VDA German Association of the Automotive Industry

Comment

# Simplification of administrative burdens in environmental legislation

## Feedback on the adopted act

11 May, 2026

# Foreword

The increasing density of reporting requirements and bureaucratic obligations has posed significant challenges for companies in the automotive industry and many other sectors for years. In particular, European environmental legislation, which aims at driving the sus-tainable transformation of the economy and society, has led to a noticeably growing ad-ministrative bur-den in recent years. Companies are required to collect, prepare and dis-close comprehensive data on environmental impacts, supply chains, and the circular economy. These regulations entail high costs, time investment, and administrative com-plexity.

In response to this situation, the European Commission proposed the so-called “environ-men-tal omnibus” entailing various proposals to reduce the administrative burden on com-panies and public authorities in the EU. In the context of the initial Call for evidence, the German auto-motive industry has identified and proposed comprehensive measures to significantly simplify and streamline administrative requirements related to the environment in the areas of waste, products, and industrial emissions. This initial feedback with its de-tailed proposals can be re-trieved under EU document number Ref. Ares(2025)7560931 - 10/09/2025.

The German automotive industry welcomes the European Commission’s effort and vari-ous of the proposed changes in the Commission adoption. Particularly, some of the IED proposals do contribute to reducing administrative burden, for instance with the environ-mental management system operating at company level rather than at plant level or the removal of the chemicals inventory. In other realms such as the PPWR or regarding sub-stances of concern, the current proposals fall short of achieving the intended simplifica-tion. In addition to the proposals in the above-mentioned initial feedback (Ref. Ares(2025)7560931 - 10/09/2025), the German auto-motive industry suggests further areas of simplification below.

# 1 Packaging and Packaging Waste Regulation (PPWR)

The PPWR should be simplified through a clear and consistent interpretation, so as to rule out national variations and new market bans, thereby safeguarding the integrity of the EU single market. Overall, we call for a streamlining of requirements and interpretative practices to reduce the administrative burden and enable a coherent, EU-wide application of the PPWR.

## Aftermarket / Service Parts

Spare parts / service parts are often on stock for a very long time (> 10 years) to be able to service older cars. The current average age of cars in the EU is over 12 years.
Under the current legal framework of the PPWR, the lack of a specific provision for legacy stock may in practice result in serviced spare parts being required to be re-packaged in order to meet documentation and conformity requirements, where the originally required information cannot be retrospectively provided.

**Proposal for simplification:** If a general exemption for pre PPWR packaging cannot be provided, a narrowly defined and safeguard based alternative could be considered. This approach would allow the continued use of legacy packaging for serviced spare parts where both the parts and their packaging can be demonstrated to form part of pre existing stock. Any such ap-proach would be strictly limited to cases that can be objectively and verifiably documented as produced, packaged and placed into inventory (under consideration of transportation time until arrival at the final warehouse) before the PPWR's date of application.

**Justification:** Linking any limited allowance to auditable stock documentation would effectively prevent misuse, such as placing newly produced parts into old packaging. At the same time, forc-ing the re packaging of genuine legacy stock would be clearly counterproductive, as it would generate additional packaging waste and resource use without any environmental benefit, thereby undermining the objective of waste prevention.
The in-depth proposals of the German automotive industry regarding the PPWR in the environment omnibus can be found in the initial feedback Ares (2025)7560931 – 10/09/2025.

# 2 Industrial Emissions

As mentioned in the beginning, the German automotive industry welcomes the changes proposed by the European Commission with regard to the IED. The fact that the envi-ronmental management system should operate at site or company level rather than at plant level is in line with operational practice and significantly reduces administrative bur-dens. Also, the removal of the chemicals inventory, risk assessment and substitution as-sessment which risked creating double regulation (with REACH, CAD and CMRD) signifi-cantly reduces the administrative burden. Still, further adjustments of the IED are neces-sary to achieve an effective an efficient IED implementation.

Moreover, a **stop the clock provision is urgently necessary** to postpone the deadline for the IED's national implementation until the efforts to streamline the directive within the environment omnibus are completed. This way, double efforts and thus unnecessary bureaucratic burdens can be avoided.

## 2.1 Industrial Emissions Directive and Environmental Impact Assessment Directive

The Environmental Impact Assessment Directive (Directive 2011/92/EU, EIA Directive) should be streamlined. Projects subject to environmental impact assessments and prelim-inary review requirements should be significantly reduced and thresholds raised. Changes to installations should only be subject to an EIA if they exceed certain materiality thresh-olds. The scope and depth of the assessment should be reduced (Article 5 and Annex IV). Furthermore, it should be stipulated, for example, that an environmental impact as-sessment is not required for permits under the EU Industrial Emissions Directive (IED). This would significantly simplify and speed up the procedures involved. Permits under the IED are cross-media permits, in which the impact on the protected assets of the EIA Di-rective is often already considered extensively. Furthermore, double regulation with other directives should be avoided. For instance, the same projects should not have to be as-sessed under both the SEA and EIA Directives.

## 2.2 Exemption of plants for the construction of vehicle engines

With regard to industrial emissions, a significant reduction in administrative burden could be achieved by exempting plants for the construction of vehicle engines from the approv-al requirement in the IED altogether. Although this is regulated in the IED's national legis-lative implementation (Appendix I of 4th Bundes-Immissions-schutzverordnung), this ex-emption would first require a corresponding amendment to the EIA Directive in advance.

The current provision in section 3.24: 'Plants for the construction of vehicle engines' is to be replaced by 'Plants for the construction of combustion engines for motor vehicles'. An identical amendment is to be made in Annex 1 of the EIA Act.
Section 3.24 was added to the 4th BImSchV in 2001 and is based on European legal requirements of the EIA Directive (1985 and subsequent directives). Until recently, motor vehicle engines were always combustion engines. The proportion of electric vehicles and thus the number of electric motors to be manufactured for vehicle propulsion continues to increase. The manufacturing processes for electric motors and combustion engines for motor vehicles differ fundamentally. The environmental relevance of the manufacture of electric motors is low. A subsumption under the general term 'facilities for the manu-facture of motor vehicle engines' that does not take this into account is therefore legally questionable and also raises the question of why the manufacture of electric motors for other applications is not subject to approval.

## 2.3 Reduction of microplastic pollution

### 2.3.1 Remove reporting obligations for downstream users

**Existing reporting obligations for restrictions, such as on micro-plastics, must be removed and future ones should be avoided:** The restriction of microplastics also includes an obligation for the industrial user of mix-tures containing microplastics to report to ECHA. Similar obligations also exist for manu-facturers and suppliers. The collection, processing and reporting of this data to the au-thorities across the entire supply chain causes a considerable amount of work, without it being clear for what purpose this data is collected at ECHA and what options for action and control result from it. **The same considerations also argue against the introduction of a reporting obligation in the Regulation on preventing plastic pellet losses to reduce microplastic pollution (Regulation (EU) 2025/2365).**

There are also considerations about reporting obligations in the planned restriction of PFAS. **The added value of such a reporting obligation is not recognizable since the sub-stances are to be banned anyway after a fixed transitional period.**

### 2.3.2 New Regulation on preventing plastic pellet losses to reduce micro-plastic pollution

EU legislators have agreed on a new regulation on preventing the loss of plastic pellets in the fall of 2025. While the automotive industry recognizes the environmental challenges that can be entailed by the use of microplastic, we would like to point out that double regulations must be avoided, particularly with regard to the pollutants already covered by the REACH Regulation as mentioned above. In light of the Commission’s current efforts to reduce administrative burdens and strengthen competitiveness of European companies, avoiding redundant legal provisions is of crucial importance.

Moreover, plastic pellet losses are currently not being specifically recorded as other indus-trial emissions are. In addition, the proposed regulation requires a new certification, as well as a risk management plan (Annex 1), which must be reviewed by the accredited certifier every three years and regularly presented to the authorities. Additional certifica-tions result in additional financial and organisational costs. Furthermore, large companies are required to meet annually in a “formal management meeting” to review additional points, including the risk assessment plan (Annex 1, paragraph 9a). These additional points are not defined in more detail, leaving uncertainty for companies with regard to future implementation. Furthermore, such regulation should not be applied at plant level, but rather at site level for better manageability. In addition to EMAS, ISO 14001 should also be recognised (see Article 6).

Another aspect raising concern refers to Article 4 (4), according to which the competent authorities shall publish a freely accessible register on a web-site containing the risk as-sessment plans and declarations of compliance notified in accordance with paragraphs 1 and 2 of this Article. With the exact form of the register still being unclear at this point, we would like to point out the critical risk of internal company data being published therein. The regulation needs to ensure proper data protection with regard to company data.

On a more general level, there is no precise definition of plastic pellets. According to REACH, microplastics are defined as particles measuring 5 mm or less, while the explana-tory memorandum to the proposed regulation states that it concerns microplastics without specifying a threshold, meaning that macroplastics measuring more than 5 mm may also be included.

Overall, the requirements currently stipulated by the regulation will make reporting very complex and costly for companies. Six months after the publication of the regulation, companies must already estimate the release quantities using standardised methods. As these methods do not yet exist, the six-month period does not seem feasible from an industry perspective.

# 3 Waste Management

## 3.1 Reduction of microplastic pollution

**Proposal for simplification/removing of inconsistency:** Removing the requirement from the Waste Framework Directive to transfer information to the SCIP database.

**Justification:** In our opinion, the SCIP data is neither used nor needed by producers, distributors, or consumers. The database also does not provide waste operators with the information needed to allow them to produce high quality recycled materials (see SCIP Evaluation Report, PwC and ECHA). Relevant information on recycling requirements for vehicles is shared in the automotive industry, for example, via the proven IDIS system. Only ECHA and national competent authorities use analyses from the database to derive initiatives for substance restrictions. However, due to the design of the database and the large number of different companies required to submit data, the timeliness and quality of the data is inaccurate and unreliable, and thus not appropriate for such purposes  An ad hoc investigation by ECHA to determine the impact of certain substances in products (call for evidence) is more effective, as it allows current and consolidated data to be used from the outset.

In parallel to SCIP, product manufacturers must also provide information on substances of very high concern in products within the supply chain in accordance with Article 33.1. This means that identical data has to be issued twice.

# 4 Conclusion

The German automotive industry welcomes the European Commission's effort for streamlining European environmental policies and various of the proposed changes in the Commission adoption. Still, further changes are required in order to ensure that the omni-bus package can actually live up to its potential. In addition to the proposals mentioned in this paper, the German automotive industry suggested extensive areas of simplification in its initial feedback to the environment omnibus (Ref. Ares(2025)7560931 - 10/09/2025). These include, among others, necessary changes to the Ecodesign for Sustainable Products Regulation, the discontinuation of the SCIP (substances of concern in products) database under the Waste Framework Directive as well as a targeted revision of the REACH regulation.

## Contact persons

**Andreas Rade**
Managing Director

andreas.rade@vda.de

**Michael Püschner**
Head of Division Environment & Sustainability

goetz.schneider@vda.de

**Philipp Meichsner**
Specialist

philipp.meichsner@vda.de

**Dr. Zozan, Evin**
Specialist

evin.zozan@vda.de

The German Association of the Automotive Industry (VDA) consolidates around 620 manufacturers and suppliers under one roof. The members develop and produce cars and trucks, software, trailers, superstructures, buses, parts and accessories as well as new mobility offers.

We represent the interests of the automotive industry and stand for modern, future-oriented multimodal mobil-ity on the way to climate neutrality. The VDA represents the interests of its members in politics, the media, and social groups. We work for electric mobility, climate-neutral drives, the implementation of climate targets, securing raw materials, digitization and networking as well as German engineering.

We are committed to a competitive business and innovation location. Our industry ensures prosperity in Germany: More than 730,000 people (2025) are directly em-ployed in the German automotive industry.

The VDA is the organizer of the largest international mobility platform IAA MOBILITY and of IAA TRANSPORTATION, the world‘s most important platform for the future of the commercial vehicle industry.

If you notice any errors, omissions or ambiguities in these recommendations, please contact VDA without delay so that these errors can be rectified.

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| Publisher | German Association of the Automotive Industry<br>Behrenstraße 35,10117 Berlin<br>www.vda.de/en |
| | German Bundestag Lobby Register No.: R001243 EU<br>Transparency Register No.: 9557 4664 768-90 |



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| Version | May 2026 |