



Council of the European Union  
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**NOTE**

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From:	General Secretariat of the Council
To:	Delegations
Subject:	Forced Labour Ban Regulation - General comments from EE

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## **General comments by the Estonian delegation on the proposal.**

- Estonia is still forming its national position on the proposal. Therefore, we are still scrutinizing the text and all our suggestions and comments are preliminary.
- Estonia supports the general objectives of the proposal. At the same time, we would like to point out that as a complex issue and a new EU acquis, the regulation should be clear and effectively applicable in practice. Sufficient time is therefore needed to enable qualitative discussions at a technical level, especially given that the proposal lacks an impact assessment. Therefore, quickly pushing the file to the political level may be too premature.
- Concerning the proposal, we see that the alignment and clear interlinkage with other relevant legislation is important for legal clarity and effective applicability, particularly with regard to the CSDDD, the Whistleblower Directive, Deforestation and the Conflict Minerals Regulation.
- Estonia would also like to see a more central and a leading role of the European Commission, particularly when a cross-border procedures in third country investigations are involved.
- The implementation of the regulation should not entail a disproportionate administrative burden on small and medium-sized enterprises, compared to the goals sought by the draft. Also, enterprises should have a sufficiently long transition period to take into account the consequences of the implementation of the regulation.
- We consider that the information submission requirements for businesses, competent authorities and customs should allow for electronic submission of data as much as possible.