation and Economic analysis)
LIKELY TYPE OF INITIATIVE	Legislative proposal
INDICATIVE TIMING	Q4 2025
ADDITIONAL INFORMATION	-
<p><i>This document is for information purposes only. It does not prejudice the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described by this document, including its timing, are subject to change.</i></p>	

A. Political context, problem definition and subsidiarity check

Political context

The Commission President's Political Guidelines for the 2024-2029 mandate place great importance on implementation and simplification: making EU laws more effective and creating a regulatory environment where business can flourish, while preserving the objectives of EU legislation. The same approach has been echoed in the Commissioners' mission letters.

The [Competitiveness Compass for the EU](#) identifies the policy changes that are needed for the EU to grasp the new realities and develop novel ways of working together to ensure the political relevance of the Commission's legislative proposals. A pivotal way to achieve this will be the simplification of the regulatory environment and the reduction of administrative burden without undermining the respective policy goals. The Compass sets the target of cutting administrative burden by at least 25% for all companies and at least 35% for small and medium-sized enterprises (SMEs). The Compass also calls for accelerated permitting for more sectors in transition to a clean and digital economy in the EU.

The Commission is currently screening environmental laws to identify legislative acts with significant potential for simplifying administrative tasks. The aim is to reduce the administrative burden without affecting the environmental objectives agreed under the existing legislation. The goal is not to lower the EU's environmental objectives or the protection of human health granted by EU environmental laws, but to attain them more effectively without causing avoidable costs to businesses (especially SMEs), public administrations and the public. This will ensure that environmental policies are faster, easier and cheaper to implement, while ensuring that the environmental objectives are achieved.

This initiative brings together a series of measures to simplify environmental legislation to reduce administrative burden and streamline administrative procedures for EU businesses.

Problem the initiative aims to tackle

In 2024, a [Flash Eurobarometer survey \(No 549\) of SMEs](#) indicated that intentions to 'green' their operations through resource efficiency, renewable energy and other measures were affected by the complexity of legislation. Specifically, 35% of SMEs undertaking resource efficiency actions say they encountered complex administrative or legal procedures and 26% referred to complex environmental reporting. The same issues related to administrative complexity and cumulative burden also affect medium and large businesses.

Engagement with stakeholders in recent months provided the first feedback on practical difficulties and bottlenecks they encounter when ensuring compliance with the laws and where the administrative and reporting burden could be reduced without jeopardising the objective of the laws. A potential to rationalise notification obligations has also been identified.

Stakeholders have also underlined the need to accelerate and streamline permitting processes. The EU has already put in place legislation to accelerate and streamline the permit-granting process for some industrial installations, in particular through the Net Zero Industry Act and the revision of the Industrial Emissions Directive.
Basis for EU action (legal basis and subsidiarity check)
Legal basis
The Treaty on the Functioning of the European Union, in particular: i) Article 114 ensuring the functioning of the single market will be the legal basis for most of the amendments; and ii) Article 192(1) related to ensuring a high level of environmental protection will be the legal basis for remaining amendments.
Practical need for EU action
The initiative will modify existing administrative obligations in EU legislation. These can only be amended by action at EU level.
B. What does the initiative aim to achieve and how
<p>Potential areas for simplification measures have been identified based on widespread stakeholder input collected through a previous call for evidence on the rationalisation of reporting requirements, spontaneous stakeholder input, and stakeholder meetings related to environmental legislation. In addition, as part of an ongoing study on environmental reporting, input was gathered from more than 300 participants in an online workshop on 13 February 2025 and a follow-up survey of the same participants. These consultations gathered initial input from stakeholders on areas of administrative and reporting burden. In addition, during the implementation dialogue with Commissioner Roswall on environmental assessments and permitting on 10 April 2025, stakeholders pointed to implementation, digitalisation of procedures, and data quality and data sharing as key for accelerating procedures.</p> <p>After the stakeholder input has been gathered, this initiative will aim to reduce administrative burden stemming from environmental legislation in the areas of circular economy, industrial emissions and waste management. This may include the following measures:</p> <ul style="list-style-type: none"> - rationalising reporting/notification obligations, for example, the discontinuation of the SCIP (substances of concern in products) database under the Waste Framework Directive; - harmonisation of the provisions for authorised representatives for extended producer responsibility (EPR) in each Member State where a producer sells a product falling under EPR rules and on facilitation of EPR reporting; - streamlining reporting obligations, removing double requirements to report, promoting further digitalisation of reporting in the area of circular economy, industrial emissions and waste management, while maintaining the policy objectives; - addressing permitting challenges relating to environment assessments based on experience recently gained such as under the Net Zero Industry Act. <p>The list of measures to take could evolve depending on stakeholder feedback and further analysis.</p>
Likely impacts
<p>Policy measures will be devised to reduce administrative burden without undermining the environmental objectives pursued by the concerned legislation. The measures should reduce the cost of reporting, monitoring, notifying, auditing, and other administrative obligations as well as streamline administrative procedures.</p> <p>The policy measures should enable the environmental objectives of the EU legislation to be reached in a more effective and cost-efficient way, with a view to making it easier for EU industry to comply with and increasing the effectiveness of environmental policy. They should also reduce demands on Member State competent authorities, allowing for better enforcement and implementation.</p>
Future monitoring
Results of the simplification measures will be assessed when the affected policies are evaluated and monitored.
C. Better regulation
Impact assessment
The proposal will be accompanied by a Commission staff working document that assesses and quantifies the impacts of the proposed measures. Given that the envisaged initiative aims to carry out targeted simplification

measures reducing administrative burden and bringing about administrative efficiencies with little to no impact on the underlying policies, an impact assessment is not deemed necessary, in line with the Commission's Better Regulation rules, and in light of the need for action and the steer provided from consultations done so far.

Furthermore, some of the changes relate to recently adopted legislation, where an impact assessment has already provided a strong evidence base for decision-making.

Consultation strategy

This initiative is of potential interest to relevant industrial/economic actors, including SMEs, public bodies (e.g. administrations in charge of implementing environmental legislation), non-governmental organisations (such as environmental groups or consumer bodies), international organisations, and academia. Everyone is welcome to provide their contribution.

To identify amendments, stakeholders are invited to provide feedback to this call for evidence. The Commission will also consult stakeholders through their standard consultation activities, such as Expert Groups and Forums. Targeted consultations and reality checks may be undertaken in order to inform the Commission's work on the present initiative and contribute to putting forward evidence-based EU legislation.

Contributions to all stakeholder consultations will be summarised in the staff working document accompanying the proposal. All feedback to this call for evidence is published on the Have Your Say portal.