



# EU Consultation: Simplification of administrative burden in environmental legislation

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European Association of Chemical Distributors (Fecc)

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The European Association of Chemical Distributors (Fecc) welcomes the [European Commission's initiative to simplify administrative burden in environmental legislation](#). For the chemical distribution sector, simplification is not only a matter of reducing costs, but of ensuring that regulatory requirements remain **workable in complex, multi-actor supply chains**, while maintaining a high level of environmental and human health protection.

Distributors operate at the interface between manufacturers and downstream users and are subject to obligations under chemicals, waste, transport, and sustainability legislation. The cumulative effect of these frameworks creates significant administrative pressure, particularly for SMEs.

We appreciate the opportunity to provide input in this consultation and would like to highlight key concerns and recommendations:

### Targeted Areas for Simplification:

Fecc considers that simplification efforts should prioritise areas where administrative burden is high but added environmental value is limited.

A key issue is the **duplication of data requirements across frameworks** such as REACH, CLP, waste legislation, and emerging sustainability reporting obligations. For example, distributors are often required to collect, verify, and transmit the same substance-related information in different formats and through different systems, without clear added value.

Similarly, **reporting obligations are fragmented**. Companies must submit comparable data to multiple authorities at national and EU level, often using non-interoperable IT systems. This leads to inefficiencies and increases the risk of inconsistencies.

Another area of concern is **labelling and information requirements**. Distributors frequently need to adapt labels and documentation to reflect overlapping legal requirements, while also managing multilingual obligations across Member States. This creates operational complexity without necessarily improving risk communication.

Finally, permitting and administrative procedures—particularly in relation to storage, handling, and transport of chemicals—remain time-consuming and differ significantly across Member States, affecting the functioning of the internal market.

### Fecc Recommendations

Fecc supports a simplification agenda focused on concrete, implementable measures.

To that end, the following points merit consideration:

- A first priority should be the establishment of a **single EU data submission system for chemicals-related information**, building on existing tools such as IUCLID and the European Chemicals Agency platforms. Information submitted once should be accessible to all relevant authorities, eliminating duplicate reporting under different legislative frameworks.
- In parallel, the Commission should promote the **harmonisation of reporting formats and datasets** across legislation. For instance, aligning data requirements between REACH registration updates, poison centre notifications, and sustainability reporting would significantly reduce administrative workload.
- Fecc also calls for the wider use of **digital labelling solutions**, such as QR codes, to complement or replace physical labels where appropriate. This would allow more flexible and up-to-date information provision, reduce multilingual labelling constraints, and lower logistical costs, while maintaining safety standards.
- Another important measure is the introduction of **simplified regimes for low-risk activities and SMEs**. For example, distributors handling non-hazardous or low-volume substances should benefit from lighter reporting and documentation requirements. This would ensure proportionality and allow resources to be focused on higher-risk areas.
- Fecc further recommends improving the efficiency of administrative procedures through **mutual recognition and harmonised permitting approaches** across Member States. A distributor authorised in one Member State should not face significantly different or duplicative requirements when operating in another.
- Finally, clearer and more practical **guidance at EU level** is needed to support consistent implementation. Guidance should be developed in close consultation with industry to ensure that obligations are realistic and operational.

Fecc underlines that simplification should enhance, not weaken, the effectiveness of environmental legislation. Reducing administrative complexity allows companies to allocate more resources to compliance, risk management, and innovation.

Fecc supports the Commission's initiative as an opportunity to make EU environmental legislation more efficient, coherent, and future-proof.

Concrete measures—such as a single data submission system, harmonised reporting, digital labelling, and proportionate requirements—can significantly reduce administrative burden for chemical distributors without compromising safety or environmental objectives.

Fecc remains committed to engaging further with the European Commission to address climate change and regulatory challenges. A pragmatic and targeted simplification approach will strengthen both the competitiveness of the sector and its ability to contribute to the EU's sustainability goals.

To access the Fecc's response on EU Commission's website, please click [here](#).

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