DANSK ERHVERV
Børsgade 4
1217 København K

www.danskerhverv.dk
info@danskerhverv.dk
T. + 45 3374 6000

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Call for evidence - Simplification of administrative burden in environmental legislation

The Danish Chamber of Commerce (DCC) welcomes the Commission's initiative to simplify administrative procedures and reduce regulatory complexity in EU environmental legislation, as outlined in the Call for Evidence published on 22 July 2025 (Ref. Ares(2025)5953566). We strongly support the stated ambition to reduce administrative burdens by at least 25% for all companies and by 35% for SMEs – without compromising the EU's environmental objectives.

Environmental protection and economic competitiveness must go hand in hand. A streamlined, digital, and proportionate regulatory environment is a prerequisite for meeting Europe's climate targets and securing investment in renewable energy and green infrastructure. We therefore welcome the Commission's recognition that permitting, environmental assessments, and data/reporting obligations require targeted simplification.

Simplification must not undermine environmental ambition. While simplification is welcomed to address the administrative burden of companies, it is important that it does not compromise the ambitions of the EU Green Deal.

Further, this initiative to simplify administrative procedures and reduce regulatory complexity in EU environmental legislation should be taken up as an opportunity to level the playing field between EU businesses and businesses from third countries in terms of administrative and financial burdens. This is extremely important as European companies are currently covering expenses for the environmental obligations of sellers from 3rd countries.

The Danish Chamber of Commerce offers the following proposals, drawing on the experience of our members and previous EU initiatives such as the Renewable Energy Directive (RED III), the Net Zero Industry Act, the Industrial Emissions Directive and the legislative shortcomings that became visible in the E-commerce toolbox communication from the Commission.

Reporting requirements
We recommend consolidating environmental reporting obligations across EU legislation. Many companies currently report similar data to different authorities under different acts. A harmonized EU-wide reporting portal or standardized template would significantly reduce administrative burdens and improve data quality. Furthermore, we recommend that these reporting requirements are also introduced for online marketplaces when it comes to products from sellers in third countries (these sellers are not under EU jurisdiction).

- *Reporting on unsold consumer products (Ecodesign for Sustainable Products Regulation - Article 24(1))*
  Article 24(1) requires companies to report annually on unsold consumer products. Instead of imposing a heavy administrative burden on businesses, we propose that the Commission mandate an independent consultancy or research institute to examine different product categories on a yearly basis. This would ensure that data collection is consistent, reliable, and less resource-intensive, while still providing policymakers with the necessary information to assess environmental impacts.

  For textiles, we would like to point out some more specific challenges and solutions, tied to the implementing act:

  - *Responsible Economic Operator*
    Accountability is linked to ownership at the time of discarding and ensures legal certainty and avoids double counting. Fulfilment/logistics providers act only as intermediaries; they are not responsible for the discarding decisions. Our proposed recital is as follows: economic operators owning unsold products at discard are responsible for disclosures, and only if that operator is not established in EU, the responsibility will fall on the intermediary.

  - *Disclosure of Subsidiaries*
    Subsidiaries are already disclosed under the CSRD consolidated reporting. There is therefore no need for separate duplicate reporting for unsold goods.

  - *Recalled or Withdrawn Products*
    Products withdrawn post-sale due to systemic issues should be out of scope of ESPR reporting.

- *SCIP database*
  The Waste Framework Directive requires reporting about the presence of substances of very high concern (SVHCs) above 0.1% by weight in articles, according to Article 9. This effort is an administrative burden across the value-chain including the retail sector. The candidate list is updated twice a year and therefore, potentially requires biannual submission to SCIP for both new and existing Articles. And taking into account, that recyclers (and consumers) hardly ever use the database (2022 ECHA evaluation of SCIP) and the complexity of searching for the product/Article name, model number or serial number is

reported as taking too much time and effort, Danish Chamber of Commerce supports the discontinuing ag the SCIP database.

Information of SVHC's is also covered by REACH regulation art. 33 which ensures traceability of SVHC's in the value chain including information to consumers upon request. Also Art. 7(2) part (a) of ESPR mandates notifying the presence of substances of concern (SoC), including SVHCs, in the Digital Product Passport (DPP). So we believe this provision in the WFD is a duplication of reporting and can be removed.

Labelling

The requirement to physically label packaging or products is a costly exercise, and in many cases not a viable option. This challenge is particularly acute for companies selling products in multiple EU member states, where each market requires information in its official language. The current system results in duplication, increased costs, logistical barriers, and in some cases wasted materials when packaging cannot be used across borders.

We recommend the following simplification measures:

- *Digital-first labelling options*
  Allow for the use of digital product passports, QR codes, or other digital means to provide legally required information. This would ensure that all consumers have access to accurate information in their own language, without the need to print multiple labels.

- *EU-wide harmonization of labelling content*
  Align labelling requirements across member states to eliminate national variations. Companies should be able to use the same packaging or product labels throughout the Single Market without needing to customize them per country.

- *Reduced physical labelling obligations*
  Limit mandatory physical labelling to essential safety or hazard information that must be immediately visible to consumers. Other information (e.g. recycling instructions, extended product details) should be provided digitally.

- *Simplified language requirements*
  Where physical labelling remains necessary, a single harmonized EU symbol system or standardized set of icons could replace text translations, ensuring clarity for consumers while easing burdens for companies.

Extended Producer Responsibility (EPR) Schemes

EPR schemes remain highly fragmented across the EU, creating unnecessary complexity and cost for companies operating in multiple member states. A harmonized approach would significantly reduce administrative burdens while still ensuring environmental goals are achieved. We propose the following simplification measures:

- *Digital one-stop-shop platform*
  Reporting related to EPR obligations is required under different pieces of EU waste legislation (Batteries Regulation, WEEE Directive, Packaging and Packaging Waste Regulation and in the future for textiles under the Waste Framework Directive). Therefore we propose to establish an EU-wide platform where producers can report packaging and product volumes once, with the data automatically distributed to relevant national authorities.

- *Advance eco-modulation in packaging*
  Ensure quicker and harmonized implementation of eco-modulation criteria for packaging across member states, so that businesses face consistent incentives for sustainable design.

- *Simplified reimbursement for exports*
  Introduce a standardized EU-wide procedure for reimbursement when products are exported, to avoid double charging and streamline financial flows.

- *Harmonized fee structures and categories*
  Align product categories, fee structures, and calculation methodologies to prevent diverging interpretations and ensure predictability for businesses.

- *Obligations for online marketplaces to report and collect according to EPR Schemes on behalf of their sellers in 3rd countries*
  Currently traditional EU companies are burdened with the expenses related to the handling of products and packaging coming to Europe from sellers in 3rd countries through online marketplaces. The online marketplaces are perfectly capable of requiring their sellers from third countries to register and pay to the EPR schemes before the sellers have access to sell products to EU consumers through the online marketplace. It should also be possible for the online marketplace to register and pay on behalf of their sellers, if they prefer that.

Such harmonization would not only reduce costs and legal uncertainty for companies but also improve the effectiveness and transparency of EPR systems across the EU.

Textile specific comments related to EPR schemes

The general comments on EPR schemes, as mentioned above, also apply to EPR on textiles, as layed out under the Revision of the Waste Framework Directive. In addition, there are two important points to highlight, that account for textiles only, as textiles are a new product group, and because parts of the financial model is supposed to support research and development. The latter is essential, as there is a crucial need for innovation with regards to recycling in the textile industry. But it can only become scalable and operational if activities are harmonised across member states.

- Harmonise the financial model for the PRO to clarify textile waste ownership, including revenue and cost streams.
- Harmonise the structure for research and innovation in technological developments in the most efficient and targeted way, and how this support can build on current research and innovation.

Environmental Assessments and Permitting Procedures
Environmental assessments are a necessary safeguard but must be made more efficient, predictable, and proportionate to the complexity of the project in question.

We recommend the following:

- Introduce binding maximum timeframes under the Environmental Impact Assessment (EIA) Directive. As a rule, the entire EIA procedure should not exceed 12 months for projects of overriding public interest and 18 months for other projects, counted from the date when the application is deemed complete. As a benchmark, a six-month limit should also be established from the date of application to the decision for the ESPOO consultations.
- Enshrine a clear proportionality principle in the EIA Directive and the Habitats Directive, ensuring that assessment requirements are strictly commensurate with the scale and potential impacts of the project. This would prevent disproportionate procedural burdens for projects with limited or already well-understood environmental effects.
- Limit the suspensive effect of legal appeals. Legal challenges should only suspend the specific contested aspects of a decision and not the entire project, unless critical legal grounds are demonstrated.
- Enable partial reassessments. In cases where additional information is required, only the relevant parts of the EIA should be reopened, rather than repeating the full process.
- Apply the “one-stop-shop” principle consistently across all permitting procedures, including environmental and spatial planning, as provided in RED III.
- Expand the use of fast-track approval pathways for projects of lower or medium complexity. Such procedures could rely on standardised self-declarations and pre-cleared templates.

These reforms would reduce costs, increase legal certainty, and help accelerate the rollout of renewable energy and climate-friendly infrastructure across the EU.

Overriding public interest
Experience from the EU Emergency Regulation (2022) demonstrates the effectiveness of targeted exemptions and prioritisation mechanisms.

We recommend the following measures:

- Permanently enshrine Article 6 of the Emergency Regulation, allowing simplified permitting procedures for renewable energy, hydrogen, and grid infrastructure, including streamlined EIAs where appropriate.

- Scale up the use of "acceleration zones" under RED III Article 15, where pre-zoning and early-stage assessments can replace project-level EIAs.
- Apply the principle of "overriding public interest" (as found in Article 6(4) of the Habitats Directive and Article 16a of RED III) more broadly to energy infrastructure. This would prevent strategic projects from being blocked due to localised ecological constraints that can otherwise be mitigated.

Guidance, Harmonisation and Data Coordination
Many of the current administrative burdens stem from outdated regulation and uncertainty, duplication, and inconsistent interpretation across Member States.

We recommend the following measures:

- Issue EU-level guidance documents that clarify the interaction between project permitting and other directives. These guidance documents should include practical instructions for using derogations and compensatory measures, as allowed under existing EU law.
    - The Habitats Directive,
    - The Birds Directive,
    - The water Framework Directive,
    - The Marine Strategy Framework Directive.

- Revise annex IV of the Habitats Directive to reassess listed species and remove those no longer critically vulnerable. The Annex should reflect contemporary scientific understanding and be regularly updated.

- Clarify that geothermal energy is not to be equated with extractive activities (e.g. oil drilling or mining), as the regulatory treatment should reflect its fundamentally different environmental impact profile.

Transparency and Digital Infrastructure
Improved digital systems and data coordination are essential for reducing the reporting burden and enhancing cross-border regulatory alignment.

We recommend the following measures:

- Create an EU-wide database for Environmental Impact Assessments (EIAs) and Strategic Environmental Assessments (SEAs). All assessments conducted under EU law should be published here to enable transparency, learning, and consistency.
- Standardise and digitalise environmental reporting obligations across Member States.
- Ensure full interoperability of digital permitting systems, enabling companies and authorities to submit, track, and respond to applications efficiently.

Harmonisation of definitions across EU legislation.
Align definitions and reporting requirements across EU legislation (e.g., Substances of Concern under ESPR and EU Taxonomy) to create a coherent regulatory framework. The opposite is a challenge and burden for economic operators, who handle numerous products and Articles falling under different pieces of legislation, each having its own set of definitions for the same or similar concepts. One example related to chemicals. We believe assessment and classification of chemical substances should be kept within REACH and CLP regulation. SoC have been introduces in more regulations without clear definition which challenges economic operator. Often "dangerous substances" correspond to those classified as "Substances of Very High Concern" (SVHC) under the EU REACH Regulation. This discrepancy EU definitions causes confusion. This also creates duplicate reporting requirements, as the REACH Regulation already mandates that companies, upon request, inform consumers about the presence of SVHCs in their products.

Another example: Overlapping chemical assessments under the Biocidal Products Regulation (BPR) and CLP risk creating legal uncertainty and unnecessary costs. Different committees working on classifications with diverging timelines may result in inconsistent or even contradictory outcomes. In the worst case, this can lead to temporary legislation that is soon overturned, undermining trust in the regulatory system and causing avoidable costs for industry. Clear responsibilities and coordination between the two regulatory frameworks are therefore essential. A concrete example is the possible classification of ethanol under the BPR. Such a step could have far-reaching economic consequences across multiple industries. Importantly, the BPR does not allow consideration of relevant exposure routes, while the CLP framework might enable inclusion of scientific data on actual exposure patterns. This discrepancy risks leading to disproportionate and misleading hazard classifications. Regulators should ensure clear division of responsibilities between BPR and CLP and base classifications on scientific data and when justified include realistic exposure routes.

Energy efficiency directive
According to the Energy Efficiency Directive (DIRECTIVE (EU) 2023/1791 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955) enterprises with an annual energy consumption above 10 TJ are obliged to carry out a compulsory energy audit. Consequently, many small enterprises, for instance hauliers with just around 10 trucks, have become subject to these mandatory energy audits.

The energy audit is costly and represents an administrative burden for these SMEs. The additional information gained from the audit is very limited and does not justify the efforts needed. The Danish Chamber of Commerce proposes a more proportionate approach to the energy audit requirement. In practice, this should mean that obligations are targeted at enterprises with a demonstrable potential to improve their energy efficiency – in line with the intentions of the directive. This would avoid unnecessary burdens on companies with limited potential for further energy efficiency gains (such as small hauliers), while still ensuring that the overall objectives of the directive are met. If a sector-specific approach is developed for transport, a combined threshold based on both annual energy consumption and company size could be considered in order to distinguish between small hauliers with limited efficiency potential, and larger enterprises.

Moreover, there are overlaps with the energy performance certificate. For large enterprises that have already invested in an energy performance certificate, it can be burdensome and duplicative to start over with a full-scale energy audit. The directive should therefore allow such enterprises to conduct a less comprehensive energy audit, making use of the data already assessed under the energy performance certificate.

Sufficient time for implementation and guidance availability
In general, The Danish Chamber of Commerce emphasized the for sufficient time for implementation of new or revised legislation. Often obligations concerns more economic actor. Therefore, appropriate time to comply should be ensured through the value-chain. Danish Chamber of Commerce also request guidance to be available in due time well before the entry into force dates.

Urban wastewater treatment
The revised Urban Wastewater Treatment Directive introduces new Extended Producer Responsibility and cost-coverage provisions in Article 9 for pharmaceutical and cosmetic producers. Producers, importers, retailers and wholesalers are impacted by these new rules, though the medicine and cosmetic products they produce or sell

Danish Chamber of Commerce fully support the overarching goal of reducing water pollution based on a producer responsibility principle. However, the revision was criticised by the industry for disproportionate financial burden, overestimates regarding the cosmetics industry's contribution to the pollution of urban wastewater and that the initial impact assessment was based on incorrect or inaccurate substance classifications. A reassessment of the financial responsibilities under this legislation is now being discussed, in particular to ensure the production and competitiveness of medicine and pharmaceutical products in Europe. Danish Chamber of Commerce supports a reassessment and call on the Commission to ensure that the Urban Wastewater Treatment Directive is based on solid scienced-based data and does not lead to a disproportionate financial burden and maintain the security of medicines supply in Europe

EFPIA urges the Commission to use this initiative to clarify and harmonise how pharmaceuticals are treated under the EPR framework:

- We fully support the overarching goal of reducing water pollution. However, we urgently call on a science-based reassessment of the Directive to protect patient access and maintain the security of medicines supply in Europe.
- The Directive runs counter to essential EU Treaty principles: polluter pays, proportionality and non-discrimination. Moreover, it also fails to incentivise greener product development across all sectors, missing a key opportunity to drive environmental progress.
- Increased concerns on the present EPR system have been raised recently by members of the European Parliament, as well as member states, with Germany/France Council of Ministers on 29 August 20256, (Press Release) specifically ‘urges the Commission to come up with further simplification initiatives of existing legislation and call for: … examination

of targeted simplification regarding the Urban Wastewater Treatment Directive (EU) 2024/3019'.

- The EPR attributions are based on scientifically unsubstantiated assumptions, and the proposed funding system lacks economic viability and sustainability.
    - Flawed Toxic Load Estimates: The UWWTD EPR scheme is based on inaccurate toxicity/PNEC (predicted no effect concentration) data, significantly overstating the environmental impact of medicines, as required for new APIs under the EMA guidance.
    - Underestimated quaternary Water Treatment Costs: Independent estimates from Member States, the private and the water sector show that actual costs of quaternary treatment are significantly higher than the Commission's projections, some up to 10 times more.
- Imposing these EPR obligations on the pharmaceutical sector would jeopardise patient access to medicines and undermine efforts to maintain security of supply and competitiveness in a strategic sector for Europe, as recently recognised by the Draghi report.

We urge the Commission to include in the omnibus an immediate suspension of the EPR implementation (notably articles 9 and 10 and Annex III of the Directive).

Change Waste Shipment Regulation to support Circular Economy

Environmentally safe waste management is an important part of the circular economy, and the waste shipment regulation does not sufficiently support this. The revision from 2024 will help, however, to further support the transition more changes need to be made. This includes:

- Introduce an easy process for renewal of an approved notification. A notification lasts a year, when you need a new notification, you have to make a completely new application. If it is the same type of waste that is transported to the same recycling facility, then it should be possible to renew the notification in a simple way.
- EU-approval of cross-border shipment in case of registered take-back scheme. Take-back schemes where the same type of waste is collected in several EU countries and transported for recycling within EU should be approved/registered in the EU Commission. This should allow transport across boarders without getting a new notification every year for each country.
- Make clear guidelines and templates that are the same in all EU countries. The guideline should refer to templates that need to be filled out as a part of the notification, this should include table for R12 and R13 treatment, contract between notifier and waste treatment facility, how to calculate financial guarantee and so on.
- Mandatory that all countries approve documents in English. If the coming digital system can translate documents and it is viewed as official documents, then that solution can be used.
- Special regulation for own products/waste that has not been used by consumers and waste from clinical trials. Easier and possible cheaper approval process when the composition of the waste is clearly known and described because it comes from production, clinical trials or are expired products. It can also be very small amounts of waste,

if you have to go through a full process to get a notification then it can end with the waste being landfilled instead of recycled.

- New process for waste classification. Currently each country can classify waste differently which makes it very difficult to transport the same kind of waste from different countries to the same final country of destination.
- Address of dispatch can be changed after the notification is approved. This should be the case if the waste still has the same composition. For the address of dispatch to be changed it requires 1) the new address, 2) new transport route and 3) a recalculation to check if the financial guarantee is still sufficient in the case a take back of the waste is needed.

Waste shipping

Shipping waste across EU borders is complex both from an administrative and regulatory perspective. The current system involves multiple notifications, consents, inspections, and documentation requirements that delay shipments, increase costs, and hamper recycling and circular economy efforts. Furthermore, illegal waste shipments pose environmental and health risks, requiring stringent controls and monitoring. The reliance on paper-based procedures has contributed to inefficiencies and inconsistencies in the shipment process, which slows down environmentally sound waste recovery and recycling operations.

The shipment of waste, across borders within the EU, is governed primarily by Regulation (EU) 2024/1157 on shipments of waste, which entered into force on 20 May 2024 with most provisions applicable from 21 May 2026. This regulation amends and repeals earlier rules such as Regulation No. 1013/2006.

We suggest the following simplifications:

- Fully implement and promote the digital DIWASS system across all EU Member States to replace paper-based notifications and streamline consent procedures.
- Harmonize and extend the scope of green listing for non-hazardous wastes to reduce the need for prior notification and consent where environmental risks are minimal.
- Establish a centralized EU-wide pre-consent mechanism for recovery facilities, so a single approval is valid across Member States, eliminating multiple national procedures.
- Simplify documentation requirements by standardizing and reducing redundant information for notified shipments, focusing on essential data for environmental protection.
- Improve coordination and information sharing between competent authorities to speed up reviews and reduce administrative delays.
- Provide clear guidance and training to economic operators on the new regulations and digital tools to ensure compliance and ease of use.
- Evaluate possibilities to exempt low-risk waste categories from notification while ensuring robust monitoring and enforcement to prevent illegal shipments.

These suggestions offer a way to lessen the administrative burden, while still maintaining the environmental safeguards. Further, they offer a way to facilitate smoother cross-border waste shipments.

European Pollutant Release and Transfer Register (E-PRTR)
The E-PRTR regulation (Regulation (EC) No 166/2006) requires that each PRTR facility reports data on the quantities of PRTR pollutants they released to air, water and wastewater, as well as the quantities of waste transferred off their facilities, in the previous calendar year. The Corporate Sustainability Reporting Directive (Directive (EU) 2022/2464) requires the same data reporting. As a result, companies are double reporting. To simplify, we suggest withdrawing the E-PRTR regulation. Alternatively, companies reporting via both legislations, could be exempted from the E-PRTR regulation.

Industrial Emissions Directive, BAT conclusions
According to the Industrial Emissions Directive (IED), when BAT conclusions are published that relate to a company's main activity, the authority must reassess the company's permits to ensure that the BAT conclusions are complied no later than four years from the date of publication. To lessen the administrative burden for companies and authorities, we suggest that the reassessment is limited only to cover the parts of the permit which relate to the new BAT-conclusions.

Further, BAT conclusions are often vaguely worded. This leaves significant room for interpretation by the authorities in the Member States, which has led to inconsistent permit terms across the member states. To ensure the same level of environmental safeguards across all Member States, we suggest an added focus on creating clear and precise BAT conclusions. This suggestion would also help to create a more level playing field for companies across the EU Member States.

CBAM-regulation
The Carbon Border Adjustment Mechanism (CBAM-regulation) regulates the import of certain goods with high CO2 emissions produced in countries outside the EU and the purpose is to prevent carbon leakage.

To ease the administrative burden, we suggest simplifying the reporting requirements, so they correspond to the initial proposal of the CBAM-regulation from the Commission. Some exporting countries do not allow for exporters to share certain information due to competition laws, data protection etc. This makes it very time consuming and difficult for EU companies to comply with the CBAM-regulation's reporting requirements.

Specifically, we suggest simplifying the obligation that requires companies to declare information regarding the whole supply chain of a product. If possible, the information should be reported but if it is not possible there should be a standard rate per e.g. ton of steel, that can be used as default – this default should be set high enough to ensure that there is still an incentive to retrieve and use the real value. This simplification should apply to all companies, irrespective of their size. This simplification will ensure that the right incentive from an environmental perspective is still in place while preventing carbon leakage but at a significantly lower administrative burden. As an added benefit this would also be compliant with the WTO-regulation.