

Basis for Sweden's position ahead of EU negotiations – proposal for the Environmental Omnibus

The Implementation Council's contribution to the Swedish position is presented in full in section 7. The Council's proposals in summary are as follows:

- Work to ensure that the proposed reforms in the environmental omnibus are implemented and contribute to the overall simplification agenda.
- Promote EU harmonisation of regulations and definitions, particularly in the area of extended producer responsibility (EPR).
- Strive for greater coherence between adjacent regulations by supporting the removal of the SCIP database.
- Advocate for more efficient permit processes with regard to national conditions.
- Ensure that simplification efforts improve the conditions for smaller companies.

1. Task of the Implementation Council

The Implementation Council is tasked with assisting the Government in its efforts to strengthen the competitiveness of Swedish companies by avoiding implementation above the minimum level and counteracting unjustified regulatory burdens, as well as reducing administrative costs and other compliance costs in connection with the implementation of EU regulations in Swedish law. The Implementation Council's work must be based on a company perspective.

The Implementation Council is to submit documentation and recommendations to the Government, partly as a contribution to Swedish positions in negotiations and partly on how EU legal acts can be implemented in Swedish law in a way that is not more far-reaching from a business perspective than what the legal acts require.

The Implementation Council's work is based on problem descriptions that have been communicated to the Council, mainly from industry organisations and their member companies. During the work on the documentation, contacts are also made with others who are familiar with the respective subject area, such as government agencies. In the light of the information gathered and in the context of the overall objective of the act in question, the Council makes a weighted and independent assessment of how the business perspective can be effectively addressed in each case.

In preparing this opinion, the Council has used documentation received in contacts with the Confederation of Swedish Enterprise, the Federation of Swedish Farmers and the Technology Industries of Sweden. The opinion is limited in scope and aims to support the simplification proposals presented in the European Commission's environmental omnibus.

2. Relevant proposals for EU legal acts

The European Commission's proposal for the environmental omnibus¹ includes several pieces of legislation. The proposals include Directive 2008/98/EC of the European Parliament and of the Council on waste (the

¹ COM(2025) 980; for Directive 2008/98/EC, see proposal COM(2025) 983; for Regulation (EU) 2023/1542 see proposal COM(2025) 981; for Directive 2010/75/EU see proposal COM(2025) 986; for Directive (EU) 2024/1785, see proposal COM(2025) 986; for Regulation (EU) 2024/1244 see proposal COM(2025) 981; for Directive (EU) 2015/2193 see proposal COM(2025) 986; for Directive 2007/2/EC see proposal COM(2025) 985

Waste Directive), Regulation (EU) 2023/1542 on batteries and waste batteries (the Battery Regulation) and Directive 2010/75/EU on industrial emissions, as amended by Directive (EU) 2024/1785. It also includes Regulation (EU) 2024/1244 on the reporting of environmental data from industrial installations and the establishment of an industrial emissions portal, as well as Directive (EU) 2015/2193 on the limitation of emissions of certain pollutants to the air from medium-sized combustion plants. The Commission's environmental omnibus also includes Directive 2007/2/EC establishing an Infrastructure for Spatial Information in the European Community (INSPIRE). In addition to these legal acts, the environmental omnibus also includes a proposal² for a regulation on speeding up environmental assessments, with the aim of streamlining permitting processes and reducing costs for companies.

3. Objectives of the proposal according to the European Commission

European Commission's environmental omnibus aims to ensure that the European Union's environmental objectives are achieved in a smarter, more efficient and less costly way. The measures proposed in this omnibus are designed to facilitate the implementation of existing laws and achieve environmental objectives, while reducing unnecessary bureaucracy for businesses, including farmers and SMEs, and strengthening of the internal market.

4. Where in the process is the proposal?

The European Commission presented its environment omnibus on 10 December 2025, and it is being negotiated under the ordinary legislative procedure.

5. Responsible ministry

Ministry of Climate and Enterprise.

² COM (2025) 984

6. The proposal for an environmental omnibus from a business perspective

The following provides an overview of the simplification proposals in the package that the Council, based on discussions held with representatives of the business community, considers particularly important and on which the Government should seek to exert influence in the forthcoming negotiations. This assessment is also made in light of the Council's position on the upcoming Circular Economy Act (CEA).³

Extended Producer Responsibility (EPR)

The stakeholders with whom the Council has been in contact with welcome the proposed simplifications to the extended producer responsibility for batteries, packaging and packaging waste, e-waste, and plastic products. The proposal provides relief for businesses, not least through the removal of the requirement to appoint a separate EPR representative in each Member State. This measure will reduce administrative burdens and costs and facilitate cross-border operations. These changes may be of great importance for SMEs, as the current requirements for EPR reporting in each individual Member State and the obligation to identify and join national producer responsibility organisations constitute a significant barrier for small exporting businesses.

At the same time, further simplifications are needed to address fragmentation between national systems. As highlighted by the Implementation Council in its opinion on the CEA, companies currently face different criteria, definitions, data requirements, reporting formats and deadlines in each Member State, which complicates cross-border operations and makes the systems unnecessarily administratively burdensome.⁴ Common EU-level definitions of which products and materials are subject to producer responsibility, as well as more harmonised data points and reporting formats, would therefore further strengthen the conditions for companies. Without such measures, EPR systems risk continuing to be an obstacle to effective compliance, scaling up circular business models and the

³ See the Implementation Council's opinion on circular economy [260120Implementeringsradets-yttrande-CEA.pdf](#)

⁴ The Implementation Council's opinion on the Circular Economy Act, page 7, [260120Implementeringsradets-yttrande-CEA.pdf](#)

functioning of the internal market. This fragmentation is something that should be addressed in the context of the upcoming Circular Economy Act.

INSPIRE Directive

The proposed amendments to the INSPIRE Directive aim to modernise and simplify the Directive and to reduce the administrative burden and financial impact on Member States, which is welcomed by stakeholders with whom the Council has been in contact with. The proposal replaces complex harmonisation requirements with more flexible and standards-based approaches. Some technical requirements are also removed, and data access is brought together on a single EU data platform, while maintaining the necessary quality standards and coordination mechanisms. The goal is for the regulatory framework to be proportionate and continue to make it easier for authorities, companies and citizens to access and reuse geospatial data.

SCIP database

The removal of the SCIP database, which collects information on articles containing substances of very high concern, is welcomed by relevant stakeholders and seen as a step in the right direction in increasing coherence between adjacent regulatory frameworks. Experience since the introduction of the SCIP database has shown that it imposes significant reporting burdens and other administrative costs for companies, without delivering corresponding environmental benefits. The information required for SCIP reporting also overlaps to a large extent with existing obligations under chemicals legislation, in particular REACH, resulting in double reporting and inefficient information flows across often complex supply chains.

However, it is important that the SCIP database is not replaced by a temporary system during the phase-out period, as has been raised as a possible concern by stakeholders. Given that the SCIP database is currently used to a very limited extent, and that companies are already obliged to provide similar information under other regulations, there is no need for a temporary solution. Introducing such a system would only entail an increased administrative burden and additional double reporting. However, the future digital product passports, provided that they are designed in a proportionate and practicable manner, may in the long term be a welcome replacement of the SCIP database as they are expected to create better conditions for ensuring that the right information reaches the right actors at the right time. However, it is important that the digital product passports are introduced gradually and focus solely on the information that is truly

necessary. The implementation process must not be rushed, and it must be carried out in a controlled manner and in close consultation with the business community, ensuring that companies have time and capacity to manage the associated costs.

Streamlining and Accelerating Environmental Assessments

The environmental omnibus also includes a proposal aimed at speeding up and streamlining permitting processes for environmental assessments, with the ambition to create a higher degree of harmonisation between several legislative acts.⁵ The ambition to speed up and streamline the environmental assessment processes is necessary from a business perspective. In Sweden, however, there are challenges linked to the national implementation of the proposal, taking into account how the Swedish environmental assessment system is designed. This applies not least to the environmental omnibus's proposal to introduce fast tracks for certain strategic sectors.

In Sweden, permit processes generally take too long, and it is therefore important to now implement the reforms proposed in the Swedish Inquiry on Environmental Permitting (miljö tillståndsutredningen) and continue the development of the new environmental assessment authority, whose main purpose is to harmonise and continuously follow up the national assessment processes and provide support and guidance for applicants. However, the proposed fast-track mechanism entails priorities between different sectors, which risks creating distorted effects between sectors and in turn inefficiencies, not least in complex value chains. Priorities are also based on today's needs and, in the best case, also on forecasts of future needs, but the fact that these can change quickly has been shown not least by the changing geopolitical situation of recent times. In addition, there are risks associated with conferring on the Commission, as proposed in Article 14, the power to designate in implementing acts specific projects to be covered by the fast track. The implementation of the reform proposals in the environmental permit inquiry is in any case of great importance if Sweden is to achieve the purpose of the environmental omnibus.

The proposal for a fully digitalised application process and support via a one-stop shop is welcomed from a business perspective. However, it is crucial that the implementation takes place from a holistic perspective. It is a

⁵ See footnote 2

prerequisite that sufficient financial resources and relevant expertise are available.

In particular, it can be noted that the Commission's proposal for a Regulation on the acceleration of environmental assessments includes an article stating that Member States shall endeavour to waive administrative fees and costs related to environmental assessments for project developers that fall within the definition of small mid-cap companies under Recommendation (EU) 2025/1099, or within the definition of SMEs under Recommendation 361/2003/EC (Article 11).

Industrial Emissions Directive (IED) and Industrial Emissions Portal Regulation (IEP)

The European Commission has proposed simplifications of IED and IEP. The proposals consist of, among other things, simplification of the requirements for environmental management systems (EMS)⁶ within the IED and that organic poultry production should be exempted from the directive⁷, like the current exemption of organic pig production. Furthermore, simplifications are proposed to the IEP Regulation that means that operators in livestock production and aquaculture are exempted from reporting the use of water, energy and relevant raw materials. Member States are also given the possibility to exempt these activities from additional reporting requirements, such as off-site transfers of waste, off-site transfers of pollutants in wastewater, production volume and number of operating hours, provided that Member states can gather this information on the basis of other data sources

The proposal to remove the requirement for a chemical inventory in the EMS within the IED is particularly welcomed by companies, as there are already corresponding requirements in other legislation. At the same time, the direct impact on Swedish companies is limited, as most industrial sectors already have functioning EMS in place. Instead, the main benefit lies in reducing the risk of double regulation and in the possibility of applying a

⁶ Environmental Management Systems.

⁷ Provided that their production capacity does not exceed the values set out in Annex Ia to the Directive. The revised Industrial Emissions Directive has not yet been implemented in Sweden, it must be done by 1 July 2026, so the Swedish regulatory framework is still based on Directive 2010/75/EU and the limit values set out in Annex I.

common environmental management system at company level, rather than separate systems at installation level.

The proposal to exclude organic poultry production from the scope of the Industrial Emissions Directive aims to ensure a harmonised approach to the organic livestock sector, given that the sector is already subject to specific legislation. At present, it is difficult to determine what relief this proposal may mean for companies since the revised IED has not yet been implemented in Sweden. However, a comparison with today's IED requirements can show that the regulations are so complex that companies in practice need to hire consultants to meet the requirements of IED.

The proposal to exempt livestock and aquaculture operators from the reporting requirements under the IEP Regulation aims to reduce the administrative burden on businesses without having a negative impact on the environment. For the companies concerned that already have established routines for continuous production follow-up and efficient use of resources of water, energy and raw materials, this proposal can thus reduce the risk of double reporting. At present, however, it is difficult to estimate how large the administrative relief is expected to be, as the rules under the IEP Regulation have not yet entered into force.

7. The Implementation Council's basis for Sweden's position in upcoming EU negotiations

The Implementation Council proposes that the Government should work for the following during the upcoming EU negotiations:

Work to ensure that the proposed reforms in the environmental omnibus are implemented and contribute to the overall simplification agenda

The Implementation Council agrees with and welcomes the Commission's overall ambition to reduce regulatory burdens and increase the coherence of EU environmental legislation. The now proposed environmental omnibus is seen as a step in the right direction, but there remain significant structural obstacles that risk slowing down the climate transition and the development of circular business models. Against this background, the upcoming Circular Economy Act (CEA) will be crucial. In its opinion on CEA, the Implementation Council has emphasised the need for a comprehensive approach to how products, materials and resources are regulated throughout

the life cycle.⁸ The Implementation Council therefore recommends that the Government ensure that the proposed simplifications are implemented in the forthcoming EU negotiations on the environmental omnibus and use them as a starting point for driving the simplification agenda forward in future negotiations.

Promote EU harmonisation of regulations and definitions, in particular in the area of extended producer responsibility (EPR)

The Government should actively support the Commission's ambition to strengthen the harmonisation of regulations and definitions within the EU, especially within the extended producer responsibility (EPR) and the INSPIRE Directive. Abolishing the requirement for national EPR representatives is a necessary first step to reduce fragmentation between Member States and to ensure that EPR systems do not continue to hamper the functioning of the internal market. This is particularly important for small and medium-sized export companies, which are disproportionately affected by today's extensive reporting requirements. The Government should also work to ensure that these issues are addressed collectively in the forthcoming Circular Economy Act.

The proposed simplifications in the INSPIRE Directive are considered to contribute to reduced administrative burdens, increased usability and strengthened EU harmonisation. This will be achieved by making environmental data available through a common EU portal based on existing open data infrastructure, rather than through parallel systems. Combined with other EU initiatives on open data, the proposal has the potential to improve access to reliable geographical information for companies in areas such as environment, energy, urban planning and transport.

Strive for greater coherence between neighbouring regulatory frameworks, including by supporting the removal of the SCIP database

The government should support the removal of the SCIP database and ensure that there is no temporary replacement solution during the phase-out period. The Implementation Council strongly welcomes the removal of the

⁸ See the Implementation Council's opinion on the Circular Economy Act, [260120Implementeringsradets-yttrande-CEA.pdf](#)

SCIP database, as it would eliminate the current double-reporting requirement and allow the use of existing, well-established and functioning reporting channels instead.

The Implementation Council also believes that the Government should support the proposed simplifications in the IED and the IEP Regulation. This applies especially to the removal of the requirement for a chemical inventory in the EMS within the IED, as the measure is considered to reduce the risk of double regulation.

Advocate for more efficient permit processes with regard to national conditions

The Implementation Council believes that the Government should support the ambition to streamline and digitalise permit processes for environmental assessments. At the same time, the introduction of fast tracks should be adapted to Swedish conditions and preceded by necessary national reforms, in order to avoid distorted effects between different sectors.

The Government should also ensure that the Commission is not given too much leeway to identify strategic projects in implementing acts.

Ensure that simplification efforts improve the conditions for smaller companies

The simplification proposals in the Commission's environmental omnibus are not specifically targeted at smaller companies. However, the Commission considers that these companies stand to benefit the most, as they often lack the resources that larger companies possess to manage complex reporting obligations, such as reporting to the SCIP database or complying with the requirement for EPR representatives. The Council therefore considers it essential that these simplifications are implemented, and that the Government, in the negotiations, advocates for these and future legislative initiatives to deliver real simplification and improved conditions for all companies, particularly smaller ones.

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