



CONFEDERATION OF INDUSTRY
OF THE CZECH REPUBLIC

Confederation of Industry of the Czech Republic's comments on the draft delegated Regulation (ET) amending Delegated Regulation (EU) 2019/1122 supplementing Directive 2003/87/EC of the European Parliament and of the Council as regards the functioning of the Union Registry

We would like to raise following comments as part of the ongoing public consultation of the revision of the registry regulation:

On point 35 amending Article 81

We disagree with the possibility to charge reasonable annual fees to account holders by the central administrator.

This breaches the subsidiarity principle as the political decision on fees paid to the European Commission is being made by the delegated act.

Due to existing practice, information system of the central administrator was financed from the general EU / EC budget. New wording of point 35 of the proposed delegated regulation would burden account holders directly by paying centrally set fees to national administrators, who would consequently transfer them to the central administrator.

We disagree with this profound change, which hugely impacts existing practice of national fees, which reflected relevant national situation. We suggest keeping Article 81 in its original wording.

Contact point for further information:

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