

POLICY FLASH

EU OMNIBUS PACKAGES - KEY TAKEAWAYS

As of 14 November 2025

Earlier this year, the European Commission launched a series of **Omnibus packages**, marking a new phase in its policy agenda focused on simplification and competitiveness. These packages are legislative tools designed to integrate measures that **streamline rules, harmonize requirements, and reduce administrative burdens** for businesses. While President Ursula von der Leyen's European Green Deal initially framed the green transition as Europe's strategic advantage, the Commission is now shifting its emphasis toward **a more efficiency-driven regulatory framework** designed to **ease compliance costs and operational burdens for companies** across the EU.

Omnibus Packages in Progress

Omnibus I & Omnibus II

Launched on 26 February 2025

Omnibus I intends to amend the application dates and the content requirements of the Corporate Sustainability Reporting Directive (**CSRD**), the Corporate Sustainability Due Diligence Directive (**CSDDD**), and the **Taxonomy** Regulation.

Where do we stand?

Member States must **transpose** the "**Stop the Clock**" **Directive** into national law **by 31 December 2025**.

Regarding the **Content project**, the EU has finalised its position, and the **European Parliament adopted its stance on 13 November 2025**. On that date, MEPs voted to **exempt more companies** from the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD).

The changes, driven by members of the EPP, ECR, and ID groups, **significantly narrow the scope** of EU sustainability rules. Under the revised thresholds:

- **CSRD** will apply to companies with at least **1,750 employees** and **€450 million in revenue**.
- **CSDDD** will apply to companies with at least **5,000 employees** and **€1.5 billion in revenue**.

This vote marks a **shift in the EPP's traditional pro-EU stance**, reflecting a new provisional political alliance in Parliament. The next step is **trilogue negotiations** between the Parliament, the Council, and the Commission to reach a final agreement.

Omnibus II aims to simplify existing legislations on investments such as the **InvestEU** program, the **European Fund for Strategic Investments (EFSI)**, the **Connecting Europe Facility (CEF)**, and the **InnovFin** initiative, supporting investment, innovation, and infrastructure across the EU.

Where do we stand?

During trilogue negotiations on September 23, the European Parliament and Council reached a **provisional agreement**, boosting the "Invest EU" program with a €2.9 billion increase in the EU guarantee (from €26.2 billion to €29.1 billion).

The provisional agreement **must be formally endorsed** by both the the European Parliament and Council, prior to the adoption of the legislative act, with the European Parliament's indicative **first-reading plenary** vote scheduled for **November 24 2025**.

Omnibus III : Common Agricultural Policy (CAP)

Launched on 14 May 2025

Omnibus III aims to simplify the **Common Agricultural Policy (CAP)** and strengthen farmers' competitiveness. Key measures include:

- Reducing administrative burdens and control requirements;
- Simplifying payment schemes for small farmers and streamlining conditionality rules;
- Improving access to finance for farmers in times of crisis.

Where do we stand?

On September 3, the Council of the EU retained the main elements of the Commission's proposal. Negotiations are now set to take place with the European Parliament, followed by trilogue discussions at the end of the year.

Omnibus IV : SMEs and small mid-cap enterprises

Launched on 21 May 2025

Omnibus IV targets reducing administrative burdens, costs, and modernising EU single market rules by :

- Promoting the **digitalisation of product** legislation;
- Establishing common specifications to ensure the **free movement of goods**;
- Reducing record-keeping obligations, particularly for GDPR compliance, for companies with fewer than 750 employees;
- Postponing by two years the due diligence obligations applicable to batteries.

Where do we stand?

On 24 September, the Council broadly retained the Commission's proposals on digitalisation and common specifications, with some technical amendments. Negotiations with the European Parliament are now scheduled, followed by trilogue discussions at year-end.

Omnibus V : Defense

Launched on 17 June 2025

Omnibus V aims to **facilitate and promote investments in the defense sector**, improve conditions for the defense industry, and simplify security and defense acquisitions.

Where do we stand?

On 23 June, the Council of the EU adopted its position. Negotiations are now set to take place with the European Parliament, followed by trilogue discussions at the end of the year.

Omnibus VI : Chemicals

Launched on 8 July 2025

Omnibus VI focuses on **postponing** and **easing** certain **regulatory obligations** under key EU chemicals and related product legislation, including:

- **CLP Regulation** (Classification, Labelling and Packaging): covers labeling, update deadlines, advertising, distance sales, and fuel pumps; compliance is postponed to 1 January 2028.
- **Cosmetics Regulation** (2009): governs safety, labeling, and marketing of cosmetic products in the EU.
- **Fertiliser Products Regulation** (2019): sets the framework for the approval, marketing, and use of fertilisers, soil conditioners, and plant biostimulants.

Where do we stand?

The Council of the EU adopted its position in September to incorporate the 'Stop the Clock' mechanism on chemicals. Negotiations are now set to take place with the Parliament and later in trilogues at year-end.

Upcoming Omnibus Packages

Digital Omnibus

Expected launch date: 19 November 2025

The **Digital Omnibus** package focuses on **streamlining digital regulations** and enhancing the predictability and efficiency of the EU digital ecosystem. Key areas include:

- **Data:** harmonising and simplifying the rules stemming from the **Data Governance Act**, the **Data Act**, the **Open Data Directive and GDPR** in order to reduce fragmentation, align terminology, adapt certain sectoral provisions and introduce targeted reforms. Key changes include introducing a subjective definition of personal data, refining the scope of special category data, and **ensuring GDPR serves as a framework** for responsible innovation rather than a barrier.
- **Cookies and online tracking:** the revision of the **ePrivacy Directive** aims to address consent fatigue, strengthen users' rights through clearer information and simplified consent management, and facilitate the responsible use of cookies and other tracking technologies to enhance data availability.
- **Cybersecurity and incident reporting:** the revision of the **Cybersecurity Regulation** seeks to simplify and harmonise reporting obligations, notably through the creation of a single reporting model and a centralised EU-level platform.
- **Artificial Intelligence:** ensuring a predictable and effective implementation of the **AI Act**, consistent with the establishment of the necessary support and enforcement structures. Key changes include confirming lawful bases for AI training, supporting **privacy-enhancing technologies** (PETs), and clarifying derogations for special category data processing.
- **Electronic identification and trust services:** aligning with the forthcoming **European Digital Identity Wallet**, while applying the "one in, one out" principle, whereby any new regulatory obligation must be offset by the removal of an existing one.

Where do we stand?

While the official proposal is still pending, **the content of the Digital Omnibus has leaked**, fueling intense debate even before its publication. The leaked draft appears to introduce **substantial changes to EU privacy legislation**, revealing the Commission's intention to centralise oversight of AI and to ease some of the safeguards established under the General Data Protection Regulation (GDPR) in order to **facilitate the use of personal data for training AI models**.

Once published on November 19, the Council aims for swift adoption within one to two months. The European Parliament process **is expected to be longer and more complex**, involving multiple committees due to the Omnibus touching on several different legislations, with potential political conflicts and the **risk of expanding the scope** beyond the Commission's original draft, as seen with the Omnibus I.

Energy Omnibus

Expected launch date: Q3 2026

The **Energy Omnibus** was announced by Commissioner for Energy Dan Jørgensen on May 2025. This comprehensive package was conceived in response to the 2022 energy crisis, which revealed Europe's dependency on external energy sources and its vulnerability to electricity price fluctuations. Its objectives are to:

- **Modernise and expand existing energy infrastructures**, increase storage capacities, and strengthen system resilience;
- **Realign the EU's energy security framework** within the context of the Clean Industrial Deal.

Where do we stand?

On October 22, the European Commission updated its work programme and introduced a new set of energy-related initiatives to replace the initially planned "Energy Omnibus" package scheduled for Q3 2026. These measures include:

- **Electrification Action Plan**, including measures on heating and cooling (*non-legislative, Q1 2026*).
- **Energy Union package** (*legislative, Q3 2026*):
 - i. an update of the rules on renewable energy;
 - ii. revisions to the regulations on CO₂ transport infrastructures and markets;
 - iii. a post-2030 energy efficiency framework;
 - iv. a renewable energy framework on.
- Omnibus for the **simplification of energy production legislation** (**legislative, Q2 2026**).

Environmental Omnibus

Expected launch date: 3 December 2025

According to the **scoping note** framing the consultation launched by the **European Commission** on the **Environmental Omnibus**, the initiative is broadly aimed at "*simplifying the administrative burden related to environmental legislation.*"

Although the list of measures is not exhaustive, three priority areas have been identified: **circular economy, industrial emissions, and waste management**.

The first reform proposals unveiled by the Commission include:

- abandoning the **SCIP database** on substances of concern in products (Waste Directive);
- harmonizing certain provisions with **extended producer responsibility** (EPR) schemes;
- "rationalizing" obligations regarding the communication of information on **circular economy, industrial emissions, and waste**;
- addressing "difficulties related to the granting of **permits.**"

The **Environmental Omnibus** is expected to align with several recent or ongoing EU policies:

- **Ecodesign for Sustainable Products Regulation (ESPR) from 2024:** establishes sustainability and efficiency requirements for products in order to reduce their environmental impact throughout their life cycle.
- **Packaging and Packaging Waste Regulation (PPWR) from 2024:** sets out rules to reduce, reuse, and recycle packaging and packaging waste across the EU.

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- **Technical Regulation Information System (TRIS) Directive from 2015:** requires Member States to notify the Commission of draft national technical regulations prior to their adoption.
- **Batteries Regulation from 2023:** lays down requirements on the design, sustainability, recycling, and labelling of batteries to reduce environmental impact and recyclability.
- **Directive on Empowering Consumers for the Green Transition from 2024:** strengthens consumers' rights to be informed and make sustainable choices during green transition.

A **Circular Economy Act** is expected to be launched in the third quarter of 2026, complementing the objectives of the Environmental Omnibus.

Where do we stand?

On October 2, Commissioner Jessika Roswall met with business, civil society, and academic representatives to discuss the public consultation on environmental simplification, which drew around 190,000 responses. Participants emphasized that simplification should facilitate compliance without leading to deregulation with a one-stop access point to legislation.

Get in touch

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