



IVSH-Feedback: Commission proposal - Simplification of administrative burdens in environmental legislation

We welcome the Environmental Omnibus Package as an important step toward reducing unnecessary administrative burden, strengthening the Single Market and restoring proportionality across EU environmental and product legislation.

We strongly support:

- the abolition of the SCIP database (a high-cost/low-benefit duplication of REACH Art. 33), which will deliver immediate relief to manufacturers, recyclers and authorities.
- the suspension of mandatory EPR Authorised Representatives (ARs) until 2035 across waste/electrical equipment/single-use plastics, batteries and packaging—an essential move to restore Single Market coherence and remove costly, fragmented national AR regimes.
- the streamlining and modernisation of geospatial/data obligations (INSPIRE) to end prescriptive, outdated technical rules and align with open-data frameworks.
- the horizontal effort to speed up environmental assessments via a common procedural framework (while safeguarding standards).

At the same time, we urge the Commission to address four critical structural issues to ensure the Omnibus delivers its intended impact:

(1) Digital Product Passport (DPP) — A single, product-specific digital access point is essential and non-negotiable. One QR code must be sufficient to provide access to all legally required product information. The current compromise wording on “direct access” must be clarified to avoid interpretations requiring multiple QR codes, which would undermine digitalisation, increase costs and fragment the Single Market. Legal clarification requested – IVSH proposal: *“A single machine-readable identifier per product that links directly to a product-specific landing page shall be deemed to provide*



‘direct access’ to all legally required product information. Competent authorities and Member States shall not require additional machine-readable identifiers or separate codes for individual documents.” . We furthermore have to emphasize the need for a phased and sector-specific implementation model, beginning with a binding Minimal Viable DPP system, followed by a voluntary fully featured system only once governance, standards, and data protection mechanisms are mature. Trade secrets and sensitive information must be protected. The DPP must not require public disclosure of supply chains or proprietary manufacturing processes. Access to such information should be limited to authorities, through ensuring strong DRM mechanisms. The DPP must integrate with existing regulatory requirements (GPSR, EUDR, FCM, REACH, PPWR, CSRD) to avoid duplicate reporting obligations and enable the “once-only” principle. Sector-specific flexibility is essential. The cutlery and household goods industry comprises thousands of product variations; therefore, product grouping, batch-level approaches and sector-defined templates are necessary. Avoiding new duplication: PPWR/DoC must recognize existing regimes (REACH/FCM/CLP) and CSRD/ESRS must be concretely simplified (fewer datapoints, real materiality, SME-adapted templates)—or else the Omnibus risks shifting burdens rather than removing them.

(2) Trickle-down effects on SMEs and SMCs — Formal exemptions have limited value if large enterprises impose full compliance requirements on smaller suppliers. We therefore call for a legally binding value chain cut-off, a rebuttable presumption of compliance for intra-EU SME-supply chains, clear limitations of due-diligence obligations, and integration of proportionality principles into digital tools such as the DPP.

(3) CSRD / ESRS — We encourage the Commission to introduce further concrete simplifications, including a reduction of datapoints, clearer materiality rules and SME-adapted templates following an updates VSME standard.

(4) Avoiding new duplication: PPWR/DoC must recognize existing regimes (REACH/FCM/CLP) and CSRD/ESRS must be concretely simplified (fewer datapoints, real materiality, SME-adapted templates)—or else the Omnibus risks shifting burdens rather than removing them.



(5) Delete the Substances of Concern (SoCs) criteria from Ecodesign for Sustainable Products Regulation (ESPR) and all legal texts in which it is referenced, to reaffirm REACH as the central tool for regulating chemicals.

(6) Delete the provisions in the Environmental Omnibus regarding Extended Producer Responsibility (EPR) and instead address EPR rules under the upcoming Circular Economy Act (CEA) to ensure coherence and practicability.

IVSH remains ready to contribute technical input, sector templates and SME onboarding via our role as neutral industry intermediaries.

About IVSH

The Industrieverband Schneid- und Haushaltwaren e.V. (IVSH) represents companies in the cutting and household goods industry across Germany. This industry is responsible for thousands of jobs and billions in revenue in Germany. The sector produces high-quality everyday products that are appreciated and loved worldwide and contribute to social cohesion.