

# BASF Position on the IED Proposals in the EU-Commission's Environmental Omnibus package

## Key messages

- BASF welcomes the simplifications to the **IED** proposed by the European Commission. At the same time, further **adjustments** are needed to reduce administrative burdens and ensure a practical implementation for the chemical industry, contributing to strengthened industrial resilience.

## Topic

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On 10 December 2025, the European Commission presented proposals within an Environmental Omnibus package aimed at reducing bureaucratic burdens, including a reduction of certain requirements under the Industrial Emissions Directive (IED). These relate in particular to the requirements for environmental management systems (EMS). The next step is for the Council and the European Parliament to review these proposed amendments. In parallel, the IED "2.0" is required to be implemented into national law by 1 July 2026.

## Our Position

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### **Simplifications to the requirements for the environmental management system**

- We welcome the planned simplifications to the environmental management system (EMS), in particular the possibility of implementing an EMS at company level within the same Member state rather than at installation level, the removal of requirements for chemical inventories with risk assessments and substitution analyses, the removal of transformation plans and independent audit obligations, as well as the extended implementation deadline until 2030.

### **Beyond the current Environmental Omnibus proposals, further adjustments to the IED are urgently required**

- While we support the EMS simplifications, we call for not introducing an additional binding environmental management system- neither through the IED nor through BREF or any other regulation. Existing EU frameworks already ensure robust environmental management; adding another mandatory system would increase administrative burden without delivering additional environmental value.
- Taking into account the specific circumstances of individual installations, the full range of emission levels must be considered and proportionality must be ensured. We reject any orientation towards "strictest achievable limit values."
- No binding environmental performance limit values should be established, such as water consumption per ton of product. The IED should focus on its core function of defining limits for environmental emissions; requirements relating to environmental performance should again become indicative.
- The confidentiality of sensitive data under competition law must be safeguarded. Access to sensitive primary data must be restricted to a group of persons bound by confidentiality obligations. We reject mandatory publication requirements on the internet.