

## Joint Business Position on the Environmental Omnibus Proposal, March 2026 [\[Link\]](#)

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

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



### Support for improvements in the Environmental Omnibus Proposal

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. Not only small and medium-sized companies (SMEs) but even large companies are often overwhelmed by excessive bureaucracy and authorisation procedures. Reducing unnecessary administrative burden 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. In the Environmental Omnibus Proposal of December 10<sup>th</sup>, 2025, we especially welcome the following improvements, thanks to which many companies will benefit from simpler rules:

- **IED (Industrial Emissions Directive):** improvements concerning chemical inventory, transition plan and environmental management systems
- **EPR (Extended Producer Responsibility):** suspension of the obligation to appoint an authorised representative in other EU Member States, implemented in several waste stream legislative acts
- **SCIP (Substances of Concern In Products):** deletion of database, which is missing proportional added value
- **Environmental Assessments:** improvements of environmental assessments in terms of simplification, harmonisation and acceleration, in particular the introduction of the preclusion and the population protection approach for species protection.

### Necessary amendments in the Environmental Omnibus Proposal

- **IED:** rely on existing environmental management systems such as ISO 14001 or EMAS, introduce de minimis thresholds for SMEs, deleting the requirement for a baseline report and the reference to the strictest possible limit values
- **Environmental Assessments:** improve and sharpen the proposal concerning environmental assessments such as the possibility to use data which is older than five years, a mandatory effective preclusion, the protection of business secrets and the introduction of binding cut-off dates rule in the relevant EU directives, which prevent the permitting process from requiring repeated adjustments to changes in the legal framework
- **IED & Environmental Assessment:** streamline regulations under the IED and the Environmental Impact Assessment Directive (EIAD), exempt permit applications for installations covered by the IED from EIA requirements
- **WFD (Waste Framework Directive) concerning EPR:** establish legislative solution for VLOPs, very large online platforms, to avoid free-riding of imported packaging, batteries or electrical and electronic equipment from third countries

- **EUBR** (EU Batteries Regulation): amend text to avoid broader SVHC (Substances of Very High Concern) definition than in REACH Regulation, delete useless labelling of the visible fee for recycling costs on batteries
- **INSPIRE**: amend the blanket application of the “open-by-default” in view of the protection of sensible private and public data towards a balanced solution.

### **What we need beyond the Environmental Omnibus at EU level**

The package of measures does not address all areas of regulation that currently cause a particularly high bureaucratic burden for businesses. The following urgent files also require simplification efforts:

- **PPWR** (Packaging and Packaging Waste Regulation): postpone the entry into force through a stop-the-clock, reduce overall complexity, clarify addressee, revise requirements for proof of conformity and for reusable packaging
- **ESPR** (Ecodesign for Sustainable Products Regulation): 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, recognise existing evidence and established standards
- **NRR** (Nature Restoration Regulation): limit the non-deterioration principle to Natura 2000 sites, include the fundamental rights of landowners into the legislative framework
- **UWWTD** (Urban Wastewater Treatment Directive): amendment of disproportionate and unfair producer responsibility under Article 9 of the UWWTD.

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

### **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 relief measures for SMEs (think-small-first principle).

For detailed proposals for further simplification of the environmental acquis see our input from November 2025 prior to the Proposal: WKO [[Link](#)], DIHK [[Link](#)].

**Conclusion:** The Environmental Omnibus Proposal as well as future proposals should provide a genuine opportunity to streamline and harmonize 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.

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