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LIST OF SIMPLIFICATION AND ENFORCEMENT MEASURES

1. Encourage well-calibrated **regulatory harmonisation to reduce unnecessary administrative burdens** while ensuring a clear and consistent framework for businesses operating across multiple countries, without compromising economic and social development objectives, and climate and environmental objectives.

2. **Harmonise compliance and reporting obligations across sectors**: Redundant and overlapping regulations - such as multiple cybersecurity and safety reporting requirements - create inefficiencies. Ideally, a single reporting online portal should be created. A regulatory stocktaking exercise should be conducted to identify and remove unnecessary reporting burdens, ensuring better implementation of existing rules. The Commission's **Omnibus** packages are a step in the right direction in addressing the problems businesses face if carried out properly.

3. **Electronic tools and portals should be the norm for all reporting**, and Member States must be obliged to put in place electronic permitting systems. Automated reporting tools, including AI, would streamline processes, improve the accuracy of reporting and reduce administrative burdens.

4. **A common approach to integrated projects**: Integrated European projects for common solutions for complex multi-themed challenges often face great administrative burden, as they can consist of multiple applications or span the working areas of multiple managing authorities. By using a common approach to integrated projects, they spend less time reporting and more time delivering for European citizens.

5. **Simplified reporting for beneficiaries of European structural and investment funds:** Instead of scrutinising every euro, reporting shall flexibly combine results-based and cost-based models depending on project nature and objectives. Audit and control procedures are modified by strengthening the single audit principle, reducing duplication, and clearly distinguishing between unintentional errors and fraud.

6. Accelerate the adoption of **digital tools to streamline reporting and auditing processes for beneficiaries of EU funds**: A standardised and fully digitalised system would reduce administrative burdens, minimise errors, and improve efficiency for both beneficiaries and administrations.

7. **Alleviate the administrative and reporting burden for farmers,** through the Simplification Package of the current agricultural legislative framework, which according to the Vision for Agriculture will deliver on-farm simplification and **streamlining of requirements, making greater use of simplified payments and easing access to financial instruments** available under the current MFF.

8. **One digital platform for the maritime sector** to submit data. Currently different formats and data requirements lead to grave inefficiencies and a burden for ship-owners. A single platform for submitting data should prevent double reporting.

9. **Ensure a strict enforcement of the Better Law Making agreement.** Before any new regulation, the Commission must carry out a full impact assessment of the proposal. As stated in the Better Law Making agreement, the Commission's Regulatory Scrutiny Board must also carry out a quality check of its impact assessments to make sure that the impact on the businesses is not disproportionate. This impact assessment must evaluate the impact on EU businesses, particularly SMEs and start-ups of any EU new legislation. This assessment should evidence how the proposed new EU legislation contribute to the EU competitiveness, measure compliance costs, stimulate EU sustainable growth and innovation objectives. Consider the use of artificial intelligence to check the consistency of EU legislation.

10. In the next MFF, **competitiveness mainstreaming** should be introduced throughout the Union budget. This approach should follow the same structured methodology used for climate mainstreaming in the Union budget, while ensuring overall EU's priorities and values.

11. Simplified and standardised **indicators and targets** and **data collection methods** across different policies are needed for consistency and reduced redundancy. Visualisations should shift from inputs and outputs to results-oriented insights that highlight the real-world effects of projects. EU-level integrated IT platforms should provide clear, actionable data for better decision-making.

12. When reviewing existing legislation and preparing new proposals, the Commission should build on its **own reporting, the experience from the Member States** in enforcing the EU legislation and the **consultation of stakeholders**, including those living and working in particular areas, such as rural areas, in order to identify hurdles they face and to adapt and make these policies fit for purpose.

13. **Assess the impact of amendments:** During the legislative process and especially in view of trilogue negotiations, significant amendments proposed should be able to undergo impact assessments upon request by Parliament.

14. **Enabling law enforcement and judicial authorities to cooperate better across borders:** The EU needs to enhance law enforcement cooperation against transnational threats and networks, including organised crime and terrorism. We need legislative proposals that will enable our law enforcement and judicial authorities to cooperate better across borders.

15. **Use level 2 legislation** to facilitate implementation of Level 1: Concentrate the use of level 2 legislation, such as delegated and implementing acts to technical issues. Level 2 legislation should always have clear timelines and timely notice to be enforceable for stakeholders. When developing level 2 measures the Commission should systematically conduct stakeholder consultation to ensure their simplicity, readability and workability.

16. **Timely and harmonised implementation**: To avoid multiple implementation phases for companies in practice, EU legislation should systematically foresee that level 2 measures must be published before the entry into force of level 1 measures. To avoid diverging implementations in the 27 Member States it is key to ensure a harmonised EU

implementation framework. For financial services specifically it is essential to ensure a more integrated supervision at EU level.

17. **Remove the barriers for a circular single market**: The EU must ensure the free movement of waste for recycling and create a real EU market for secondary raw materials by removing regulatory barriers and through simplified and more effective common standards and procedures.

18. **Empowering Consumers for the Green Transition Directive**: In a delegated act, the design of the harmonised label and notice should include only the essential information requirements as well as a link to full information for consumers.

19. **Speed up the scale-up of clean technologies across the EU** by removing all market barriers between Member States for the uptake of innovative green technologies and products. The EU must simplify the access to finance for the scale-up of clean technology by improving synergies between different instruments as well as national financing, and by reduced bureaucracy and faster procedures for the funding applications.

20. **Speed up and simplify the EU authorisation of low-risk plant protection products (PPP) and biocontrol PPP**: the authorisation procedure for such products takes too long and is not well aligned between Member States. Such action is promised in the Vision for Agriculture. We need to prioritise low-risk and biocontrol authorisations and improve and align procedures and communication between EU-level and national authorities..

21. **Simplified and better enforced consumer policies:** In the Consumer Agenda 2025-2030, the focus should be on strengthening enforcement and harmonising consumer protection across Member States.

22. **Reporting requirements** need to be simplified throughout all **financial services legislation**. An approach could be to rely more on existing data sources such as ESAP and the PRIIPs KID. Reporting requirements must ensure coherence and comparability.

23. **Disclosure to consumers in the context of financial services:** Currently, consumers are often overflown with information - it is too heavy and not understandable. By willing to protect consumers when making investment decisions we have achieved the opposite by providing too much information. Disclosures to clients need to be streamlined and made simpler.

24. **Create a single European business code** ("28th regime"): SMEs face significant administrative burdens when trying to scale across borders due to inconsistent national rules. Such a regime would provide a harmonised legal framework for businesses operating across the single market, simplifying cross-border transactions and reducing compliance costs.

25. **Establishing a 28th Regime for Scale-Ups and Venture Capital Funding:** A pan-European investment framework will harmonise rules, improve capital access, and retain high-growth businesses within Europe.

26. **Clarify rules in tech regulation:** Following the planned fitness check on digital laws it is necessary to address the need to reduce unnecessary burden on companies and to streamline definitions, implementation and reporting to ensure legal certainty.

27. **Ensure legislative coherence** and **prevent conflicting requirements**: Conflicts between different EU regulations related to the very same issues may create legal uncertainty. The EU should mandate an ex-ante **regulatory coherence check** before new legislation is introduced.

28. **Ensure proper enforcement of digital and tech legislation** which is crucial for the better functioning of EU internal market.

29. Merge cybersecurity and digital legislation into a **single digital rulebook**, including a revision of the Cybersecurity Act, a binding 5G toolbox, and unified definitions and reporting requirements.

30. **Simplification of the implementation of the AI Regulation:** The Code of Practice for General-Purpose AI model should represent a central tool for providers to demonstrate compliance with the AI Act, incorporating state-of-the-art practices. It should not in any case create a de-facto parallel legislation that goes beyond the political agreement on the AI Act.

31. **Push for the European Business Wallet**. This should serve as a key simplification tool by providing companies with a secure, digital repository for essential business documents and certifications. This would reduce bureaucratic hurdles by enabling businesses to easily access and share verified information across EU borders.

32. **Improving efficiency through speedy digitalisation in the fields of home affairs and justice:** The development of e-justice and the exploration of how AI could enhance data processing and analysis is crucial for improving efficiency. The rapid digitalisation and homogeneous use of the EU IT systems across the Member States is essential for implementing the EU Pact on migration and asylum, for example.

33. **Consider creating a definition for small mid-cap companies.**

34. **Simplifying compliance obligations for low-risk SMEs in the GDPR.** The GDPR compliance process can be challenging, time-consuming and costly, especially for small and medium-sized enterprises. Therefore, it would be important to provide simplified tools, which reduce obligations for low-risk SMEs to comply with EU legislation.

35. **Ensuring that simplification does not compromise transparency and effective budgetary control:** European citizens expect the EU budget to be managed responsibly, thoroughly monitored, and safeguarded against fraud and corruption.

36. **Streamline audit and control procedures:** Procedures, especially under the Recovery and Resilience Facility, remain overly complex, requiring multiple checks. There is a strong need to simplify and rationalise audit and control procedures for all future performance-based funding mechanisms to ensure their effectiveness.

37. **Mainstreaming should align with broader political objectives** beyond budgetary concerns and the addition of themes should be approached with caution to avoid overloading the governance framework.

38. More flexibility is possible regarding instruments under the **EU external action** that have their distinct political logic and implementation modalities: think development cooperation, humanitarian aid and pre-accession. The EU is best served by safeguarding

them as distinct and this should be the backdrop of the MFF plans for external action after 2027.

39. Funding from the **Innovation Fund** should become more accessible for maritime and aviation sectors.

40. **Reduce the average approval time** resulted from the complicated and fragmented requirements in biotech, construction and many other areas. For instance, the average approval time for use of drones in the specific category is up to 8-12 weeks. Streamlining documentation requirements could significantly speed up the approval process in various areas.

41. **Harmonisation of rules for roadworthiness inspection of trucks and trailers in the EU:** It would increase flexibility and predictability for transport companies and reduce CO_2 emissions if heavy-duty vehicles are not required to return to the Member State of registration for inspections.

42. **Medical Device Regulation: Reduce regulatory burden for Medical- and In-Vitro Device Manufacturers.** Removing the requirement for reclassification for products in risk classes I, I*, and certain non-active products in class IIa in the Medical Devices Regulation that have been marketed in Europe for five years or longer, so that a full Clinical Evaluation Plan (CEP) and Clinical Evaluation Report (CER) are no longer required.

43. **Clinical Trial Regulation: Centralise the approval and criteria for clinical trial applications.** A centralised approval process with harmonised criteria will make it less burdensome and time-consuming for researchers to conduct multi-country clinical trials, which will benefit patients and healthcare systems.

44. **Cross Border Healthcare Directive: Simplify the approval and reimbursement process for patients.** A single set of authorisation and reimbursement rules, including for transport and hospitalisation, for accessing cross-border healthcare will reduce the burden on both healthcare providers and patients, allowing more Europeans to access the treatment they need in a timely manner.

45. The revised **Fisheries Control Regulation** provides possibilities for simplifications, especially using new digital tools. The Commission should more actively work with relevant stakeholders and the Member States to make best use of the flexibilities provided in the new rules.

46. **Simplification of the access to financial support from the European Maritime, Fisheries and Aquaculture Fund (EMFAF).** Further simplification is required to ensure that support can be given to invest in the modernisation and decarbonisation of vessels especially with new green energy, and is not blocked due to the rules of capacity ceilings.

47. **Simplification on the administrative burden on the landing obligation, mainly for small-scale fisheries.** Provide further incentives for fishers to conduct trials of new fishing gear, improving selectivity and sustainability by widening the types of fishing gear that could be exempted from the Landing Obligation in order to conduct such trials.

48. **Ensure digitalisation as a key priority in the ongoing revision of rules on the coordination of social security systems -** which have been stalled for many years - to facilitate their

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implementation through better digital integration and improved cooperation between Member States.

49. **Improve access to the European Social Fund Plus (ESF+)** by simplifying administrative procedures, harmonising the beneficiary classification at the European level and enhancing transparency in application tracking, particularly for small organisations with a direct impact on local communities.

50. Ensure that **VET diplomas and skills** are recognised equally in each Member State. VET diplomas obtained in one European Member State facilitates the mobility of practically skilled professionals throughout the EU.