



EU Environmental Omnibus EU Proposal 10.12.2025 ([Link](#)) WKO Provisional Position

Austrian Federal Economic Chamber (WKO)
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From the perspective of the Austrian Federal Economic Chamber (WKO), simplifications are generally welcome, but measured against the expectations of the business community, the “Environmental Omnibus” falls significantly short of what would be necessary to actually ease the burden on companies and of what has been demanded by the business community in advance, as it merely covers specific areas such as approval procedures or geodata and often proposes only minor textual changes.

WKO welcomes certain aspects of the package, such as:

- Simplifications of environmental management systems within the framework of the Industrial Emissions Directive (IED), which can be applied at company level in the future
- the abolition of the SCIP database, which previously required complex chemical information on products
- the postponement of EPR representatives for waste dossiers, as well as
- a number of adjustments in the area of approvals for environmental impact assessments (EIA) and
- targeted exemptions for emergency power generators in data centers.

However, the dossiers we consider to be most urgent from an economic perspective for an Environmental Omnibus, such as the Ecodesign for Sustainable Products Regulation (ESPR), the Nature Restoration Regulation (NRR), important legal acts on the subject of water such as the Water Framework Directive (WFD) and the Urban Wastewater Treatment Directive (UWWTD) as well as the Packaging and Packaging Waste Regulation (PPWR) are hardly or not at all covered in the legislative package. A stop-the-clock approach would have been necessary here, at least until key implementation issues have been clarified. Instead, the urgently needed repairs have been postponed until 2029, which is too late. The announced stress tests on the environmental acquis must not be a substitute for clear political decisions.

The most significant dossiers missing in the Environmental Omnibus from the WKÖ's perspective and our proposals in this regard:

1. ESPR

Unfortunately, there is no proposed legal text at all on ecodesign in the Environmental Omnibus. Given the complexity of the ESPR as a framework regulation, it should only be specified in such a way that it leads to a reduction in complexity and bureaucratic requirements. Our frequently cited recommendation on the ESPR is: “Keep it simple and make it work.” Before ESPR rules are enacted, they should have to pass a practical test, particularly regarding the international competitiveness of the European economy and reasonable feasibility for businesses, especially SMEs. If this test is not carried out or if the outcome is negative, the project should be halted until these conditions are met. Furthermore, the time schedules of ESPR are over-ambitious or even unrealistic and have therefore to be revised. A step-by-step approach needs to be put in place.

2. NRR

The Environmental Omnibus also lacks amendments to the NRR. We are particularly critical of Article 8 of the NRR: The restoration of urban ecosystems stipulated therein affects central economic areas. Since August 18, 2024, a prohibition on deterioration has applied to green spaces and trees in these areas, which will be replaced in 2031 by a requirement for improvement that will remain in force until a satisfactory level is achieved. No

consideration will be given to existing building land designations. This regulation interferes with property rights and real estate development opportunities, increases the cost of residential and commercial construction projects, and creates uncertainty for businesses and investors. It triggers an avalanche of administrative, monitoring, and reporting requirements, paralyzes enforcement, and slows down approval procedures. It turns the cornerstones of spatial planning policy upside down and promotes development outside Europe's central economic areas. Therefore, we call for the suspension of the entire NRR until a practical review has been completed. If this is not possible, the application of Article 8 should at least be restricted to urbanization level (DEGURBA) 1, as this would greatly reduce the areas affected and - at least in this area - take some of the pressure off. The degree of urbanization (DEGURBA) 2 mainly refers to rural areas, which is probably not in line with the regulatory intent of Article 8 of the NRR.

3. Legal Acts on the Subject of Water

It is disappointing that the clear feedback from industry on the WFD has been ignored in the Environmental Omnibus VIII (e.g., a revision of the prohibition of deterioration, an end to the "one-out-all-out" approach, an improvement in the licensing situation for companies). Although the Commission's communication on the Environmental Omnibus claims that the directive has already been "simplified" with the September 2025 package of amendments, it is not clear how. This package amending the WFD, the Environmental Quality Standards Directive, and the Groundwater Directive, which is currently being finalized, has not delivered, and now the Omnibus is also putting off a process that is unrealistic. In addition, the Commission is announcing stress tests for the implementation of the WFD for 2026, even though the amendment itself does not have to be implemented nationally until December 2027.

Furthermore, in our WKO proposals prior to the publication of the Environmental Omnibus, we called for a crucial amendment of the Urban Wastewater Treatment Directive (UWWTD), which is, however, not included in the Environmental Omnibus package either: We regard the extended producer responsibility as contradictory to the polluter pays principle, therefore, a broad cost-sharing across all dischargers is needed. The fourth stage treatment should be necessary only where drinking water sources are at risk.

4. Packaging and Packaging Waste Regulation

This regulation urgently needs a "stop-the-clock" before its application deadline on August 12th 2026 and at least the following "repairs" (including a thorough evaluation of the overall concept of the regulation):

- The 100% reuse target for transport packaging is unrealistic - exemptions are needed (incl. pallet wrappings/straps)
- the addressees of the sustainability requirements in the regulation are unclear and therefore problematic - they need to be clarified
- the bans in Annex V risk hygiene/food safety and may increase food waste and should thus be deleted
- the requirement of mandatory refill stations is excessive - a deletion thereof is necessary.

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