

Regulatory, Digital and Trade Committee **2025**

#	Issue	Description	Status Quo
1.	Pharmaceutical waste regulation	Ensuring a clear and proportionate framework for the management of pharmaceutical waste, with specific attention to medicines used in clinical trials, reporting obligations and avoidance of double taxation.	In process / partially reflected in consultations: EBA submitted Position Paper No. 112-25/AD on 10.10.2025 to MDED. The main proposals focused on clarifying responsibilities for medicines used in clinical trials, improving reporting clarity and avoiding double taxation for clinical trial imports.
2.	Food safety / labelling of imported food products	Clarification of food labelling requirements applicable to imported food products, especially in relation to import procedures, interpretation of labelling rules and practical application by ANSA inspectors.	Partially accomplished: EBA facilitated technical dialogue with ANSA on labelling of imported food products. The discussions helped clarify practical import-stage issues and identify solutions to improve predictability and uniform application of labelling requirements.
3.	Criminal liability of legal persons	Ensuring legal clarity, proportionality and predictability in the draft law consolidating the criminal liability of legal persons, especially in relation to reorganization, transfer of liability and complementary sanctions.	In process: EBA submitted Position Paper No. 145-25/AD on 15.12.2025 to the Ministry of Justice. The main position focused on legal certainty, proportionality, clearer terminology, safeguards against automatic transfer of liability and avoidance of excessive or indefinite sanctions.
4.	Digitalization and remote business operations	Promoting digital solutions that simplify interaction between businesses, consumers and authorities, including electronic contracts, electronic communication and remote access to services.	In process: Digitalization was reflected as a cross-cutting advocacy priority. EBA supported electronic contracts, electronic communication and digital interaction mechanisms to reduce paper-based procedures and align regulation with modern business practices.