



THE EEB'S PRIORITIES FOR THE
2025-2026
PRESIDENCY TRIO

POLAND - DENMARK - CYPRUS



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The EEB is Europe's largest network of environmental citizens' organisations. We bring together over 180 member organisations from 41 countries. Together, we work for a better future where people and nature thrive together.

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Introduction

The Polish, Danish, and Cypriot EU Council Presidency Trio, starting 1 January 2025 and ending June 2026, will be the first Council Presidency Trio under the new legislative cycle, responding to the new European Commission's Political Guidelines delivered in July 2024, the Strategic Agenda agreed by Heads of State in June and engaging with the new European Parliament that started its work on 16 July 2024. The Strategic Agenda recognised the importance of the triple climate, nature and pollution crisis. The Political Guidelines reaffirmed the Commission's commitment to the European Green Deal as well as *"to step up [the EU's] engagement with civil society organisations that have expertise and an important role to play in defending specific societal issues and upholding human rights [and to] ensure civil society is better protected in its work"*.

These eighteen months will be **an essential time to prove and improve the EU's commitment to tackling the crises of climate** – ever more clearly impacting Europeans across Member States through floods, fires, droughts and storms. It is also essential to not backtrack on the **fight to halt biodiversity loss and ecosystem degradation** that is not only ethically unjust but also erodes our life support systems and basis of livelihoods. A regenerative vision, helped through nature restoration, is key for our future. And the eighteen months are essential to **tackle pollution and toxics that undermine health** and do not respect any political boundaries and constituencies.

In addition to tackling the triple climate-biodiversity-pollution crisis, the Trio Presidency has opportunities to respond to **the Strategic Dialogue on Agriculture and create a positive agenda for sustainable food systems** and address farmers' needs. Furthermore, the **Clean Industrial Deal**, if designed well, represents a major opportunity to drive innovation and sustainability and support both cooperation and competitiveness towards sustainability. There are clear opportunities through an accelerated shift away from a wasteful linear economy towards a **circular economy** with its multiple benefits that will support the EU's economic resilience.

There is a need to **more effectively ensure social justice** and help address the connected social crisis. All of society needs to be part of the transition – both in agency by helping make it happen and through benefitting from the actions taken and measures. Together **with a commitment to implement and keep with the European Green Deal (EGD)**, the transformative agenda Europe needs can and should continue. Looking at the scientific facts, there is no alternative. This is both about

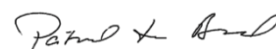
responding to crisis and seizing opportunities that will make EU's ecosystems more resilient, support quality of life, well-being, livelihoods, company sustainability, and strengthen economies by **investing in Europe becoming a globally competitive leader on sustainability**. Given the shifts in the multi-polar world, the EU must recognise the urgency of stepping up and scaling up as the global leader on climate and environment.

This comes at a time of increasing disinformation and calls for pausing the legislative train, even though the crises will not wait while the EU pauses. It is essential that the Trio Presidency keeps on with the EGD and progressing an agenda that addresses the interlinked crisis and **creates a vision and agenda of hope**. This is a core opportunity for the next Presidency Trio of the Council of the EU. The decisions taken by the EU over the next two years will define the next ten. This is no time to be paralysed by denial and deregulation.

The EEB, building on consultation with its 190+ members, wider civil society partnerships and stakeholders, developed these **specific asks across environmental areas – the 'dozen demands'** - where ambitious, coordinated Presidency engagement, commitment and solidarity can make a lasting and fundamental difference.

Below is EEB's draft proposal for a dozen priorities that we think should be at the heart of the next Trio programme – these build on **EEB's European Pact for the Future: a green and social deal for a one-planet economy**, EEB's more detailed **Action Plan** and the **Industrial Blueprint**.

The Dozen Demands presented below, with their range of specific asks, consider our understanding that politics is the art of the possible. However, if and where the possible does too little to avoid dramatic climate change, biodiversity loss and major negative health impacts, then the future challenges will be impossible for society to deal with. Appreciating the impossibility of truly being able to deal with climate change and other existential crisis in the future should make us reflect again on what we perceive as possible today and make us reconsider the level of courage and ambition for the decisions to be taken within each Presidency remit.



Patrick ten Brink,
Secretary General, European Environmental Bureau (EEB)

A Dozen Demands for the Polish, Danish and Cypriot Presidencies



1 Implement and keep advancing the **European Green Deal** – to become a full green and social deal for a one-planet economy: a new European Pact for the Future



2 Ensure a truly '**Clean**' **Industrial Deal** that catalyses a transition to an industry that is **competitive on sustainability** and a global frontrunner in decarbonisation, detoxification, de-pollution, and restoration



3 Build on the **Strategic Dialogue for Agriculture** and advance towards sustainable food systems and reform agricultural support to embrace social justice and sustainability



4 Commit to a sufficient **EU Budget and wider financial tools** to have a credible and fair transition to a one planet economy: listening to the voice of youth and others too often forgotten



5 Fast track measures to **tackle the climate crisis** and **embrace social justice**



6 Deliver a **nature-positive agenda** for land, freshwater and oceans, support biodiversity and promote climate adaptation and resilience



7 Tackle pressures on surface and groundwater and secure **clean and safe water for all**



8 Guarantee the **right to clean air** and reduce exposure and preventable mortality and illness



9 Drive **chemicals policy** towards safe and sustainable chemicals, accelerating restrictions of the most harmful chemicals, marrying innovation with increased protection and confidence in toxic-free supply chains



10 Address **resource use** and seize **circular economy** opportunities for the economy and society



11 **Implement and enforce EU legislation** to protect the rule of law and our health, foster environmental and social justice and strengthen civil society engagement and democracy.



12 **Drive a debate on the future of Europe and solidarity in EU enlargement**, rolling out the EGD benefits across nations, and progress towards global climate and environmental justice

Embrace the vision of living well
within planetary boundaries



1. Implement and keep advancing the European Green Deal – to become a full green and social deal for a one-planet economy: a new European Pact for the Future

In these complex times, as Europe confronts multiple crises and constant change that can create an atmosphere of fear, we need leadership committed to an agenda of hope and a clear action plan for delivery.

There is still a strong political backing to continue advancing the European Green Deal (EGD). It was the flagship initiative of Ursula von der Leyen's first Commission term, and her re-election by the European Parliament was based on her Political Guidelines, where she promised to stay committed to the EGD and deliver a transformative Clean Industrial Deal (CID). The EU Strategic Agenda, signed by Heads of State, recognised the triple climate-nature-pollution crisis. Despite serious concerns about the "simplification" agenda pushed by the Draghi report, it recognised decarbonisation as a game-changer for lowering Europe's energy costs and boosting security. It also underlined the need for massive investment. Additionally, the Strategic Dialogue on the future of EU Agriculture resulted in a consensus among diverse stakeholders across the food chain and civil society on the urgent need to reform food production and consumption to stay within planetary boundaries. The La Hulpe Declaration called for a stronger social pillar.

We must focus on the facts to set ambition levels, not on false narratives. The facts show that progress is too slow, the risks of inaction are too significant, and much more needs to be done. The EU Climate Risk Assessment (EUCRA) paints a stark picture of climate impacts on Europe. The European Environment Agency's (EEA) progress report on the 8th Environmental Action Programme (EAP) concludes that many commitments for 2030 are unlikely to be met. The World Economic Forum's Global Risks Report 2024 warns that the top four risks in the next decade are extreme weather events, critical changes to Earth systems, biodiversity loss and ecosystem collapse, and natural resource shortages. It is, therefore, crucial for EU leaders to maintain their commitment—and indeed go further—towards a green and social EU that embraces a one-planet economy.

While the scientific facts and the impacts on the ground are real, we live in an era of disinformation — where fake news, false facts, misleading claims and narratives, buried information, and other efforts to undermine progressive policies are launched by short-term vested interests, political point scoring, the far right pushing anti progressive narratives, and destructive foreign interference — it is essential for decision-making, for the health of democracies, for the European Project and for protecting and empowering people, to enforce political promises and to tackle disinformation systematically.

There are **increasing calls for a competitiveness and autonomy agenda** based on the concern that China and the USA will benefit most from attracting investment and accessing markets in the transition to a carbon-neutral economy and profit more from the opportunities present in the ecological transition. The EU cannot match US subsidies, nor indeed Chinese state aid, but has a different toolkit to promote innovation. Regulation has proven to be a powerful catalyst for innovation and competitiveness. Investment in infrastructure, research and education, all strengthen "locational quality" and hence the pull factor for investments. A commitment to implementing and building on the European Green Deal, with its mix of legislation, incentives guided by conditionalities, finance and, where strengthened by investment in skills and training, should prove a winning package.

The social dimension of the transition is key. Implementing the right to a clean, healthy, and sustainable environment, as recognised by the United Nations General Assembly, will be essential to safeguard the rights of future generations and protect environmental defenders in Europe and beyond. In addition, the EU and Member States should, in practice, commit to a new social contract that ensures wellbeing within the planet's ecological limits. This contract should address persistent and deepening inequalities and exploitative structures,

both within the EU and globally. It should also tackle the cost-of-living crisis and the root causes of poverty, democratise the economy, and reduce dependence on continuous growth and unsustainable material extraction. The ecological transition cannot be done without also embracing social justice. This social contract must also partner with businesses, farmers, fishers, and foresters who are ready to engage in system-wide change and support the future economy. Adequate funding, economic signals, and transition measures must support these efforts.

We therefore call upon the Presidency Trio to:

- **Reaffirm commitment to the European Green Deal** by progressing all files in the spirit of the commitments made by the Council, Parliament and Commission of *Living Well within Planetary Boundaries* as made in the 8EAP, and in the spirit of commitments to a carbon neutral, zero pollution Europe. In addition, debate what elements of *The European Pact for the Future: a green and social deal for a one-planet economy* can be embraced as practical priorities for further policies and for implementation.
- **Strengthen the international dimension of the EGD and EU diplomacy to find global solutions to the triple planetary crisis** ensuring the EU's global credibility, position, and influence. Support ambitious conclusions of the on-going negotiations of a legally binding instrument to curb plastic pollution at INC-6, push high ambitions for COP30 in Brazil, and engage in diplomacy to encourage Global Green Deals abroad. Encourage that the objectives of the EGD are at the heart of the implementation of the 'Global Gateway' launched by the EC and the EU High Representative.
- Ensure a strong follow up in the Council regarding the **implementation of the SDGs** in and by the EU asking the Commission for an action plan to upscale SDG implementation in the last political mandate to fulfil the Agenda 2030, addressing the full spectrum of sustainable development as the main instrument to achieve EU targets for 2030, reducing negative spillover effects and leading by example with **positive support for a second European Voluntary Review**.
- **Encourage the development of an EU strategy and practices to combat disinformation:** ensure appropriate communication of the EGD across the EU at national, local level starting with schools and universities. Embrace a fact-checking portal and service, also open to industry and civil society requests to immediately debunk false claims. Ensure good media balancing at EU level. Ensure better communication of environmental scientific consensus and ensure scientific consensus remains at the centre of any expert groups, discussion groups, civil society exchanges organised by the EU Institutions. Implement and enforce the green claims legislation to ensure a more fairly and correctly informed public and prevent greenwashing. Finally, systematically communicate the benefits of action (including cumulative benefits of action against cost of inaction), of policies and measures.
- **Debate and embrace an agenda on competitive sustainability** that serves the people's and future generation's interests for a prosperous future and empowers the EU for a "race to the top" in sustainability. Insist on a broad framing that looks not just at short-term commercial interests but also at long-term needs and opportunities for the sector as a whole.
- Make use of the **8th Environment Action Programme** to monitor the EGD, SDGs and wider sustainability progress with a commitment for high-level debate and response by all EU institutions – **including proposing a legislative response in case the mid-term assessment shows that progress is insufficient**. In addition, lead by example nationally by committing to the wellbeing economy, subsidy reform, and wider commitments to live within planetary boundaries.
- Promote the further greening of the **European Semester** to fully integrate the EGD, SDGs and fiscal reform with a view to strengthening economic, societal and ecological resilience, revisiting the economic vision at

the heart of the Semester and embracing the wellbeing economy and economics of public goods underpinned by healthy ecosystems (see also #12).

- Promote **sustainable digitalisation** for people and planet, supporting transparency and embracing ethical dimensions to guide the integration of sustainable digitalisation across policy areas.
- Push forward the reform of the EU's international **trade policy** to fully align it with the EGD's objectives by only pursuing agreements with countries who share the EU's environmental and human rights commitments, leading the EU position on a transformative WTO reform, and ensuring that the relations with the UK do not lead to a deterioration of environmental protection standards.
- Ensure transparency and public participation in the roll out of the **Green Agenda for the Balkans** and the Economic Investment Plan as well as in the implementation of Association Agreements with the Eastern Partnership.
- **Reform the 'better regulation' agenda** so that it is truly about effective 'responsible regulation' which benefits society and not about enabling deregulation, where social and environmental protections risk being compromised and with it the health and wellbeing of people and the state of the environment upon which our societies rely.
- **Strengthen EU measures to promote EU green transition** to drive transformative change and mitigate risks from the US inflation reduction act – combining progressive regulation, targeted investment with conditionalities, and a commitment not to roll back the rule of law.
- Support the **green reconstruction of Ukraine** following principles of the EGD and the EU environmental acquis. **Ensure that the partnership between the EU and Ukraine** through RebuildUkraine aiming at its reconstruction and recovery **is defined by the objectives of the EGD**, in particular carbon neutrality, zero-pollution, an economy that works for all and a just transition by:
- **Developing Council Conclusions that commit the EU and the funds** channelled to Ukraine **to EGD objectives** with strong conditionalities for long-term sustainability, equity, anti-corruption, and transparency, giving preference to renewable energy, efficient buildings, green urban development, a low carbon economy, sustainable agriculture, remediation measures and nature restoration.
- Ensure that European institutions involved in RebuildUkraine **guarantee a regular dialogue with Ukrainian Civil Society Organisations** (CSOs) and European civil society networks working for its reconstruction in the activities of RebuildUkraine and involved institutions, including the European Investment Bank and the European Bank for Reconstruction and Development. Environmental CSOs should be given a clear role in RebuildUkraine and relief and recovery measures.

More information: [Calls for pause on green laws threaten EU's future](#) • [How to promote green industry beyond subsidies](#) • [Mid-term assessment of the European Green Deal \(with input\)](#) • [Mid-term assessment of the European Green Deal](#) • [Responsible Regulation' instead of 'Better Regulation' – is the European Commission's better regulation proposal fit for future?](#) • [European Green Deal: One Year In](#) • [Turning fear into hope: Corona crisis measures to help build a better future](#) • [Reprotecting Europe: The EU Green Deal v The War on Regulations](#) •

Fast-track towards a one-planet
economy and promote a just
transition



2. Ensure a truly ‘Clean’ Industrial Deal that catalyses a transition to an industry that is competitive on sustainability and a global frontrunner in decarbonisation, detoxification, de-pollution, and restoration

The Clean Industrial Deal (CID) should work for the planet and its people. Europe is threatened by a triple climate, biodiversity and pollution crisis and deepening levels of socio-economic inequality. Industry’s sustainability and competitiveness cannot be secured by degrading further our climate, environment, health and society or disregarding public acceptance. We must therefore harness climate positive sustainable frontrunner solutions and raise the regulatory bar for industry to make the ‘Clean’ Industrial Deal underpin the Green Deal.

A “clean” and fair Deal needs to promote sustainable competitiveness¹ that serves the people’s and future generations interests for a prosperous future, not an exclusive economic agenda allowing laggard industry operators to stay off-track with planetary boundaries and compromise labour and health standards. Calls for “competitiveness” should be regarded as a tool for protection the planet and its people, not at the expense of human health or the environment. We need an industrial policy that works for safety and sustainability, for communities, workers and the environment. An accelerated shift away from a wasteful linear economy towards a circular economy with its multiple benefits will support the EU’s economic resilience.

Europe’s global strength lies in effective policies rooted in robust social and environmental standards. The EU should lead as a frontrunner in detoxification, de-pollution, decarbonisation and restoration, while keeping a thriving industry.

We therefore call upon the Presidency Trio to:

- **Embrace the shift to zero-pollution, toxic-free, socially just and decarbonised industry and an ambitious and coherent Clean Industrial Deal (CID) aligned with [the joint industry-NGO ‘Vision for a prosperous and sustainable industry: a positive blueprint for the future’](#) which will commit stakeholders to become global frontrunners for decarbonisation, detoxification, depollution and restoration.** Adopt a dynamic policy mix of regulation that drives innovation that serves the public interest, ensuring a level playing field via strict and ambitious enforcement of EU standards, prioritising pollution prevention guided by a restoration mindset. Support an ambitious implementation of the Carbon Border Adjustment Mechanism (CBAM) including a prompt adjustment of loopholes, assessing carbon and trade intensities and widening scope to downstream products. Support an EU Directive on Just Transition.
- **Commit to a holistic, zero-pollution aligned ambition and “deep transformation” pathways** by embracing the needs for system change in an integrated way, ensuring ‘clean’ is more than climate neutral. Recognising the strategic value of pollution prevention and remediation. Reversing the burden of proof on the manufacturer of substances of concern to adopt the “*no evidence of absence of harm, no right to pollute principle*” and the acceleration of phase out and substitution of chemicals of concern will be paramount, such as the deployment of an Action Plan on Electrification, promoting the direct electrification of industrial processes, addressing the preparedness of EU electricity networks, and the deployment of nature positive renewables.
- **Prioritise the implementation of circular economy strategies aiming at chemical, material and energy sufficiency and efficiency**, through substitution of critical or carbon intensive materials with low-carbon

¹ The term “sustainable competitiveness” is understood as meaning that the competitiveness is subordinate to the environmental sustainability conditionality and safeguarding of planetary boundaries.

and natural alternatives, measures to lower the need for raw materials, energy and other feedstocks and ensure detoxified material cycles, especially for PFAS-free solutions.

- **Implement the pollution prevention hierarchy and the polluter pays principle to encourage responsible behaviour and fast track of innovation and substitution of toxic chemicals**, by adopting a “Toxic-Free and Zero Pollution Compatibility check” for new or revised pieces of legislation, state aids and any support schemes (e.g. Innovation Fund, Projects of Common European Interests, Public Procurement etc.), lifting cost imbalance between fossil fuels and renewables and holding polluting companies accountable for the costs of pollution prevention at source and compensation and contribute to independently managed funds dedicated to depollution. Full accountability on environmental, climate and human rights impacts of value chains globally, as well as the internalisation of external costs, will be paramount. In addition, support the review of the **Environment Liability Directive** to that end, removing the permits defence and by making financial guarantees mandatory for all polluting activities.
- **Provide for user-friendly tools to enable tracking of progress on delivery on the Green Deal objectives and foster public accountability in decision making**, notably by making digital safety information, permitting and digital reporting the norm. Providing for public, user-friendly tools to enable tracking of progress to deliver on the climate neutrality, toxic-free and zero pollution ambitions for all actors by integrated pollution prevention benchmarking and tracker portals e.g. Industrial Emissions Portal, a revised UNECE Protocol on Pollutants Release and Transfer Register, Digital Products Passports, with systematic and formalised consultation of end-users, will be key.
- **Demonstrate that the “EU walks the talk” around the ‘green’ digital age** to serve progress on environmental performance and accountability of decision making, notably by reviewing the Commission Expert Groups Rules and Council work practice to ensure full transparency and accountability with early and effective participation of the public. Ensure ‘simplification’ calls do not compromise the high level of protection objectives.
- **Ensure that public procurement promotes uptake of environmentally and socially responsible products and services**, notably through mandatory conditionalities linked to best in class environmental and social performance requirements, simplified tools to assess costs of negative environmental externalities, robust monitoring and reporting regimes to accurately measure progress and extensive capacity building and training programmes for procurement authorities.
- **Commit Member States to adopt ambitious secondary legislation stemming from the Industrial Emissions Directive 2.0**, delivering in a timely and forward-looking manner on the zero-pollution, climate, and circular economy high protection goals, notably through ambitious BREF guidance rules, comprehensive and comparable installation-level transformation plans as well as robust operating rules for livestock rearing and compensation regimes as well as dissuasive penalties.

More information: [Joint industry-NGO ‘Vision for a prosperous and sustainable industry: a positive blueprint for the future’](#) • [Open letter on the Clean Industrial Deal](#) • [Briefing on the opportunities of the IED2.0 and the IEP](#) • [Proposals for a BREF process fit for the future](#) • [Aarhus ECO Forum statement on PRTR Protocol modernisation](#) • [EEB Briefing on a Post-growth Industrial policy](#) •



3. Build on the Strategic Dialogue for Agriculture to transform EU agri-food policies for a just transition to sustainable food systems

Our food system is driving multiple environmental and health crises. Experts are warning that the way we produce and consume food is not sustainable, that our food security is at stake and that business as usual is no longer an option – facts also underlined in the Strategic Dialogue consensus report. From nitrogen pollution to biodiversity loss, from household food insecurity to the growing burden of diet-related diseases, the challenges are complex and interrelated, requiring urgent, bold, and systemic policy and legislative solutions. The dominant policy approach so far has relied primarily on voluntary business initiatives and nudges to individuals (whether farmers or consumers) to make the right choices, with little impact. The EU and Member States must urgently design an effective and coherent mix of policies and laws to accelerate the transition to a sustainable, fair and healthy food system.

In 2025 and 2026, the EU will embark on a new round of reform of the Common Agricultural Policy (CAP). Work will step up on the EU's post-2030 climate policy, and the role of the agriculture sector therein will be a central question. Following up on the consensus of the Strategic Dialogue, the Commission has also committed to address farmers' incomes through, among others, the Unfair Trading Practices Directive, but it remains to be seen what follow up will be given to the recommendations related to supporting healthier and more sustainable diets.

Regarding the ongoing evaluation of the Common Fisheries Policy, the EU needs first and foremost to focus on the proper implementation of existing regulations. The Vision for Fisheries for 2040 must promote a just transition to low impact fisheries, supporting livelihoods and respecting the biological limits of the ocean.

We therefore call upon the Presidency Trio to:

- **Make a transition to sustainable food systems a top political priority**, encompassing changes in both production and consumption, and pursuing better incomes for farmers at the same time as higher environmental sustainability.
- **Work with the Commission, Parliament, and with all stakeholders to deliver an ambitious CAP reform** which targets socio-economic support exclusively to those farmers who need it the most and gradually increases support for good environmental and animal welfare practices with a greater focus on outcomes as outlined in the **Strategic Dialogue**.
- **Build political support for ambitious science-based emissions reduction goals and policy measures for the agriculture sector**, as recommended by the Strategic Dialogue.
- **Champion science-based and inclusive dialogue on food and diets**, to enable policy action at EU and national level to make healthier and more sustainable diets more accessible and attractive for consumers.
- **Urge the Commission to publish the long-awaited proposals for the revision of the EU's animal welfare legislation** and in particular to ban the use of cages in animal farming, as called for by 1,4 million European citizens, and once published, secure support in the Council for ambitious measures in line with the latest science.
- **Maintain the spirit of collaboration and exchange initiated by the Strategic Dialogue** by fostering open discussions across agricultural and environmental stakeholders and engaging with environmental NGOs on the same basis and frequency as farmers' unions.
- **Work on the proper implementation of the Common Fisheries Policy**, notably regarding Article 17 and the criteria to allocate fishing quotas, as well as encourage Member States to implement the Marine Action Plan.

More information: [EEB report 'Hungry for Change – An EU Sustainable Food Systems Law for People and Planet'](#)

• [Joint report 'Sustainable Food Systems Law – Policy Recommendations for a Meaningful Transition'](#) • Joint EEB-BirdLife-WWF vision paper 'A brighter future for EU food and farming' • ['EEB-Birdlife-WWF Report 'Will CAP eco-schemes be worth their name?'](#) • [EEB-BirdLife-NABU report 'CAP unpacked... and unfit'](#) •



4. Commit to a sufficient EU Budget & wider financial tools to have a credible & fair transition to a one-planet economy: listening to the voice of youth & others too often forgotten

The investment needs for the socio-ecological transformation of the European economy are enormous (around 800bn EUR per year). While the private sector must play its role, research shows that only a third of the EU's essential financial needs can be raised through capital markets and 60% of green investments needed until 2030 don't have a "bankable" business case. The end of the Recovery and Resilience Facility (RRF) implies an almost 50% reduction in the EU funding available, including significant cuts, amounting to about EUR 300 billion less for climate and nature investments in the 2028-34 period than what's required. Other European-level existing funds (e.g., structural, Social Climate Fund) and proposed funding instruments (i.e., the Competitiveness Fund) are necessary, but insufficient to address all public investment needs and are often targeted toward a limited purpose. The reformed EU fiscal rules will not be a game changer in providing additional fiscal space for Member States but rather limit government spending. Evidence highlights that large targeted public investment and active shaping of the economy are central to development of a sound and effective green industrial policy.

There is a significant window of opportunity for a coordinated EU public finance approach now. There is much support for such new investments. While some countries are currently opposed to new EU-joint borrowing, other countries are in favour. The former Commissioner for Economy and Finances Gentiloni and institutions such as the International Monetary Fund (IMF) have called for implementing a permanent EU fiscal capacity. Mario Draghi also highlighted the need for common funding in his long-awaited report on future EU competitiveness. Ursula von der Leyen's political guidelines emphasise significant investment commitments to foster EU competitiveness, innovation, and green transition goals. In her new guidelines for 2024-2029, von der Leyen announced plans to introduce a "European Competitiveness Fund," intended to strategically fund essential sectors – a vision for a new EU budget is currently being prepared. Public support for joint EU investments is also present. A recent study by the Jacques Delors Centre shows widespread support for green industrial investments financed by borrowing, if coupled with social conditionalities.

There are further increasing calls for a system of **fair and efficient taxation and pricing in the EU** – within the European Green Deal (EGD), at national level, and by the research community - underlining the need for ecological tax reform to put more burdens on resources and pollution and less on labour. There is a growing recognition that without addressing pricing and subsidies, the economy will not support sustainability needs. A fair and efficient pricing system is one where, *inter alia*, there are no harmful subsidies and where pricing reflects, *inter alia*, environmental externalities (such as climate change, air pollution, discharge to water bodies, or marine litter polluting the oceans) as well as resource costs (such as water, materials) and service provision (such as waste management costs), while also considering affordability and distributional issues. Fiscal rules must be designed to achieve macroeconomic stability and to lower the burden of future generations. Today, this means investing in the just transformation of our economies and societies and implementing the EGD.

We therefore call upon the Presidency Trio to:

- **Support public investments for a stronger, more resilient and sustainable economy**, including advancing discussions on **new own resources i.e. progressive taxes including a tax on extreme wealth, a frequent flyer levy, an excess profit tax on fossil fuel and a financial transaction tax** to support the EU and governments to plug green and social investment gaps. Also commit to environmental tax reforms to implement the polluter pays principle, while guaranteeing that it does not negatively affect low-income groups and workers in particular.
- **Support the need for increased public investment capacity** for productive investments as a cornerstone of a more sustainable and resilient economy by **Preparing MMF negotiations for the 2028 to 2035 cycle that**

commits to an EU budget enabling a green and just transition – by initiating discussions with EC, member states, CSOs and social partners. The next MFF needs sufficient funding to advance decarbonisation, depollution, a circular economy, nature protection and restoration and a dedicated Oceans Fund with clear environmental, climate and social conditionalities across all funding programmes. If the current model for the MFF reform with its three pillars is adopted – Pillar 1 for Member States via RRF-inspired funding linked to priorities and national policy reform; Pillar 2, a competitiveness fund at the European level; and Pillar 3: the international dimension – then it is essential to have the Pillar 2 a “Competitiveness for Sustainability Fund” or “Clean Competitiveness Fund”, demonstrating coherence with the Clean Industrial Deal ambitions. The **LIFE programme**, representing 0,3% of the EU budget, has proven to offer significant added value and should be maintained, indeed strengthened.

- **Facilitate debate at EU level on EU mechanisms to reform taxation and pricing to ensure fairness and distribution**, putting in practice the polluter pays principle, including advancing discussions on new own resources i.e. progressive taxes including a tax on extreme wealth, a frequent flyer levy, taxes on resource use, an excess profit tax on fossil fuel and a financial transaction tax to support the EU and governments to plug green and social investment gaps. This is essential given the needed level of investment in decarbonisation, depollution, and nature restoration that each support EU competitiveness for sustainability and avoids the increased flow of funding to military defence undermining funding in these areas.
- **Start discussions to establish a long-term EU just transformation fund post-2026** to create a dedicated and long-term EU public investment fund to finance green and social investments – with a careful look at the social dimension to ensure that all segments of society benefit from the transition, which supports both the EGD and social justice.
- **Assign dedicated financial and human resources to citizens’ participation** (which include youth, and those often overlooked). Furthermore, promote citizens participation in budgetary matters to ensure the inclusion of citizen’s perspectives on where investment and funding is needed is taken into account.
- **Transform the current European Maritime Fisheries and Aquaculture Fund into an Ocean Fund**, that can successfully deliver on the EU Ocean Pact. The Ocean Fund should be based on 2 pillars, the long-term restoration and conservation of the marine environment and the just transition to a low impact blue economy.

More information: [The EEB’s main asks for the Fit for 55 Package- A package fit for the planet and fair to society](#) • [Joint NGO statement on the Carbon Border Adjustment Mechanism](#) • [National Recovery and Resilience Plans – EEB Position](#) • [EEBs submission on the review of the EU Economic Governance Framework](#) • [Letter on State aid Guidelines on climate, environmental protection and energy 2022](#) • [Circular Taxation report](#) • [EEB’s Feedback on the EU Taxonomy Delegated Acts](#) • [Do No Significant Harm to Circular Economy in the Climate Taxonomy](#)

Chart an ecological transformation:
addressing the triple climate-nature-
pollution crisis and realising
opportunities of the transition



5. Fast track measures to tackle the climate crisis and embrace social justice

This decade will be a turning point for climate policy in the history of the European economy. The European Green Deal (EGD) and the EU's commitments under the UNFCCC make it clear that many of the unprecedented changes we need to make to our energy production and consumption patterns must take place or begin within this decade. The Presidency Trio is called upon to promote ambition and coherence in the implementation of the EGD and the 'Fit for 55' package.

In addition, the Presidency Trio will be in charge of bridging the transition between the outgoing and the incoming Commission, and to ensure that the various climate and energy dossiers continue to receive support and cohesive action. Among other important high-end objectives, the practical implementation of the energy efficiency first principle will be needed. This is a key enabler for the decarbonisation of our economy and one of the pillars of the SER framework (sufficiency, efficiency, renewables) to increase the EU's energy independence.

Building on the decisions taken in the framework of the Fit for 55 package, the Presidency Trio will be called upon to mark the end of new investment in fossil fuel infrastructure and fossil fuel subsidies. After struggling to keep Europeans warm in the winter following sanctions against Russia and the explosion of the Nord Stream gas pipeline, the time is ripe to redirect spending that has supported fossil fuel infrastructure toward efficiency and renewable energy that can meet our energy needs. This is particularly important in the housing and transport sectors, where the pace of change is faster and the technology is more mature, building on the carbon price for all energy uses and making the best use of the Social Climate Fund as a blueprint for the use of all carbon pricing revenues. At a key moment for meeting the 2030 targets, the Presidency Trio is called upon to give a strong boost to renewables in these sectors. The promises of the nuclear industry are fairytales and EU Presidencies should be careful not to put them on an equal footing with renewables, which have shown again and again that they can be scaled cheaply, contrasting with investments in nuclear which are not economical and only serve the interests of very few in Europe.

The Presidency Trio will also need to strengthen the link between the climate and biodiversity goals of the EGD by ensuring that natural sinks play a key role in climate change mitigation and adaptation.

We therefore call upon the Presidency Trio to:

- Ensure that the **Social Climate Fund** is a blueprint for transparent and efficient spending of all revenues from carbon pricing. The SCF should help low-income households cope with higher bills while also supporting their heating and transport investments. Social Climate Plans need to be developed by EU countries as soon as possible and include direct payments to ensure the poorest households that are often hard to reach with subsidies are not forgotten. The Commission should clarify that direct payments for middle-income households have a climate impact by ensuring that the carbon price continues to be viewed as a climate policy and not a tool to raise revenue. Subsidies should be targeted at developing renewable energy and efficiency solutions to tackle energy poverty.
- Explore, discuss, and promote further measures at EU and national level to **tackle fuel poverty in the context of next winter**, given the ongoing conflict in Ukraine and the likely use of energy as an instrument of war to weaken the EU. Member States must prioritise electrifying heating, building renovation, energy efficiency and renewable solutions, where feasible, to increase energy savings, self-production and resilience, and limit the need for price support which can drain public funds and lock in fossil fuel dependency.
- Finalise the implementing act for the **Energy Performance of Buildings Directive (EPBD)** as well as the related Ecodesign and Energy Label for heating and cooling implementing acts, thereby giving clarity to both investors and citizens on the future of European buildings and contributing to curbing the fastest

growing source of emissions of the European economy. This decision must not come at the cost of those households which struggle to pay their energy bills.

- Maintain EU's leading role in curbing emissions in the refrigerants sector by promoting ambition in the framework of the Montreal protocol and aligning it with the most ambitious provisions of the EU's **F-Gas regulation**.
- Use the Council discussions to push for a **nature-friendly and socially equitable approach to accelerated renewable energy development**, based on the guidance on the integrated mapping and designation of renewable energy 'acceleration areas' to be implemented by Member States, where already published.
- Demonstrate EU leadership and ethics at the **UNFCCC COP30** in Belém, Brazil, by promoting clear and binding commitments to ensure appropriate financing of the **loss and damage facility** and pushing for **reduced access and role of fossil-fuel lobbyists** to reduce their impact and ensure full transparency to improve governance.

More information: [How renewables can help vulnerable households](#) • [How renewables can help regions move beyond fossil industries](#) • [Land for Renewables: Briefing on spatial requirements for a sustainable energy transition in Europe](#) • [Nuclear Phase-out: How renewables, energy savings and flexibility can replace nuclear in Europe](#) • [An assessment of nine updated draft National Energy and Climate Plans \(NECPs\)](#) • [Building a Paris Agreement Compatible \(PAC\) energy scenario and associated policy brief](#) • [EEB's views on a Carbon Border Adjustment](#) • [EEB and others letter on the Gas Package](#) • [EEB and others letter on energy labelling for space heaters](#) • [EEB report on the missing subventions gap to decarbonise heating in Europe](#) • [EEB contribution to the Renovation Wave consultation](#) • [EEB via Coalition for Energy Savings EED position paper](#) • [No more new hydropower in Europe: a Manifesto](#) • [Fossil Gas Phase Out Manifesto](#) • [Joint NGO letter on the Sustainable Carbon Cycles Communication](#) • [Joint NGO letter on the Effort Sharing Regulation / Climate Action Regulation for Europe](#) • [EEB Policy Recommendations for a reliable Carbon Removal Certification](#) • [EEB Analysis of the Commission's legislative proposal for Carbon Removal Certification](#) • [Nature-Positive Renewables: Summary for policy makers](#) • [Policy brief: A sustainable hydrogen strategy for the EU](#) • [Policy brief: EC delegated act on renewable hydrogen production](#) • [EEB and Better Without Boilers "The gas lobby's boiler battle"](#) • [Renewables best practices: Solutions for nature-positive, community-led renewable energy in Europe](#) • [Joint letter: Industry, consumers and NGOs urge final adoption of the Renewable Energy Directive](#) • [EEB and Ember's Power in Unity: Doubling electricity interconnection can boost Europe's green transition](#)



6. Deliver a nature-positive agenda for land, freshwater and oceans, support biodiversity and promote climate adaptation and resilience

Our lives, health, wellbeing, economy and our ability to mitigate and adapt to the climate crisis depend upon healthy and biodiverse ecosystems. However, despite this urgent moral, economic and environmental imperative, nature is in a state of crisis. The five main direct drivers of biodiversity loss (changes in land and sea use, overexploitation, climate change, pollution, and invasive alien species) are making nature disappear or deteriorate, making it imperative that the EU continues the course implementing and strengthening the European Green Deal including its commitments to protect, restore and sustainably use nature. The negotiations on some key Green Deal laws are still ongoing, such as the **Soil Monitoring Law** (SML) and **Forest Monitoring Law** (FML). The Presidencies must represent the common European interest in the negotiations on EU laws and push back against orchestrated disinformation campaigns by powerful vested interests who have been blocking progress on the European Green Deal. Strong Council leadership and a timely handling of the negotiations will be crucial to make the most of the potential that these new laws can provide.

The roll out of the key EU strategies for 2030 continues, including **EU Strategies on Biodiversity, Climate Adaptation, Forests, and Soil**. The mid-term review of the 8th Environmental Action Programme highlighted the need for EU Member States to protect and restore nature as well as transform the economy including through impactful implementation and enforcement of obligations under the existing nature, water and marine laws.

Delivering on a strong **EU Ocean Pact** will also be key, as the EU currently lacks an overarching and ambitious framework ensure all policies and legislation that impact the ocean work in harmony with one another. The Ocean Pact should integrate existing and new legislation, to guarantee that all ocean-related policies are fit for preserving and restoring the ocean as well as improve compliance with and enforcement of environmental rules at the national and international level.

In addition, the Trio Presidencies will represent the EU on a global stage including negotiations under the **Convention on Biological Diversity** and will oversee the delivery of the key policy initiatives by the von der Leyen Commission II such as **Climate Adaptation Initiative**, **Water Resilience Strategy** as well as initiatives on biodiversity financing (e.g. nature credits). It is essential the Presidencies ensure these policy initiatives deliver for nature and people and are not used to backtrack from the existing EU environmental standards.

The strong EU action on protecting and restoring nature is supported by citizens, scientists, civil society, mayors and businesses among others and provides for a progressive political agenda that wide sections of society can rally around.

We therefore call upon the Presidency Trio to:

- Demonstrate the EU's global leadership on tackling the nature crisis and loss of biodiversity, especially **by opposing the expected European Commission proposal to lower the protection status of the wolf under the EU legislation** following the regrettable Bern Convention standing committee's decision on the wolf. This leadership needs to be **backed-up by clear progress within the EU stepping up efforts to achieve co-existence with large carnivores as well as on nature restoration and effective protected area management**.
- Recognising the **opportunities the recently adopted Nature Restoration Regulation offers to tackle biodiversity and nature crisis**, the Presidency Trio should prioritise support for the establishment of proper governance as well as development of the EU wide implementation tools to ensure its impactful roll out across the EU.
- Conclude the negotiations on the first **EU Soil Monitoring Law** and ensure the adopted law is impactful enough to put our soils on the path to recovery by 2030 and guarantees that they are brought back to health by 2050.
- Prioritise Council negotiations on the **Forest Monitoring Law** including close involvement of the environmental authorities in the deliberations so that it helps establish a comprehensive picture of the

state and use of forests in the EU and facilitate targeted decision-making for better forest management, including via closer-to-nature forestry approaches.

- Work with the European Commission to ensure that the revamped **EU Adaptation Strategy**, promised as a priority by the Von der Leyen II Commission, prioritises nature-based solutions to adapt to climate change, aiming at making clean water available for nature and for people, reduce water needs by tackling our unsustainable diets and foster a move to more plant-based diets, sustainable agro-energetic projects that improve water retention in the soil and prevent evaporation, forestry and land management techniques that help prevent landslides and floods.
- Promote the need for stepped up **implementation of the EU Biodiversity Strategy for 2030** including review and ratcheting up of progress as well as achievement of the **commitments under the Kunming Montreal Global Biodiversity Framework**.
- **Drive ambition for biodiversity action globally especially at the negotiations under the Convention on Biological Diversity**, while building on the EU's positive role in securing the Kunming-Montreal Agreement as well as adoption of the EU's Nature Restoration Regulation. In addition, the EU's credibility as a champion for biodiversity and nature needs strengthening, especially **through action in the EU in tackling drivers of nature crisis**.
- Promote that the next EU budget has **dedicated Nature Restoration Fund** in addition to better mainstreaming of the biodiversity across all EU funding instruments and securing the private investment in nature restoration (e.g. through nature credits).
- Support the development of the progressive **Ocean Pact** building on joint meetings of Environment, Energy, Fisheries and Transport Ministers. Reverse the increasing degradation of **marine and coastal ecosystems** and scale up ambition to achieve a healthy ocean by halting extractive and polluting practices (industrial fishing, deep-sea mining, marine geo-engineering, littering etc.) and supporting a climate resilient, regenerative wellbeing blue economy that respects planetary boundaries. The Ocean Pact should be supported by a **dedicated Ocean Fund** in the next EU budget.
- Lead by example in the implementation of the **Nature Directives** and the **Nature Restoration Law** as well as by focusing on new pledges to reach the EU's target to protect and effectively manage 30% of EU's land and seas.

More information: Joint statement by 300+ civil society organisations calling for strict wolf protection to be maintained • [At Full Speed: EEB Policy Brief on the EU emergency regulation to accelerate renewable energy](#) • [Proposal for a Regulation on Nature Restoration – NGO analysis](#) • [Fact sheet on Peatland restoration](#) • [River restoration briefing](#) • [Joint marine NGO position paper on the Nature Restoration Law](#) • [Food security fact sheet](#) • [Policy Brief on Nature-Positive Renewables](#) • [EU restoration targets for rivers and freshwater ecosystems – NGO position](#) • [The Final Sprint for Europe's Rivers](#) • [EU Biodiversity Strategy Shadow Action Plan to conserve fisheries resources and protect marine ecosystems](#) • [Planning offshore renewable energy with nature in mind](#) • [At a crossroads: Europe's role in deep sea mining](#) • [The top ten problems for renewable energy in Europe are not linked with nature protection](#) • [Certification of Carbon Removals: EEB Policy Recommendations](#) • [EEB Analysis of the Commission's legislative proposal for Carbon Removal Certification](#) • [EEB Position Paper on the Soil Health Law](#) • [Seas at Risk: Blue Manifesto](#)



7. Tackle pressures on surface and groundwater and secure clean and safe water for all

Most of the rivers, lakes and groundwater aquifers across the EU are not healthy, thus undermining our health and livelihoods and causing alarming biodiversity decline: one in three freshwater fish species in Europe are currently threatened with extinction and migratory freshwater fish populations have seen a 93% collapse since 1970. Pollution, including from chemicals and nutrients, is one of the main reasons for this, as well as the fact that our rivers, lakes and wetlands have often been dammed and canalised to enable production of energy from hydropower, transportation of goods by inland navigation, or water storage for agriculture. Climate change intensifies these pressures and often manifests itself through water, for example through extreme events such as floods and droughts, thus making it imperative that the EU achieves ecological and climate resilient water management.

The EU Water Framework Directive (WFD) including its daughter Directives on groundwater (GWD) and priority water pollutants (EQSD) is a holistic legal framework that aims to achieve good status for Europe's freshwater bodies by 2027 at the latest. Where political will exists, the WFD has proven to be an effective framework for addressing the main pressures facing freshwater ecosystems, including climate change, but efforts and resources for better implementation and enforcement of the WFD need to be significantly stepped up. In general, the ambition of the 3rd generation River Basin Management Plans remains low, with excessive use of exemptions from the WFD's environmental objectives, thus delaying the needed transformative change in how we manage and value water, our most precious natural resource.

Moreover, our freshwater ecosystems are suffering from pollution from chemicals including, pesticides, pharmaceuticals, (micro)plastics and PFAS, often in complex mixtures. The European Commission proposed to update lists of water pollutants to be more strictly controlled in surface waters and groundwater as part of the EU's Zero Pollution Action Plan (ZPAP), but, unfortunately, the progress in the Council on priority substances has been slow, risking that adoption of the proposed new substances will come too late to allow planning of measures in the next (2028-2033) River Basin Management Plans. Thus resulting in the next cycle RBMPs becoming empty shells in terms of acting on pollution.

In addition, following the recent calls from the European Parliament and Council, the EU is to develop a Water Resilience Strategy in the broader context of reducing vulnerability and building resilience to climate change impacts that often manifest themselves through water.

We therefore call upon the Presidency Trio to:

- Conclude inter-institutional negotiations on the **update the list of water pollutants of surface and groundwater under the Polish Presidency and ensure that Member States are required to take measures on the proposed new priority pollutants in the next (2028-2033) RBMPs**. Keep the scope of the legislative update of the EU Water Directives (WFD, EQSD, GD) limited to priority pollutants of surface and groundwater and avoid weakening existing environmental safeguards; recognising the conclusions of the fitness check evaluation of the EU water policy that the existing legal framework provides sufficient flexibility to for permits for sustainable projects.
- Lead the Council's work including as a co-chair of the Common Implementation Strategy of the Water Framework Directive as well as at the Water Directors and Ministerial level on **EU's action to step up implementation and enforcement of the Water Framework Directive** (and related directives on floods and priority pollutants) to ensure that the environmental objectives of the WFD are met by 2027. **Discourage the construction of new dams** and other damaging infrastructure given their negative biodiversity impacts and focus instead on barrier removal to restore free flowing rivers.

- Contribute to the development of the upcoming **EU's Water Strategy focused on building resilience** through enhanced contribution of healthy freshwater ecosystems to manage water scarcity and droughts and achieving climate resilient water management in the EU.

More information: [LRE Water Handbook for 2024-2029 mandate](#) • [Joint NGO priorities for priority substance trilogues](#) • [The Final Sprint for Europe's Rivers](#) • [Conference report: Under the surface](#) • [EEB briefing: The Water Framework Directive, the forgotten tool to fix Europe's water crisis](#)

8. Guarantee the right to clean air and reduce exposure and preventable mortality and illness

Air pollution is the number one environmental health risk in the EU, causing both chronic and serious diseases such as asthma, cardiovascular problems and lung cancer. Air pollution has been shown to be responsible for some 400,000 premature deaths in the EU every year and for damage to ecosystems and biodiversity through eutrophication, acidification and excess ozone levels. Air pollution is largely preventable and EU air quality standards, especially legally binding limit values, have proven to be vital in cleaning up the air.

The 2008 EU Ambient Air Quality Directives (AAQD) is one of the cornerstones of the EU's clean air policies, setting standards for air quality for the protection of people's health and the reduction of environmental damage. However, current air quality standards are insufficient and outdated, i.e., they do not reflect the latest available science. In September 2021, the World Health Organisation (WHO) published its updated recommendations for air quality, based on a thorough scientific review process. EU air quality standards should urgently be updated in line with these recommendations. For this reason, following a Fitness Check process, the Ambient Air Quality Directive started a revision process in 2022 which ended with the publication of the revised law in the European Official Journal on 20.11.2024. Member States now have two years to transpose the revised text into national law and it is of paramount importance they do so swiftly.

The National Emissions Ceiling Directive (NECD) which sets national reduction commitments for key air pollutants that have a significant negative impact on human health and the environment and requires EU member states to monitor and report on the emissions of these pollutants, should be reviewed no later than 31 December 2025. It is in that context that the European commission launched a consultation process aiming at evaluating the Directive's impacts which closed at the end of November.

The revision of the NECD represents a crucial opportunity to address a dangerous ozone precursor, namely methane (CH₄) which for now falls outside of the scope of the Directive. This revision will also represent an opportunity to better tackle ammonia emissions as, according to the 2024 status report: Reducing ammonia emissions remains the biggest challenge. Nine Member States need to cut their 2022 emission levels to fulfil their 2020-2029 reduction commitments. The agriculture sector is the principal source, responsible for 93% of total ammonia emissions.

Ammonia emissions have decreased only slightly in many Member States since 2005 and in some cases have increased. And since air pollution from the agricultural sector remains largely unaddressed in the revised Industrial Emissions Directive (IED) (cattle remained excluded from the Directive which has dire implications for health and the environment, lack of action in this legislation underlines the importance of action under the NECD. Further, the revised IED excludes farms with a Livestock unit of less than 2/ha, this is twice the amount of Nitrogen deposition limits advised. The operating rules for livestock rearing are under review in the next two years, and these shall also develop measures to ensure decarbonisation and biodiversity. This revision should therefore be in line with what science urges us to do and be a priority in order to take place no later than end of 2025.

In the EU, residential burning is the predominant source of health - and climate-damaging - fine and ultrafine particles, including of black carbon (BC). Rules for the decarbonisation of the energy system, together with the adoption of energy efficiency and energy saving measures, also in public and private buildings, are key developments for the reduction of air pollution from the domestic heating sector. The Presidency Trio must ensure this issue is tackled in all relevant legislative files in an ambitious and coherent way.

Effective policy action to quickly and drastically reduce the health and environmental damage caused by air pollution is urgently required. The actions within the next 18 months of the PL-DK-CY Presidency Trio are key to support the implementation of the revised AAQD, alongside the review of the NECD and Gothenburg

Protocol. These provide a golden opportunity for the Presidency Trio to ensure cleaner air and to work to achieve a high level of protection for citizens and ecosystems, in line with the EU's zero-pollution ambition.

We therefore call upon the Presidency Trio to:

- Lead in the adoption of an ambitious revised **National Emissions Ceiling Directive (NECD)** which **reflects science** and lead the Council through NECD trilogues to ensure that health and nature protection are given the priority they deserve. In particular, by strengthening mandatory measures to ensure compliance, particularly in agriculture with regards to ammonia and nitrogen management, setting **additional emission reduction targets for the year 2035 and 2040** and expanding the scope to include methane in the list of pollutants.
- **Ensuring improvements to monitoring and reporting** for better representativeness of ecosystem and geographic types and accurate and transparent emissions projections and inventories.
- **Promote coherence between the IED, AAQD, CAP, ZPAP and the NECD** and global commitments in the **Gothenburg Protocol**.
- Commit to and promote bold action against air pollution at the international level through the **Gothenburg Protocol** revision, expanding the number of air pollutants covered by binding Emission Reduction Commitments (ERCs) by adding methane (CH₄), black carbon (BC) and mercury (Hg).
- Ensure stricter post-Euro 6 and Euro VI emission standards for **light-duty vehicles and heavy-duty vehicles** respectively to reflect the commitment to zero-pollution ambition – with stricter emission limits for regulated air pollutants (NO_x, PM, PN, CO, THC, NMHC and, for lorries and buses, CH₄ and/or NH₃), and new emission limits for currently non-regulated air pollutants (Sub-23 nm and total particles, N₂O and, for cars and vans, CH₄ and/or NH₃). Improve real world testing and continuous on-board monitoring of real-world emissions to support accuracy and transparency.
- Fully embrace a **zero-pollution ambition** when positioning the Council in decision-making processes which have an impact on air quality and emissions reduction by promoting zero risks to health and the environment by 2050 at the latest by addressing pollution at source and by focusing on prevention, while also showing zero tolerance for non-compliance and providing no funding for polluting activities. In addition, ensure that the ZPAP and all legislation implements key principles enshrined in the EU Treaties, in particular by: preventing pollution through action at source in line with the **prevention principle**, in particular through ambitious operating rules for livestock, including measures on biodiversity protection and decarbonisation; anticipating protective actions in case a risk cannot be determined with sufficient certainty and protecting the environment and people's health, in line with the **precautionary principle**. In addition, keeping polluters accountable and recovering the costs from them to rectify the damage they cause in line with the **polluter-pays principle**; and ensuring accessible decision-making processes and publicly available pollution data, **in line with the transparency principle**.

More information: [EEB Submission to AAQD review](#) • [Airy promises: how EU governments are failing to cut air pollution and what to do about it](#) • [Six necessary steps for cleaner air](#)



9. Drive chemicals policy towards safe and sustainable chemicals, accelerating restrictions of the most harmful chemicals, marrying innovation with increased protection and confidence in toxic-free supply chains

The European Union stands at a pivotal moment to shape a future where prosperity, public health, social justice, and a resource-preserving as well as climate-friendly economy coexist. Despite progress in health, climate and environmental policies, pollution from hazardous chemicals remains a major [threat](#) to human [health](#) and [planetary stability](#). [Found](#) in water, food, air, and everyday products, these chemicals cause serious illnesses like cancer, infertility, and cognitive impairments, with disproportionate impacts on vulnerable groups, including women, children, and future generations. Europeans are already heavily [contaminated](#): 'forever chemicals' have been detected in drinking water and in all umbilical cord samples across nearly 30,000 cases, with [flame retardants](#) found in breast milk. Addressing PFAS pollution alone would cost more than 10% of [global GDP](#). The societal cost of inaction, including health impacts, remediation, and water clean-up, are unaffordable, and far exceed those of banning harmful chemicals.

However, while the EU has a leading chemical safety framework and the EU chemical industry is a strong performer - with production growing from €537 billion in 2011 to €785 billion in 2023 with a [trade surplus](#) of €198 billion in 2023—regulatory action lags in addressing chemical pollution, as hazardous chemicals still make up [two-thirds](#) of the market, and their use is increasing.

Key actions to achieve a 'toxic-free environment', promised in the 2020 **Chemicals Strategy for Sustainability (CSS)**, remain undelivered. **REACH**, the existing chemicals control system, must be modernised. On average it takes over 19 years to identify and regulate known harmful chemicals, while 95% of chemicals continue to be placed on the market despite [unknown properties](#), including the building blocks for plastics, known as polymers. The system lags behind scientific consensus and most well-known harmful chemicals like bisphenols, halogenated flame retardants, and PVC remain on the market. A swift reform of the current system is necessary to effectively protect citizens and the environment. Only chemicals for which complete and adequate safety data are provided should be allowed on the market and the restriction of the most harmful chemicals must be accelerated. **PFAS pollution** still requires special urgent attention due to widespread soil and water contamination, including drinking water, in the EU and globally.

[Mercury](#) and its compounds are highly toxic, can damage the nervous system and are particularly harmful to foetal development. Mercury 'travels' globally, bioaccumulates up through the food chain, especially in certain predatory fish, and presents a human exposure risk. At EU level, the revised **EU Mercury Regulation** was adopted in 2024, prohibiting the use and export of dental amalgam by 1 January 2025, as well as the export of mercury-added lamps, which are already domestically prohibited, by December 2025 and 2026.

Although internet platforms were notified of high mercury levels detected in their skin lightening creams, online sales continue and penetrate EU borders. While new rules on product safety and online platforms entered into force in recent years and now have to be fully enforced, such as the **Digital Services Act**, the **General Product Safety Regulation** and more recently the **Product Liability Directive**, online platforms are still systematically kept outside of the chain of responsibility for the products they offer for sale. Additionally, the **Cosmetic Products Regulation**, which revision was announced for 2022, is still not out as of November 2024.

At global level, the **Minamata Convention on Mercury** was adopted in October 2013, to protect human health and the environment from anthropogenic-mercury emissions. **The Fifth Conference of the Parties (COP5) to the Convention** took place in November 2023 and notably decided to ban the manufacture and trade of fluorescent lamps and to fully ban mercury from cosmetics. It further decided to carry out intersessional work towards strengthening the enforcement of the mercury cosmetics ban. The production of polyurethane using mercury-containing catalysts was also banned. **The Sixth Conference of the Parties (COP6) to the Convention** will take place from 3 to 7 November 2025 in Geneva. Important decisions are expected to further strengthen

the Convention by, among others, towards controlling mercury compounds, banning vinyl chloride monomer (VCM) production provided mercury free alternatives are available, and strengthening implementation of the ban on mercury-added cosmetics.

As we look towards the Trio Presidency mandate, the EU must commit to a toxic-free and socially just green transition and support the European industry in leading the way in the innovation of clean and non-toxic chemicals, products, and practices.

We therefore call upon the Presidency Trio to:

- Support the full delivery of the **Chemicals Strategy for Sustainability (CSS)** and maintain a high level of ambition in its implementation, by demanding the European Commission to adopt pending actions such as: to implement the Restrictions Roadmap for toxic-free products; to halt exports of EU-banned chemicals; and to improve the funding and governance arrangements for the European Chemicals Agency, ECHA, through an ECHA Basic Regulation.
- Ensure the upcoming **Chemicals Industry Package** complements the CSS and supports the transition needed for the chemical industry to achieve the CSS objectives and position the EU as a global frontrunner in pollution prevention, detoxification, de-pollution, decarbonisation and restoration, by advancing both regulatory clarity and the predictability that industry needs to foster innovation in safer, sustainable alternatives, while ensuring a level playing field for all companies, especially downstream users and SMEs.
- Lead the Council to support a robust adoption of the **One Substance, One Assessment (OSOA) package** by: enhancing the Common Data Platform on Chemicals (CDPC) for better data use, gap identification, and inclusion of independent research; guaranteeing that the Early Warnings and Action System (EWAS) holds authorities accountable to act when emerging risks are identified; avoiding replicating poorly designed REACH mechanisms to ensure consistency; reducing regulatory burdens on authorities; and aligning the RoHS Directive with future REACH updates ensuring timely decisions.
- Lead the Council to support ambitious modernisation of the **REACH regulation**, by simplifying, speeding up and reducing the burden of Restriction and Authorisation processes for authorities; introducing fast-track restrictions for all the most harmful chemicals in all consumer and professional products, by 2030 at the latest; and improving safety data registration requirements, including for polymers, endocrine disruptors, persistent, bioaccumulative and mobile chemicals and carcinogens.
- Urge the European Commission to **clarify** its science-based approach to restricting **PFAS** under REACH, with defined transition periods for critical uses lacking alternatives, while promoting PFAS-free solutions. Additionally, the Council should call for the completion of the PFAS Action Plan, ensure health and financial support for affected communities, and coordinate with Member States on a decontamination strategy based on the 'polluter pays' principle to prevent financial burdens on citizens.
- **Promote EU leadership in strengthening the Minamata Convention on Mercury** by, among others, actively engaging in the intersessional processes of the COP; supporting initiatives towards firstly; widening the scope of mercury added products and processes to be phased out including lamps, dental amalgam and VCM production; secondly; controlling and where feasible eliminating mercury compounds' trade; as well as by strengthening the implementation and enforcement of the ban of mercury-added cosmetics.
- **Ensure that the revised EU Mercury Regulation** is properly implemented and in a timely manner, while setting swiftly the ground for developing a draft guidance on abatement technologies for mercury emissions from crematoria, as well as for assessing the need of regulating further mercury compounds, remaining mercury uses and waste sources.

- **Promote the revision of regulatory tools** such as the Cosmetics directive, that holds e-platforms accountable for selling illegal and dangerous chemicals and other products containing them, such as mercury added skin-lightening creams, and ensures that failure to comply with those requirements results in meaningful consequences.

More information: [From Risk to Resilience: Navigating Towards a Toxic-Free Future](#) • [Toxic-Free Choice: Actions for a more circular and resilient economy](#) • [Let's Clarify PFAS](#) • [A roadmap to nowhere?](#) • [EEB position OSOA](#) • [Waiting for REACH: The negative impacts of delaying reform of EU chemical laws](#) • [The Need for Speed – Why it takes the EU a decade to control harmful chemicals](#) • [Joint Statement: EU-wide ban on the export of banned pesticides](#) • [EEB response RoHS revision](#) • [Skin lighteners online mercury findings](#) • [EEB comments EU Mercury Regulation review](#) • [Letter to Director Manfredi](#) • [Joint Statement on Mercury Added Lamps](#) • [Report – Online Sales of Illegal High Mercury Skin Lightening Products](#) • [Online Marketing of Toxic Skin Lighteners: Mercury in cosmetics](#) • [Mercury in Retrograde](#)



10. Address resource use and seize circular economy opportunities for the economy and society

Over the past five years, the EU has made significant strides in developing policies to foster a more circular economy. However, concrete progress remains insufficient with the EU's Circular Material Use Rate essentially stagnating below 12%, while overall material consumption continues to rise (with a 6% increase over the past decade). Europe's systemic overconsumption and its overdependence on primary material extraction carries severe social and environmental consequences, while also exposing the EU to new geopolitical vulnerabilities and threatening the long-term competitiveness of European industry. This demonstrates the substantial untapped potential of circularity, the opportunities for a more decisive shift towards a circular economy reconciling resource consumption with planetary boundaries, as well as the urgent need to address remaining regulatory gaps while strengthening implementation.

As underlined by the [European Environment Agency](#), circular economy policies now need to become more binding and target-oriented to accelerate the shift towards a regenerative economy in Europe. This requires moving beyond the current strong focus on waste management to address resource use more directly. A key priority for the next three Presidencies will therefore be ensuring that the EU equips itself with the regulatory framework needed to drastically reduce waste, steer the economy away from unsustainable resource dependency, and transition to a prosperous economy fit for one healthy planet. The Presidencies will also play a critical role in ensuring the full implementation of existing circular policies and in finalising major legislative proposals put forward under the Green Deal, including the Green Claims Directive, the targeted revision of the Waste Framework Directive, and the End-of-Life Vehicles Directive.

We therefore call upon the Presidency Trio to:

- Continue to progress on the introduction of **binding EU targets on reducing resource use** (material footprint) **and its impacts** (consumption footprint) in line with planetary boundaries, building on the first steps secured under the Belgian Presidency and reflected in the Council conclusions on the 8th Environment Action Programme (June 2024), which identified this as a strategic priority for the post-2024 period.
- Urge the European Commission to prepare an **ambitious Circular Economy Act, putting forward a holistic strategy for sustainable resource management** and avoiding a limited and short-sighted approach focused only on recycling and managing waste. Ensure that the new act focuses on measures to design waste out of the system, promote reuse and repair and introduces circular taxes and economic incentives to make the sustainable choice the easy choice.
- Adopt a robust **Green Claims Directive** assuring coherence between this legislation and the Directive on Empowering Consumers for the Green Transition to tackle greenwashing and ensure that green claims are reliable. It should introduce a pre-approval process for green claims and labels with clear assessment and communication rules, improve the robustness of the requirements substantiating green claims, including on aspects not sufficiently addressed by life cycle assessments, such as the presence of hazardous substances in products. It should also reinforce the ISO Type I Ecolabels, such as the EU Ecolabel and the Nordic Swan, as robust instruments demonstrating products' environmental performance.

- Take an ambitious stance and conclude trilogue negotiations on the **targeted revision of the Waste Framework Directive (WFD)**. Support a textile waste reduction target for 2030 of 10-15%, based on the volumes placed on the market in 2020 as a baseline year; establishing a mechanism to analyse the impact of used textile exports which can move us toward the setting of **Extended Producer Responsibility (EPR)** schemes rooted in global accountability; as well as product-specific waste management performance targets. Moreover, ensure that the EPR scheme includes a volume criterion as part of the calculation of eco contribution fees and the thresholds for bonuses under progressive eco-modulation. Concerning **food waste**, ensure that negotiations lead to ambitious legally binding food waste targets respecting the commitments in the 2018 WFD to reduce food loss and waste from Farm to Fork by 50%, which is supported by several Member States and MEPs, and also committed to in SDG 12.3. Finally, develop a stance on the implementation of various review clauses in the WFD (i.e., Art. 9 (9), Art. 11 (6), Art. 12 (2)) particularly regarding the reuse and recycling of construction and demolition waste and the necessity to revise the WFD swiftly and in due manner.
- Adopt an ambitious approach to the proposal for a **Regulation on Circularity Requirements for Vehicle Design and on Management of End-of-Life Vehicles (VDEoL)**, ensuring specific measures to reduce the material use and footprint of vehicles; strengthen measures on repair and reuse as well as on dismantling and disassembly of vehicles at EoL to foster high-quality recycling; measures to enable the exchange of information and traceability of Extended Producer Responsibility (EPR) obligations with non-EU trading partners; harmonise the Circularity Passport for vehicles with other Digital Product Passports proposed under the Ecodesign for Sustainable Product Regulation and the Batteries Regulation; and address Substances of Concern, going beyond heavy metals restrictions.
- Urge the Commission to **close legal loopholes in the regulation of imports via online marketplaces** to ensure the effective enforcement of EU product safety, chemicals, and environmental policy and create a level playing field for European businesses. Despite advances on the topic with the Digital Services Act, online marketplaces are still not considered economic operators, which prevents them from having the same responsibilities regarding product compliance than traditional supply chain actors. Closing these loopholes is crucial to preventing large amounts of non-compliant products from entering the EU market, harming European businesses, consumers, and the environment.
- Ensure that strategic partnerships and projects under the **Critical Raw Materials Act (CRMA)** are implemented with meaningful consultation with civil society, including adopting Free Prior and Informed Consent and value addition based on circularity and effective demand-side measures. The Presidency Trio will be crucial in implementing strategic projects and gaining approval from the Critical Raw Materials Board, working with member states to accelerate initiatives. They must facilitate communication between the Commission, Parliament, and Council, ensuring civil society involvement. We recommend that the Polish, Danish, and Cypriot Presidencies organize events similar to the Belgian Presidency's March 2024 event on critical raw materials.
- For national measures on **circularity under the CRMA**, advocate for binding national targets on recycling, reuse, and the integration of secondary critical raw materials, supported by strong financial incentives such as deposit-return schemes and green public procurement. Promote robust reporting mechanisms, transparent data collection, and dedicated funding for civil society-led repair, reuse, and recycling initiatives. Prioritize workforce upskilling, alignment with EU

environmental standards, and seamless integration of circularity into broader waste management strategies to ensure consistent, impactful, and equitable implementation across Member States.

- Ensure Europe maintains a leading role and towards and signs an **international legally binding agreement to curb plastic pollution** through a life-cycle approach, following the commitment made at UNEA-5 in Nairobi.

More information: [Open letter: for a holistic vision on circular economy](#) • [Open letter: Yes to an EU legislation on Sustainable Resource Management](#) • [White Paper on Sustainable Resource Management in the EU](#) • [Civil society recommendations for green and social ambition in EU textiles policies](#) • [European stakeholders united for a level playing field for online marketplaces and effective enforcement](#) • [Reforming Extended Producer Responsibility to Promote Repair](#) • [A resilient and resource-wise Europe: Sufficiency at the heart of the EU's future](#) • [EEB position on legislative proposal on substantiating green claims](#) • [EEB feedback on proposed Regulation on Vehicle Design and Management of End-of-Life Vehicles](#) • [EEB Priorities for the Waste Framework Directive Revision](#) • [Letter to Member States on food waste reduction targets](#) • [Policy brief on the feasibility of ambitious food waste reduction targets in the WFD](#) • [EEB article on effective EPR for vehicles](#) • [EEB article on circular design for vehicles](#) • [Joint call for ambitious recycled plastic content targets in the EU vehicle regulation](#)

Implement our commitments and
show solidarity across an
enlarging EU



11. Implement and enforce EU legislation to protect the rule of law and our health, foster environmental and social justice and strengthen civil society engagement and democracy

The environmental and climate agenda of the new Commission is less ambitious than the previous one but rather includes a focus on implementing the already existing EU environmental acquis. The Council will need to ensure that the Commission does not derail from the need to transpose and implement all the European Green Deal legislation, which was passed in the last 5 years, with its new simplification agenda. While regulatory coherence and efficiency are virtues we should strive for, these should not be pursued at the expense of reducing the possibility for the public concerned to be involved in decision-making. This is especially important for projects and programmes that are needed for the Just Transition, such as in the development of the national Social Climate Plans or in implementing new mining projects under the **Critical Raw Materials Acts (CRMA)**, where public engagement is an essential precondition to ensure that no one is left behind.

Moreover, any proposal to simplify legislation which has not even been transposed and implemented yet, such as on the **Corporate Sustainable Due Diligence Directive**, is premature and counterfactual and should, therefore, not be supported. We urge the Trio Presidency to prioritise legal certainty and clarity in the direction that the EU takes in regulating business conduct, and to favour a clear and rigorous transposition and implementation of legislation in the Member States before supporting any attempt to cut regulation without evidence of their effectiveness or lack thereof.

With the rule of law challenged throughout Europe and mistrust in institutions mounting, it is crucial that the Trio Presidency stays strong on the EU commitment to the rule of law, accountability and protecting people's freedoms and rights. The Council Trio Presidency should work together with the newly elected European Ombudsman and support transparency and accessibility of EU decision-making. Wider access to documents and discussions stemming from the institutions, especially from Commission Expert Groups and Council preparatory bodies, will improve public trust in EU decision-making, counter disinformation, and increase legitimacy of EU level decision-making.

The Trio should be vigilant of proposals of new laws in some Member States that mimic the Foreign Agents Laws in Russia (or elements thereof) which pose a threat to the freedom of association of civil society and media organisations, and which have knock-on effects on freedom of information. While rules to report on funding for civil society organisations are important for transparency, such rules should not be designed to overburden public interest organisations to the extent that it renders their public interest mission impossible, nor should such rules have a self-censoring effect on civil society.

The 8th Meeting of the Parties of the **Aarhus Convention (MOP-8)** and 5th Meeting of the Parties of the **PRTR Protocol** will take place under this Trio Presidency, and the Council will have an important duty to prepare for the position that the EU will take at that meeting, especially with regards to endorsement of **Aarhus Convention Compliance Committee (ACCC)** findings against the EU. The EU position in the previous MOPs has seriously threatened the international rule of law and at MOP-8 the EU has a duty to reinstate its credibility on the international stage and to endorse the authoritative ACCC findings (decision VII/8f and request ACCC/M/2021/4). It will also be a crucial moment for the EU and its Member States to

continue to support the Rapid Response Mechanism for environmental defenders under the Convention as well as the whole Compliance Mechanism politically and consider how to support it financially.

We therefore call upon the Presidency Trio to:

- Promote the full respect of the rule of law in all Member States and promote any initiatives under the **democracy defence shield** which protect and ensure that civil society can freely operate and carry out their public interest functions without barriers or harassment.
- Resist efforts for allowing foreign agent laws which include hidden agendas of restricting civic engagement to creep into the EU, and to critically assess and engage on the Commission proposals to ensure that there are **no unintended effects on core freedoms and rights** that remain cornerstones of the EU.
- Make the Council lead by example and implement the framework and measures contained in **Commission Recommendation (EU) 2023/2836 of 12 December 2023 on promoting the engagement and effective participation of citizens and civil society organisations in public policy-making processes**; and proactively publish information and documents related to Commission Expert Groups and Council preparatory bodies.
- Lead by example on **implementation and enforcement of EU environmental law**. Firstly, via compliance with EU infringement proceedings and CJEU rulings, secondly by voluntary transparency of all infringement letters, thirdly by **holding the Commission to account to step up its enforcement work** with increased capacity and transparency of infringement processes.
- Support the **Aarhus Convention Compliance Mechanism** with its **Compliance Committee** and **Rapid Response Mechanism** and urge EU Member States and the European Commission to support the mechanisms financially.
- Ensure full compliance by the EU with the **Aarhus Convention** through supporting **access to justice provisions** in all EU environmental legislations, including the remaining ongoing files of the previous legislature, to demonstrate the Council's commitment to accountability of EU environmental law in national courts and through fully addressing the Compliance Committee findings on granting access to justice on the Commission's state aid decisions (case C128).
- Lead the Council in discussions on any revision of the **Environmental Liability Directive** and argue for the need to revise the seriously outdated legal framework.
- **Promote civil society space and meaningful participation in decision-making for democratic legitimacy**, particularly in the national Social Climate Plans, and the implementation of strategic projects within the CRMA by ensuring that consultations and public participation avenues continue past the delivery of the first drafts.

More information: [The EU's non-compliance with the Aarhus Convention: A brief history](#) • [Avoid the citizenwashing trap: the do's and don'ts of public participation](#) • [EEB Implement for Life report: Crime and punishment](#) • [Meta article: MOP-7 Geneva Wrap-Up](#) • [Meta article: EU reputation at stake](#) • [Protecting Public Watchdogs Across the EU: A Proposal for an EU Anti-SLAPP Law](#) • [Joint letter regarding the EU position on the Aarhus Convention](#) • [Joint NGO paper: Putting the Environment in Human Rights and Environmental Due Diligence](#) • [NGO briefing concerning trilogue negotiations on proposed revision of the Environmental Crime Directive](#)



12. Drive a debate on the future of Europe and solidarity in EU enlargement, rolling out the EGD benefits across nations, and progress towards global climate and environmental justice.

The rise of the far-right and emerging fascist tendencies across Europe is also a result of a neoliberal economic system which is in crises. The neo-liberal turn taken by capitalism since the 1980s has not solved the problems faced by ordinary people, nor the ecological crises. On the contrary, decades of unfettered growth of extraction, production and trade have fuelled a cycle of large-scale destruction. It has created insecurities, inequalities, concentration of capital and wealth, exploitation of labour, environmental degradation and climate crises. Today, six of the nine defined Planetary Boundaries are crossed and six ecological “risk tipping points” have been identified of which climate change is just one.

It becomes ever clearer: with the current production model, the poly-crisis cannot be resolved. Neither the UN's Sustainable Development Goals nor the objectives of the EU's Green Deal can be fully achieved. Moving the EU beyond growth is a necessary part of a global peace project. Advancing to a wellbeing economy is not only to survive, but also about the creation of a social- and gender-just economy, rooted in the principles of care, cooperation and solidarity. It is about promoting civil society space and meaningful participation in decision-making processes, with particular attention to the engagement of youth and affected communities. Certain social groups, such as women, and minorities, such as Roma, wider BAME (Black, Asian and minority ethnic) communities and migrants, are disproportionately affected by the negative impacts of our current unsustainable economic system. A wellbeing economy must ensure social justice for all and break the exploitative structures that perpetuate inequalities between countries, genders, races and classes. This is supported by [scientific evidence](#), debated during the [Beyond Growth conference](#) and [supported by over 400 top-level](#) economists and civil society organisations.

We therefore call upon the Presidency Trio to:

- Advance the **Beyond Growth agenda** and progress on discussions and policy implications through the following measures;
- Promote the establishment of permanent structures at the Commission, the Council, the Parliament, and within Member States to assess **post-growth strategies and pathways**;
- Advance discussions on designing and implementing **beyond growth policies** based on the four principles of:
 - **Biocapacity**: a Fossil Fuel Non-Proliferation Treaty, a Resource Justice and Resilience Act including a binding material footprint reduction target and real, area-based nature restoration;
 - **Fairness**: fiscal instruments to foster a more equal society such as a carbon wealth tax;
 - **Wellbeing for all**: Universal Basic Services and job guarantees;
 - **Active democracy**: citizen assemblies with strong mandates to formulate socially acceptable sufficiency strategies based on biocapacity, fairness and wellbeing for all.

- Push the creation an **Intergovernmental Panel on Wellbeing, Inclusion, Sustainability and the Economy (IP-WISE)** which would provide a governance structure to consolidate the present knowledge and drive a process of convergence of methodology and terminology.
- Advance discussions on the importance of acknowledging the **interlinkages of environmental policies and gender and social justice** (especially in new flagship program) by facilitating debates and identifying where policy integration and coherence could be strengthened at EU level and at home, leading by example.
- In Council deliberations, **systematically ensure reflections on the fair treatment of people, communities and people in vulnerable situations** who are exposed to pollution, toxic chemicals, flooding, heat, water pollution, ecosystem changes, threats to their cultures (including the Saami and Roma) and people subject to social exclusion e.g. homeless, lower-income families, religious or other minorities, migrant communities, and those with disabilities.
- **EU Raw Materials Strategic Partnerships** and projects must ensure value addition in partner countries, uphold FPIC, and include meaningful consultation with impacted communities, especially Indigenous Peoples. A robust framework is needed to share benefits equitably, involving local NGOs and communities in decision-making. Thorough EIAs and SIAs are essential to address risks and align projects with EU environmental and social goals, ensuring community support and integrity.
- **Systematically consult and engage youth in decisions on their future.** At Council level, consider inviting youth representative to relevant fora such as Working Party meetings and Informal Meetings of Ministers to ensure those with the most at stake for the future are heard and heeded. This will strengthen environmental democracy and give a voice to youth and others too often forgotten.

More information: [Why energy justice? Towards a new economic and energy framework in Europe](#) • [Reimagining work for a just transition](#) • [Investing in our future: seven EU economic governance reforms for a stronger, greener and more resilient Europe](#) • [Joint NGO paper: Putting the Environment in Human Rights and Environmental Due Diligence](#) • [Joint NGO Demand: The Need for an EU Anti-SLAPP Directive](#)

Abbreviations

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|--------|--|
| AAQD | Ambient Air Quality Directives |
| ACCC | Aarhus Convention Compliance Committee |
| BAME | Black, Asian and minority ethnic |
| BAT | Best Available Techniques |
| BREFs | Best Available Techniques Reference Documents |
| CBAM | Carbon Border Adjustment Mechanism |
| CBD | Convention on Biological Diversity |
| CAP | Common Agricultural Policy |
| CID | Clean Industrial Deal |
| COP | Conference of the Parties |
| CJEU | Court of Justice of the European Union |
| CSS | Chemicals Strategy for Sustainability |
| EGD | European Green Deal |
| EPBD | Energy Performance of Buildings Directive |
| E-PRTR | European Pollutant Release and Transfer Register |
| EQSD | Environmental Quality Standards Directive |
| ETS | Emissions Trading Scheme |
| FMPL | Forest Monitoring and Planning Law |
| GD | Groundwater Directive |
| IED | Industrial Emissions Directive |
| ICT | Information and communications Technology |
| MFF | Multi-Annual Financial Framework |
| NRRPs | National Recovery and Resilience Plans |
| PAs | Partnership Agreements |
| RBMPs | River Basin Management Plans |
| REACH | Registration, Evaluation, Authorisation and Restriction of Chemicals |
| RRF | Recovery and Resilience Facility |
| RoHS | Restriction on Hazardous Substances Directive |
| SDGs | Sustainable Development Goals |
| SHL | Soil Health Law |
| UNFCCC | United Nations Framework Convention on Climate Change |
| UWWTD | Urban Wastewater Treatment Directive |
| VCM | Vinyl Chloride Monomer |
| WFD | Water Framework Directive |
| WTO | World Trade Organisation |
| ZPAP | Zero Pollution Action Plan |

The EEB and its members welcome continued engagement and cooperation with the Presidencies of the Council of the European Union.

We develop Ten Green Tests before each Presidency and assess the Presidency performance against these tests. You can find the [Ten Green Tests for the Polish Presidency here](#) and the [Assessment of the Hungarian Presidency here](#).

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