

Suggestions included in the draft Stakeholders' suggestions VII

Nr	Author of suggestion	MS	Relevant regulation	Problem description	Solution	Responsible DG
1	European Boating Industry	BE	Batteries Directive 2006/66/EC, Waste Packaging Directive 94/62/EC, WEEE Directive 2002/96/EC	Member States vary in their interpretations of a number of EU waste directives. Furthermore, in many Member States a firm must have a locally registered company in order to be listed in the producer's registers. Lastly, in some countries, there is a minimum volume to be placed on the market in order to register as producer on the national register, which also prevents the registration.	Simplify current requirements and make the national producer's registers interoperational in order to allow producers that have registered in one national register, and are complying with the rules of that country, to place their products across the EU internal market without additional administrative burden.	ENV
2	Verband der Chemischen Industrie e.V. (VCI)	DE	Directive 98/8/EC	The existing requirements of the Directive on Biocidal Products are too burdensome, complex and costly, in particular since the two-stage approval procedure under the Plant Protection Products Directive has been transferred to the Directive on Biocidal Products.	The stakeholder asks for a comprehensive evaluation of the European legislation in this area with the aim of simplifying the complex procedures in Member States.	ENV
3	ERRO Design GmbH	DE	Directive 2002/96/EC on waste electrical and electronic equipment (WEEE); Commission proposal COM(2008)810	Burdensome monthly notification requirements and significant registration fees for electrical appliances particularly hamper for small trade businesses; separate registrations are required for each individual Member State.	As for batteries only one annual notification should be required. A lump sum should be paid towards waste disposal for the import of electrical appliances in the EU instead of an individual registration of each individual electric appliance in each Member State.	ENV
4	Joint Position: Digital Europe, European Portable Batteries Association, Recharge aisbl and TechAmerica Europe	BE	R&TTE Directive (Radio and Telecommunication Terminal Equipment) 1999/5/EC	With respect to the revision of the R&TTE Directive measures increasing administrative costs and burdens are considered including: (1) additional translation of compliance documentation; (2) Uploading technical documentation to a third party location (3) Product and/or manufacturer registration (4) abstract references to 'health and safety'.	Reduce administrative costs and burdens instead of increasing them.	ENTR
5	Federation of European Accountants	BE	No specific pieces of legislation identified.	Overlaps and frequency of reporting, filing and other requirements for different regulatory purposes such as tax, incorporation, employment and statistics. Burdens are also to be found in dividend distribution requirements, the implementation of health and safety legislation and returns as well as in the administration of miscellaneous social security programs.	Increased use of e-government solutions. Exploit further simplification opportunities e.g. concerning a common EU approach towards XBRL.	MARKT EMPL ESTAT
6	Ludwig von Mises Institute Europe VZW	BE	Directives 2008/2/EC on the field of vision and windscreen wipers for wheeled agricultural or forestry tractors; 2000/14/EC on the approximation of laws relating to noise emission in the environment by equipment for use outdoors; 1999/74/EC laying down minimum standards for the protection of laying hens	Overregulation, outdated and misguided legislation	Certain pieces of legislation should be removed or simplified.	ENTR SANCO
7	Division for Better Business Regulation, Danish Government Regulatory Reform Group, Government of the Netherlands Better Regulation Executive, UK government	DK NL UK	general approach	Inspection and enforcement practices differ greatly.	Agree on a number of principles of good inspection and enforcement across the EU. With these principles, authorities in Member States would be given greater flexibility to apply 'new' practices and tailor their inspections according to risk-based approaches. In addition, introducing and improving eGovernment systems will entail that data already collected by the government can be shared amongst authorities to prevent double reporting and errors.	SG INFO
8	Association of Universities in the Netherlands (VSNU)	NL	8th Framework Programme	Simplify and reduce the administrative burden for the 8th Framework Program (FP)	(1) Provide for ex ante proof of the institution's accounting methodology and processes. (2) A uniform framework of administration rules for all different subsidy programmes. (3) Allow national accounting practices. (4) A Single Information Single Audit (SISA) accounting system. (5) Full cost based accounting system. (6) Use of lump sums. (7) Accept smaller consortia to decrease complexity and organisational costs.	RTD
9	BNAE – Aviation, Space and Defence Standardisation.	FR	No specific piece of legislation identified.	In aviation, companies must produce different manuals: one for the design in order to obtain a type certificate, another for production in order to obtain a certificate of airworthiness, and a third for maintenance (APRS).	Pool redundant elements of different handbooks - possibly into one manual, which covers design, production and maintenance. Standardisation of safety criteria for performance standards.	MOVE
10	M. Puder (citizen)	DE	No specific pieces of legislation identified.	Problems with implementation and inconsistencies in enforcement.	A more direct exchange of information between the Commission and national enforcement authorities, for instance by field appointments, work experience of relevant new Commission staff in national enforcement authorities, regular online-surveys of enforcement authorities etc...	SG