



A flood of red tape: Reduction starts in law-making

Ever-increasing bureaucratic burdens are tying up more and more resources in companies in Germany and the EU. This inhibits innovation and has a negative impact on growth. Even though the issue has been recognised and intensively discussed at the political level, there has hardly been any effect on regulations to date. However, the first step in reducing bureaucracy should be to avoid unnecessary new burdens at the legislative stage.

Load limit reached

Companies in the paint and printing ink industry are faced with an increasing number of regulations and reporting duties, which means that they have to devote more and more resources to regulatory obligations. These resources are therefore not available for the development of new products or the realisation of innovations. Many companies have now reached their limits.

In view of demographic developments and the challenges of the green transformation, this is not a sensible use of resources.

Problem recognised but not solved

Even though the issue is now being addressed by politicians in the EU and in Germany, the announcements have so far been followed by few concrete actions. The easiest way to reduce bureaucracy is to start with legislation by avoiding new, unnecessary bureaucratic burdens. However, the opposite is the case: On a small scale, with every single specific regulation, the German government and Brussels are not implementing what is promised. Particularly in the area

of chemicals legislation and in the context of the Green Deal, new requirements and reporting obligations are constantly being created. This thwarts the fundamental willingness to reduce bureaucracy.

Seemingly harmless individually, paralysing in total

Even if the effort of each individual regulation may seem justifiable, it adds up to an immense burden that is particularly unbearable for small and medium-sized companies and inhibits the innovative strength of the industry in the long term. This was also recognised by President of the European Commission Ursula von der Leyen: „However, as we all know, often it is not an individual obligation to provide proof, often it is not an individual condition that makes life difficult for them. It is the huge sum of all such requirements.“ This realisation must now finally have an impact on every single specific regulatory measure.

**This is
what we
are calling
for**

Reducing bureaucracy starts in law-making

Reducing bureaucracy should start with avoiding unnecessary new regulatory requirements. In a second step, existing regulatory requirements should be reviewed to determine whether they are sensible and necessary.

Bureaucracy reduction must take place at specific regulations

What is promised in the big picture must also be implemented in detail. This also applies to chemicals legislation: the reduction can only have an effect if the huge amount of individual requirements is reduced.

Cutting red tape in Brussels and Berlin

Particularly in chemicals, environmental and plant safety legislation, most regulations are based on EU law. Here, the Parliament, the Commission and also the member states are called upon to provide relief. New requirements are also constantly being created at national level, not least due to additional national red tape when implementing EU directives.



From the product idea to the application:

Examples of bureaucratic hurdles for the paint and printing ink industry in Germany and the EU

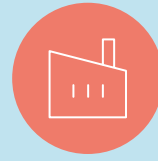
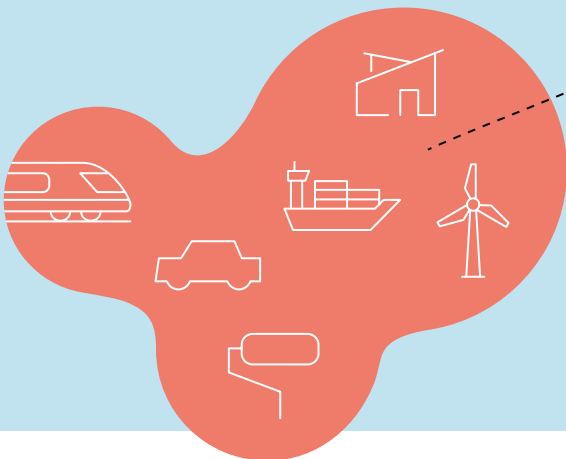
Notification to the poison centres

As part of this notification, which is sensible in principle, an individual notification is sometimes required for each specific colour of an otherwise identical paint or printing ink (which is only used industrially). This misses the point and is very time-consuming, especially when one considers that paints are hardly relevant in cases of poisoning.



Supply Chain Due Diligence Act

Measures to prevent child labour, forced labour, discrimination or environmental violations in the supply chain are sensible. However, here too there is an unbelievable level of detail in the requirements as to what must be recorded and reported. This leads to burdens without serving the objective.



Federal immission control law

When the 31st BImSchV was revised, the mandatory review of solvent balances by independent experts (which do not yet exist) went beyond EU law and created a lot of unnecessary burden.

Microplastics

A restriction on intentionally added microplastics is understandable in terms of the precautionary principle. However, as the definition is so broad that it also affects products that would not actually be considered containing microplastics and which cannot be banned, extensive reporting obligations have been created that place a burden on the entire value chain.

Biocide law

The national biocide law implementation ordinance has created extensive reporting obligations and also defined new requirements for mandatory handover interviews in retail and also online (!). This also includes wood coatings that have been explicitly authorised for the use of the end consumer in a complex process.



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