

Joint Business Position on the future Environmental Omnibus, November 2025

Ares (2025)5953566 [\[Link\]](#)

Detailed positions on the Environmental Omnibus are added as a “[[Link](#)]”:

- WKO (Austrian Federal Economic Chamber) - Austria [\[Link\]](#)
- SMVdanmark (SMEdenmark) - Denmark
- DIHK (Association of German Chambers of Industry and Commerce) - Germany [\[Link\]](#)



Support for the Environmental Omnibus

We welcome the European Commission initiative on an Environmental Omnibus to simplify environmental legislation at EU level. European businesses are increasingly challenged by the growing complexity and overlapping nature of EU environmental legislation. Especially small and medium-sized companies are often overwhelmed by excessive bureaucracy and authorisation procedures. Reducing unnecessary administrative burdens is therefore essential - both to safeguard the competitiveness of European companies and to enable sustainable growth, ensuring the long-term prosperity of the EU economy.

Timelines and adaptations at EU level

We propose the introduction of “stop-the-clock” mechanisms starting with the following urgent files - with the expectation of additional acts in a follow-up:

- EUDR (Regulation on Deforestation-Free Products)
- PPWR (Packaging and Packaging Waste Regulation)
- ESPR (Ecodesign for Sustainable Products Regulation)
- NRR (Nature Restoration Regulation) and
- UWWTD (Urban Wastewater Treatment Directive).

Such mechanisms must ensure realistic transition periods, giving businesses planning certainty while allowing EU legislators sufficient time to simplify the content of these acts.

Focus on reduction of red tape

Especially in recent years (Green Deal 2019-2024), mandatory conformity declarations, reporting obligations, certifications and verifications have multiplied because of EU legislation in environmental policy (e.g. PPWR, CSRD and many more). Too often, these requirements do not directly contribute to environmental and climate protection. Instead, they rather reflect a “lack-of-trust principle” of the political level that shifts entrepreneurial energy into costly and resource-intensive paperwork rather than innovation.

Key provisions requiring adjustment

- EUDR: introduce a no-risk category for countries with negligible deforestation risks, focus compliance duties on first party importing into the EU
- PPWR: clarify addressee, revise requirements for proof of conformity and for reusable packaging, especially the 100% target for transport packaging

- ESPR: introduce a step-by-step approach for a balanced EU implementation, extend transition and phase-in periods for product groups and the digital product passport (DPP), minimise disproportional conformity declarations and other red tape
- IED (Industrial Emissions Directive): reduce double regulation for environmental management, chemical inventory and transition plan by relying on existing environmental management systems such as ISO 14001 or EMAS; introduce de minimis thresholds for small and medium-sized enterprises (SMEs)
- EIAD (Environmental Impact Assessment Directive): streamline regulations under the IED and the EIA Directive; exempt permit applications for installations covered by the IED from EIA requirements
- NRR: limit the non-deterioration principle to Natura 2000 sites, include the fundamental rights of landowners into the legislative framework
- UWWTD: amendment of disproportionate and unfair producer responsibility under Article 9 of UWWTD.

Further key recommendations

- Accelerate and simplify permitting procedures (IED and EIAD); apply the streamlining measures of the Renewable Energy Directive (RED III) to all permitting procedures
- Apply the data once-only principle (EUDR, PPWR, ESPR etc.)
- Provide proportionate rules or effective relieve measures for SMEs (think-small-first principle).

Conclusion

The Environmental Omnibus should provide a genuine opportunity to streamline a broad range of EU legislation, reduce unnecessary burden and ensure that environmental goals are achieved in a proportionate and business-friendly way. The competitiveness of EU businesses is at stake - and thus the backbone of our welfare and job security in Europe. We stand ready to engage with the Commission, the Parliament and the Council to ensure a balanced and effective outcome.

Contact

- Axel Steinsberg, WKO, Tel. +43 590 900-4750, axel.steinsberg@wko.at
- Bjørn Strøm, SMVdanmark, Tel. +45 54 58 46 43, stroem@smvdanmark.dk
- Kathrin Riedler, DIHK, Tel: +49 1511 1313136, riedler.kathrin@dihk.de