

EurEau policy recommendations on the IED, IEPR and SCIP database in the Environmental Omnibus

Abandoning traceability for chemicals and water use will not help competitiveness

Summary

EurEau supports the simplification of administrative burdens in environmental legislation but stresses that simplification should not lead to abandoning the ambition on sustainability and protection of the environment that was at the very heart of the European Green Deal and reaffirmed in the Water Resilience Strategy. Efforts should focus on addressing genuine instances of excessive administrative burdens and refining administrative-related disclosures to ensure that simplification enhances, rather than dilutes, the effectiveness of environmental policies.

Scrapping measures which ensure the traceability of chemicals in industry and in products, and quantify water use in factory farms, risks blinding public authorities to potential sources of harm to water resources, on which water services depend to deliver drinking water to households and businesses. This could impact not only public health but also the Commission's 2030 target to improve water efficiency by 10%, as well as the objective of a competitive circular economy. We urge the co-legislators to reject the Commission's proposals on these points.



Introduction

Water service providers are defined as **critical entities** under the Critical Entities Directive,¹ delivering services that are essential to **maintaining vital societal functions** under all circumstances.² Protecting the resilience and affordability of water services should thereby represent an **overriding public interest**.

If water services are compromised, this has a knock-on effect on the most essential societal and economic functions in the affected area. When water services have to invest in additional treatment to undo the damage caused by pollution, or when they must find new water resources to complement depleted or contaminated ones, the WFD's cost-recovery principle means that it translates into **higher water bills for households and businesses alike**. SMEs and larger companies across Europe, as well as farmers and food producers, depend on water services for water supply and wastewater management, just as citizens and society do.

In short, while keeping track of hazardous substances and of water use may create some additional paperwork for individual companies, **not doing so would risk placing a burden on the competitiveness of the entire economy, particularly SMEs**.

Industrial Emissions Directive & chemicals inventory

The 2024 revision of the Industrial Emissions Directive (2010/75/EU, IED) was the result of a carefully balanced compromise achieved by the co-legislators. Proposed changes to the IED under the Environmental Omnibus³ aim to reopen this text in relation to Environmental Management System (EMS) and transformation plans for industrial installations.

While we can understand the pertinence of only requiring one EMS per company in each Member State, other aspects of the proposal go beyond "simplification" by removing important safeguards against pollution.

This is the case, in particular, for the removal of **point (2)(d) in Article 14a** of the IED. This point requires industrial operators to report a **chemicals inventory** of the hazardous substances present in or emitted from their installations, and conduct a risk assessment of their impact on human health and the environment, as well as an analysis of the possibilities for **substituting them with safer alternatives** or reducing their use or emissions.

The release of such substances into the environment can have a significant impact on water services' ability to perform their mission in a safe and affordable way. **Keeping an accurate inventory of hazardous substances provides an indispensable basis for assessing related risks**: when industrial accidents occur, public authorities and water services need this information to take the right measures against specific substances. Chemicals inventories also contain essential information for water services to perform the risk assessments required by the Drinking Water Directive ((EU) 2020/2184, DWD) and the

¹ Directive (EU) 2022/2557 on the resilience of critical entities and repealing Council Directive 2008/114/EC.

² Joint Communication on Preparedness Union Strategy.

³ COM(2025) 986: Proposal for a Directive on simplification of some requirements and reduction of administrative burden.



recast Urban Wastewater Treatment Directive ((EU) 2024/3019, rUWWTD). **Scrapping them would effectively blind water services and public authorities** to an entire class of risks on their territories.

Besides inventories, it is also necessary to **stop, reduce or substitute** the use of these chemicals to bring emissions down and significantly lower the risk of accidental spills during transport or storage. The analysis of substitution options mandated by the IED is a **proportionate tool** to foster innovation towards this goal and should not be removed from the Directive.

The IED already avoids double reporting in the EMS, as Article 14a (3) allows a simple reference to existing documents developed under other legislation.

Industrial Emissions Portal Regulation

The 2024 Industrial Emissions Portal Regulation establishes the obligation for industries to report on their use of resources, including water. Proposed changes to the IEPR under the Environmental Omnibus ⁴ now seek to reverse this for industrial-scale livestock and fish farms.

This proposal directly contradicts the Water Resilience Strategy published by the Commission in June 2025, which asserts that “authorities must conduct up-to-date assessments of water availability and abstractions by water users and **increase their efforts to register and control all abstractions, losses and returns**. [...] The Commission will promote the exchange of best practices on water balances and smart water metering **across all economic sectors**.” ⁵ The Omnibus proposes instead to renounce collecting any water use data from factory farms.

Accounting for water use by all sectors matters increasingly in a changing climate where increasing swathes of Europe are facing water scarcity and/or more frequent droughts. In line with the subsidiarity principle, competent authorities in each river basin need to be able to make informed choices about water allocation if and when resources become insufficient to match demand. They can only do so if information on water use across all sectors is available to them.

Making an exception for industrial livestock rearing and aquaculture **puts a brake on water resilience efforts**, when we should be accelerating them across society. The proposed exception would especially hinder efforts to meet the Water Resilience Strategy’s 2030 target to improve water efficiency by 10%.

⁴ [COM\(2025\) 981](#): Proposal for a Regulation amending Regulation (EU) 2023/1542 and Regulation (EU) 2024/1244 as regards simplification of some requirements and reduction of administrative burden.

⁵ [European Water Resilience Strategy](#), page 7.



Waste Framework Directive & the SCIP database

The European Commission committed to better protecting citizens and the environment and boosting innovation for safe and sustainable chemicals through the Chemicals Strategy for Sustainability, as part of the EU's zero pollution ambition. Both are important enablers for water resilience.

Scrapping the Substances of Concern In Products (SCIP) database, as proposed under the Environmental Omnibus, ⁶ would run directly counter to this commitment.

The SCIP database contains information on hazardous substances in products, aimed at improving transparency and promote the safer management of hazardous substances in products and articles throughout their entire lifecycle. The SCIP enables recyclers to access this information and ensure they process these products in an appropriate manner once they become waste.

Discontinuation of the SCIP would deprive waste operators of the opportunity to identify and separate substances of very high concern, thereby exposing workers and the environment to risks of toxic contamination, while allowing hazardous substances to persist in materials intended for a second life. This, in turn, would put water resources at risk and undermine confidence in the quality and safety of secondary raw materials.⁷

This pollution by hazardous substances will prevent water operators from realising their full potential to provide **safe and affordable drinking water** to European citizens and businesses, and to contribute to a **competitive circular economy**, e.g. by using reclaimed water for irrigation in agriculture (in line with the Water Reuse Regulation).

The Digital Product Passports (DPPs), presented as an alternative to the SCIP, do not offer the same comprehensive coverage. Furthermore, the Ecodesign for Sustainable Products Regulation ((EU) 2024/1781, ESPR) is set to be implemented in a piecemeal fashion, through a series of delegated acts each covering a particular product group, meaning **there could be a gap of several years** between the end of the SCIP and the introduction of DPPs for certain product groups.⁸

The SCIP should not be discontinued without an **operational and comprehensive replacement** offering the same scope of coverage. **This is not the case today.**

About EurEau

EurEau represents Europe's water sector, bringing together 70,000 public and private drinking water and wastewater service providers across 33 countries.

We work with EU institutions and international organisations to ensure legislation supports resilient, sustainable and affordable water services by protecting water quality, promoting resource efficiency and safeguarding access to water.

⁶ [COM\(2025\) 986](#): Proposal for a Directive on simplification of some requirements and reduction of administrative burden.

⁷ [ClientEarth](#), page 15.

⁸ The Commission's [2025-2030 Ecodesign Working Plan](#) explicitly sets the timeline for some product groups beyond 2030.