EURATEX

THE EUROPEAN APPAREL AND TEXTILE CONFEDERATION

EURATEX Feedback on COM Proposal on the Simplification of administrative burdens in environmental legislation

Final Version

May 2026

EURATEX, the European Apparel and Textile Confederation, welcomes the European Commission's initiative to simplify administrative burdens in environmental legislation and supports efforts to ensure that sustainability objectives are implemented through a coherent, efficient and workable regulatory framework.

The European textile and apparel sector is strongly committed to the transition towards a circular and sustainable economy. However, companies increasingly face overlapping regulatory obligations, fragmented national implementation and duplicative reporting requirements, which risk diverting resources away from investments in sustainability, innovation and circular business models.

EURATEX therefore supports the Commission's efforts to reduce unnecessary administrative burdens while maintaining environmental objectives, ensuring effective enforcement, and safeguarding a level playing field across the EU Single Market.

Simplification of Extended Producer Responsibility systems

Extended Producer Responsibility (EPR) schemes are a key instrument for achieving circular economy objectives. However, companies currently face a highly fragmented landscape of national EPR systems across the EU.

Producers operating across borders must comply with multiple registration and reporting systems, different data formats and varying administrative procedures in each Member State. This creates significant complexity and administrative costs, particularly for small and medium-sized enterprises.

EURATEX therefore supports further efforts to simplify, harmonize and digitalize EPR systems at EU level. This should include the development of coordinated EU-wide registration and reporting frameworks facilitating cross-border operations within the Single Market.

Such systems should aim to simplify administrative processes by providing a single interface, harmonised data formats and streamlined reporting, while allowing Member States to maintain differentiated eco-contribution structures reflecting national cost conditions.

At the same time, simplification efforts must ensure that compliance systems remain enforceable in a cross-border environment. The development of EU-level tools, such as a digital one-stop shop (OSS), should therefore be accompanied by effective mechanisms ensuring traceability, accountability and enforcement across Member States.

Rue Belliard 40 – Box 2 | B-1040 Brussels | +32 2 285 4881 | www.euratex.eu

Authorized representatives and enforcement

The Commission proposal to simplify authorised representative (AR) requirements aims to reduce administrative burdens linked to cross-border operations.

For EU-based producers, the appointment of an authorised representative primarily fulfils an administrative function, acting as a point of contact with national authorities and Producer Responsibility Organisations (PROs). In this context, a single point of contact at company level could in principle be sufficient, provided that effective enforcement and control are maintained.

The development of a digital One-Stop Shop (OSS) offers opportunities to streamline registration and reporting processes, by providing a single interface through which companies can fulfil administrative obligations and authorities can access relevant information. Such tools could contribute to improved coordination and efficiency across Member States, while reducing administrative burden.

At the same time, it is important to recognise that enforcement remains largely national. While simplification measures can improve efficiency, they should not lead to a weakening of enforceability, particularly in a cross-border context.

This is especially relevant for:

- Non-EU sellers placing products on the EU market
- Distance sellers and online platforms operating across multiple Member States

In these cases, the presence of a legally responsible entity within the EU remains essential to ensure traceability, accountability and effective enforcement.

EURATEX therefore considers that:

- For **non-EU producers**, the appointment of an authorised representative established within the EU should remain mandatory
- For **EU-based producers**, simplification of AR requirements may be considered, including through OSS-type solutions, provided that enforcement and control remain ensured
- The development of digital tools should support administrative simplification and coordination, while complementing existing enforcement mechanisms
- Any evolution of AR requirements should follow a **sequenced approach**, ensuring that effective enforcement mechanisms are maintained

Ensuring a level playing field and addressing the issue of free riders must remain a priority.

Streamlining reporting and data obligations

Companies are increasingly required to report similar information under several regulatory frameworks, including waste legislation, chemicals legislation and emerging product information systems.

Simplification efforts should therefore focus on:

- Eliminating duplicative reporting requirements
- Ensuring consistent EU-wide definitions and objectives
- Improving interoperability between regulatory data systems
- Enabling companies to report data once and reuse it across multiple frameworks

At the same time, interoperability between systems such as EPR reporting and the Digital Product Passport should remain proportionate and avoid creating additional administrative burdens.

Additional simplification opportunities

From a textile sector perspective, certain environmental reporting obligations illustrate how administrative burden can be reduced without weakening environmental protection.

Microplastics reporting (REACH Annex XVII, Entry 78)

Textile finishing and processing companies act as downstream users of textile auxiliaries and formulations whose composition is determined upstream by the chemical industry.

The reporting obligations introduced under REACH Regulation (EC) No 1907/2006, Annex XVII, Entry 78 (paragraph 11), require industrial downstream users to submit annual reports on estimated emissions of synthetic polymer microparticles to ECHA. In practice, the relevant information is already generated and controlled by the producer and the first downstream user placing the mixtures on the market.

For textile operators further downstream, this results in duplicative reporting along the value chain without generating additional environmental insight, as these actors do not modify formulations or possess additional data.

From an Environmental Omnibus perspective, this represents a clear case where administrative burden can be reduced without compromising environmental objectives. Concentrating reporting obligations on the producer and the first downstream user placing mixtures on the market would significantly reduce compliance costs across the value chain while maintaining transparency for authorities.

Support for existing simplification measures

The textile sector welcomes the planned discontinuation of the SCIP database, as this represents an important step towards reducing duplicative environmental information obligations where substance data is already generated under other frameworks.

The sector also supports the proposed simplification and increased flexibility of environmental management system requirements under the Industrial Emissions Directive (IED).

The deadline for the first certification of environmental management systems should, as proposed, be postponed to 2030. This extension is essential to allow textile installations sufficient time to implement ISO 14001 and other requirements under challenging operational conditions.

Looking ahead

EURATEX notes the Commission's intention to pursue further work on the simplification and harmonization of circular economy legislation, including under the upcoming Circular Economy Act.

The European textile and apparel industry stands ready to engage constructively with the European Commission and co-legislators to ensure that future initiatives support circularity objectives, effective enforcement, and the competitiveness of European industry.

EURATEX remains committed to working with policymakers to develop practical, coherent and enforceable regulatory frameworks that support the transition to a circular and sustainable European economy. -