

Brussels, 5 December 2025
(OR. en)

15718/25

ENV 1256
COMPET 1261
SIMPL 189

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the Council (Environment) meeting on 16 December 2025 2025 Annual Progress Report on Simplification, Implementation, and Enforcement (Environment) - Information from the Commission

Delegations will find in the Annex the above-mentioned report.



2025
ANNUAL PROGRESS REPORT

*Simplification,
Implementation
& Enforcement*

Jessika ROSWALL

European Commissioner
for Environment, Water Resilience
and a Competitive Circular Economy

SEPTEMBER 2025



1. Introduction

This report provides an overview of the progress made in simplifying, implementing and enforcing in the field of environment during the period 1 January - 31 July 2025.

Building on [2025 Environmental Implementation Review \(EIR\)](#), it examines the application of EU legislation within [my portfolio](#) during this period and highlights the urgent need for action in the following areas: circular economy and waste management, pollution and water resilience, environmental governance, nature protection and biodiversity.

Given the scale of the EU competitiveness challenge, simplifying EU environmental law is essential to reduce administrative burden, increase transparency, and improve compliance. Moreover, its effective implementation and robust enforcement are cornerstone priorities of my commitment to protecting and preserving our natural world, driving a competitive and circular economy, strengthening water resilience and security, and to delivering on the green and clean transition.

As the Commission has embarked on a process of continuous review and assessment of existing legislation, making legislation clearer, anticipating new needs and priorities to enhance EU resilience, and embracing innovation, I will continue to work closely with civil society, the business community, Member States, regional and local actors, to ensure swift and effective implementation of EU environmental legislation. My key objective is clear: to make EU environmental law more effective and reduce administrative burden, while upholding the rule of law and safeguarding the protection of human health and the environment.

2. Executive summary

EU environmental law and policy contribute to the EU's prosperity, competitiveness and security and is essential to achieve its sustainable development and for improving the quality of life for all Europeans. However, the [2025 EIR](#) reported [an estimated EUR 180 billion annual cost for the EU economy due to implementation gaps with EU environmental law](#).

To address the implementation challenges and seize the potential to promote innovation, boost competitiveness and achieve economic resilience, I instructed my services to engage in a continuous and inclusive process of simplification and streamlining of EU environmental laws. Simplification of EU environmental laws can make an important contribution to their implementation. It is about achieving environmental objectives in a more effective, smart, and efficient way. In line with the Commission's approach, I also prioritise strategic and targeted enforcement action, focusing on systemic and significant breaches of EU environmental law, to ensure that Member States comply with their obligations and promote a level playing field. In addition, my services provide tailored and targeted support to Member States through technical assistance, guidance, and funding to help them build capacity and achieve environmental objectives in a cost-efficient and sustainable manner. By working together with Member States, civil society and the business community, I promote a culture of compliance and cooperation, to proactively ensure that EU environmental law is implemented in a way that is both effective and efficient.

3. Delivering results: key measures

The [Letta](#) and [Draghi](#) reports underline that **the only way to ensure our long-term competitiveness is to build a clean, competitive and circular economy**. To achieve this, it is essential to make the green transition easy and affordable for individuals and businesses. I engaged personally and have held two implementation dialogues in the

first half of 2025. Continuous engagement with stakeholders supported by studies, evaluations, and assessments provides us with the evidence base to simplify EU environmental rules and to implement them more effectively. This process aims to achieve environmental goals in a smarter and more efficient way. However, simplification alone is not enough; better implementation and consistent enforcement across Member States are also necessary to make EU law more effective.

A. Simplification and stress tests

An **analysis of the planned delegated and implementing acts** was conducted in the first 2025 semester. The intention is to give priority to measures that themselves lead to simplification (for example standardisation of reporting templates) or help economic operators by providing uniform operating conditions throughout the single market and are necessary for the functioning of the legislation. In this analysis, 253 potential delegated and implementing acts were screened to determine their priority. Of these potential acts, 196 acts were considered as needed to achieve environmental, or burden reduction, policy objectives, while 57 acts were considered as having less immediate added value while being burdensome/costly in terms of administration or implementation and are therefore considered for de-prioritisation. Eleven of those acts are nevertheless legally required within a given timeframe and amendments to the empowerments in the basic act would therefore be needed. Moreover, for those that are priorities, efforts will be made to minimise the associated costs in the preparation of each measure. This will also enable better management of the large volume of legislation in the pipeline, whose cumulative complexity places an excessive burden on businesses. A dialogue is ongoing with the co-legislators about this matter.

The Commission has announced an **omnibus proposal** or package **in autumn 2025 to simplify administrative obligations related to the environmental acquis**. In preparation for this proposal, my services launched a call for evidence. The feedback to this call for evidence has been significant, reaching around 200 000 replies, with most replies coming from citizens but also many suggestions from business. The upcoming environmental omnibus proposal aims to streamline reporting requirements and reduce administrative burden while ensuring that EU's environmental objectives and public health safeguards remain uncompromised.

The process of **stress-testing** more than 70 Regulations and Directives in the environmental acquis, along with their associated implementation measures, involves evaluations and fitness checks, reviews of reporting and administrative burdens, screening of delegated and implementation acts, analysis of the impact on small and medium-sized enterprises, efforts to digitalise the acquis and stakeholder feedback through implementation dialogues and reality checks. A targeted **reality check** on the transition from the Ecodesign Directive to the Ecodesign for Sustainable Products (ESPR) Regulation (EU) 2024/1781 for energy-related products is planned in 2025.

Key evaluations published over the reference period include:

- An [evaluation of the EU Marine Strategy Framework Directive](#) which reveals that, while the Directive has established a solid foundation, it has fallen short of achieving "good environmental status" across all European seas, prompting the Commission to consider potential amendments.
- An [evaluation of the Bathing Water Directive](#), which showed strong performance (with 85% of sites rated "excellent" and with 96% compliant), while identifying opportunities for better alignment with the Water Framework Directive to boost health and reduce administrative burdens.
- An [evaluation of the Ship Recycling Regulation](#), which found improved environmental and social standards in ship recycling practices, but remaining weaknesses due to inconsistent hazardous materials inventories and flag-changing.

- An on-going evaluation of the [Nitrates Directive](#), assessing its effectiveness, coherence with climate objectives, and its ability to address the increasing pressures on water quality.

The outcomes of these evaluations will also feed into the stress-testing of existing legislation and the design of future proposals.

To provide clarity and simplify compliance for businesses and third countries, [updated guidance](#) and [Frequently Asked Questions](#) have been published to support the implementation of the [EU Deforestation Regulation](#) (EUDR). The Commission has also finalised the country benchmarking system through an Implementing Act. Together the various simplification measures are expected to lead to a currently estimated 30% reduction of administrative costs and burden for companies, while ensuring fair and efficient implementation.

B. Implementation

On 25 March 2025, with EVP Séjourné, I have held an [Implementation Dialogue on the Chemicals Industry Package](#). It covered current implementation issues of EU chemicals rules and ways to achieve impactful simplification, in particular through revision of the REACH Regulation. The dialogue resulted in broad consensus on the need to maintain chemical production in the EU, strengthen enforcement and compliance, and digitalise processes, while diverging views were expressed on specific measures such as polymer registration and PFAS regulation.

On 10 April 2025, I held an [Implementation Dialogue on environmental assessments and permitting](#). Broad support emerged for the need for digitalisation, better data sharing, guidance documents, capacity building and exchange of best practices.

In addition, a **strategic dialogue on Circularity** was held on 2 July 2025 which was jointly chaired by Executive Vice-President Teresa Ribera, Executive Vice-President Stéphane Séjourné and myself, bringing together high-level business leaders, civil society and academia. The transition to a circular economy is a key driver of competitiveness and decarbonisation, as highlighted in the Clean Industrial Deal. This Dialogue kicked off a public consultation with stakeholders and a call for evidence to support the preparation of the **2026 EU's Circular Economy Act** by identifying areas where further efforts are needed to accelerate this transition, harnessing the single market for secondary raw materials and waste, improving resource availability, and stimulating innovation.

In all these dialogues, stakeholders highlighted several key environmental areas that require significant investment and regulatory attention (including simplification and implementation efforts), in particular the circular economy, waste management, clean air, biodiversity and nature, water services and noise management.

Additionally, a study is ongoing on **the mapping of all reporting obligations for businesses related to environmental legislation**, assessment of their costs and collecting suggestions for simplification from stakeholders. The delivery of this study is expected to be completed in early 2026. The first workshop was attended by more than 300 participants and followed up by 500 survey responses, providing a mix of suggestions and areas for more detailed consideration for simplification and better monitoring of implementation over the mandate. The workshop could be followed up with additional reality checks.

A [high-level meeting on the upcoming EU Bioeconomy Strategy](#) was held on 16 May 2025 focusing on the future of Europe's sustainable bio-based economy and supporting the development of a new EU Bioeconomy Strategy, to be presented by the end of 2025, a flagship initiative under the [Competitiveness Compass](#) and the [Clean Industrial Deal](#).

Moreover, dedicated high-level dialogues were organised, including a [strategic dialogue on the future of chemicals](#), several [high-level round-tables on water resilience](#), and a [round table on nature credits](#), all contributing to the ongoing policy development and stakeholder engagement.

Building on the insights from the 2025 [Environmental Implementation Review \(EIR\)](#), Member States are provided with means to ensure that EU environmental law is quickly and effectively implemented, by tackling the root causes of implementation gaps, and to prevent breaches from happening in the first place. To this end, various instruments have been developed to accompany national authorities in fulfilling their legal obligations and addressing specific implementation issues. These instruments include support measures for the transposition and implementation of new EU legislation, such as explanatory documents, guidance documents and technical assistance, which are made available to Member States to facilitate the effective implementation of newly adopted Regulations and Directives. The **explanatory documents** are discussed with Member States and stakeholders and are essential to achieve full transposition efficiently. For instance, such explanatory documents for the revised [Industrial Emissions and Livestock Rearing Directive](#) and the [Environmental Crime Directive](#) have been completed and additional ones are to come for other key revised Directives (e.g. the [UWWTD](#) and the [AQD](#)).

Moreover, **expert groups** and similar settings are used to build closer partnerships between national authorities, exchange good practices and provide peer support between Member States (for example meetings of the [Technical Adaptation Committee](#), [Nature Directives Expert Group](#), [Seveso Expert Group](#), [Environmental Compliance and Governance Expert Group](#), [Ambient Air Quality Expert Group](#), [Water Strategy Coordination Group](#), [Waste Shipment Regulation Expert Group](#)). **Guidance documents** are prepared for newly adopted acts as well as existing ones (for example the recent [BAT conclusions](#), the draft [guidance document on definitions and use of industrial site, facility and installation for IEPR reporters](#) or the [Water Framework Directive Guidance on Chemical Monitoring Frequency](#)). **Enhanced assistance** to Member States in transposing and implementing EU Directives also helped to prevent new breaches of EU environmental law (for example [online platform for sharing information on IED implementation](#), [Workshop on implementation on the revised Ambient Air Quality Directive](#)). Support was also provided to foster cooperation between Member States enforcement agencies to address illegal activities harming the environment, such as waste trafficking or wildlife trafficking, through contribution to activities by networks addressing environmental crime and the organisation of specific meetings such as [the waste shipment enforcement group](#) and the [wildlife enforcement group](#).

Also, my services provide meeting-based support to Member States through **technical workshops and peer-learning sessions promoting the exchange of best practices in implementing environmental law**. In addition, **direct technical assistance** is available via instruments such as the [LIFE Programme](#), [Green Assist](#), and [TAIEX](#). These tools offer tailored expertise and funding opportunities to help address specific challenges. The Technical Support Instrument (TSI) has supported environmental reforms, including projects on green budgeting, implementation of the "Do No Significant Harm" principle in public finances, preparing national biodiversity financing plans, and phasing out harmful subsidies. A growing [list of successful environmental projects across the EU](#) demonstrates the practical impact of this support. Together, these initiatives strengthen national capacities and foster more effective environmental governance.

C. Enforcement

Despite support to Member States, breaches of EU environmental law persist, requiring enforcement action to prevent harm to health, the environment and the economy. The Commission therefore **prioritises strategic and targeted enforcement**, focusing on **systemic and structural breaches** with the greatest impact, to ensure that legislation delivers tangible benefits and promotes a level playing field. On 31 July 2025, 319 infringement active cases were handled by my services (290 initiated on own initiative and 29 based on other sources, e.g. [complaints](#) and petitions) of which [40 new cases were opened](#) during the reporting period, supporting key political priorities

such as the circular economy, water resilience, and environmental rule of law. At the same time, [30 cases were closed](#) following compliance, with 87% resolved without referral to the [Court of Justice](#).

The Commission addressed significant shortcomings in the implementation of [EU waste legislation](#), including the failure to meet standards on landfill closure and rehabilitation, which resulted in fines from the Court of Justice ([C-315/23](#) and [C-318/23](#)). The Commission also took decisive action to ensure the correct transposition and implementation of the [Landfill Directive \(infringement details\)](#) which sets requirements to prevent adverse effects on human health, water, soil and air. Moreover, the Commission launched procedures against several cases of incorrect transposition of the [Waste Framework Directive \(infringement details\)](#) and the [Single Use Plastic Directive \(infringement details\)](#) to prevent and reduce the impact of certain plastic products on the environment and on human health.

The Commission continued to take action to ensure that a major steel plant operates in compliance with [EU rules on industrial emissions](#), posing serious risks to human health and the environment ([infringement details](#)); this case was also based on petitions received by the European Parliament. It urged relevant Member States to transpose and implement key directives, including the [Medium Combustion Plants Directive \(infringement details\)](#) and the [Seveso III Directive \(infringement details\)](#). The Commission also opened cases against several Member States for poor application of the [National Emission reduction Commitments Directive \(infringement details\)](#) to move towards achieving levels of air quality that do not give rise to significant negative impacts on and risks to human health and the environment, and continued action against certain Member States for failure to adopt noise maps and action plans under the [Noise Directive \(infringement details\)](#) highlighting the need for improved implementation of EU noise legislation to protect public health.

To contribute to improving water resilience across the EU and achieving the [EU's zero pollution ambition](#), the Commission also referred a case to the Court ([infringement details](#)) and urged several Member States to correctly transpose the recast [Drinking Water Directive \(infringement details\)](#). To ensure regular reviews of water use controls under the [Water Framework Directive](#), the Commission called on several Member States to take action ([infringement details](#)) and urged another Member State to improve wastewater treatment under the [Urban Waste Water Treatment Directive \(infringement details\)](#). The Court also fined a Member State for persistent wastewater issues ([C-515/23](#)) and found that another Member State was late in updating the river basin and flood risk management plans ([C-359/24](#)).

The Commission referred a case to the Court for denying access to justice on air quality plans under the [Air Quality Directive \(infringement details\)](#) and continued proceedings against several Member States for their failure to correctly transpose the [Environmental Impact Assessment Directive \(infringement details\)](#) that may lead to the approval of projects without sufficient consideration for their environmental effects, potentially harming the environment and human health.

With regard to [nature protection & biodiversity](#), the Commission referred a case to the Court for an infringement of the [Birds Directive](#) by illegally using nets on wild birds ([infringement details](#)) and launched or moved forward infringements against several Member States regarding incorrect transposition or bad application of the [Birds and Habitats Directive \(infringement details\)](#). The Commission also continued action against one Member State over the fire ant under the [Invasive Alien Species Regulation \(infringement details\)](#), and closed infringements concerning the protection of the Turtle Dove, following conservation successes ([infringement details](#)).

Failure to comply with environmental EU rules and Court judgements has serious consequences, including financial penalties under Article 260 TFEU. These aim to deter non-compliance and uphold the rule of law. Currently, [several Member States](#) are paying penalties into the EU budget due to ongoing non-compliance. Against this background, the Commission took action during the reporting period to ensure that Member States comply with Court rulings. [Formal warnings under Article 260 TFEU](#) including a [second referral to Court](#), were sent with regard to the execution of judgements on the implementation of the [Birds Directive](#), on forest habitats and the lack of protection of species

and on special areas of conservation under the [Habitats Directive](#) and on closure of illegal landfills under the [Landfill Directive](#).

4. Way forward

Engaging with stakeholders, including SMEs and local and regional actors, by holding dedicated implementation and High-level stakeholders' dialogues, reality checks, stress testing the acquis, providing strategic guidance and targeted technical assistance to Member States and businesses, laying the groundwork for a more coherent and effective implementation of the environmental acquis **is an absolute priority**. More is to come, starting this year, with the Water Structured Dialogues, designed in the Water Resilience Strategy, which aim to close long-standing compliance gaps in implementing water legislation, notably the Water Framework Directive and Floods Directive. Particular attention will be paid to also engage with regional and local authorities and actors.

Closing the gap with regard to environmental investment needs is crucial for achieving the EU's ambitious climate and environmental targets and for ensuring that all Europeans benefit equally from environmental protection. Up to 2030, the environmental investment gap in the EU, i.e. the environmental investment needs unmet by existing private and public funding, is estimated to be at least EUR 122 billion per year. However, there is potential to increase the use of existing EU funding for nature and environment-relevant investments, and take further action to make polluters pay, including by using market-based instruments. The proposed next Multiannual Financial Framework also includes targeted funding for climate and the environment. The Commission will also continue to work with the European Investment Bank on this matter and pursue its work on nature credits.

Continuing dialogue with stakeholders to identify potentials for simplification: A thorough analysis of the enforceability of the environmental existing acquis, while pursuing the dialogue with stakeholders, is important to identify genuine simplification opportunities. Such analysis also informs Commission's economic assessments, for example in the context of the European Semester. Exploring innovative solutions could also contribute to more effective implementation and enforcement, particularly if reporting obligations are streamlined. The planned environmental Omnibus, including streamlined environmental assessments and permitting, and Circular Economy Act should all provide genuine opportunities for simplifying and accelerating environmental processes, reducing bureaucracy and increasing efficiency.

Strengthening partnership: Enforcing EU law is crucial to ensuring equal treatment and a level playing field. The European Commission's enforcement powers play a vital role in protecting the rights of Europeans, with a focus on strategic and systemic cases of non-compliance. Successful implementation of EU environmental law requires shared responsibility between the European institutions and Member States. A structured approach to resolving divergences of opinion, with a focus on dialogue and cooperation, is essential. This report shows positive results. It also shows where continued engagement and cooperation of Member States is needed.

Upholding democratic values in environmental protection: The rule of law is a cornerstone of environmental protection, and access to justice in environmental matters is a fundamental right, enabling citizens and civil society to hold authorities accountable for environmental decisions. Regressions, such as disregard of court rulings in the area of environment or attempts to silence environmental defenders, have negative impact to the environmental rule of law. My services will continue to defend this principle and promote access to justice in environmental matters. We will also ensure that Member States execute the relevant rulings of the Court of Justice and that EU citizens are protected against systemic breaches of EU law. The Commission remains committed to defending the rule of law in line with the [2025 Rule of Law Report](#).

Annex: examples

1. The Environmental Implementation Review 2025

The Environmental Implementation Review (EIR) is a key tool to help the Member States to benchmark their environmental implementation performance (including financing needs) against the standards laid down in EU environmental law and policy, against their own past performance, and against other Member States. The EIR also highlights success stories and best practices that are useful to the Member States' implementation efforts. In addition, the EIR contains "priority actions", which are recommendations from the Commission to each Member State about the most urgent and important actions to take regarding environmental implementation. In light of this knowledge and recommendations, the EIR is also useful to regional authorities, businesses and civil society, as it can help them to anticipate the trajectory of the environmental transition and shape their actions accordingly.

Implementing EU environmental law and policy requires a sustained, multi-pronged effort. In light of the Commission's experience in discussing implementation with the Member States, the 2025 EIR identifies five key factors that make the difference between good implementation and poor implementation. These factors are: (1) the integration of environmental objectives in public policies, through political dialogues and choices on sharing the implementation cost among stakeholders; (2) financing; (3) administrative capacity, especially to ensure proper planning and coordination; (4) digital data; and (5) the role of public participation in environmental decision-making and access to justice.

2. A uniform format for national restoration plans to guide Member States in implementing the Nature Restoration Regulation

To support Member States in the implementation of the Nature Restoration regulation, the European Commission has adopted an [Implementing Regulation](#) that establishes a uniform format for national restoration plans. The uniform format is the central implementation tool for the Regulation. It will support Member States in their nature restoration planning and keep administrative burden as low as possible through pre-filling and a report-once approach, in line with the Commission's commitment to simplification. Mindful of concerns about the costs of reporting, the format makes full use of existing planning and reporting information so that Member States only need to report once, and data is reused, thereby improving the evidence base and minimising costs.

3. Implementation Dialogue on the Chemicals Industry Package informing the European Chemicals Industry Action Plan

All stakeholders agreed on the need to keep chemical production in the EU to secure autonomy of key supply chains, safe jobs and sustainable production of safe chemicals. There was also consensus on the need to step up enforcement and compliance with chemicals legislation to ensure a level playing field for companies and better health and environmental protection. Taking into account this Dialogue and the input from the Strategic Dialogue on the future of the Chemical Industry in Europe, with representatives of the sector hosted by President Ursula von der Leyen, a [Chemicals Industry Action Plan](#) was adopted on 8 July.

4. The Implementation Dialogue on environmental assessments and permitting

Accelerating permitting processes is key to strengthening Europe's industrial competitiveness during the green transition. The Implementation Dialogue enabled an open discussion with stakeholders to identify the potential challenges of implementation and simplification solutions. It featured an open and fruitful exchange with several stakeholders, including business and industry, civil society, public authorities and judges. This Dialogue will inform the upcoming Commission Environmental Omnibus proposal streamlining environmental permitting.

5. Call for evidence on future environmental legislation simplification

The Commission launched a call for evidence on 22 July to simplify environmental legislation and reduce administrative burdens at the implementation level. The upcoming environmental omnibus proposal will put together a series of measures to simplify environmental legislation concerning the circular economy, industrial emissions and waste management. The objective is to identify existing EU environmental policies that have the potential for real simplification for operators without affecting the EU's environmental objectives and the protection of human health. This call for evidence assembled around 200 000 replies, which the Commission will take into account when preparing a proposal.

6. Safer waste management through better landfill standards

The European Commission has taken legal action against Member States to ensure proper application of the Landfill Directive, which aims to reduce harmful impacts from waste disposal. This Directive sets certain requirements for landfills to avoid risks to human health, air, soil, and water. It requires that waste be treated before being landfilled and sets clear targets to significantly reduce landfilling by 2035. Inadequate implementation of these rules increases the risk of pollution and long-term environmental damage, especially in communities near landfills. By enforcing these standards, the European Commission helps prevent contamination and protects both people and nature.