



Government Offices of Sweden

Simplification proposals

**A list of simplification proposals for EU legislation from
the Swedish government**

July 2025

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1.1 Directorate-General for Budget

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification Proposal
<p>Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (recast). Article 127</p>	<p>According to article 127 of the Financial Regulation, where an audit of the use of EU funds has been conducted by an independent auditor based on accepted standards, this audit should form the basis of the overall assurance. This will avoid reduce overlapping and unnecessary work, reduce the overall costs of auditing and reduce the administrative burden of those subject to the audit. However, during the development and implementation of the Recovery and Resilience Plans, the administrative burden associated with evaluations was unnecessary large.</p>	<p>Assess whether the provisions of cross-reliance on audits need to be updated in order to avoid duplication of efforts, without imposing laxer auditing standards. Consider whether the Commission to a larger extent should rely on audit authorities of Member States</p>

1.2 Directorate-General for Climate Action and Directorate-General for Environment

General Simplification Proposals		
Legislation	Issue	Simplification Proposal
CO2 labelling and Life Cycle Assessment	<p>As highlighted in 9.2.5 of the government's climate policy action plan, consumer choice is crucial for which vehicles are brought to the market. Consumers need to be provided with the best possible information about the vehicle's environmental and energy properties when purchasing in order to make informed choices. However, there is not enough evidence for life cycle labelling at a national level. A solution is therefore needed at EU level and legislative proposals are expected to come.</p>	<p>Revise CO2 labelling to ensure clear consumer information on vehicle emissions and energy use. Base labelling on a harmonized Life Cycle Assessment to standardize and simplify incentives across the EU.</p>

1.3 Directorate-General for Communications Networks, Content and Technology

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification Proposal
NIS2 Directive: new rules on cybersecurity of network and information systems, (Directive (EU) 2022/2555)	The Directive puts considerable obligations and an administrative burden on European firms.	The directive should better reflect the commissions ambition to simplify legislation to boost European competitiveness.

1.4 Directorate-General for Competition

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification Proposal
Regulation (EU) No 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty	The EU state aid framework contains different terms that seemingly refer to the same concept. The framework also contains sentences that are long and therefore difficult to interpret. This causes unnecessary confusion and requires additional resources by the authorities using the framework.	Assess the contents of the state aid framework, especially GBER, in order to standardize terminology as well as shortening and clarifying sentences.

1.5 Directorate-General for Economic and Financial Affairs

General Simplification Proposals		
Legislation	Issue	Simplification Proposal
N/A	There are no EU-wide rules on how to keep accounting records. It is therefore possible for Member States to have rules in place that prevent accounting records from being digitally preserved. The obligation to keep accounting records in original entails administrative burdens and costs for businesses.	In an effort to simplify and reduce administrative burdens and costs for undertakings operating cross border, the EU could adopt rules requiring Member States to allow undertakings to store accounting information digitally.
N/A	Member States' Recovery and Resilience Plans are regulated by the Council's implementing decisions, financing agreements and operational agreements. During the work with the Plans, the Commission has presented additional guidelines and definitions at late stages of the process. The Commission has also asked for input that goes beyond the scope of prior agreements. This has caused unnecessary administrative costs at Member State level.	In the event of similar processes in the future, EU legislation and other provisions should safeguard a transparent and predictable process in which unnecessary administrative costs are avoided, without lowering the protection of the Union budget.

1.6 Directorate-General for Employment, Social Affairs and Inclusion

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification Proposal
<p>Proposal for a Directive of the European Parliament and of the Council on improving and enforcing working conditions of trainees and combating regular employment relationships disguised as traineeships ('Traineeships Directive')</p> <p>COM/2024/132 final</p>	<p>The proposed Directive could put considerable reporting obligations/ administrative burdens on employers, which run the risk of discouraging employers, especially SMEs, from providing traineeship opportunities. Limited added value as the proposal can only target trainees that are already workers. The proposal would add to an increase fragmentation to the EU labour law.</p>	<p>SE could support the PCY proposal for GA. A Directive's scope must be limited to open market traineeships and there must be ample room for different national contexts including room for social partners to find suitable solutions via collective bargaining. SE would not oppose if the COM as an alternative choose to withdraw the proposal for a Directive and instead focus on the update of the recommendation</p>
<p>Revision of Regulation No 883/2004 and Regulation No 987/2009 on coordination of social security systems</p>	<p>The revision has been under negotiations for over eight years due to challenges in finding a compromise solution acceptable to both the Council and the European Parliament. Current provisions are in many ways outdated and do not respond to the social and economic realities in the Member States.</p>	<p>There is a pressing need for modernised rules on social security coordination in place, both for employees, businesses and administrations. Effective social security coordination is crucial for the functioning of the internal market and the EU's competitiveness. SE therefore wishes to see an agreement on the revision as soon as possible.</p>
General Simplification Proposals		
<p>Forthcoming initiative on the</p>	<p>Fear for unnecessary regulatory and administrative burdens in an</p>	<p>It is important that the COM proceeds step by step and</p>

<p>right to disconnect and tele work</p>	<p>already complex legal landscape related to working time and health and safety. A legally binding initiative, a Directive, may also affect the social partners' room for manoeuvre to agree through collective agreements.</p>	<p>carefully analyses the needs to avoid overlaps with existing regulations and considers the benefits of non-binding alternatives. Any initiative in this area should be flexible and without detailed regulation and ample room for social partners to find solutions via collective agreements.</p>
<p>Forthcoming Action Plan on the European Pillar of Social Rights</p>	<p>In the employment and social policy area a minimalistic approach should be applied as regards new initiatives. Initiatives should contribute to competitiveness and have clear added value. This should be applied in the forthcoming Action Plan on the European Pillar of Social Rights. Not only directives but also soft law instruments often carry administrative burden in monitoring with only limited added value. Such examples are the Council recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality and Council recommendation of 27 November 2023 on developing social economy framework conditions.</p>	<p>Apply a minimalistic approach to new initiatives in the employment and social policy area and thoroughly analyse its added value – in particular in view of the forthcoming Action Plan on the European Pillar of Social Rights.</p>

1.7 Directorate-General for Energy

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification Proposal
<p>Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652</p>	<p>Energy legislation has a direct impact on competitiveness, energy price and public and industrial acceptance for ambitious climate policies. Moving towards 2040 targets makes it necessary to adopt a new approach in legislation to enable reasonable energy prices, boost competitiveness and maintain public acceptance.</p> <p>In addition to the binding target 42,5% renewable energy by 2030 the renewable energy directive also includes 12 numeric sub-targets specifying how, where and with what the headline target must be achieved. The directive also includes various detailed specifications requiring considerable administrative efforts to verify compliance.</p> <p>The very detailed legislation makes renewable energy more expensive, hampers innovation, increases administrative burden and counteracts competitiveness.</p> <p>Furthermore, the detailed requirements adds little value to what is achieved anyway if the EU achieves its binding headline target more cost-efficient.</p> <p>Restricting a reform to only amendments of industries'</p>	<p>The directive should facilitate for MS to meet the binding headline target. The importance of such reform increases as the energy transition progress and low-hanging fruits have been picked. Placing more focus on the binding headline target while drastically reducing the number of sub-targets and detailed regulations would lower the cost for renewable energy, drive innovation and support competitiveness as industries, regions and MS develop and compete with their most cost-efficient alternatives to fossil fuels.</p> <p>Ensuring that the headline target is met is critical. The binding headline EU-target (art. 3.1) could possibly be made binding at MS level – if: 1) sub-targets and detailed requirements on transport, industry, heating and cooling and joint and innovative projects would be drastically reduced, and. 2) Binding targets at MS level is based on an increasing convergence among MS national targets the closer we get to 2050 (i.e. all MS should have substituted all fossil fuels by 2050).</p> <p>To include a component of technology neutrality the binding headline target for 2040</p>

	<p>reporting requirements would be purely cosmetic changes without any impact on competitiveness, energy price or public acceptance</p>	<p>could be divided in two binding components; one target for renewable energy (with a floor and ceiling), complemented with one higher target that can be met with any fossil free energy (including nuclear). That higher target should correspond to the trajectory for each MS to phase out all fossil fuels by 2050.</p> <p>One possible compromise could be to let MS choose between a) staying under a common headline target at EU level and comply with all sub-targets and detailed requirements, or b) not have to comply with all sub-targets and detailed requirements but follow a national trajectory towards a fossil free national energy system by 2050.</p>
<p>Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) Article 4</p>	<p>During the last revision of the EED-directive the final energy consumption-part of the overarching EU-energy efficiency target become binding. The member states contribute to the overarching target by fulfilling non-binding national contribution by lowering their final energy use from 2020 to 2030. However, the calculation method that is used to divide the national contributions between the member states, doesn't take the ongoing electrification into account. The reference scenario uses data from the former NECP:s from 2019 (with an inclusion of data from 2020) where some countries already have included an decrease in</p>	<p>The Commission needs to review the method so that it better matches reality. The countries that have already included a reduction in final energy use by 2030 should be able to take credit for it instead of a further reduction being imposed. Alternatively, countries that electrify and thus contribute to the EU's reduced climate emissions should receive an advantage in the distribution of national contributions.</p>

	<p>their scenario of the final energy use till 2030, while some countries have stated an increase of their final energy use in their scenario till 2030. This leads to that the member states which have stated an increase of final energy use in their NECP:s they will have to contribute less to the overarching EU-target than countries that have already stated an decrease. Also, since the reference scenario leans on data from the previous NECP from 2019 (with an inclusion of data from 2020) the calculation method doesn't consider updated data from member states, which for Sweden means that the ongoing electrification is not included. The national contribution is therefore contrary to the ongoing electrification which is highly needed in order to contribute to the EU's decarbonisation.</p>	
<p>Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) Article 8</p>	<p>The requirements for a certain percentage of energy savings measures to relate to energy poverty creates unnecessary complexity in the design of policy instruments, and an unnecessary administrative burden, where energy companies' risk having to handle very extensive customer-related information. There is furthermore a risk that the measure will lead to increased investment costs for the "energy poor" and great difficulties in getting an accurate design of policy instruments.</p>	<p>Abolish the requirements for a certain percentage of energy savings measures to relate to energy poverty. Energy efficiency instruments with a general design have better conditions for achieving set overall energy saving goals. In Sweden energy poverty is furthermore principally handled by measures targeting poverty more generally through the welfare state.</p>

<p>Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) Article 8</p>	<p>The energy savings requirements do not take in to account the energy efficiency of using heat that would otherwise have gone to waste. Waste heat has a primary energy factor of 0 and should not be counted as energy to be saved.</p>	<p>Capturing waste heat and using it for heating purposes should not be counted as "using energy" in the context of fulfilling the energy savings target. Hence, all waste heat used in for example district heating should be deducted from the energy savings gap.</p>
<p>Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) Article 8</p>	<p>The energy savings requirements do not take in to account the energy mix or the electrification ambitions of different MS. Increasing electrification and investments in renewable and fossil free electricity production while simultaneously imposing energy savings measures risks leading to suboptimal and socioeconomically expensive outcomes.</p>	<p>Apply a discount when it comes to energy savings requirements depending on the electricity mix and rate of electrification of individual MS. The emphasis should be on targeting fossil electricity production and usage.</p>
<p>Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) Article 6</p>	<p>Setting special requirements for public buildings as a model and requirements of 3% energy renovation/year is redundant in relation to the parallel implementation of EPBD, which sets general renovation requirements for public buildings as well. Public building owners are subjected to parallel renovation requirements that are not coordinated. Indirectly, this type of goal also risks leading to too narrow a system perspective where energy efficiency from an energy system perspective is lost.</p>	<p>Abolish the setting of special requirements for public buildings as a model and requirements of 3% energy renovation/year</p>

<p>Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast)</p>	<p>The overall challenge with the EPBD is that it is overly detailed and has a high impact on the daily lives of citizens. Many of the measures are relevant in the context of a fossil-based energy system, and when there is a need to reduce the dependency on fossil fuel imports. However, as the energy system step-by-step becomes more decarbonized, this link is less clear. Therefore, the cost-benefit balance of EPBD is more unclear than with many other legal acts.</p>	<p>The most appropriate solution would be to introduce a pause for new revisions of the EPBD of at least 10 years, to allow for countries to meet the obligations of the current revision and to allow the effects to play out. The Commission should be able to conduct review and analysis (in accordance with Article 28) but should not propose that new revisions of the directive come into force within this timeframe. The current revision has detailed targets extending to 2030, 2033 and 2035, as well as longer-term targets to 2040, 2045 and 2050. It is important to be able to evaluate the requirements and the achievement of the targets before starting to discuss new requirements. The Directive also establishes a framework of National Building Renovation Plans (NBRPs), including how these should be renewed, spanning the entire period until 2050, when the entire building stock should meet the criteria for ZEB. This provides good governance for this sector for a long time to come.</p>
<p>Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast) Article 10</p>	<p>Article 10, solar energy in buildings. The mandatory solar energy requirements for property owners can lead to a distortion of competition in relation to large-scale electricity producers and increased costs for electricity grid companies to handle large amounts of distributed electricity production far out in the electricity grids.</p>	<p>Higher degree of flexibility in the application of solar energy requirements, to adapt the deployment of solar energy to national conditions, such as solar radiation and energy mix.</p>

<p>Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast) Article 13</p>	<p>Article 13, technical building systems. Too detailed requirements, especially 13(3), 13(5), 13(9) and 13(12). The level of detail of the requirements on the technical installations is very high. This gives less flexibility when fulfilling specific needs of a certain building.</p>	<p>Consider reducing the level of detail. Also change the 70 kW limit for BACS installations by 2029, in order to reduce the number of buildings covered by the requirements. Lower the requirements regarding automatic lighting controls with occupancy detection.</p>
<p>Directive (EU) 2024/1275 of the European Parliament and of the Council of 24 April 2024 on the energy performance of buildings (recast) Article 14</p>	<p>Article 14, sustainable mobility. This article is too detailed, includes retroactive requirements, and can give unproportionate burden on microenterprises and households. The previous revision of EPBD included the possibility of exemptions for SMEs. It is unclear why these exemptions were removed, especially considering microenterprises and voluntary-based organizations.</p>	<p>Re-introduce the exemptions for SMEs from the previous revision. Also skip requirements regarding bike parking, as it is outside the scope of EPBD.</p>

1.8 Directorate-General for Environment

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification Proposal
<p>Proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive) 2023/0085 (COD) 22.03.2023</p>	<p>A pending proposal which entails a substantial administrative burden for companies wishing to communicate their environmental and climate performances.</p> <p>Other EU legal acts already govern the objectives of the directive and environmental claims, and there is a significant risk of overlapping regulations.</p>	<p>The directive should be suspended. Other EU legal acts have come into force that fulfil the purpose of the proposal.</p> <p>Evaluate how the directives below can address consumers' need for better information, without a new legislative act.</p> <ul style="list-style-type: none"> - Directive (EC) 2024/825 amending Directives 2005/29/EC and 2011/83/EU as regards <i>empowering consumers for the green transition through better protection against unfair practices and through better information,</i> - Changes in Directive 2005/29/EC as regards <i>unfair business-to-consumer commercial practices in the internal market</i> - 2025/40 as regards <i>packaging and packaging waste</i> - 2022/2464 as regards <i>corporate sustainability reporting</i>
<p>Upcoming revision of the REACH Regulation</p>		<p>The provisions on the restriction of harmful substances in consumer and professional products should be amended. The phase-out of harmful substances should be based on intrinsic properties (rather than risk) and be provided with clear</p>

		timelines. Such a change would make the restriction process faster and more efficient, while at the same time making it simpler and more predictable for companies.
Proposal for a Regulation of the European Parliament and of the Council on a monitoring framework for resilient European forests COM (2023)728	Introduces unmotivated administrative burdens and costs but has low added value. Existing structures can be used instead.	Withdrawal.
Water Framework Directive (WFD); Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy	The EU member states have agreed to create a similar management of their waters through the Water Framework Directive, WFD (2000/60/EC) and to ensure the conservation of flora and fauna species through the Birds Directive and the Habitats Directive. There is a possible need for an improved coherence with policy processes/areas, such as CRMA, NZIA, the Clean Industrial Deal, Vision for Agriculture, as well as to the European Climate Adaption Plan and EU biodiversity strategy for 2030 to simplify the implementation of the policies/legislations.	The EU-Commission should identify and analyse possible inconsistencies in EU legislation that delay or hinder permitting processes. In situations where there are competing objectives, the Commission needs to find ways to balance the interests at stake, for example article 4.7 in WFD. Two such ways are flexible solutions and compensatory measures without compromising environmental goals. For example, there is a need to analyse and clarify the possibilities to weigh different interests against each other in EU legislation related to land and water use. This is important to facilitate and speed up permitting processes as well as to improve the implementation of relevant legislation, such as the Water Framework Directive, the Birds Directive and the Habitats Directive. There is room for improvement without

		compromising high environmental standards.
Simplification Proposals for Existing Legislation		
EUDR, (EU 2023/1115) on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010	The regulation is very unclear. Overall, the problem remains that companies, as a result of the regulation, face a disproportionately high administrative burden to avoid disproportionately severe sanctions or disproportionately negative economic consequences.	The provisions of the regulation and its application need to become more proportionate, both in terms of administrative burden and sanctions. An example of simplification would be to maintain the strict traceability requirement from forest to industry gate/terminal as in the Renewable Energy Directive. Thereafter, allow mass balance among deforestation-free raw materials from several different production sites that have been mixed, i.e., more like the current practice in traceability certifications.
The Natura 2000 network and Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds	The rules that apply to protected and endangered species are found in the EU's two nature conservation directives: the Birds Directive and the Habitats Directive. The directives mean that Sweden has a long-term responsibility to ensure that designated natural habitats and species remain and have a favourable conservation status in the country. With the support of the directives, valuable areas are selected to be included in the EU's network of protected areas, the Natura 2000 network.	There is a need to review the nature conservation directives (species and habitat as well as N2000), there must be a possibility for exemptions for socially important activities, such as mines (ore bodies and other geological formations are site-specific). There must be opportunities to review the areas and to adjust the geographical distribution for specific socio-economic and security reasons. Large contiguous areas hinder regional development and industrial establishment. Access to land is a problem today. The regulations are outdated and prevent any infrastructure, industries, hotels, etc., from

		being established in such areas. Today, 11% of Sweden's area is protected, with the largest areas in northern Sweden.
Regulation (EU) 2024/1991 of the European Parliament and of the Council on the restoration of nature and amending Regulation (EU) 2022/869	The regulation (NRL) means that damaged nature must be restored in all member states, and it contains binding targets for the restoration of ecosystems, habitats, and species, with interim targets for 2030, 2040, and 2050. The targets apply to many different habitats and species, both in the sea, on land, and in freshwater. Necessary measures must be in place and cover at least 20 percent of the EU's land and sea areas by 2030 and all ecosystems that need to be restored by 2050. Until 2030, the restoration of Natura 2000 areas should be prioritized. For certain specifically designated habitat types, listed in an annex to the regulation and currently not in good condition, the regulation prescribes that member states should take measures to restore: at least 30 percent of the area by 2030, at least 60 percent of the area by 2040, at least 90 percent of the area by 2050.	The Nature Restoration Act needs to be reviewed and simplified, as its implementation could have potentially extensive consequences for a range of areas: the mining sector, the aggregate industry, agriculture, forestry, future urban planning, material, and energy production.
Batteries Regulation (Regulation 2023/1542(EU)) in Articles 18(2), 38(10), 40(3), 41(8), 42(6), and in the Packaging and Packaging Waste Regulation (Regulation	Both the Batteries Regulation and the Packaging and Packaging Waste Regulation provide possibilities for MS to request documentation on paper. However, the vast majority of MS accept electronically submitted documentation. Paperwork implies more work tasks for affected companies. Documentation to be submitted	Remove the possibility for MS to require documentation on paper. The amendment should be introduced in the Battery Regulation and PPWR.

2025/40(EU) in Recital (77) and Articles 15(10), 16(1), 18(8) and 19(6)	to different MS also needs to be handled in different ways. Further, the processing time for national authorities is extended.	
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1.9 Directorate-General for Financial Stability, Financial Services and Capital Markets Union

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification Proposal
<p>Retail Investment Strategy (RIS) (COM (2023) 279 final and COM (2023) 278 final) Financial Data Access (FiDA) Regulation (COM (2023)360</p>	<p>Both acts are still being negotiated and hold potential for simplification. In this sense, it could be considered low-hanging fruit to make changes before finalisation. Efforts would then be needed by the Council, the European Parliament and the European Commission to improve the two acts.</p> <p>In FiDA, one issue is that all financial institutions in all MS are required to share all data in scope at a specific point in time, regardless of market demand, resulting in high investment costs with uncertain benefits.</p> <p>In RIS, considerable improvements would be needed during the trilogues to reduce regulatory burden. We have identified two priority areas for simplification: 1) the new reporting requirements proposed in order to collect data for new benchmarks and peer group comparisons, intended to ensure value for money for retail investors, are unnecessarily burdensome and 2) the proposed requirements for how to cater for retail investors' best interest and manage conflicts of interest in connection with inducements are overly complex.</p>	<p>In FiDA, the mentioned issue could be solved by introducing market demand as a trigger for the sharing of specific data points.</p> <p>In RIS, the proposed new reporting requirements should be removed since existing data reporting is largely sufficient to fulfil the purpose. The proposed conditions in connection with inducements should be substantially simplified or removed altogether (in that case implying to maintain existing rules).</p>

General Simplification Proposals

<p>Reporting according to several legislative acts in the financial services area</p>	<p>The aggregate regulatory reporting requirements imply costs and burdens for reporting institutions and supervisory authorities and are sometimes also overlapping and inconsistent.</p>	<p>As Sweden has proposed to the Commission, reporting requirements should be reviewed and overlapping and inconsistent reporting requirements should be removed. Possible efficiency gains through centralized reporting of data at the EU level should be considered, while ensuring access to data for national supervisory authorities.</p> <p>Financial stability should be safeguarded and the possibilities to identify financial stability risks should therefore be safeguarded when assessing the potential for reducing reporting requirements.</p>
<p>Amendments to the Solvency II Directive (2025/2/EC)</p>	<p>A lot of unnecessary administrative burden, especially due to reporting (e.g. QRTS) and disclosure (SFCR). This will increase with the new amendments of the Solvency Directive.</p>	<p>According to the finance industry, Solvency II reporting should not be amended to include other topics which are already dealt with under specific legislation, e.g. sustainability reporting. In general, overlaps between annual report, SFCR, RSR and ORSA should be removed; content of the SFCR which is already included in the annual report should be deleted, e.g. regarding business, system of governance, description of balance sheet items according to local accounting rules or the list of supervisory board members and information on remuneration. These proposals by the finance industry are in line with ambitions of the omnibus 1 act and should be considered going forward.</p>

1.10 Directorate-General for Health and Food Safety

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification proposal
<p>Pharmaceutical package: Proposal for a Directive of the European Parliament and of the Council on the Union code relating to medicinal products for human use, and repealing Directive 2001/83/EC and Directive 2009/35/EC</p> <p>Proposal for a Regulation of the European Parliament and of the Council laying down Union procedures for the authorisation and supervision of medicinal products for human use and establishing rules governing the European Medicines Agency, amending Regulation (EC) No 1394/2007 and Regulation (EU) No</p>	<p>The proposal for a new legislative framework for pharmaceuticals contains several provisions that will have an impact on the European life science for decades to come.</p>	<p>The Swedish government believes that the new rules regarding pharmaceuticals should create good conditions for a balanced, predictable and efficient system that both large and small pharmaceutical companies find advantageous for their investments in innovation in comparison with other regions.</p>

<p>536/2014 and repealing Regulation (EC) No 726/2004, Regulation (EC) No 141/2000 and Regulation (EC) No 1901/2006</p>		
<p>Simplification Proposals for Existing Legislation</p>		
<p>Regulation (EU) 2017/745 of 5 April 2017 on medical devices of the Council and Regulation (EU) 2017/746 of 5 April 2017 on medical devices for in vitro diagnostics Directive 98/79/EC on medical devices for in vitro diagnostics</p>	<p>Industry representatives have highlighted that the regulations are complex and thus lead to unpredictability for several central processes, which also creates uncertainty for companies when launching products in the EU. The representatives highlight that as soon as possible after the ongoing evaluation carried out in 2025 is completed, the European Commission must come up with proposals on how the regulations should be amended or changed.</p>	<p>To increase predictability in the conformity assessment process a mechanism for scientific and clinical advice and structured dialogue between manufacturers and notified bodies should be introduced as well as timelines including stop-the-clock. The fees applicable to different actors in the conformity assessment process should be transparent and preferably based on a harmonized structure. To improve the attractiveness of the EU market and to insure keeping products on the market there is a need to make the processes smoother throughout the lifecycle of the device. To introduce standardised and harmonised protocols for applications to notified bodies and for technical documentation will relieve the administrative burden on the companies. Other examples of where the regulatory burden may be reduced are; focusing re-certification on changes and safety aspects, avoid duplication of work by different actors in</p>

		the system and reduction of unnecessary reporting requirements. A system of partly reliance should be considered in the EU framework.
Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain	All information claimed confidential either by falling under GDPR or by being Confidential Business Information (CBI) as defined by Article 63 of Regulation (EC) 1107/2009, requires individual justification on the precise piece of information. This increases administrative costs.	Exempt items obviously falling under GDPR by their very nature (e.g., names) from the obligation to provide a justification
Regulation (EU) 2022/2371 of 23 November 2022 on serious cross-border threats to health	The regulation does not require double reporting, the ambition is rather the opposite. However, in practice, this is sometimes the case. Most double reporting relates to the SPAR survey (IHR) and reporting linked to Article 7 of the regulation. The SPAR survey is a reporting requirement set out in the International Health Regulations, which the WHO is responsible for.	Continued development of the technical systems used for reporting and support to Member States from the Commission and ECDC.
Regulation (EU) No 1169/2011 on providing food information to consumers	There are Member State-specific rules governing the origin labelling, which creates additional costs in the food industry. In addition, there is a lack of common rules for labelling of products suitable for vegetarians/vegans, allergen labelling requirements and food enzymes content. This means that Member State-specific rules apply, which creates administrative costs.	Assess rules governing the labelling of origin and content, with a view to achieve a higher degree of harmonization

<p>Regulation (EU) 2017/625 – Official Controls Regulation (and Delegated Regulation (EU) 2019/624 and Implementing Regulation (EU) 2019/627)</p>	<p>Small slaughterhouses (especially in rural areas), often require meat inspections on short notice. The Swedish National Food Agency struggles to schedule these due to resource limitations (staff) and long travel times for inspectors. This can cause production delays and economic consequences while food safety, animal welfare, and disease control must be maintained. It also increases control costs.</p>	<p>National adaptations for flexible and more risk-based slaughter control would reduce travel time, improve availability, and help businesses comply with regulations without unnecessary delays and costs. By Implementing remote meat inspection (ante-and postmortem) using camera technology and digital tools for real-time inspection could simplify while ensuring the same quality as physical inspections.</p>
<p>Regulation 1069/2009 laying down health rules as regards animal by-products and derived products not intended for human consumption</p>	<p>The legislation is detailed and very complex. Its purpose is to prevent and minimise risks to human and animal health, and to ensure the food and feed chain is kept safe. Animal by-products is in short parts of animals that are not food, e.g. feed, meat and bone meal for fertilizing, carcasses, slaughter residues, biodigestion, biofuel etc.</p>	<p>The legislative area needs to be updated and harmonized from a simplification perspective.</p>
<p>Regulation 767/2009 on the placing on the market and use of feed Annex III</p>	<p>Recycled minerals from wastewater are prohibited for use in feed. (today phosphorus is mainly imported from RU, and it is a Swedish company that drives the development).</p>	<p>Sweden suggests the Commission to request a risk assessment from EFSA, followed by necessary amendments of the legislations.</p>
<p>General Simplification Proposals</p>		
<p>Soft law initiatives in the field of health policy</p>	<p>There is a need to ensure a proportionate administrative burden relating to soft law instruments.</p>	<p>Soft law instruments often entail administrative burden in monitoring, sometimes with unclear added value. There is a need to reflect more on how to better streamline and avoid duplication in terms of reporting obligations.</p>

**1.11 Directorate-General for Internal Market, Industry,
Entrepreneurship and SMEs**

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification proposal
Proposal for a Regulation of the European Parliament and of the Council on combating late payment in commercial transactions	In order to provide for a more resilient and effective Single Market the rules in this area should be based on the freedom of contract and balance the interest of the parties. Also, increased regulatory and administrative burden for companies should be avoided. The proposal, which includes inter alia a maximum payment period of 30 days and a system of enforcement authorities, does not meet these conditions, and is not in line with the Commission's new focus on competitiveness and reduction of burdens.	The Commission should withdraw the proposal, and, if still deemed necessary, return with a recast of the current Late Payment Directive, accompanied by an Impact Assessment that analyses all relevant issues in-depth and justifies all policy choices made in a transparent manner.
Simplification Proposals for Existing Legislation		
Council Regulation (EC) No 2679/98 of 7 December 1998 on the functioning of the internal market in relation to the free movement of goods among the Member States	Regulation 2679/98 establishes an obligation for the Member States to notify all other Member States on existing or planned short-term barriers to the free movement of goods. This includes situations where individuals through their actions create physical barriers to the free movement of goods, such as demonstrations and unlawful strike actions. The scope of the Regulation is however unclear, and the Commission has informed that the majority of notifications received concern barriers that are not covered by	To ensure that all EU legislation is fit for purpose, Sweden proposes that the regulation is repealed.

	<p>the regulation. In the last two years, there has been fewer than two notifications each year. The effectiveness of the regulation has also been questioned as there is technology that can track barriers and physical disturbances more efficiently and in real time. During the Commission's evaluation of the regulation, several national authorities highlighted that a repeal of the regulation would not have any negative effects on the free movement of goods.</p>	
<p>EU directives on measuring instruments 2014/32/EU and 2014/31/EU</p>	<p>The Measuring instruments directive (MID) and the Directive on non-automatic weighing instruments (NAWI) are neither functionally neutral nor applicable to all existing measurement needs. In the absence of well-functioning EU regulation, MS will continue to develop their own solutions to address the problems. The Commission' proposal for a partial change of the Measuring Instruments Directive, including for electric vehicle supply equipment, is currently being negotiated. The proposed changes are in several ways too extensive and technically detailed, therefore not clearly aligned with the ambition to simplify regulations and reduce the regulatory burden. The implications for the coming revision of the full directives are also unclear.</p>	<p>Use the ongoing revision of the directives to develop a modernised framework that is aligned with the new legislative framework approach and the ambition to simplify regulations. The new legislation should be functionally neutral and applicable to future measuring needs. The ongoing partial revision should be as limited in scope as possible, so as not to make the full revision more difficult.</p>
<p>Directive 2005/36/EC of The European</p>	<p>The freedom of establishment and the freedom to provide services are cornerstones of the internal market and facilitate the</p>	<p>To improve the mobility of professionals within the internal market, Sweden proposes that the European Commission</p>

<p>Parliament and of the Council of 7 September 2005 on the Recognition of Professional Qualifications</p>	<p>mobility of businesses and professionals across the EU. It is estimated that 17 million EU citizens live or work in an EU country other than their home country. To a large extent, it is up to each Member State, under certain conditions, to decide whether a profession should be regulated. As a result, the number of regulated professions varies significantly between Member States. Sweden has approximately 158 regulated professions, such as doctors, veterinarians, security guards, lawyers, and real estate agents, which is relatively few compared to other EU countries. The regulation of professions is included on the European Commission's list of the ten most disruptive barriers to the internal market. The reason is that Member States impose different requirements for education, certification, and professional experience. Additionally, recognition procedures are organized at the national level, meaning that administrative practices, including documentation requirements, differ between Member States.</p>	<p>conduct a review of professional regulations with the aim of encouraging Member States to reduce the number of regulated professions in the EU, especially professions that are regulated only in one Member State.</p>
<p>General Simplification Proposals</p>		
<p>Forthcoming Industrial Decarbonisation Accelerator Act</p>	<p>EU regulation regarding permitting in different sectoral legislation should be aligned to make it possible to have one national system, which applies to all industries.</p>	<p>The forthcoming Industrial Decarbonisation Accelerator Act should be based on the provisions regarding permitting in the Net Zero Industry Act.</p>

<p>Lead time within the framework of vehicle regulation/legislation linked to vehicles, not least regarding type approval of vehicles in EU (incl. mega-decisions on EU positions regarding type approval on vehicles in UN regulations)</p>	<p>In various processes concerning legislation and regulation, for example type approval for vehicles, vehicle manufacturers often see problems with excessively tight lead times (between final regulation and implementation), which is a common SE position. This creates challenges in terms of adaptability, lack of predictability, high costs and administrative burdens, and negative impacts on competitiveness. Further, the EU legislation often does not take into account that there are different conditions for light and heavy duty vehicles.</p>	<p>Principles for lead time (between final regulation and implementation) linked to vehicle regulation/legislation linked to vehicles, for example type approval of vehicles, must be revisited and clarified. The exact lead times for light and heavy vehicles need to be analysed in more detail in order to formulate an appropriate solution from different perspectives. The industry proposal to establish a "Regulatory observatory" raised by ACEA is not deemed to be necessary to achieve this, but may rather add complexity to the regulations process.</p>
<p>Data legislation regarding vehicles - Access to in-vehicle data</p>	<p>There are over 20 existing EU regulations that governing the sharing of data from connected vehicles and given the scope of this regulation, there is no need for additional legislation. The Swedish automotive industry is concerned about the proposal, which they believe is an unnecessary regulation.</p>	<p>Implement existing data legislation and evaluate its impact and consequences for the automotive industry. There is no need for additional sector-specific legislation to regulate data in vehicles.</p>

1.12 Directorate-General for Justice and Consumers

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification proposal
<p>Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law</p>	<p>The Directive contains obligations to set up reporting channels, i.e. systems where people working in a company, for example, can safely and confidentially report wrongdoings. Among other things, the recipient of the report is obliged to investigate the wrongdoing and provide feedback on the action taken to the reporting person.</p> <p>Before the Whistleblowing Directive, many groups had common reporting systems. The Directive requires each company to set up local reporting channels instead of group-wide ones, which creates major problems. It is very costly for companies, leads to less effective investigations, and actions risk being less vigorous. The parent company's ability to obtain information and act is greatly impaired. Confidentiality is more easily maintained with group-wide channels.</p>	<p>The Directive's provision in Article 8(6), regulating which companies who can share reporting channels, should be amended to allow for reporting channels at group level.</p>
<p>Article 6a of Directive 98/6/EC of the European Parliament and of the Council of 16 February 1998 on consumer protection in the indication of the prices of products</p>	<p>The Article states that any announcement of a price reduction shall indicate the prior price applied by the trader for a determined period of time prior to the application of the price reduction. The prior price means the lowest price applied by the trader during a period of time not shorter than 30 days prior to the application of the</p>	<p>Extend the possibility to make exemptions to cover all food products in accordance with the definition in Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying</p>

<p>offered to consumers</p>	<p>price reduction. According to paragraph 3 of the Article, Member States may provide for different rules for goods which are liable to deteriorate or expire rapidly. This is an important opening to exempt certain goods that are not industrially manufactured, for example fresh fruit, milk and similar food products. Sweden has made use of this Member State option. This means that some food products are exempt from application while others, with longer durability, are covered. Consequently, traders in the food sector must apply different price indication rules for different food products, depending on expiration date. This puts unnecessary burdens on the food sector and creates confusion for consumers.</p>	<p>down procedures in matters of food safety.</p> <p>Article 6a</p> <ol style="list-style-type: none"> 1. Any announcement of a price reduction shall indicate the prior price applied by the trader for a determined period of time prior to the application of the price reduction. 2. The prior price means the lowest price applied by the trader during a period of time not shorter than 30 days prior to the application of the price reduction. 3. Member States may provide for different rules for food and goods which are liable to deteriorate or expire rapidly. 4. Where the product has been on the market for less than 30 days, Member States may also provide for a shorter period of time than the period specified in paragraph 2. 5. Member States may provide that, when the price reduction is progressively increased, the prior price is the price without the price reduction before the first application of the price reduction.
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1.13 Directorate-General for Maritime Affairs and Fisheries

General Simplification Proposals		
Legislation	Issue	Simplification proposal
European Maritime, Fisheries and Aquaculture Fund (EMFAF)	The European Commission has encouraged Member States to use simplified cost options (flat rates, lump sums, and unit costs) to streamline the implementation of the national programmes for the European Maritime, Fisheries and Aquaculture Fund (EMFAF) regarding grants to beneficiaries. However, extensive requirements regarding their calculation and application have hindered their broad use in Sweden.	Sweden suggests increasing the flexibility in how simplified cost options can be calculated and applied by Member States and welcomes development of more “off the shelf” simplification options in the coming legislation that are better suited to current conditions as it saves time and resources for the MA as well as for the beneficiaries. Simplified cost options should be developed with a view to ensure that grant levels are not higher than necessary.

1.14 Directorate-General for Migration and Home Affairs

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification proposal
Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund	Annex VIII stipulates gender and age categories to be reported for each individual reported under the indicators. This is also included in the reports sent to the European Commission regarding the output- and result indicators. This is very administratively burdening for beneficiaries and the managing authority and leads to increased checks and controls to certify the correctness of reported data.	The need for this detailed level of data is not clear, and removing this requirement would lead to better efficiency in managing the funds.
Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund	Unclear system for reporting and indicators, Annex II and III. The current lack of indicators has proven a challenge in the required evaluations as they cannot entirely take results outside of the output and result indicators into account.	Many projects have a holistic perspective on the migration process and wish to work with actions within more than one specific objective. We would prefer a system where projects are placed within one specific objective but can report on indicators within all specific objectives – this would generate more visible results for the EU and add flexibility for the beneficiaries. An improved intervention logic and as well as result- and output indicators would deliver more representative results of the actions. This would simplify for the managing authorities and for beneficiaries and is likely to make more organisations apply for AMIF funds.
Regulation (EU) 2021/1147 of the European Parliament	Limitations in operation support.	We see many benefits with a continued possibility for operation support, as there are

<p>Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund</p>		<p>actions contributing to the specific objectives that are not suitable for the regular project design. Our view is that operation support should also be possible for larger IT-projects. This would ideally be paired with a review of the intervention logic and an overview of output- and result indicators, in order to better take into account their contribution to the specific objectives.</p>
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1.15 Directorate-General for Mobility and Transport

General Simplification Proposals		
Legislation	Issue	Simplification proposal
Revision of Annex III (medical requirements) of the Driving Licence Directive (2006/126)	Although the directive is now being revised, no major changes are being made to the medical requirements. The Commission has delegated powers to revise the annexes to the directive and the work is usually done at expert level in the implementation committee attached to the directive. Many new research findings and medicines have emerged since the requirements were introduced and the annex should therefore be updated.	It is important from a transport supply perspective that people are not unnecessarily prevented from obtaining a driving licence or working in professional traffic., while it is important to have safe drivers and the at the same time it's necessary to ensure a high level of road safety and to ensure that the burden on the health care system is proportional. Work therefore needs to be carefully considered at expert level. A revision of Annex III (medical requirements) to the driving licence directive (2006/126) should therefore be made.
Proposal to amend Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO2 emission class of heavy-duty vehicles with trailers	The economic incentives intended with the proposal, by the inclusion of efficient trailers into the CO2-differentiation of the user charge and toll systems regulated by the eurovignette directive, will not materialise in countries with a heterogenous trailer fleet that to a large extent will not be covered by the proposal. Such trailers are often used in the Nordic countries. It will also increase the administrative burden for trailer manufacturers, transport companies and authorities.	MS should have the possibility, but not be mandated, to include the impact of trailers in the CO2-differentiation of the user charge and toll systems if further assessment shows that it is a cost-effective way of creating the intended incentives, taking national circumstances into account.

1.16 Directorate-General for Regional and Urban Policy

Simplification Proposals for Existing Legislation		
Legislation	Issue	Simplification proposal
Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions	Many funds are currently governed by the Common Provision Regulation (CPR). More detailed rules are stipulated in Fund-specific regulations and implementing acts. The detailed framework governing the administration of funds creates a legal uncertainty and generates administrative costs.	Assess whether obligations in the CPR, the Fund-specific regulations and relevant implementing acts can be harmonised, without imposing laxer obligations. Especially consider whether funds and their administration to a higher extent should be governed by a single set of common provisions.
Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum,	Article 55.1 regarding the Home Affairs funds sets specific requirements and conditions which require time and resources for the managing authorities.	We would like to see more “off the shelf” simplification options in the coming legislation, as it saves time and resources for the MA as well as for the beneficiaries. It also lessens the risk of errors as compared to nationally developed alternatives. We would prefer simplifications without specific requirements or conditions.

<p>Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy</p>		
<p>General Simplification Proposals</p>		
<p>General comment regarding cohesion policy framework: SE are doubtful about changes in the regulatory framework for the current period because it creates an administrative burden for the managing authority, uncertainty for beneficiaries and thus the risk of delays in program implementation. However, SE welcomes simplifications in the regulatory framework for cohesion policy after 2027 and has the following</p>	<p>There are challenges in dealing with today’s many EU instruments with similar objectives and, sometimes, overlapping regulatory frameworks.</p> <p>The programme structure with policy objectives, specific objectives and earmarking needs to be simplified to avoid lock-in effects.</p> <p>The administrative burden is far too high when trying to finance an investment with funds from different EU sources.</p>	<p>The number of EU instruments should be reduced to avoid the multiplication of funds and reduce the fragmentation of support.</p> <p>In order to achieve results, it will be important to continue work with thematic concentration, but the forms for how this is to be achieved must be developed and adapted to different types of regions and challenges. The ear marking applied during the current period has contributed to making the implementation of the programs more complex. In this context, the regulatory framework needs to be adapted to the size of Member States’ EU-funding.</p> <p>When the intention is for an investment to be able to be financed by funds from different EU sources, the regulatory framework must be adapted to this. The administrative burden is now far too high for example when trying to finance an</p>

simplification suggestions:		investment with funds from different instruments.
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1.17 Directorate-General for Single Market or Digital services

General Simplification Proposals		
Legislation	Issue	Simplification Proposal
N/A	It poses a challenge for undertakings in the different Member States to find information about starting up and running businesses in other Member States and to comply with the different rules. The burden will be particularly high for SMEs, which normally have fewer resources and are less able to research the regulatory frameworks in other Member States.	To reduce administrative burdens and costs for these undertakings, EU can construct and maintain a digital information hub that contains information on the relevant aspects of Member States' regulatory frameworks for setting up and running a business.

1.18 Directorate-General for Taxation and Customs Union

Simplification Proposals for Legislative Proposals Currently Subject to Negotiation		
Legislation	Issue	Simplification proposal
UNSHELL, DEBRA, BEFIT, TP, HOTS		The Commission should withdraw the Unshell, Debra, Befit, TP and HOTS proposals. It is clear that there is very limited appetite among MS for these proposals, and even though neither of them has been approved yet a withdrawal can be regarded as a simplification as it would make clear for stakeholders that work on this proposal is cancelled. Also, the Commission should make clear that they are no longer intending to present the proposal on Securing the Activity Framework of Enablers.
General Simplification Proposals		
Minimum taxation (Pillar 2)	The global minimum tax is very complex and creates significant administrative and compliance burdens.	The commission should push the OECD for changes to the Pillar 2 rules that reduces the administrative burden of those rules. Such changes could for example be a permanent safe harbour.
Potentially all legal acts that require information from companies	There is a need to increase productivity in the EU. Uncoordinated data collection runs the risk of unproductive double reporting by imposing a too high administrative burden on companies on the inner market, i.e. a wasteful use of resources.	In any work conducted by COM that relies on the contribution of information/data there should always be a concern of the resources needed in combination with the value added. The perhaps most important way to address this concern is to <u>coordinate</u> and <u>consolidate</u> data collection. To be even more concrete, SE, hence, encourages COM to

		create <u>one</u> datahub for all legal acts that require information from affected parties.
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1.19 Directorate General for Trade and Economic Security

General Simplification Proposals		
Legislation	Issue	Simplification proposal
Potential future regulation on outbound investments	<p>The regulatory burden associated with potential future regulation of outbound investments can significantly impact companies' willingness and ability to invest. Although there are legitimate concerns about security risks such as technology leakage, there is a risk of disproportionately burdensome regulation. Currently, there is only a recommendation from the commission that member states should collect information on risks associated with outbound investments. Based on the member states' data, an assessment will be made to determine if measures need to be taken.</p>	<p>Advocate for any potential future regulation to not be overly or disproportionately burdensome for businesses and ensure that future regulation does not weaken businesses' ability and willingness.</p>