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LIMITE

DATAPROTECT

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WORKING DOCUMENT

From:	Presidency
To:	Delegations
Subject:	Easing administrative burdens related to the General Data Protection Regulation (GDPR) - Discussion paper

Ahead of the meeting of the Working Party on Data Protection of 10 October 2025, delegations will find in the annex a discussion paper on easing administrative burdens related to the General Data Protection Regulation (GDPR).

Framework for an exchange of views: easing administrative burdens related to the General Data Protection Regulation (GDPR)

Since its adoption in 2016, the GDPR has contributed to strengthening the protection of fundamentals rights and fostering trust in cross-border data flows across the Union. However the GDPR is also criticized for contributing to the administrative burden on especially small business and voluntary organisations. To address these concerns multiple paths have been identified.

While the objects of these paths are aligned, the Presidency finds that it provides conceptual clarity to distinguish between possible targeted simplification of the GDPR and the effort to ease the administrative burden through enforcement, guidance and implementation of the GDPR.

Enforcement, guidance and implementation of the GDPR

In the most recent position and findings regarding the GDPR adopted by the Council, it underlined that while GDPR remains an appropriate legal framework for the protection of personal data of individuals in the Union, practical implementation challenges remain¹. Notably, the Council stressed that opportunities to further support smaller entities in complying with their obligations under the GDPR should be explored.

Within the Data Protection Working Party a number of initiatives have been explored in that regard. Recently, the Polish Presidency has facilitated discussion on the possibilities of further supporting e.g., SMEs, in complying with the GDPR including by facilitating exchanges and drafting reports regarding single entry points for reporting obligations² and guidance on the interplay between the AI Act and GDPR³.

At a high-level meeting in Helsinki on 1–2 July 2025, the European Data Protection Board (EDPB) adopted a statement (the Helsinki Statement) on enhanced clarity, support and engagement⁴. The statement outlines new initiatives to facilitate easier GDPR compliance, to enhance the dialogue with a broad range of stakeholders, to strengthen consistency and to develop cross-regulatory cooperation in the new digital regulatory landscape.

At the Meeting of the Data Protection Working Party on 10 October the EDPB will be invited to present the Helsinki statement and the initiatives, which have been implemented in this regard.

Possible targeted simplification of the GDPR

In the Commissions communication, a Simpler and Faster Europe, published on 11 February 2025, the Commission announced its target to reduce reporting requirements by at least 25% for all companies and 35% for SMEs, and to reduce all recurring administrative costs by 25%.

As part of its objective of simplifying EU rules and reducing administrative burdens, the Commission has proposed the "Omnibus IV", which includes targeted modifications of the GDPR focusing on the reduction of burden of record-keeping obligations for SMEs and SMCs and

¹ ST 15507/2023 INIT.

² ST 10035/2025 INIT.

³ WK 5269/2025 INIT.

⁴ https://www.edpb.europa.eu/our-work-tools/our-documents/statements/helsinki-statement-enhanced-clarity-support-and-engagement_en

organisations with less than 750 employees. On 24 September, Coreper adopted a mandate for negotiations with the European Parliament regarding Omnibus IV⁵.

The Commission has further announced that it will propose a digital package towards the end of the year. This will form part of a broader assessment of whether the expanded digital acquis, adequately reflects the needs and constraints of businesses such as SMEs and small midcaps, going beyond necessary guidance and standards that facilitate compliance⁶.

On 16 July the Commission conducted an implementation dialogue with relevant stakeholders regarding the GDPR. The Commission has shared written summary conclusions from the implementation dialogue⁷.

At the informal JHA-ministerial meeting on 22 and 23. July one of the working sessions dedicated to "simplification and the GDPR". In this context the justice ministers reaffirmed their commitment to both the fundamental rights enshrined in the GDPR and the aim of fostering the Unions global competitiveness through simplification. Generally, the ministers did not see the need for a full-scale global re-opening of the GDPR. A number of ministers did however contemplate the need for more targeted amendments of the GDPR.

At the meeting of the Data Protection Working party on 12 September the Commission debriefed the Working Party from the implementation dialogue. The Presidency additionally debriefed from the informal JHA-ministerial meeting.

Framework for an exchange of views

Having regard to ministers' reflections at the working session regarding simplification and the GDPR at the informal JHA-ministerial meeting in Copenhagen, the Presidency proposes a broad exchange of views. In this context, the Presidency invites members states to reflect upon all measures, legislative or otherwise, that might contribute to easing administrative burdens related to the GDPR with a view to provide further inputs for the Commissions ongoing considerations as wells as the implementation of the EDPB 's Helsinki Statement.

The presidency intends to ask for Member States contributions based on the questions below.

Guidance, enforcement and implementation

1. Do you consider that working on enhancing clarity, support and engagement from individual Supervisory Authorities and/or from the EDPB could ease administrative burdens related to the GDPR?
2. Do you identify concrete measures or best practices, which could be implemented by individual national Supervisory Authorities and/or by the EDPB to enhance clarity, support and engagement?
3. Do you identify other concrete measures, which could be implemented by Member States or the Commission to ease administrative burdens related to the GDPR within the current legislative framework?

⁵ ST 13223/2025.

⁶ [8556fc33-48a3-4a96-94e8-8ecacef1ea18_en](#)

⁷ ST 12411/2025 INIT.

The part of the exchange regarding enforcement and implementation, which relates to the tasks and activities of the EDPB (point 1 to 2) will be conducted in the presence of the EDPB to allow the EDPB to also take member states' input directly into account.

Possible legislative measures

4. While ensuring a high level of data protection and preserving the core principles and provisions of the GDPR, do you identify concrete provisions or obligations under the GDPR that might be subject to targeted amendments to ease administrative burdens related to the GDPR?

Next steps

After the exchange of views, Member States are invited to share written contributions until 22 October COB.

The Presidency intends to present a report compiling Member States suggestions for how to ease administrative burdens related to the GDPR.

The report is intended to provide input to the Commission's ongoing considerations regarding the GDPR in the light of e.g., the implementation dialogue on the GDPR. As the Commission has indicated that it will consider the matter closely before taking possible further steps, the report aims to share Member States preliminary suggestions, without prejudice to further assessment and discussions.