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# Does the ‘simplification’ of environmental standards serve the EU’s competitiveness?

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**As France and Europe seek to regain competitiveness and re-establish themselves as industrial powers, the President of the European Commission, business organizations and various political parties are calling for the "simplification" of environmental regulations. What exactly does this mean? And how can simplification serve competitiveness in the context of the ecological transition?**

## Does simplifying mean better regulation?

Regulatory simplification has been at the heart of European political agendas for more than twenty years. Successive waves of reform have sought to ease regulatory constraints, reduce administrative burdens and limit the associated costs for business. This momentum has nonetheless accelerated in recent years, driven by growing calls to strengthen European competitiveness and lighten the regulatory framework (IDDRI, 2025). In this context, the European Commission, under the presidency of Ursula von der Leyen, launched a new series of simplification initiatives in 2025 — the "Omnibus" packages — designed to amend several pieces of EU legislation at once, particularly in the field of the environment.

12 "Omnibus" packages have been proposed to date. Grouped by theme, each touches on a number of legislative texts in order to amend certain provisions simultaneously or to postpone their application. According to the Commission, this could generate savings of around €17 billion a year.1 6 Omnibus packages have so far been the subject of an agreement between the European Parliament and the Council; the remainder are still under negotiation. Each package covers a wide range of sectors, from corporate and investment sustainability to agriculture, defence, chemicals, digital, the environment and transport, alongside further ancillary simplification initiatives.

What raises questions about these new methods is the way they circumvent the principles of the Better Regulation agenda (IDDRI, 2026). The process is fed by "implementation dialogues"; each Commissioner is required to organize at least two a year, bringing together sectoral stakeholders selected according to the themes placed on the agenda.2 These dialogues are held in a restricted format, with some 20 participants, among whom civil society actors are few in number compared with the larger contingent of company representatives and their trade federations. Such a format does not always reflect the diversity of the interests at stake, nor the difficulties encountered in implementing legislation at national level. National authorities appear to be only marginally represented, even though they hold considerable expertise on the practical conditions under which EU law is applied.3 The issue at stake is therefore less the legitimacy of the dialogue than the diversity of the stakeholders consulted, the transparency of the process, and the capacity of these exchanges genuinely to inform the trade-offs made by the Commission.

## What effects on the environment and on health?

These Omnibus packages reopen several areas of EU environmental legislation, with potential consequences for environmental protection and health. A few examples give a sense of what is at stake.

Omnibus VI concerns **chemicals**, **cosmetics** and **fertilizers**. The agreement reached between the Parliament and the Council in June 2026 does not merely remove certain formalities: it also changes the timetable for applying the rules. In particular, it postpones until 1 January, 2030 the entry into force of several provisions of the CLP Regulation, which governs the classification, labelling and packaging of chemical substances.4 The text also provides for transitional periods for certain cosmetic products and eases a number of labelling and information obligations. These measures are intended to reduce the costs and the adjustment time borne by business, but they also defer the application of certain regulatory requirements.

Omnibus VIII, known as the "Environment" package, covers **industrial emissions**, **the circular economy** and **environmental assessment procedures**, among other areas, and could relax certain impact assessment and reporting obligations. It provides in particular for permitting procedures to be speeded up by reducing the time devoted to analyzing the environmental impacts of industrial projects, to examining alternatives and to public consultation. It also proposes to scale back certain annual reporting obligations: livestock and aquaculture operators are to be "exempted from reporting on water, energy and materials use" under the industrial emissions reporting legislation.5

Omnibus X paves the way for a lighter framework for **pesticides** and for extending the use of certain **biocidal substances**, used notably as disinfectants, pest control products or wood preservatives. It provides in particular for a review of the conditions governing the aerial spraying of pesticides, and for the protection of scientific data relating to certain biocidal substances to be extended until 2030, owing to delays in their assessment at European level. This measure pushes back the point at which certain potentially harmful substances can be subjected to a full assessment.6

So, while the exercise is presented as one of administrative simplification, several initiatives go beyond a simple reduction of formalities, through:

- the scaling back of certain declaration and reporting obligations;
- the easing or acceleration of certain assessment procedures, particularly as regards environmental assessment, the consideration of scientific evidence and public participation;
- changes to authorization timelines or to the conditions of use of certain substances.

In parallel, the **Birds and Habitats Directives** are being subjected to a stress test which, in this context of simplification, aims to assess their effectiveness and relevance while identifying scope for "reducing costs and administrative burdens". It covers 3 strands: the application of Article 6 of the Habitats Directive, in particular appropriate assessments of projects liable to affect Natura 2000 sites; policy coherence, governance and financing; and lastly, derogations from the species protection regime. While the stress test does not in itself constitute a revision of the directives concerned, its findings could nonetheless feed into future changes to their legal framework.7

Certain provisions on **species protection** have already taken this turn: in December 2023, the level of protection afforded to the wolf was lowered under the Bern Convention at the initiative of the European Union, opening the way to a targeted amendment of the annexes to the Habitats Directive. To this must be added the Water Framework Directive (WFD), which is the subject of a targeted revision announced by the Commission under the RESourceEU plan,8 with a view to identifying and removing certain regulatory "bottlenecks" liable to hinder access to critical raw materials and the development of mining activities.

## The deregulation risks associated with simplification

These examples raise a more fundamental question: is it really possible to simplify without undermining environmental protection? A degree of consensus can emerge around the principle of simplifying European

rules, particularly where the aim is to remove procedural obstacles. But once simplification leads to a reduction in obligations or in the level of protection, it ceases to be merely an exercise in streamlining rules and comes closer to deregulation. This distinction is decisive if the real effects of these reforms are to be identified, and it points to a broader issue of transparency and democratic debate at the European level: making clearer the trade-offs between reducing burdens, ensuring regulatory effectiveness and maintaining the level of environmental protection.

A further issue, less often raised in debates on simplification, concerns the risk that it may translate into a weakening of certain procedural safeguards and, more broadly, of fundamental rights. The provisions envisaged under Omnibus VIII, which could restrict the scope for citizens and associations to challenge certain environmental assessments, raise questions in this respect. Such mechanisms play an important role in access to the courts for contesting administrative decisions relating to projects or infrastructure, and restricting them could weaken access to environmental justice, a right enshrined in the Aarhus Convention.

The European Commission has embarked on this course with precise objectives: to cut administrative burdens on business by at least 25%, and by 35% for SMEs. It estimates that these targets could generate close to **€37.5 billion in savings** between 2024 and 2029.9 But can such savings deliver competitiveness gains? It is well documented that regulatory constraints can, in certain cases, act as a lever for competitiveness rather than a brake,10 by stimulating innovation and productivity. Moreover, the effective implementation of EU environmental legislation could save at least **€180 billion** a year, notably through reduced health costs and environmental damage.11

Conversely, simplification has a cost of its own. The Omnibus process modifies an already dense legal framework whose provisions must be absorbed by businesses. Every regulatory change, even one intended to simplify, can generate new costs: understanding the rules, adapting internal processes, revising Corporate Social Responsability approaches, or knock-on effects along value chains. And for those sectors that would benefit from new exemptions, short-term cost reductions could be accompanied by a transfer of part of the costs and risks to other actors. The reopening of the WFD in December 2025,12 particularly in the context of discussions on access to critical raw materials and mining activities, illustrates this point: relaxing requirements could facilitate certain industrial projects, but it could also increase the risk of water pollution by certain metals and, with it, the need for monitoring, treatment and restoration of aquatic environments. These costs would then fall more heavily on local authorities and on society at large.

These changes can also produce a reverse "first-mover" effect. Companies that anticipated regulatory developments and have already invested in order to comply could see part of those investments lose their value if the rules are subsequently postponed or watered down. As demonstrated by the debate and the repeated stop-and-go around the EU Deforestation Regulation (EUDR): companies such as Ferrero and Nestlé have called for its integrity to be preserved, not least in view of the investments already made to prepare for its implementation.

Over the longer term, weakening environmental requirements could also increase the European Union's vulnerability to ecosystem degradation. Yet the availability of water (both drinking and non-drinking), the resilience of agricultural systems and the capacity to recycle and secure critical raw materials all contribute

directly to its strategic autonomy. By easing certain constraints today in the name of competitiveness, the Union could tomorrow increase its exposure to environmental risks and to the very dependencies it is seeking to reduce.

## Is revising environmental standards the only option?

That said, the accumulation of European legislation — often developed sector by sector and without always anticipating how the various texts interact — does represent a genuine challenge. This layering can create overlaps, or even contradictions, between texts, while increasing the costs and complexity of implementation. The difficulty, then, is not necessarily to reduce obligations, but above all to coordinate public policies more effectively so as to build a regulatory framework that is more coherent, more intelligible and more predictable. This is precisely what is at stake in the Better Regulation agenda that governs the making of European law, and on which the European Commission's most recent communication leaves several questions unanswered (IDDRI, 2026).

Moreover, the difficulties encountered by business do not always originate in Brussels. They also stem from the way European rules are transposed and implemented at national level. The weight of regulation can thus vary according to administrative practice, enforcement arrangements or the legal culture of individual Member States. In France, these factors can add to the regulatory burden over and above European requirements. The length of environmental procedures offers a concrete illustration. According to the "Guillot" report of January 2022, an environmental permit takes an average of 17 months in France, compared with 4 to 12 months in Germany and 4 to 6 months in Poland, whereas the theoretical French time limit is 9 months.13 Such discrepancies can create differences in costs and timelines between European companies that are nonetheless subject to the same regulatory framework, as well as competition between Member States for international investors.14

The debates surrounding the WFD likewise attest to these divergent approaches. Several Member States, including France, Spain, Denmark, Italy and Hungary, consider that the current framework — in particular the principle of non-deterioration of water bodies — offers sufficient flexibility to accommodate mining and industrial projects. The example of Imerys' lithium mine project in the Allier department (France), authorized in 2025, shows that before amending environmental requirements, there is also room for improvement in how they are applied: streamlining procedures, shortening processing times and improving coordination between the authorities concerned (prefects, the State's devolved services, water agencies, local and regional authorities, environmental observatories and environmental authorities) can help speed projects up without necessarily lowering the level of protection.

## Conclusion

Environmental regulation can generate adjustment costs, but the level of ambition it sets explains only part of the difficulties faced by business. Administrative delays, the fragmentation of procedures, differences in implementation between Member States and the lack of visibility over forthcoming rules also weigh on their capacity to invest.

The priority might therefore be to make the rules more intelligible, coherent and predictable, rather than to turn their environmental ambition into the main adjustment variable. The European institutions have set themselves the goal of concluding all simplification work by the end of 2027.15 The compromises to come will show how

far this simplification will go. The question of whether it does in fact make the rules easier to apply, and produces real reductions in the administrative burden on businesses within the EU, nonetheless remains entirely open, and will remain so as long as no lessons-learned exercise — if not a proper evaluation — is carried out. What is true of simplification efforts is equally true of Better Regulation: as long as measures follow one another without any lessons being drawn from them, it is not only difficult to steer policy, but also to build a convincing narrative about the European Commission's progress in these areas. This also calls for a transparent assessment of the effects of the Omnibus packages on European competitiveness.

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2026 State of the Union Address by President von der Leyen, 16 September 2026.

2

For example, on 18 February, 2026, Jessika Roswall, European Commissioner for Environment, Water Resilience and a Competitive Circular Economy, together with Christophe Hansen, Commissioner for Agriculture and Food, brought together representatives of the farming and water sectors and members of civil society to work on several key pieces of EU environmental legislation, including the Water Framework Directive, the Nitrates Directive and the Birds and Habitats Directives.

3

European Ombudsman, recommendation of 25 November, 2025, case OI/4/2025/MIK, concerning the "reality check" carried out by the Commission as part of the Omnibus package.

4

https://environment.ec.europa.eu/topics/chemicals/classification-labelling-and-packaging-chemicals_en

5

European Commission (2025). *Simplifying for sustainable competitiveness*, COM(2025) 980 final, 10 December, 2025, pp. 2 and 8.

6

European Parliament and Council of the European Union (2026). Regulation amending Regulation (EU) No 528/2012 as regards the extension of certain periods of data protection, PE-CONS 20/26, 29 April, 2026. Official document – Council of the EU.

7

European Commission (2026). "Stress test of Birds and Habitats Directives", Green Forum.

8

RESourceEU, presented by the Commission in December 2025, seeks to reduce the EU's dependencies on critical raw materials by accelerating their extraction, processing and recycling in Europe, while diversifying supply.

9

European Commission (2026). "Simplification, implementation and enforcement".

10

Porter, Michael E., and Claas van der Linde (1995). "Toward a New Conception of the Environment-Competitiveness Relationship", *The Journal of Economic Perspectives*, vol. 9, no. 4, pp. 97–118. JSTOR, http://www.jstor.org/stable/2138392. Accessed 11 September, 2026.

11

European Commission (July 2025).

12

European Commission (March 2026).

13

Sénat (2023). *Projet de loi relatif à l'industrie verte* (Green Industry Bill), French Senate.

14

Institut Montaigne (2026). *Normes européennes : soigner le mal français* (European rules: curing the French ailment), Note d'action, June 2026.

15

"EU regulatory simplification", Council of the European Union, 2026.