

To: Environment Ministers of EU Member States

Cc: Commission President, Executive Vice-President for the Clean, Just and Competitive Transition, and Commissioners for Environment, Water Resilience and a Competitive Circular Economy, Climate, Net Zero and Clean Growth, Energy and Housing, Health and Animal Welfare and the Chair of the European Parliament Environment Committee

Re: Input to the EU Environment Council Meeting, Luxembourg, 17 June 2025

Brussels, 10 June 2025

Dear Minister,

On behalf of the European Environmental Bureau (EEB), I am writing you to share our views on the issues on the **agenda of the forthcoming EU Environment Council**. As European leaders, you are seeking to advance the long-term sustainability and resilience of our region under difficult circumstances with major **shifts in geopolitical realities and an emerging new world order**. These circumstances require that we align forces to advance the objectives of the European Green Deal, which Ursula von der Leyen committed to in her Political Guidelines, and which Heads of State and Government confirmed in their Strategic Agenda. **Achieving the objectives of the EGD help ensure long-term sustainability, social and economic resilience and human security across the region.** Under the current challenges, it is also time to work together and to protect and strengthen the **rule of law and democracy at European, national and local level.**

We strongly welcome that the EU remains committed to supporting Ukraine against Russia's illegal aggression until a comprehensive, just and lasting peace can be reached. To ensure security and independence, we welcome the roadmap laid out by the Commission to **phase out fossil fuels** – enforcement will be key to ensuring effectiveness. However, replacing gas imports from Russia with imports from the US or other unreliable partners not only risks locking Europe into unhealthy dependencies, but also delays the needed **shift to renewable energy**.

We need to refocus Europe on its strengths and its independence and build **strong and fair partnerships** with those who strive for long-term sustainability and resilience, too. We need to **accelerate measures** to tackle the **climate, biodiversity and pollution crises as well as social inequalities, precarity and the cost-of-living crisis**, which threaten the very foundations of our future and our democracies but are also making us less resilient and strategically autonomous at a time of geopolitical turbulences. Security is not limited to military security - **human security** includes, for instance, security and resilience regarding food, water, housing, energy and a closed loop for materials as well as good governance and the rule of law.

We invite you to take our concerns into account during the final preparations as well as at the Council meeting itself. We have structured the letter according to the 17 June Council Agenda and added our vision of what is needed for a sustainable and resilient Union.

European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org
International non-profit association • Association internationale sans but lucratif (AISBL) • EC register for interest representatives:
ID number: 06798511314-27 • BCE ID number: 0415.814.848 • RPM Tribunal de l'entreprise francophone de Bruxelles

1. Regulation on circularity requirements for vehicle design and on management of end-of-life vehicles (General Approach)

The EEB welcomes the proposal for a Regulation on Vehicle Design and on Management of End-of-Life Vehicles (VDEoL), merging the outdated End-of-Life Vehicles Directive and the 3 R Type-Approval Directive. The extended scope to cover more vehicles placed on the market and specific measures such as a Circularity Vehicle Passport (CVP), an EU-wide Extended Producer Responsibility (EPR) system as well as the introduction of requirements regarding the reuse of parts, components' recycled content, better collection and improved treatment at the end of vehicles' life, are clearly relevant for anchoring the whole sector into a decarbonised, non-toxic circular economy. Nevertheless, the EEB urges the Council to remedy several missed opportunities and adopt an ambitious general approach to the proposal.

We call on the Council to:

- Ensure the regulation includes **specific measures to address the number and size of vehicles on the market**, as well as the **overall material use and footprint of the sector**. While circularity measures can increase the lifetime of resources used, the best environmental protection is to reduce the demand for materials in the first place. Mandatory disclosure of Product Environmental or (at least) Carbon Footprint information of the vehicle should be considered with potential performance requirements for type approval. This would not only incentivise cleaner production of vehicles but also further bolster circularity (e.g., use of recycled content). It would also align the proposed CVP with its equivalent under the Batteries Regulation, as currently, the planned CVP does not include footprint or due diligence information.
- **Strengthen measures on ecodesign, repair and reuse** by introducing **minimum availability periods for spare parts and software updates**, ensuring that all relevant parts and components are replaceable throughout the vehicle's operational life, as well as ensuring that key components such as **electric vehicle batteries are repairable**. The Council should further **maintain ambition on plastic recycled content targets** (i.e., target level and the focus on post-consumer waste and closed-loop recycling) and seize the opportunity to introduce **recycled content obligations for steel**. Fixing malfunctioning secondary materials markets through creating demand for recycled materials is more important given the dire situation of the European recycling industry.
- **Facilitating reuse and ensuring high-quality recycling** and **recovery of critical materials at End-of-Life** by establishing mandatory disassembly and dismantling of materials and components as the preferred treatment option over shredding and post-shredding technology. Member States should strengthen reuse, remanufacturing and refurbishment of parts and components by separating treatment targets into reuse and recycling and fostering their demand through mandatory measures, including reduced VAT and a requirement for maintenance and repair operators to offer these parts alongside new ones.
- **Harmonise the Circularity Passport for vehicles with other Digital Product Passports** proposed under the Ecodesign for Sustainable Product Regulation and Batteries Regulation,

and extend the scope of information to, among others, include information relevant to the repair and durability of components and Substances of Concern beyond heavy metals restrictions.

- **Ensure full Extended Producer Responsibility beyond the End-of-Life and EU borders.** The EPR obligations need to be linked to eco-design aspects, also targeting the use stage, like repair and reuse, and systems need to be put in place to enable the exchange of information and traceability of EPR obligations with non-EU trading partners. This includes that EPR fees paid by producers within the EU must follow exported used vehicles to countries outside the EU and need to be made available to waste management systems in the receiving country. The recently revealed [car dismantling cartel](#) underscores the urgent need for robust, harmonised Extended Producer Responsibility that facilitates transparency and accountability.

2. COP 30 (and EU NDC)

The upcoming COP30 in Belém, Brazil, is a key moment for international climate negotiations. The host country has high ambitions and has also stated high expectations from state parties, including from the EU. At COP 30, governments must act. Given the stalling of climate action in the United States, it is incumbent on the EU to live up to the promises made of submitting **NDCs that reflect increased ambition**. The **European Advisory Board on Climate Change has made it very clear that the 2040 target should be between 90% and 95% and only based on domestic emissions reductions**. The Council must consider the enormous costs associated with a changing climate and increasing climate risks and harvest the large advantages for the competitiveness of European industry leading the way to a decarbonised economy.

Next to the acceleration of reducing emissions through ambitious enough NDCs, governments need to launch a **Global Just Transition Mechanism** and agree on concrete Just Transition policies, including social protection for those losing their jobs and income, re-skilling, community investment, and cleaning up polluted areas. These are not optional extras, but fundamental to real climate ambition and justice. The Global Just Transition Mechanism needs to ensure that efforts can be coordinated internationally, that support is channeled to countries that do not have the means to act on their own, to ensure true accountability and community participation, to include workers, trade unions, civil society and impacted communities in the creation of sectoral transition plans (see Climate Action Network International's [recommendations for COP 30 here](#)).

3. Danish Council Presidency Programme

The Danish Council Presidency will take over from Poland and will fall under the Trio's overarching priorities, namely “A Strong and Secure Europe, a Prosperous and Competitive Europe and a Free and Democratic Europe”. Poland started the Trio in a **challenging geopolitical context**, but also at a time where **climate disasters increased** while the **weaponisation of disinformation** accelerated; a context that has just kept worsening and will set the scene for Denmark.

Security is and will remain the dominant political focus. But **security is much more than military security**. It is also about safeguarding **human security**, such as shielding citizens from climate impacts, pollution, harmful chemicals, and health crises. It means ensuring access to affordable healthcare, preserving mental and physical health through nature access, it means rebalancing our diets, cutting our dependency on protein and food calories imports – the EU being a net importer - and embracing the one-health approach that connects the wellbeing of people, animals and the planet. It also includes protecting our societies from **misinformation and disinformation**, [identified as the top security risk in the next two years](#), and **protecting civic space** at a time when citizens' organisations and their essential work to present non-profit inputs, insights and perspectives into EU policy making is being severely questioned.

In the US, the administration is trying to increase competitiveness by tearing up environmental and social protections and by backtracking from global climate commitments; however, this is both a risky and dangerous model. Industry's sustainability and competitiveness cannot be secured by degrading our climate, environment, health and society further or by disregarding public acceptance. We must, therefore, **harness climate and nature-positive frontrunner solutions** and **boost industrial innovation** through regulation to make the Clean Industrial Deal underpin the Green Deal.

The new **multi-annual financial framework (MFF)** that will be a major item under the Danish Presidency, and if designed right, it can be a key tool to signal support and catalyse progress. Europe urgently needs significant investment in sustainable processes and technologies and to develop new technologies, make them accessible and ensure autonomy. It also needs to be carefully designed to be a meaningful engine tackling the triple crisis, disinformation and protecting civic space.

We therefore call on the Council to ensure that the Danish Presidency can ensure progress on the implementation of the European Green Deal in times of disinformation and disruptive foreign influence by:

- Addressing the disinformation crisis undermining the EGD building on the work done under the Polish Presidency;
- Resisting the temptation of deregulation which weakens the outcomes for climate, environmental protection and health;
- Embracing a new EU plan on social rights, fighting poverty and inequalities across the EU and tackling the cost-of-living crisis;
- Demonstrating solidarity with Ukraine and supporting EU enlargement;

- Engaging as a leader in global diplomacy for a green and just transition in a changing world order;
- Ensuring a truly 'Clean' Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration;
- Committing to a sufficient EU Budget and wider financial tools to catalyse a credible and fair transition to a one planet economy – enabling a race to the top on sustainability;
- Building on the Strategic Dialogue for Agriculture to advance towards sustainable and just food and farming systems;
- Responding to the climate crisis by ensuring only the most efficient pathways to decarbonization are supported, creating a fast track to a people and nature-positive renewable energy future;
- Delivering a nature-positive agenda for land, freshwater and oceans and fast track climate adaptation and resilience;
- Promoting the availability of clean and safe water for all to rebuild trust and strengthen provision and resilience;
- Advancing a toxic-free environment and transforming the transition of the chemicals sector through a future-proof, sustainable policy framework;
- Addressing resource use and seize circular economy opportunities for the economy and society;
- Protecting the rule of law and our health, fostering legal and social justice and strengthening civil society engagement and democracy.

4. Water Resilience Strategy

Given the European Commission's recent presentation of the Water Resilience Strategy (WRS), the Council may discuss the WRS under AOB. This is very timely, as water-related disasters have multiplied and intensified during recent years, with severe consequences for people and the economy. According to the Copernicus Climate Change Service, water and climate-related disasters cost the EU €3.4 billion and claimed 151 lives in 2023. In 2024, those numbers rose to €18.2 billion in estimated losses (mostly linked to flooding), and at least 335 people lost their lives due to storms and floods. Improved land and water management, protection and restoration of ecosystems that store and purify water, as well as preventing pollution and limit water abstraction to sustainable levels, are key to ensuring long-term availability of water for both people and nature, while mitigating flood risks. The European Commission has just published its Water Resilience Strategy as well as accompanying recommendations on the principle of water efficiency first. Member States must now follow suit and support the recommendation in Council conclusions, in particular:

- Recognise that the EU water acquis and the Green Deal provide a strong basis for water resilience;
- Prioritise the potential of ecosystems to store, purify, release and restore water via nature-based solutions;

- Apply the Water Efficiency First principles by putting priority on curbing demand and over-abstraction, followed by efficiency measures and only using increased supply as a last resort option;
- Recognise that the polluter pays principle should not only apply to existing pollution but also be an instrument to prevent pollution at source, including by proper water pricing.

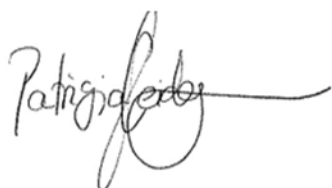
We hope that the above insights and recommendations help you in your Environment Council deliberation and decisions, and wider responsibilities. We also remind you of [The European Pact for the Future, signed by 330 organisations, our vision of a sustainable and resilient Europe](#) and its [Action Plan](#). We also invite you to have a look at our [Industrial Blueprint](#), our [position paper for the Circular Economy Act, a Future-Proof Chemicals Policy](#) and on [Clarifying PFAS](#).

We remain available to discuss with you these practical visions and look forward to working together to create an agenda of hope and progress.

Yours sincerely,



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



Patrizia Heidegger
Deputy Secretary General, European Environmental Bureau (EEB)