CCIA Europe Response to the European Commission's Call for Evidence

Towards A Smarter Framework for Europe's Green Future

September 2025

The Computer & Communications Industry Association (CCIA Europe) appreciates the opportunity to provide feedback to the European Commission's call for evidence on simplifying administrative burdens in EU environmental legislation. Excessive burdens continue to limit the global competitiveness of businesses operating in the Single Market.

CCIA Europe believes reducing this red tape is crucial for enhancing EU competitiveness and promoting innovation, which in turn will lead to new environmental solutions. The Association is encouraged that the Commission has identified key areas for improvement, including the Waste Framework Directive, Extended Producer Responsibility (EPR) schemes, and the digitalisation of compliance and reporting requirements.

Indeed, simplifying these processes can yield significant benefits. However, further practical steps are needed to allow digital sector businesses to focus their resources on developing innovative products and services that benefit both consumers and the environment. Therefore, we have outlined eight actionable recommendations below.

I. Unlocking innovation by simplifying battery rules

Recommendations:

1. Create a simpler path to safety, innovation, and sustainability
2. Simplify the transition from R&D to market-ready products
3. Make compliance easier for a competitive Single Market

II. Strengthening the Single Market through smarter EPR

Recommendations:

4. Unify and digitalise the fragmented Single Market for waste
5. Eliminate redundant aspects of existing EPR schemes

III. Embracing a digital-first future for product information

Recommendations:

6. Simplify compliance and reduce operational costs
7. Facilitate a smooth transition to a fully digital future

IV. Ensuring consistency in data centre legislation

Recommendations:

8. Create a clear regulatory framework for sustainable data centres

Introduction

The Computer & Communications Industry Association (CCIA Europe) welcomes the European Commission's call for evidence on reducing administrative burdens in EU environmental legislation. We strongly support this effort to streamline compliance – an essential step towards fostering a more competitive and innovative European economy.

Excessive administrative requirements and fragmented rules across the Single Market, particularly in environmental policy, continue to undermine the EU's global competitiveness. Outdated obligations and counterproductive mandates raise costs for both businesses and the environment. Cutting this red tape is essential to establishing a predictable regulatory framework that enables companies to focus on innovation.

A modern regulatory framework should be clear, harmonised, and forward-looking. To that end, we have set out eight key recommendations, organised under four major themes:

I. Unlocking innovation by simplifying battery rules
II. Strengthening the Single Market through smarter EPR
III. Embracing a digital-first future for product information
IV. Ensuring consistency in data centre legislation

Together, these recommendations would help the EU build a coherent, harmonised, and future-proof environmental regulatory framework – one that strengthens the Single Market, while empowering companies to deliver for consumers and the environment.

I. Unlocking innovation by simplifying battery rules

Effective and future-proof regulation must be practical, proportionate, and reflect market realities. A one-size-fits-all approach is not appropriate as it can stifle progress and create unintended negative consequences for safety, competitiveness, and the environment.

1. Create a simpler path to safety, innovation, and sustainability

A simpler regulatory framework is most often also much more effective. Even the original Commission proposal for the EU Batteries Directive recognised that, in practice, there are certain circumstances in which making the battery removable and replaceable would have an adverse impact that outweighs the potential environmental benefits[1].

For businesses, mandating end-user battery replacement complicates their ability to manage product safety and environmental obligations, as it places these critical tasks in the hands of untrained consumers. While a more effective model is to channel battery replacements through qualified professionals, this is unlikely to be workable for high-tech products, which often contain custom-made batteries. As such, the Commission should also, in parallel, reassess whether technological developments and hazards linked to

[1] Commission Staff Working Document Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) 2019/1020, available here.

specific categories require additional considerations, including exempting them from Article 11 of the Regulation altogether, as originally conceived by the Commission[2].

Restricting battery removal and replacement to trained professionals would greatly streamline risk management for businesses. When professionals handle these procedures, companies can mitigate the significant liability and safety risks that would arise from end-users using (potentially faulty) third-party batteries. This danger is not theoretical: studies[3] have shown that 88% of such batteries failed and caused fires. For example, Google's Pixel 8 safety guidelines[4] warn that using non-qualified batteries or performing improper replacements can result in fire or leakage hazards.

While well-intentioned, **encouraging do-it-yourself replacements risks creating unintended safety risks and counterproductive environmental outcomes**. With the EU's collection rate for e-waste at only 40.1% in 2022[5], any increase in improperly discarded batteries will only worsen recovery rates.

For high-tech devices such as virtual reality headsets, a sudden failure from an improperly replaced battery poses significant risks, including punctures and overheating while worn on the head, or short-circuiting during amateur replacement – all of which can lead to fires or permanent damage.

Professional servicing channels, by contrast, offer a more reliable pathway for ensuring that used batteries are collected and recycled safely, allowing businesses to meet their environmental obligations more effectively.

High-tech products, such as wearable technologies, are often built with custom-made batteries and lack a necessary secondary market. Considering the disproportionate burden imposed on manufacturers, combined with the high risks consumers would face, and the limited environmental upsides, the Commission should consider exempting such high-tech products by extending the list of products covered by Article 11, paragraph 2, of the Batteries Regulation.

2. Simplify the transition from R&D to market-ready products

Forcing a one-size-fits-all replaceability mandate complicates the entire product development lifecycle – increasing costs and stifling the innovation crucial for market leadership. The mandate would impose severe limitations on innovation right at a time when companies are leveraging miniaturisation and advanced integration techniques. Even if modular battery compartments make repair easier, they would stifle innovation in efficient assembly. This is particularly problematic as components like eyeglass temples for wearables become thinner, and the available space for batteries shrinks.

[2] Commission Staff Working Document Impact Assessment Report Accompanying the document Proposal for a Regulation of the European Parliament and of the Council concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) 2019/1020, available here.
[3] Safety Concerns of Aftermarket Smartphone Lithium Batteries, UL Solutions, available here.
[4] Safety & Regulatory Guide for Pixel 8 & Pixel 8 Pro, available here.
[5] Waste statistics - electrical and electronic equipment, European Commission, 2022, available here.

Therefore, the **replaceability and repairability mandate imposes severe design constraints** that force companies to engineer products that are bulkier, heavier, and less durable, **directly contradicting what market research shows consumers want[6].**

The significant lead times required to re-engineer complex products to accommodate easily removable batteries are often also underestimated. The complete research and development (R&D) lifecycle for such a fundamental redesign can range from 18 months to as long as four years[7], depending on the product. This process represents a substantial investment of both capital and time. It is therefore impractical to expect businesses to completely redefine their product lines within just a few months.

The Commission's timeline for the possible extension of the products exempted from the Batteries Regulation's removability and replaceability requirements further complicates the timeline. The partial derogation process commenced much later than originally proposed and is now tied to a very long process. Article 11 is coming into force in February 2027, which is just around the corner from a product pipeline perspective, considering that manufacturers are unlikely to have any certainty before the end of 2025.

From a business perspective, this delay exacerbates the situation as it provides no certainty, especially to manufacturers of novel high-end technologies. In order to address this clear misalignment, a delay of three years to the application of Article 11 is appropriate. In the meantime, the European Commission should reassess whether technological developments and hazards linked to specific categories require additional considerations, including exempting certain product categories from Article 11 altogether.

3. Make compliance easier for a competitive Single Market

A predictable and harmonised regulatory environment simplifies business operations. Imposing EU-specific rules that diverge from global standards unnecessarily complicates compliance for any business operating in the Single Market. This regulatory fragmentation increases supply chain complexity, raises administrative costs, and forces difficult strategic decisions about launching products in Europe.

As reports have highlighted[8], complex regulatory burdens are already a significant impediment to innovation and the ability to scale in Europe of digital enterprises. A **targeted derogation for specific product categories is needed to simplify the rules of the market**.

The current list of derogations and exemptions included in Article 11, paragraph 2, of the Batteries Regulation is too narrow in scope and does not account for the fast-moving pace of high-tech devices. Keeping the selection of obligations that need to be simplified so narrow, will continue to hold back innovation in Europe and jeopardise EU leadership in a range of sectors – for example, next-generation mobile computing platforms. A

[6] Promoting product longevity, Policy Department for Economic and Quality of Life Policies, Directorate-General for Internal Policies, European Parliament Research Service, March 2020, available here.
[7] Product Development Timeline: How Long It Takes to Develop a New Hardware Product, available here.
[8] Strengthening EU Digital Competitiveness: Stoking the Engine, J. Scott Marus, Maria Alessandra Rossi, 2024, Centre for a Digital Society, Robert Schuman Centre, European University Institute, available here.

combination of risks needs to be considered in determining an expanded list of derogations and exemptions.

Taking a more pragmatic approach would reduce the need for businesses to create costly EU-specific product variants and lower the administrative burden associated with navigating the fragmented EU regulatory landscape. Indeed, this would greatly contribute to making the EU a simpler and more attractive market for companies to invest and innovate, also allowing for more effective competition on a global scale.

CCIA Europe believes that battery replacement should be carried out by qualified professionals, be it the original manufacturers or third-party experts, to mitigate clear safety risks – particularly given that:

- The vast majority of consumers lack technical expertise for these delicate operations.
- Completely redesigning products and production lines in the span of a few months is impossible.
- Battery replacement mandates would also create unintended environmental consequences.
- Rules diverging from global standards would force businesses to produce region-specific product designs, thus harming the already struggling competitiveness of the EU.

II. Strengthening the Single Market through smarter EPR

An efficient and harmonised EPR framework is essential to the EU's transition toward a more sustainable and circular economy. Today's patchwork of rules – diverging across Member States – creates unnecessary administrative complexity and weakens the Single Market.

4. Unify and digitalise the fragmented Single Market for waste

While Extended Producer Responsibility (EPR) is a key tool for enhancing the EU's circular economy, its current implementation severely hampers business operations. Diverging legal frameworks across and within Member States have created layers of complexity that divert company resources away from sustainability objectives and towards administrative compliance[9]. The associated administrative burden can require up to 4,000 staff hours annually for a single company – a significant drain on resources, especially for SMEs.

To tackle this growing complexity, we **strongly support the creation of a digital one-stop shop (OSS) for EPR information, registration, and reporting**, with the objective of establishing a single point of entry for all mandated EPR schemes in the EU.

This digital layer would unlock massive simplification for companies. An effective OSS would allow for a single registration and reporting process, use modern tools like application programming interfaces (APIs) to communicate with national registries, and

[9] For a business operating across the EU, this can mean managing 81 different compliance processes for packaging, batteries, and electronics, a number set to rise to 108 with the new rules for textiles.

provide all necessary compliance information in one place. It would also allow a company to fulfil its EPR registration obligations for the entire EU Single Market through one streamlined and efficient procedure. To make this a reality, CCIA Europe calls on the European Commission and co-legislators to take clear, simplifying actions.

First of all, they should establish the legal basis for a Commission-managed digital OSS in the upcoming Circular Economy Act to ensure neutrality and trust. Second, drive the digitalisation of national EPR registries by setting harmonised minimum requirements, such as support for APIs, to ensure seamless communication with the OSS. Thirdly, continue the vital work of harmonising key aspects of EPR frameworks across the EU (including reporting dates, data requirements, and product categories), which is essential to simplify the system and maximise the benefits of the digital one-stop shop.

5. Eliminate redundant aspects of existing EPR schemes

While EPR is a cornerstone of the EU's circular economy, its ongoing and upcoming implementation is burdened by a patchwork of separate schemes with diverging requirements that create unnecessary complexities. To truly reduce the administrative burden, the Commission must axe redundant obligations and inconsistent reporting timelines, foster market-led solutions, and harmonise the systems that previous pieces of legislation – such as the Batteries and Waste Batteries Regulation[10] or the Packaging and Packaging Waste Regulation (PPWR)[11] – have introduced.

For example, several of today's EPR requirements create unnecessary friction for businesses, particularly for those already established and compliant within the EU. A prime example is the rule on authorised representatives. As of summer 2026, an EU authorised representative will be mandatory in every Member State, yet this requirement does not exempt sellers already established in the Union. We suggest the Commission remove this duplicative requirement for any business that already has a legal presence in the EU.

To significantly reduce the administrative burden, the framework should embrace market-led solutions. Granting online marketplaces the flexibility to offer an optional 'on-behalf' compliance service would empower both platforms and their sellers to innovate and compete, simplifying cross-border trade.

As the EU transitions towards a more circular business model, an effective EPR mechanism covering all waste streams, sectors, and products must be designed to nurture the circular economy, not hinder it. A key step would be to clarify that second-hand goods are excluded from the EPR scope. This common-sense step would prevent double-charging producers for the same item and directly support the EU's objectives for stimulating the reuse market.

Another impractical issue is the current imposition of ex-ante registration requirements. Forcing online marketplaces to collect EPR numbers from sellers before any sales are made is a redundant administrative hurdle, especially when a seller may ultimately complete zero sales in that market.

[10] Regulation (EU) 2023/1542 of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC, available here.
[11] Regulation (EU) 2025/40 of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, available here.

This lack of harmonisation is particularly evident in reporting obligations. Businesses currently lose valuable time and resources navigating different reporting frequencies across various Member States and waste streams. A single, harmonised annual declaration period across the entire Single Market would be a concrete and highly effective simplification measure.

Finally, legal and temporal certainty is essential for business investment. Companies are already making significant investments to comply with complex new EPR schemes. We strongly welcome the Commission's simplification agenda, but if these changes are only implemented after compliance deadlines have passed, companies will have incurred irreversible costs on systems that will soon be outdated.

To prevent this, we **call on the Commission to postpone the application of upcoming EPR obligations by 12 to 24 months**. This pragmatic 'stop-the-clock' approach, which has precedent in other major EU legislation, would align regulatory timelines and save businesses from wasting valuable resources.

III. Embracing a digital-first future for product information

As the European Commission strives to reduce regulatory and administrative burdens while pursuing climate goals, digitalisation offers a practical solution with clear benefits for both businesses and citizens.

6. Simplify compliance and reduce operational costs

For businesses operating in the Single Market, the current mandate for physical, in-box product documentation creates significant and unnecessary complexity and cost. Digitalisation offers a straightforward path to simplify compliance and unlock immediate (commercial and environmental) savings at the same time. Under current rules, however, businesses must manage the costly process of printing, packaging, and distributing paper labels and compliance marks in multiple languages, a logistical burden that adds no value and produces paperwork that is often discarded by consumers.

A much more pragmatic approach to digitalisation is needed in this respect in order to ensure businesses can benefit from simplification right now, not years in the future.

While the Digital Product Passport (DPP) is a valuable long-term goal in the pursuit of digitalisation, its implementation for key products is still years away, around 2030 for mobile phones, for example[12]. Forcing businesses to keep waiting for the DPP creates an unnecessary 'simplification gap' of five or more years – locking them into outdated, costly, and inefficient processes.

What's more, the European Commission's own evaluation of the New Legislative Framework (NLF)[13] has already identified the current requirement for physical documentation as burdensome. The economic case for simplification is therefore clear. **Switching to digital**

[12] The Digital Product Passport (DPP) may be compulsory for mobile phones and tablets due to the review of their Ecodesign requirements, as planned in the ESPR and Energy Labelling Working Plan 2025-30 (avaialble here).
[13] Evaluation of the new legislative framework, 2022, available here.

information would streamline logistics, reduce paper waste, and eliminate costly reprinting and repackaging every time regulations change. For consumer electronics alone, EU compliance costs are estimated at €797 million per year at the moment. A digital-first approach would reduce these costs by nearly €120 million annually[14].

If implemented correctly, with business needs and realities in mind, the DPP can also be a great opportunity for simplification. The integration of the most relevant substances of concern in products (SCIP) reporting data fields into the DPP has the potential to streamline reporting obligations and allow for much more efficient information transfers.

As things currently stand, the SCIP database constitutes a high administrative burden. Meeting the reporting obligations and maintaining the data – especially following the substance of very high concern (SVHC) candidate list updates – is a disproportionate effort given the limited use of the database by recyclers and consumers.

7. Facilitate a smooth transition to a fully digital future

To maximise the benefits of simplification, a **digital-first approach must be technology-neutral**. A flexible framework simplifies product design and supply chain management by allowing businesses to choose the most efficient and cost-effective digital tool for their specific labelling needs, whether that be QR codes, barcodes, or RFID tags.

Indeed, the mandating of a single technology by the European Union would only complicate operations by locking businesses into a standard that could quickly become outdated, forcing costly transitions down the line.

IV. Ensuring consistency in data centre legislation

If the EU wants to become a true AI continent and lead the green transition at the same time, providing a clear, consistent, and predictable legal framework for sustainable data centres is essential to foster investments and support Europe's digital ambitions

8. Create a clear regulatory framework for sustainable data centres

While most of the time well-intentioned at an individual level, the current landscape of different sustainability rules for data centres across the EU creates a complex and fragmented regulatory environment for operators. Key directives and regulations often lack explicit alignment, which risks creating additional administrative burdens for businesses.

A significant issue in this respect is the duplication of reporting and data collection requirements. For example, energy performance metrics under the Energy Efficiency

[14] Oxera Consulting, 'The economic impacts of Digital Product Passports in the EU', 24 March 2025, available here.

Directive[15], sustainability criteria in EU Taxonomy[16], and product-specific requirements from the Ecodesign for Sustainable Products Regulation (ESPR)[17] can all demand distinct and sometimes conflicting reporting formats, resulting in wasted time and resources.

This complexity is only set to increase in the near future. Because the interaction between the current legislative framework and upcoming initiatives – like the proposed Cloud & AI Development Act (CAIDA)[18] and the energy efficiency initiatives announced by the Commissioner for Energy and Housing[19] – creates regulatory uncertainty that can hinder long-term investment. Businesses may also face conflicting policy goals. For instance, rules on refrigerant choices can directly impact a facility's energy efficiency, which in turn creates difficult compliance trade-offs.

To avoid such issues, consistent harmonisation of these rules is needed. CCIA Europe therefore **calls for the simplification and rationalisation of existing laws that affect the sustainability of data centres**. A clear and predictable legal framework is essential to foster investment, promote sustainable design, and support Europe's digital ambitions.

Conclusion

The challenges and solutions outlined in this paper all point to a single, fundamental priority: the need for a shift towards smarter, more practical, and simplified environmental regulation. Today's high level of regulatory fragmentation, rigid one-size-fits-all mandates, and outdated requirements add unnecessary complexity that simply continues to stifle innovation and undermine the EU's competitiveness.

The European Commission now has a unique opportunity to clarify and modernise existing EU environmental rules, enabling businesses to direct their resources towards sustainable products and services that will drive the EU's renewed push for global competitiveness.

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve

[15] Directive (EU) 2023/1791 of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955, available here.
[16] Consolidated text of the Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives, available here.
[17] Regulation (EU) 2024/1781 of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, available here.
[18] AI Continent – new cloud and AI development act, available here.
[19] Speech by Commissioner Dan Jørgensen at the IEA 10th Annual Global Conference on Energy Efficiency, 12 June 2025, available here.

understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

Visit ccianet.eu, x.com/CCIAeurope, or linkedin.com/showcase/cciaeurope to learn more.

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