



POSITION PAPER

Brussels, 10 September 2025

Simplification of administrative burdens in environmental legislation (Environmental Omnibus) *CECE response to Call for Evidence*

The Committee for European Construction Equipment (CECE) supports the European Commission's goal to reduce the administrative burdens associated with environmental legislation and welcomes the opportunity of contributing to the upcoming Environmental Omnibus.

In this context, we urge the Commission to ensure this initiative fulfils its objective of rationalizing, harmonizing, and reducing environmental reporting obligations by taking into consideration the construction equipment industry's key concerns and recommendations.

Eliminate the SCIP database under the Waste Framework Directive. It goes far beyond the information requirements of REACH Article 33 and has not proven effective. An existing dossier in the SCIP database does not equate to be compliant with REACH, creating confusion and duplication of reporting obligations. A better alternative is to rely on the existing REACH information requirements or allow integration of substance information into the Digital Product Passport (DPP) if the specific product requires one.

Facilitate smooth implementation of ESPR without placing excessive burdens on industry. It appears essential to:

- Align implementation timelines across related legislation, such as Packaging and Packaging Waste Regulation (PPWR) and REACH.
- Exclude packaging from ESPR scope to avoid overlap with PPWR.
- Acknowledge REACH as the key legislation to regulate chemicals and avoid duplication and overlap.
- Review the DPP process for ease of application, especially considering intermediate goods.
- Reduce unnecessary third-party conformity assessments.

Reconsider the current approach to the concept of 'Substance of Concern' (SoC).

Under the ESPR, the aim is to progressively cover all substances of concern. Such a broad approach risks imposing an unmanageable burden on companies doing business in Europe. This burden is not

justified from an environmental point of view, partly because substances of concern are not harmful to the environment 'by default'; rather, they can be essential to support some of the circularity goals, e.g., longevity, safety and even sustainability of a product. To know more on industry recommendations, please refer to the Joint Industry Letter on SoC supported by 36 co-signatories, including CECE.

Maintain F-Gas Regulation under its existing framework. We call on the Commission to keep fluorinated gases governed by the dedicated F-Gas Regulation. CECE suggests excluding F-gases from the broader PFAS restrictions proposal to avoid overlapping legislation and enable long-term investment planning.

Ensure a coherent approach to chemical legislation. CECE advocates for ensuring consistency between PFAS restrictions under REACH and other laws (e.g., ESPR, F-Gas, PPWR) with a view to avoiding double regulation. Instead of imposing an all-encompassing ban (with all the associated risks), we suggest adopting a targeted risk-based approach that focuses on controlling emissions of hazardous PFAS. This recognises the essential uses of certain PFAS in industrial processes where currently no viable alternatives exist is crucial.

Harmonise and simplify the application of Packaging and Packaging Waste Regulation (PPWR). We call for clear, unified rules across Member States. Industry should not be required to interpret 27 different sets of national requirements. We propose practical solutions like allowing documentation solely in English and reducing reporting frequency.

Streamline the implementation of the Battery Regulation. In preparation for the Environmental Omnibus, we call on the European Commission to:

- Eliminate battery-specific due diligence requirements and rely on the Corporate Sustainability Due Diligence Directive (CSDDD) that covers all other goods.
- Ease notified body requirements for battery-related components (self-assessment should be possible for certain categories).
- Address divergent Member State reporting categories that force producers to compile extensive, non-harmonised datasets to remain compliant across the EU.
- Come to clearer, simpler and less prescriptive labelling requirements under Article 13.
- Remove the 'date of manufacture' from the general information labelling requirements and allow this information to be exclusively presented on the battery itself, especially for portable batteries.
- Remove the batch number requirement for the batteries' Declaration of Conformity, at least for batteries that are manufactured in bulk, as this information carries no value and only increases the amount of look-a-like documents a manufacturer has to retain.

Ensure a harmonized application of Extended Producer Responsibilities stemming from Directives and Regulations across Member states. Harmonized rules foster swift, easy and aligned application of extended producer responsibilities. Having to deal with a variety of national nuances creates unnecessary burden and risks misalignment of compliance to ESG goals across the European Union.