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EuRIC - The European Recycling Industries' Confederation



# **Simplification of admin burden in environmental legislation – EU Recyclers Feedback**



EuRIC's Response to the Call for Evidence  
September 2025

# EU recyclers' position on the simplification of administrative burdens in environmental legislation

8 September 2025

## Executive Summary

The European Recycling Industries' Confederation (EuRIC) welcomes the initiative on the simplification of administrative burden in environmental legislation and underlines the need for making EU legislation more efficient and effective while safeguarding ambitious environmental objectives.

To foster a circular and competitive EU industry, EuRIC highlights that:

- Although we fully support its initial purpose, we believe that **the SCIP database** can be phased out in its current form. However, the Commission must ensure that future data management tools, such as the Digital Product Passport, improve transparency and traceability of substances of concerns, taking into account their practicability for the recycling and manufacturing industry.
- Simplified and accelerated **permitting procedures**, less bureaucracy and digitalised and functional processes are crucial to scale up recycling in the EU. EuRIC believes that permitting procedures and subsequent legal actions should be bound at EU level by a specific timeframe.
- Heterogeneous interpretations and implementation of EU rules by Member States create a fragmentation of the single market. EuRIC calls for simplification of definitions under the **Waste Framework Directive**, **harmonized implementation** of EU rules, as well as speeding up the development of **EU-wide end-of-waste criteria**.
- When it comes to **waste shipments between Member States**, EuRIC calls for a simplification of the administrative declaration required for exportation between Member States, mutual recognition of transportation certificates and harmonized rules for the weight of cross-border waste transport.
- EuRIC calls for streamlining **reporting frequencies and processes** (generalisation of the "only once principle"), effective and efficient **digitalisation** (databases, digital labels related to the Digital Product Passport) with agile digital processes, and simplified reporting criteria for the **taxonomy**.
- For effective **Extended Producer Responsibility (EPR)** implementation, EuRIC calls for the simplification of the reporting (i.e. through a single platform) as well as reducing, pooling and simplifying the audits and inspections carried out by EPR schemes. EuRIC believes that the national authorized representative requirement from EPR schemes should be maintained. Moreover, EuRIC calls for a level playing field and equal treatment between social economy entities (SEEs) and commercial operators regarding reporting obligations.
- EuRIC calls for the simplification of the implementation of the regulation for the use of **recycled plastic in food contact applications** to foster development and increase capacity in the EU.

## 1. The discontinuation of the SCIP database

**Sufficient and usable information on substances of concern** contained in products is essential for efficient waste management and recycling activities. However, there is a noticeable gap between the intended purpose of the SCIP database and the actual usage. The current low level of use of the SCIP database has made evident that the **complexity and the level of information** and access (same for consumers and recyclers) is not appropriate. In fact, it only provides information about the presence of hazardous substances, but not where they are located in the product or about the content.

While we support the purpose of the SCIP database, primarily intended to provide waste management companies with information about hazardous components in products, **we believe that the SCIP database can be phased out in its current form.**

However, certain elements must be retained for future data management tools, and careful consideration must be given to product lifespans in order to adapt restrictions on certain substances in new products, which may still be present in products that have become waste years or even decades later at recycling facilities.

In particular, the SCIP database could be **improved and integrated with the new Digital Product Passport system**. The new system shall be compatible and designed to be usable on a day-to-day basis by the waste management industry (lean, deployable at industrial scale), allowing greater transparency in the value chain in terms of materials and contaminants.

A simplification of the information requirements of the database, the introduction of access levels based on the needs of each operator, and an improvement in accessibility to the data through the Digital Product Passport would be necessary. Additionally, the database backing the DPP should allow for the inclusion of information whenever a change in the regulatory requirements makes it necessary to guarantee that recycling operators can react accordingly to these changes.

**It is therefore essential to learn from experience and not repeat the same mistakes**, especially with the deployment of the DPP. The industry needs to be involved during the tools design to take into account the practicability of the system. These tools will only be used if detailed information is provided about where and how hazardous substances are contained, as well as whether and how they should be separated.

## 2. Simplified permitting & authorization procedures

Producing recycled materials consumes much less energy than extracting and processing virgin raw materials (e.g. recycled aluminium requires 95% less energy than primary aluminium, which significantly reduces GHG emissions). Recycling limits dependence on imports of raw materials (minerals, oil, wood), which are often high emitters. As such, they should also benefit from easier procedures for granting permits.

Simplified and accelerated permitting procedures, less bureaucracy and digitalised and functional processes are crucial to scale up recycling in the EU. However, the EU recycling industry faces significant delays due to complicated permitting processes for setting up new projects or increasing capacity. Although the duration of permit-granting processes varies, we experience that it is very common that obtention of new permits (or even renewals of existing permits) may take many years. Naturally, such permitting challenges hampers investments and slows down the green transition in Europe. **EuRIC believes that permitting procedures and subsequent legal actions should be bound at EU level by a specific timeframe.** EuRIC recommends that all legal recourses and final decisions must be issued within 2 or 3 years max.

As a matter of fact, the projects contributing significantly to emissions reduction and resource recovery should benefit from **fast-track permitting procedures** to enable quicker deployment of recycling infrastructure. Thus, while addressing permitting challenges is overall a welcome measure, this measure should look beyond the scope of the Net Zero Industry Act (NZIA). Recycling for instance contributes to both the EU's decarbonization and strategic autonomy goals but is not recognized as a strategic technology under the NZIA. We refer to the EU Critical Raw Materials Act (art. 11) where it sets a requirement for the duration of permit granting processes for strategic projects. Similar requirements could be introduced for instance in the Industrial Emissions Directive.

### 3. Simplifications to better implement the Waste Framework Directive (WFD) and EU legislation

Well-functioning internal markets for secondary raw materials is key for the European circular economy. We believe that there is a potential for better harmonisation of definitions and simplification of the European WFD. There are numerous examples of Member States practising different interpretations for regulations and definitions that are harmonised in Europe. For instance, different interpretations of the European definitions of by-products and end of waste are still common, as well as the level of contaminants allowed for in types of so-called "green listed waste". As an example, there are numerous interpretations on the criteria for by-products in the WFD with regard to e.g. when a substance or object is considered to be produced as an integrated part of a production process. The same applies when the specific use of a by-product is considered to not have overall adverse environmental or human health impacts. Different interpretations and practices stand in the way of well-functioning European markets for secondary materials. When **transposing EU legislation into national laws**, Member States should refrain from adding constraints that make the national law unnecessarily tightened and complicated.

These **heterogeneous interpretations and implementation of EU rules by Member States create a fragmentation of the single market**, making it costly for businesses to convert waste into valuable secondary raw materials and preventing economies of scale. Thus, we call for a **simplification of the current definitions of waste**, by-products and End of Waste in the WFD.



EuRIC also calls for speeding up the **development of EU-wide end-of-waste criteria** as it will remove trade barriers and simplify waste transfer, contributing to a single market for waste and recycled materials. The current process for adopting EU-wide end-of-waste criteria, which is extremely resource-intensive, both for the European Commission and for stakeholders involved in the waste value chain for the relevant raw materials. When the criteria meet the requirements of the Waste Framework Directive and there is consensus within the value chain, they should benefit from accelerated adoption procedures at the EU level.

#### 4. Waste shipments between Member States

EuRIC calls for a simplification of the **administrative declaration required for exportation between Member States**: after notification, the processing times to obtain transfer authorization are 4 months on average whereas the regulation on waste transfer mentions a three-day deadline to address the demand. Moreover, the notification methods are diversified within the EU. Some member States require a paper file, others a digital. The administrative declaration simplification and a harmonisation of the notification form will help to reduce the delay and facilitate waste cross-border transfers.

It is also equally important to ensure a **mutual recognition of transportation certificates** between Member States. In many Member States, not all waste transportation certificates are recognized, creating a legal insecurity for waste shipments operators. The harmonization of regulation at EU level will help to smooth the intra-EU waste shipment and increase the EU's waste treatment rate.

Moreover, when it comes to **cross-border waste transport**, we call for an **increase of the authorized weight to 44 tons** when a truck crosses a border between two countries that already allow 44 tons vehicles on their national territory. Currently, a truck can cross a border if both countries authorize it on their national territory. Today, the maximum weight is 44 tons in Belgium, Luxembourg, Germany, Italy, and France. However, when crossing the border between France and one of these countries, the weight is limited to 40 tonnes. Thus, we call for a regulatory harmonisation, as from an environmental point of view, it would be more reasonable to increase the tonnage transported rather than increase the number of heavy goods vehicles on the road. This change could enable us to reduce the number of heavy goods vehicles travelling to these neighbouring countries while increasing the tonnage transported by each heavy goods vehicle by 4.

#### 5. Reduced bureaucracy and digitalisation

Being composed mostly of SMEs, EuRIC fully supports simplification efforts, as 55% of SMEs cite regulatory obstacles and administrative burdens as their [biggest challenge](#)<sup>1</sup>.

To reduce administrative burdens for SMEs but also large companies, EuRIC calls for **streamlining reporting frequencies and processes** (generalisation of the “only

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<sup>1</sup> Consilium, Support to small and medium-sized enterprises (SMEs) ([available here](#))

once principle”), **effective and efficient digitalisation** (databases, digital labels related to the Digital Product Passport) with agile digital processes (avoiding the need to report the same data on several different platforms), and simplified reporting criteria for the taxonomy.

Digitalisation should always simplify reporting, not complexify it. This is especially true for **waste shipment** regarding current internal automated declaration where printed documents travel with waste vs. manual declaration on a european platform which would generate extra delays linked to digital control and non-automated procedure (we calculated it would require about 10 more full time employees only for declaration). Moreover, **european IT systems should be interoperable with local IT system**, again, to avoid extra delays in the declaration process.

## 6. Taxonomy

Directing investments towards a climate-resilient and net-zero economy by focusing on six environmental objectives, the EU Taxonomy is a cornerstone of the EU’s sustainability strategy. However, complexity and usability concerns have been identified as factors hindering reporting and assessment of the criteria. It is crucial to refine the readability of the templates and criteria, including the **‘Do No Significant Harm’ (DNSH)** assessment, whose complexity has led to disproportionate and inefficient reporting efforts. Additionally, **Climate change adaptation criteria** remain broad and often loosely defined criteria, making it challenging to precisely assess the concrete impact of specific activities on climate change. In many cases, the methodologies for measurement are unclear or not yet standardized. As a result, the reporting process can become excessively burdensome, complex, and costly for organizations, while delivering relatively limited added value in terms of actionable insights or measurable benefits

Although evidence of compliance with the Taxonomy's technical criteria is crucial in upholding the credibility and ambitions of these regulations, excessively stringent obligations risk shifting companies’ focus away from intended positive impact of the framework.

EuRIC calls for clearer guidelines for auditors and stakeholders to limit the risk of over-interpreting requirements. This pragmatic approach, aligned with the original objectives of the EU Taxonomy, would help maintain a balance between necessary rigor and operational feasibility, while contributing to consistent implementation and preventing companies from being overburdened with excessive administrative procedures. In this way, the focus should be on environmental impact and risk management systems, supported by up-to-date and effective procedures, rather than solely on exhaustive traceability and documentation.

EuRIC welcomes the revision of the Appendix C from the generic DNSH criteria on **pollution prevention and control** related to the use and presence of chemicals,

especially through option 2 as proposed in Articles 2 and 3 and as specified in Annexes VI-X of the Commission proposal on the EU Taxonomy Delegated Acts.

EuRIC welcomes the recent proposal from the Commission: delegated regulation to **streamline reporting obligations** under the EU Taxonomy (C(2025) 4568). **By simplifying the reporting templates and reducing the number of reported data points** by up to 64%, this marks a first step toward a balanced approach that maintains the Taxonomy's environmental ambitions while strengthening the circular economy and driving green industrial growth.

EuRIC welcomes the planned systematic and thorough review of the reporting requirements and the Technical Screening Criteria, including all DNSH criteria, based on stakeholder consultations and in line with the Commission's message of simplification.

## 7. Extended Producer Responsibility rules and reporting

Having too many PROs for the same product sector can lead to excessive fragmentation, notably through divergent information systems and reporting requirements. Moreover, in a competitive environment, PROs may reduce EPR fees to attract more members, leading producers to prioritize cost over performance. This downward pressure on fees can ultimately result in insufficient funding to fully cover the costs of waste collection, treatment, and recycling, eventually undermining the objectives of the EPR scheme. The expected effort of simplification and digitalisation under the Clean Industrial Deal could therefore play a crucial role in facilitating EPR reporting for recyclers by ensuring **healthy competition** among PROs while **preserving the financial, operational, and environmental integrity of the EPR scheme**.

Another aspect concerns the information that recyclers are required to report to PROs. It is important to ensure strict respect of confidentiality of data management by PROs and between PROs, in order to prevent any unfair competition regarding waste management and recycling operators. This is especially important in an operational model where PROs, acting as active recyclers, cease to be neutral system operators and become a market competitor, potentially breaching Article 102 of TFEU on EU competition law. Therefore, the role of PROs in data collection must be strictly limited to fulfilling the core missions of the EPR scheme — namely for auditing purposes, monitoring waste management and recycling operators, and ensuring traceability of waste flows. It is particularly relevant to rely on independent third-party, as is already the case in several member states, to collect, handle and share data from companies.

**EuRIC calls for the implementation of a single platform for reporting within the same EPR system** to avoid multiple declarations, especially on information systems that differ between PROs or individual system to another. Having one single platform where all data is declared only once, and the necessary information can be retrieved from it will increase efficiency.

Moreover, EuRIC calls for **reducing, pooling and simplifying audits and inspections by PROs/EPR schemes**. Currently, some recycling industrial sites are audited and inspected several times a month, and the multiplication of EPR schemes could increase the number of inspections. Recyclers already operated with a permit for waste treatment and can hold several ISO or EN certificates, thus, multiples and unnecessary audits by EPR schemes/PROs should be avoided.

Last but not least, **EuRIC believes that the national authorized representative requirement from EPR schemes should be maintained**. Removing the authorised representative and the declaration obligation in each Member State for product providers would significantly increase the **risk of free riders** for producers covered by a given EPR scheme.

EuRIC calls for a **level playing field and equal treatment between social economy entities (SEEs) and commercial operators regarding reporting obligations**. In the targeted revision of the Waste Framework Directive (WFD textiles)<sup>2</sup>, we welcome the added reporting obligation for SEEs, according to which SEEs that operate their own separate collection points must submit at least each year to the competent authority information on the quantity by weight of the separately collected used and waste textiles. However, we are concerned by the possibility for Member States (MS) to introduce a derogation to this reporting obligation: according to the final text, MS may exempt, partially or totally, SEEs, where the fulfilment of such reporting obligations results “in a disproportionate administrative burden”. This derogation might lead to under-reporting and fragmentation of SEEs' role in the system. The derogation is optional and subjective (“disproportionate administrative burden”), and thus each MS can interpret it differently. Without any safeguards, this could lead to a data gap that undermines transparency.

## 8. Simplify legislation for food-contact materials

The current regulatory framework for the use of recycled plastic in food-contact materials presents significant challenges for European plastic recyclers due to its stringent requirements for decontamination processes and qualification input. This restrictive environment has resulted in a limited number of technologies being recognized as suitable for the production of food-grade materials.

EuRIC calls for facilitating the **recognition of new technologies as suitable** for the production of food-grade materials, in particular for food-contact materials other than PET. The current framework for recycling food-contact materials limits the development of alternative technologies, such as those used to generate food-grade HDPE materials from milk bottles or PET pellets from municipal solid waste, due to the requirements for decontamination processes and input qualification.

EuRIC also highlights that it is key to make the framework for recycling food-contact materials stringent, but **flexible with other waste treatment methods**

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<sup>2</sup> as provisionally agreed in trilogues in February 2025, and before final approval in the EP plenary in September 2025



**ensuring high decontamination level.** For instance, manually collected plastics waste should be accepted as feedstock for recycling food contact materials if they allow precise materials identification and minimisation of cross-contamination risks by following strict food safety requirements. It ensures essential traceability for food applications but also guarantees the high quality of recycled raw materials by a precise sorting method.

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***EuRIC***, the European Recycling Industries' Confederation is the umbrella organisation for the recycling industries in Europe. Through its 80 members from 24 European countries, EuRIC represents more than 5,500 large companies and SMEs involved in the recycling and trade of various resource streams. They represent a contribution of 95 billion EUR to the EU economy and 300,000 green and local jobs. <https://euric.org>