



EUROMOT

The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

POSITION PAPER

Comments on Call for evidence on simplification of administrative burden in environmental legislation

4 September 2025

The logo for EUROMOT, featuring the word "EUROMOT" in white, bold, uppercase letters on a dark green rectangular background.

The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

EUROMOT POSITION

COMMENTS ON CALL FOR EVIDENCE ON SIMPLIFICATION OF ADMINISTRATIVE BURDEN IN ENVIRONMENTAL LEGISLATION

4 September 2025

Executive Summary

EUROMOT welcomes the European Commission's initiative to simplify administrative burdens in environmental legislation and strongly supports the proposed discontinuation of the SCIP database under the Waste Framework Directive. The SCIP database has imposed significant and disproportionate administrative burdens on industry, without delivering clear environmental or operational benefits. Its removal would be a meaningful step toward more efficient and effective regulation.

Key Reasons for Discontinuation

1. Duplicate Reporting with REACH

- SCIP replicates obligations already covered under REACH Article 33, creating unnecessary redundancy.

2. High Compliance Costs

- Extensive data formatting and submission requirements (XML/IUCLID) demand costly software and dedicated personnel.

3. Limited Usefulness for Waste Operators

- The database is not user-friendly and fails to provide actionable insights for waste handlers.

4. Unclear Added Value

- There is little evidence that SCIP improves environmental outcomes or supply chain transparency.



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A European Interest Representative · TVA BE 0599.830.578 · RPM Brussels
EU Transparency Register Id. No. 6284937371-73

A Non-Governmental Organisation in consultative status with the UN Economic
Commission for Europe (UNECE) and the UN International Maritime Organisation (IMO)

PRESIDENT

Dr Holger Lochmann

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Dr Peter Scherm

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

We welcome the European Commission's initiative to simplify administrative burdens in environmental legislation and appreciate the opportunity to contribute to this important consultation.

Support for the Proposed Discontinuation of the SCIP Database

EUROMOT strongly supports the proposed discontinuation of the SCIP database under the Waste Framework Directive, as referenced in the Commission's call for evidence:

“This may include the following measures:

- *rationalising reporting/notification obligations, for example, the discontinuation of the SCIP database under the Waste Framework Directive.”*

This measure would significantly reduce unnecessary administrative complexity and compliance costs for industry.

Key Reasons for Supporting Discontinuation

1. Duplicate Reporting and Overlap with REACH

- The SCIP database replicates obligations already covered under REACH Article 33, creating redundant reporting requirements.
- This duplication increases administrative burden without delivering clear added value.

2. High Compliance Costs

- SCIP compliance requires extensive data collection, formatting (XML/IUCLID), and submission processes.
- Companies often need to invest in specialized software and dedicated teams, diverting resources from core business activities.

In light of the substantial investments already made by industry, both financially and in terms of human resources, to comply with SCIP requirements, any decision to discontinue the database must be accompanied by clear and transparent information regarding future obligations. The industry cannot be expected to undergo another

similarly burdensome transition for a comparable purpose without clear justification and planning.

It is critical to understand what new burdens may shift to manufacturers, burdens that are not currently present under SCIP. Without careful planning, the “replacement” could prove even more demanding, without delivering additional benefits compared to SCIP in its current form.

Therefore, before SCIP is formally discontinued, it is essential to clarify whether a replacement mechanism will be introduced, what form it will take, and how it will impact industry stakeholders. Certainty and predictability are key to maintaining trust and enabling efficient compliance planning.

3. Limited Practical Use for Waste Operators

- Although intended to support waste handlers, the data structure and searchability of the SCIP database are not user-friendly.
- Waste operators report difficulty in extracting actionable insights, limiting the database’s practical utility.
- A more coordinated approach between manufacturers and waste handlers could also reduce front-end data burdens on manufacturers while improving usability for waste handlers.

4. Unclear Added Value

- There is limited evidence that the SCIP database improves environmental outcomes or supply chain transparency.
- The administrative effort required is disproportionate to the benefits delivered.

Conclusion

EUROMOT welcomes the Commission’s initiative to reduce administrative burden and supports the proposed removal of the SCIP database. The SCIP database has imposed significant and disproportionate administrative burdens on industry, without delivering clear environmental or operational benefits. Its removal would be a meaningful step toward more efficient and effective regulation.

We request that the European Commission engage in further dialogue and collaboration to ensure that any simplification measures, particularly those involving new systems or processes, are effective, proportionate, and aligned with industry realities.

We remain available for further dialogue and collaboration to ensure that simplification measures are effective, proportionate, and aligned with industry realities.



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THIS IS EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

OUR MEMBERS



www.euromot.eu



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