



Submission to the European Commission's Call for Evidence on the 'Simplification of Administrative Burdens in Environmental Legislation'

Any streamlining of environmental laws must not have an adverse impact on the environmental goals. It is vital that any industry which carries out activities that impact nature, undertake the necessary environmental reporting. Weakening the requirements for full and thorough reporting could allow damaging activities to go unreported. As an NGO, we understand the complex and time consuming nature of reporting and the resources it takes to effectively complete this. However, transparency in reporting is one of the foundations of a fair and equal society. We are all a part of the natural world and we all depend on it for a healthy future and a steady economy. Therefore it is necessary to hold companies accountable for any actions which could impact the environment. Simplification which results in deregulation also causes uncertainty for companies and can delay investments and cause confusion around reporting.

In the document provided on the call for evidence page it states that 'The measures should reduce the cost of reporting, monitoring, notifying, auditing, and other administrative obligations as well as streamline administrative procedures'. If costs are reduced this should not impact the quality and thoroughness of reporting, monitoring, notifying and auditing. Unfortunately cutting costs generally means reducing quality. If this was to happen it would result in damage to the environment which will ultimately carry huge costs across the entire economy as well as negative impacts to human health and quality of life. The cost of climate and environmental inaction is far greater than the cost of action. The European Commission has stated that there is an annual cost of €180 billion due to not fully implementing existing environmental laws.

We welcome the idea of removing 'double requirements to report' which is something that could reduce the work load of reporting without undermining the goals of the legislation. Harmonising reporting timeframes across key environmental policies, such as the Marine Strategy Framework Directive, the Habitats Directive, and the Water Framework Directive is an example of how streamlining could increase policy efficiency without impacting the effectiveness. It's vitally important that any streamlining must not have any negative impact on the environment. The environmental omnibus must be evidence-based, proportionate, have thorough impact assessments, and have early and ongoing stakeholder engagement with an all of society approach including NGOs, public authorities and practitioners.



The document states that the measures 'should also reduce demands on Member State competent authorities, allowing for better enforcement and implementation'. We welcome the goal to improve enforcement and implementation as this is vitally needed in Member States. The majority of EU infringement cases are related to environmental law.

Member States are not effectively implementing the laws which in turn causes excess administrative burden and high costs at national and EU level on top of environmental damage. Focus should be put on ensuring Member States and industries comply with all environmental legislation to ensure a healthy environment and environmentally sustainable economy for generations to come. Environmental regulation and safeguards aren't the problem, on the contrary, they are the solution. The problem is lack of implementation.

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