

# OUTLOOK ON THE ENVIRONMENTAL LEGISLATION

CCPIE meeting 20.01.2026

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# AGENDA

1. Omnibus I
2. Environmental Omnibus
3. Deforestation
4. REACH revision
5. Circular Economy Act

# OMNIBUS I

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- End of EU negotiations → legal certainty
- Much needed & positive simplification exercise
- Objectives untouched but more pragmatic way to handle the texts

## For example :

- More balanced ESRS's
- Due diligence obligations on risk-based approach
- Realistic scopes

# ENVIRONMENTAL OMNIBUS

- Start of EU discussions
- General idea → Ensuring that the same environmental objectives are achieved more efficiently, economically and intelligently
- Main position :
  - Good way to go forward
  - Will help with permitting deadlocks
  - Will help with bureaucratic burdens (e.g. SCIP database)

## Some issues still need to be tackled

- Harmonisation of end-of-waste status
- Waste shipment regulation
- Circular Economy Act
- Water Framework Directive

# DEFORESTATION : EUDR

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- Positive agreement in December 2025
- Less burdensome for downstream operators while protecting the EU market against deforestation-related products
- EUDR is a **due diligence** legislation, not a **traceability** one !
- What is still needed :
  - Recognition of certifications such as PEFC or FSC in the legislation to avoid double work from Belgians operators
  - A quick publication of the clarification delegated act

# REACH REVISION

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Awaiting the European Commission's REACH revision, we highlight the following key points:

1. REACH revision must avoid added bureaucracy and complexity;
2. Enforcement across Member States must be strengthened to ensure level playing field;
3. Strong need to align REACH, circular economy goals and the realities of waste management and recycling;
4. Need for continuous dialogue between companies and ECHA to reduce administrative burden;
5. Use of hazardous chemicals should be possible under safe use conditions.

# CIRCULAR ECONOMY ACT

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Awaiting Circular Economy Act, we highlight the following key points:

- Fast adoption for a clear and stable regulatory framework that support investments in recycling and circular products;
- Need for uniform EU end-of-waste criteria, reducing national discrepancies and facilitating use of recycled materials;
- The Circular Economy Act should be a key lever for securing materials, strengthening circular value chains, and supporting the EU's economic security.



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