



THE EEB'S ASSESSMENT

OF THE ENVIRONMENTAL PERFORMANCE OF
THE POLISH PRESIDENCY OF THE EU



JANUARY - JUNE 2025



Published July 2025

**Responsible editor: Patrick ten Brink
European Environmental Bureau (EEB)**

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 (0)2 289 1090

eeb@eeb.org

eeb.org

meta.eeb.org

The EEB is Europe's largest network of environmental citizens' organisations. We bring together over 190 member organisations from 41 countries. Together, we work for a better future where people and nature thrive together.

The EEB is an International non-profit association/Association internationale sans but lucratif (AISBL).

EC register for interest representatives:

Identification number 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

With thanks to Seas at Risk and the EEB Board for input.



*With the support of the LIFE Programme of the European Union.
This communication reflects the authors' views and does not commit the donors.*

Introduction

This is an assessment of the Polish Presidency of the Council of the European Union by the European Environmental Bureau (EEB), the largest network of environmental citizens' organisations in Europe, with thanks for inputs from Seas at Risk and signed off by the EEB Board and EEB Council with members from across Europe. The assessment encompasses all environment-related issues, a broad agenda comprising 'traditional' environmental issues as well as sectoral and horizontal policies with a direct or potential environmental impact, sustainable development, and participatory democracy.

The Polish Council Presidency kicked off at a time of challenging and rapid geopolitical developments, taking over from a Presidency (Hungary) that was constrained in its scope of work due to the settling in of the newly elected Parliament and the new European Commission.

Just 20 days after Poland took over the Presidency, Donald Trump's second tenure as President of the USA began and was immediately followed by meddling in European affairs, weaponising trade and pursuing competitiveness through tearing up environmental and social protections, backtracking from global climate commitments, slashing support for renewable energies, and stepping towards becoming an aggressive petrostate, leading to the following conclusion: 'The US is no longer an ally of Europe'.

The illegal Russian aggression against Ukraine continued its destruction, bloodshed, and attempts to undermine a sovereign nation and its people, while disinformation continued to spread, underpinning political interference and bias but also polarization and climate denialism.

The Presidency also coincided with the flaring up of attacks against NGO funding and against democracy, ultimately.

In the meantime, evidence has continued of the dramatic damage from climate change – notably flooding, storms, heatwaves, droughts, and fires, as well as evidence of health and pollution impacts and biodiversity loss. The scale of the PFAS pollution scandal, and the disinformation

campaigns behind it, was exposed, noting its huge costs on society and our economy. Renowned scientists made it clear that the Earth could be doomed to breach the symbolic 1.5°C warming limit in as little as three years at current levels of carbon dioxide emissions. These striking facts make it clear that the reality of impacts doesn't wait for political progress and unequivocally calls for more ambition.

A Council Presidency is clearly not responsible for all developments, and furthermore, even within its sphere of responsibility, cannot make decisions on its own. It needs the cooperation of the European Commission, European Parliament, and other Member States on files under Presidency responsibility. Nonetheless, the Presidency can still have a considerable impact and influence, for example, through the priority and profile it gives to specific issues and through the way in which it chairs discussions, prioritises practical work, and engages with other Member States to enable progress.

The assessment is not an overall political assessment of the Presidency's performance, nor is it an assessment of the Polish national political or environmental situation or its domestic policies, except to a limited degree linked to its role in leading or failing to lead by example. We are not assessing its role on foreign affairs issues, internal security matters, or migration policies, for example, except insofar as such issues have a direct bearing on the environment.

On the other hand, the assessment is not limited to the activities and outcomes of the Environment Council. It covers all Council configurations to the extent that they deal with topics that affect the environment, as well as the European Council, which is not formally under the Polish Presidency's responsibility. Our assessment is based on the Ten Green Tests we presented to the Polish Government just before the start of its Presidency on 1 January 2025.

We would like to acknowledge and thank the Presidency for its high-level focus on disinformation and its efforts to understand the scale of Russian funding for disinformation (\$2-4 billion per year on climate disinformation in

Poland alone), which helps confirm the scale and urgency of the issue.


We also wish to thank the experts in the Permanent Representation and the ministries for fostering discussion on strengthening EU democratic resilience and adopting Presidency Conclusions on this. We also thank the Presidency for its efforts in concluding negotiations on the soil monitoring law and on the targeted revision of the Waste Framework Directive.

While we recognize the many challenges faced by the Polish Presidency and welcome the efforts highlighted above, overall, there was insufficient effort to progress the EGD, and we were disappointed with the lack of progress made on so many files at a time when the evidence of the costs of inaction is so starkly clear. We were even more concerned that the Presidency did not contribute to preventing the dangerous rollback agenda on the EGD and our environmental acquis.


We are very grateful for the great collaboration spirit of the Polish Presidency team, for its invitation to the Informal Council and the focus it gave to disinformation, as well as for the help in organising the G10-Ministers' reception. As regards the assessment, building on the evidence of Presidency engagement and on the results achieved, the conclusions are, unfortunately,

overall negative on outcomes while less so on efforts. Despite a difficult context, more could and should have been done — especially to set the direction of travel as the first Presidency in the Trio.

We hope that in the future, the clear evidence of the costs of inaction (at a human, societal, and economic level), as well as the benefits of action (for people, communities, industry, and nature but also security), inspire bolder policy action by the Council and in particular lead to resistance to the dangerous and deleterious deregulation agenda that is currently being pursued.



Patrick ten Brink
Secretary General



Faustine Bas-Defosse,
Policy Director

Ten Green Tests for the Polish Presidency: Assessment

The Polish Presidency took the important initiative to raise the threats of disinformation to the European Green Deal and encourage response, made positive efforts on biodiversity and progress on harmful chemicals. However, overall, the European Green Deal suffered many steps back and missed opportunities across policy areas during the six-month presidency.

The Polish Presidency of the Council of the EU took over from the Hungarian Presidency on 1 January 2025. It was the second time Poland held the Council Presidency, the first being in 2011. Poland joined the EU in May 2004 alongside with nine other countries.

Politics is the art of the possible. However, if and where the possible does too little to avoid climate breakdown, halt catastrophic biodiversity loss

and ecological tipping points, reduce pollution exposure, or improve governance systems in a way that gives confidence in our governments, institutions and future, supports rights and justice then we cannot assess progress to be good, despite efforts. It is against these needs and not short-term political “realism”, that both effort and impact are assessed to determine the Presidency performance against the [Ten Green Tests](#). We reached the following conclusions:

| | | Effort | Outcome |
|---|---|---|---|
|  | 1 Implement and advance the European Green Deal – to become a full green and social deal for a one-planet economy |  |  |
|  | 2 Catalyse a clean industrial transition to make the EU a global frontrunner on decarbonisation, detoxification, de-pollution and restoration |  |  |
|  | 3 Advance towards fair and sustainable food systems, underpinned by farming and fisheries that are environmentally and socially sustainable |  |  |
|  | 4 Fast track measures to tackle the climate crisis and embrace social justice |  |  |
|  | 5 Deliver a nature-positive agenda for land, freshwater and oceans, support biodiversity and promote climate adaptation and resilience |  |  |
|  | 6 Tackle pressures on surface and groundwater and ensure clean and safe water for all |  |  |
|  | 7 Guarantee the right to clean air and reduce exposure and preventable mortality and illnesses |  |  |
|  | 8 Drive a green transition towards safer, sustainable and competitive European chemicals and supply chains |  |  |
|  | 9 Address resource use and seize circular economy opportunities for the economy and society |  |  |
|  | 10 Foster environmental and social justice through improved legal participation mechanisms and support for environmental defenders |  |  |



1 Implement and advance the European Green Deal – to become a full green and social deal for a one-planet economy

The verdict



on effort



on outcome

The [first green ten test](#) called upon the Polish Presidency to: Reaffirm commitment to the **European Green Deal**; to strengthen the **international dimension of the EGD and EU diplomacy**; ensure a strong follow-up in the Council regarding the implementation of the **SDGs**; encourage the development of an **EU strategy and practices to combat disinformation**, and strengthen **public accountability and civic space**; debate and embrace an agenda on **competitive sustainability** that serves the people's and future generations' interests; support the need for increased public investment and **preparing MMF negotiations** for the 2028 to 2035 cycle that commits to an EU budget enabling a green and just transition; facilitate debate to **reform taxation and pricing to ensure fairness and distribution**; start discussions to establish a long-term **EU just transformation fund post-2026 to finance green and social investments**.

Key Developments

- The Presidency made **the fight against climate disinformation** a priority under its Presidency and a key theme of the informal Council in Warsaw in April 2025.
- The [General Affairs Council](#) discussed conclusions **on strengthening EU democratic resilience**. Even though there was broad support, the text in the end had to be adopted as presidency conclusions as no consensus of Member States was reached.
- The Presidency actively facilitated discussions on **the future Multiannual Financial Framework (MFF)** through a high-level conference, and by highlighting the importance of cohesion policy and more funding for defence and security.
- EU leaders have agreed to allow Member States to temporarily bypass certain fiscal rules of the **Stability and Growth Pact (SGP)** to increase military spending. Thirteen member states have formally notified the European Commission about their intention to utilize this "national escape clause."

Good

- The Polish Presidency sought to mobilise **EU funds** for continued investment in regions that need additional support, via continued EU investment in cohesion funds and underlining the importance of the **Social Climate Fund**.
- The Presidency supported, by giving patronage to civil society-led initiatives, the topic of **social and democratic resilience**. Such a holistic approach to social resilience was evident in some international events – including a Ministry of Health conference and a joint event by EESC Group III and the Ministry for Civil Society, both focused on looking for the holistic resilience solutions, having in mind children's health and wellbeing. These spaces underscored the urgent need to invest in the social security of young people amid growing global challenges.
- The Presidency gave a **high-level focus on disinformation** at the informal meeting of environment ministers and put efforts to understand the scale of Russian funding for disinformation (\$2-4 billion per year on climate disinformation in Poland alone), helping confirm the scale and urgency of the issue.

- Presidency Conclusions were adopted on strengthening **EU democratic resilience** emphasizing the importance of supporting civil society organisations and the importance of a continuous and the importance of active engagement in an open and transparent dialogue with CSOs, as well as adequate financing.
- The Polish Presidency led by example on the need to **swiftly start the transposition of the new Ambient Air Quality Directive**: the process is ongoing at the national level. and efforts were made to secure and share contributions from different stakeholders.

Poor

- While we welcomed the [Presidency Conclusions](#) on strengthening EU democratic resilience, the Presidency did not step in to defend NGOs against the fabricated scandal on LIFE funding, nor did they organise events on the issue.
- The Presidency did not promote a strong Council position on the important issue of **climate policy beyond 2030**, symbolised by an appropriate emissions reduction target for 2040. The differing views across the EU contributed to the Commission delaying its proposal, leading to delays in the EU communicating its engagements on the international level to the UN.
- The Polish Presidency did not make any efforts to unlock **fiscal space to bridge the social and green investment gap** to address the poly crises. Economic, environmental, climate and social crises are intertwined and cannot be addressed in isolation. If more fiscal space is needed, it cannot only be for the military.
- The Presidency did not question/oppose the **deregulation agenda** on the EGD, it endorsed it by facilitating the adoption of a Council's negotiating mandate on the first omnibus proposed by the European Commission on **CSDD and CSRD** dismantling core elements of these key pillars of the Green Deal and responsible business practices.

Overall, while the Presidency made welcome and essential efforts in the combat against disinformation, secured Presidency conclusions on strengthening EU democracy resilience and led by example on AAQD implementation, it, overall, failed to contribute to the needed progress in the EGD advancements and implementation. Worse, it did not stop the dangerous rollback of several EGD initiatives and the environmental *acquis*. Hence, the verdict is **good on effort, but poor on outcome**.



2 Catalyse a clean industrial transition to make the EU a global frontrunner on decarbonisation, detoxification, de-pollution and restoration

The verdict



on effort



on outcome

[This test](#) called on the Polish Presidency to 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. Key asks relate to 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**. We also asked for the deployment of an **Action Plan on Electrification**, promoting the direct electrification of industrial processes, addressing the preparedness of EU electricity networks, and nature-positive renewables.

Key developments

- The Environment Council organised an exchange of views on the **CID** on the 27 March 2025 Council and the informal meeting of the EU Ministers for Environment and Climate on 28-29 April 2025 in Warsaw, which addressed CID-related topics such as disinformation related to climate and environmental policy, climate change adaptation, and ‘Green Ev-Green Technology Accelerator’ (Polish program).
- The [Informal COMPET Council](#) of 4 February 2025 also addressed the **industrial transformation** aspects, rather from an angle as to how to protect certain sectors like chemicals, steel, and automotive from ‘competitiveness and resilience shocks’ as well as access to key resources.
- The Special European Council of 6 March 2025 also addressed aspects affecting **security**, such as **fossil gas dependency** and the **defence industry**. Another COMPET meeting took place on 12 March 2025.
- Key legislative acts to be developed **pursuant to the CID** have yet to be proposed by the European Commission.

Good

- The **recognition at the Special European Council of 6 March 2025 that phasing out fossil fuels** (in particular fossil gas) is not just a necessity for climate protection but also for resilience is welcome although no evidence of positive efforts or outcomes could be found to improve the ambition level on industrial transformation,
- We welcome the outcomes of the exchange of views at the COMPET Council (12 March) where EU Ministers **supported decarbonisation measures, recognised circular economy** as driving decarbonisation and that **closing loopholes in CBAM** is necessary. EU Ministers also supported an **“European Union”** approach for **joint procurement for strategic industries** and the role of private finance in mobilising investments.

Poor

- The exchange of views held in the Environment Council so far on the CID the indicates a short-sighted vision regarding the meaning of **“clean,” limited to greenhouse gas emissions and climate issues only**, centred around energy supply concerns, and focused on

competitiveness concerns for European operators only.

- It emerged that throughout the Presidency the topic of **industrial resilience** was discussed almost exclusively through the lens of protecting polluting sectors from economic shocks, rather than as an opportunity to lead in clean innovation, responsible production, and safer chemical management.
- Unfortunately, at the Competitiveness Council on the 12th of March, [a range of Member States](#) played the “spokespersons” for laggard EU industries, calling for an **[‘EU critical chemicals act,’](#)** wishing to **maintain business as usual**

and **attacking the ambition of environmental legislation**, such as the EU chemicals industry, overplaying production drops and ignoring profit margins and failure to innovate within the sector. The Presidency is not resisting the worrying signals from the European Commission as to another round of a **‘Simplification’ Omnibus** leading to regulatory backtracking on key tools or provisions for accelerating the industrial transformation, i.e., installation-level Transformation Plans and hazardous chemicals substitution assessment for operators of the EU’s largest industrial activities.

Legislative acts pursuant to the CID are yet to be adopted by the European Commission, so the role of the Polish Presidency is therefore limited. The verdict is, however, **mixed on Presidency effort and poor on outcome**, given the implicit support for Omnibus(es) aimed at simplification/deregulation, a short-sighted vision as to the meaning of ‘clean,’ as well as ‘corporate clientelism’ type of behaviour vis-à-vis certain industries, e.g., Automotive and Chemicals, putting at risk ambitions set within the EU Green Deal.



3 Advance towards fair and sustainable food systems, underpinned by farming and fisheries that are environmentally and socially sustainable

The verdict



on effort



on outcome

[This test](#) called on the Polish Presidency to request a scientific review and updated impact assessment of the **Common Agricultural Policy (CAP)**; uphold the ambition and commitments of the **Farm to Fork Strategy**; create the space for ambition on the **climate goals in agriculture**; increase the **dialogue between the Agriculture Council and Environment Ministers and stakeholders**; urge the Commission to progress work on the long-awaited proposal for a revision of the **EU's animal welfare legislation**; and support adequate implementation of the **Sustainable Use of Pesticides directive (SUD)**.

Key developments

- On 19th February, the Commission published its new Vision for the **Future of Agriculture and Food**. While it had been anticipated to build on the [historic consensus](#) of the **Strategic Dialogue**, the Vision [fell short](#) on its ambition and scope.
- On 14th May, following strong pressure from Agriculture Ministers, a new “**simplification package**” targeting the **Common Agricultural Policy** was published, [strongly condemned](#) by environmental organisations for its attacks on key environmental provisions.

Good

- No evidence of positive efforts or outcome could be found.

Poor

- Simplification (and deregulation) was put high on the political agenda, with significant pressure coming from the Council to further weaken environmental safeguards in the **CAP**, despite the strong criticism of the 2024 “**CAP simplification**” for its disregard for EU better regulation processes and lack of proper consultation, impact assessment, and scientific basis.
- The Presidency **did not engage with environmental stakeholders on agricultural topics**, while giving preferential access to some farm lobbies, for example, at the Informal Meeting of Agriculture Ministers. In light of the groundbreaking consensus achieved between agricultural and environmental stakeholders in the **Strategic Dialogue** in Summer 2024, this is a major missed opportunity to advance EU agri-food policy discussions in a collaborative and constructive manner.
- The Presidency did not attempt to champion the advancement of a meaningful reform of the **EU Animal Welfare legislation** and ban on the use of cages, nor did it support a constructive exchange around the revision of the **Animal Transport regulation**, for which a Commission proposal was published in late 2023.
- The Polish Presidency steered discussions within the Council toward initiating a revision of the **Common Fisheries Policy (CFP)**, diverting attention from the scheduled evaluation process. This shift in focus was premature and risked undermining the objective, evidence-based assessment needed to guide future reform.

Overall, the Polish Presidency demonstrated a disappointing lack of leadership in promoting a just and inclusive transition to more sustainable and resilient food and farming systems. The verdict is therefore **poor on effort and poor on outcome**.



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

The verdict



on effort



on outcome

[The test](#) called on the Polish Presidency to endorse a **Green and Social Deal** that balances energy security, competitiveness, climate goals, and social equity. It emphasised **maintaining the 2040 triple target for emissions, energy efficiency, and renewables**. Advancing **building sector** decarbonization was also highlighted as key to **energy independence and citizens' well-being**. The call included promoting a **new housing paradigm** and expanding district heating with renewables like heat pumps and geothermal energy. Leadership on **nature-positive renewable projects** was encouraged. The Presidency was also asked to build on **COP29** outcomes and prepare ambitiously for **COP30**. Finally, it recommended following CAN Europe's guidance to keep the **Paris Agreement goals** within reach.

Key developments

- **Grid Modernisation for Climate Neutrality:** The EU Energy council conclusions call for a commitment to a **European Grids Package** by 2025: this is a crucial step toward a resilient, digitalised, and interconnected energy system, essential for achieving EU climate goals by 2050.
- Fifteen Member States have signed a **document to promote ETS2** while at the same time watering down its provisions.

Good

- Prompted by CSOs, the Polish government committed to strongly combat **disinformation on climate and environmental matters**, largely overlapping with anti-EU disinformation.
- **Renewable energy deployment** has continued to expand in Poland, which is one of the countries with the fastest growth of such energy vectors.
- The Presidency organised a [forum on climate adaptation](#) on 19-20 May 2025 in Warsaw.

Poor

- The Polish Presidency showed a lack of leadership with regards to setting an ambitious climate target and **pathway to 2040**. The missed opportunity to create momentum with Member States has resulted in the Commission backtracking on prior commitments and leaves us with an uncertain future on climate action.
- Instead of securing the **ETS2 funds** for direct payments and frontloading them to allow for loans that would have expanded the SCF, the Polish government voiced [concerns](#) about the ETS2 system and called for its delay, thus increasing uncertainty on this critical file.
- While some progress has been made on the **Energy Taxation Directive**, this file, essential to the phase out of fossil fuels, is still far from having a consolidated position in the Council. Even worse, energy from **waste incineration is now proposed for exception**. In the context of **fisheries and shipping**, the Presidency advanced a compromise position on the **Energy Taxation Directive** that would have significantly **delayed the taxation of fossil fuels** in the sector. This position was widely perceived as a step back from the EU's climate commitments and the principle of aligning fiscal policy with the Green Deal objectives.
- Under the Presidency, over 200 hundred meetings and events were organised and only 13 of them were related to climate discussion,

while some 13 more were classified as related to energy policies. This contributed to an overall disappointing positioning of the EU towards the COP of Belem and to unjustified watering-down of the EU climate targets.

The Polish presidency was held hostage by its internal politics on files, such as those of the climate and energy, thus leading little to no advance in these sectors. If anything, during the Polish presidency, the focus was increasingly on defence spending and deregulation –albeit masked as simplification- which has weakened the EU environmental acquis. This is why the verdict is **mixed on effort, negative on outcome**.



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

The verdict



on effort



on outcome

[This test](#) called on the Presidency to organise the Council's work to reject the European Commission proposal for the targeted amendment of the **Habitats Directive** lowering the protection status of the wolf and instead step up efforts to achieve coexistence with the large carnivores; ensure the impactful implementation of the recently adopted **Nature Restoration Regulation (NRR)**; conclude the negotiations on the first **EU Soil Monitoring Law**; prioritise Council negotiations on the **Forest Monitoring Law** including close involvement of the environmental authorities; work with the European Commission to ensure that the revamped **EU Adaptation Strategy** prioritises nature-based solutions; support implementation of the **EU Biodiversity Strategy** and drive ambition for biodiversity action globally; support EU action to reverse the increasing degradation of marine and coastal ecosystems and scale up ambition to achieve a healthy ocean by ending extractive and polluting practices and support a climate-resilient, regenerative, and sustainable blue economy that respects planetary boundaries.

Key developments

- The Presidency fast-tracked the **adoption of the Council's mandate on changing the protection status of the wolf** on 16 April, which allowed the Parliament to consequently adopt this targeted amendment of the Habitats Directive via emergency procedure on 8 May. The Council then formally adopted the amendment of the Habitats Directive on 5 June. The entry into force of the amendment is imminent. However, Member States will still have the possibility to maintain a higher level of wolf protection under national law.
- The Presidency co-led the EU's delegation at the **resumed session of the 2024 UN's Biodiversity Conference (CBD COP 16.2)** in Rome in February and supported the important decisions taken at the session - including the resource mobilisation strategy and the financial mechanism - all of which are critical for the operationalisation of the Kunming Montreal Global Biodiversity Framework (GBF).
- The Presidency fully engaged in the interinstitutional negotiations on the **Soil Monitoring Law (SML)**, securing the provisional agreement on 10 April and endorsing it at the Coreper level on 21 May.
- The Presidency succeeded in adopting Council's general approach on the **Forest Monitoring Law (FML)** on 24 June. However, there has been no improvement in the engagement of the environmental authorities in the Council's work.
- The Presidency organised a successful **meeting of the EU Nature Directors** in May, focusing on the implementation of the recently adopted **Nature Restoration Regulation**, including a **joint session with the EU Forest Directors**. The Nature Directors meeting allowed full participation of stakeholders and NGOs.

Good

- The Presidency played a positive role in securing the successful outcome **at the resumed session of the UN Biodiversity Conference** in Rome (CBD COP16.2), reviving hope on multilateral decision-making to address the greatest challenges of our time.
- The Presidency made significant efforts to conclude the **trilogue negotiations on the Soil Monitoring Law** and managed **to reach an agreement** on 10 April.
- One notable success of the Presidency was its role in facilitating a progressive Council position on the **regulation to prevent plastic pellet**

losses. This momentum, partly driven by repeated pellet spill incidents in the previous year, enabled a successful trilogue process and the adoption of a strong EU regulation—

representing a positive step in **tackling marine plastic pollution.**

Poor

- The Presidency fast tracked the adoption of the unscientific and politically motivated amendment of the Habitats Directive **downgrading the protection status of the wolves** while, fortunately, maintaining the integrity of the EU's flagship Nature Law. The Presidency **failed to promote needed EU-wide efforts to achieve co-existence with large carnivores**, for example at the Presidency conference *"Sustainable management of populations of protected animals that cause losses in agriculture"* in May, which continued to polarise the debate without offering real solutions.
- Despite the agreement reached on the Soil Monitoring law, on April 10, **the compromise is disappointingly weak** on many points, notably by including many flexibilities for Member States, watering down the articles on sustainable soil management and land take, as well as extending many of the law's deadlines, including for transposition.
- The Presidency organised an important discussion on EU forest policies among the **EU Forest Directors**, however, it failed to ensure a
- balanced representation of the stakeholder interests at the meeting - only representatives of the forestry sector and one NGO were invited, contrary to meetings allowed the scrapping of the central innovation of the law, a framework for collecting timely satellite data on forests organised by previous Presidencies.
- While the Presidency succeeded in leading the Council towards adoption of the general approach on the **Forest Monitoring Law**, it, unfortunately, allowed scrapping of the central innovation of the EC proposal – establishing a framework for collecting timely satellite data on forests. The European Commission has announced that this may result in it withdrawing the proposal altogether, further undermining the health and resilience of the EU's forests.
- There was no measurable progress during the Polish term on implementing the **EU Marine Action Plan**. The lack of advancement on this key initiative marked a missed opportunity to deliver on the EU's commitments under the Biodiversity Strategy and the Marine Strategy Framework Directive.

Overall, the Polish Presidency made real efforts to advance inter-institutional negotiations on the first **EU Soil Law**, while, unfortunately, further weakening the urgently needed EU law to protect and restore soils. It also succeeded in leading the Council towards adoption of the general approach on the **Forest Monitoring Law**; however, it unfortunately allowed the scrapping of the central innovation of the EC proposal, risking the withdrawal of the proposal by the European Commission. The Polish Presidency successfully represented the EU at several high-profile multilateral biodiversity events (e.g., resumed session of the **CBD COP16**). However, the EU institutions undermined the credibility of the EU as the global champion for biodiversity after the EU fast-tracked the unscientific and politically motivated decision to downgrade the protection **status of the wolf**, thus undermining the efforts to lead by example and achieve co-existence with large carnivores. The verdict is therefore **good on effort, poor on outcome.**



6 Tackle pressures on surface and groundwater and ensure clean and safe water for all

The verdict



on effort



on outcome

[This test](#) called upon the Presidency to lead the Council towards conclusion of the trilogue negotiations on the Commission's proposal to update the **list of water pollutants of surface and groundwater**; support the European Commission in bringing forward the delayed **Initiative for Water Resilience** and **help battling misinformation related to floods and droughts**; insist the European Commission **publishes the delayed Integrated Nutrient Management Action Plan (INMAP)** and push for the **improved implementation of the Nitrates Directive**; **(organise Council's support to the WFD implementation** including in the context of the WFD Common Implementation Strategy and ensure that the environmental objectives of the WFD are met by 2027; **lead by example in stepping up the implementation and funding of the WFD in Poland** to bring rivers, lakes and groundwater aquifers to ecological health by 2027

Key developments

- The Presidency duly represented the Council in the interinstitutional negotiations on the updated lists of **priority water pollutants**, including organising three trilogue meetings; however, no agreement was reached, and the file will need to be concluded under the Danish presidency. The delays by both the Council and Parliament in the negotiations make the agreement now really urgent, so that Member States can plan to tackle these pollutants in our water environment in the next river basin management planning cycle.
- The European Commission published its latest reports on the **state of the EU's waters** and progress in the implementation of the **WFD** on 4 February. The main conclusion of several published reports was that while progress has been made to improve EU water bodies over the
- past six years, more action was needed before the 2027 deadline. The Presidency organised the discussion on the findings of the implementation report as well as planned **Strategic Dialogues on Water** at the **Water Directors meeting** in May.
- The European Commission published the long-awaited **EU's Water Resilience Strategy** on 4 June. The Strategy underpinned the potential of existing acquis to transition to climate-resilient water management if properly implemented and enforced but fell short on binding commitments as well as on suggested actions to curb pollution at the source.
- The Presidency led the preparation for the international water fora (e.g., **Ramsar Convention on Wetlands**).

Good

- The Presidency advanced negotiations on the updated **lists of water pollutants**.
- The Presidency raised the need for the EU to become more **water resilient** at several high-level events it organised, such as at the informal meeting of the Environment Ministers in April and the **Water Directors meeting** in May. Once the **EU's Water Resilience Strategy** was published, the Presidency organised its
- presentation at the June Environmental Council, thus paving the way for the incoming Danish Presidency to adopt Council Conclusions on the Strategy.

Poor

- The Council's position on the update of **priority water pollutants** fails to tackle the urgent and serious water pollution challenges and overstepped the limited character of the revision by proposing to weaken key principles of the **Water Framework Directive (WFD)**. The Presidency didn't provide any proof that such amendments are needed or that Member States have not been able to grant permits for sustainable projects due to the WFD. Therefore, the negotiations go against the conclusions of the WFD fitness check evaluation, which deemed the WFD to be fit for purpose.
- The Presidency made no effort to push the Commission to deliver on the promised zero pollution commitments such as publishing the Integrated **Nutrient Management Action Plan (INMAP)** nor intervened to stop the dismantling of the environmental safeguards, such as proposed additional exemptions under the **WFD**.
- Unfortunately, Poland joined the pharmaceutical and cosmetic industries in challenging the innovative EPR scheme under the revised Directive on **Urban Wastewater Treatment (UWWTD)** thus creating an unnecessary level of uncertainty around the implementation and funding of the much-needed measures to tackle urban water pollution.
- Poland did not lead by example in terms of implementing the revised **Urban Wastewater Treatment Directive** and instead went to court to challenge the new Extended Producer Responsibility scheme that requires producers and importers to contribute to the cost to remove micropollutants from wastewater.

Overall, the Polish Presidency failed to advance a progressive water agenda during the six months at the helm of the EU Council. The Presidency made efforts to advance the interinstitutional negotiations on water pollutants and pushed for the EU to become more water resilient as urgent priority. The verdict is therefore **mixed on effort and poor on outcome**.

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

The verdict



on effort



on outcome

[This test](#) called on the Polish Presidency to promote Member States' engagement towards the swift transposition of the recently adopted **Ambient Air Quality Directive**, to lead on the review of the **National Emission reduction Commitments Directive**, to guide Member States during the process of revision of the **Gothenburg Protocol**, and to foresee a Council debate on the need to revise the **Environmental Noise Directive**.

Key developments

- After the new **Ambient Air Quality Directive (AAQD)** became EU legislation in November 2024, air quality related matters were somehow archived. No dedicated initiatives were adopted, nor specific steps were taken, during the Polish Presidency. This is unfortunate as air pollution does not pause. Air pollution is the first environmental health risk in Europe, and this requires regular and continuous efforts to secure the right direction of travel.
- The **Zero Pollution Stakeholders Platform** met again, for the first time, under this Commission's mandate, marking an important step for the future of this key initiative.
- The Consultation Forum, organised by the European Commission, focusing on the revision of **EcoDesign standards for stoves and boilers**, initially planned for the month of February, had been cancelled. We welcome the rescheduling that had been recently announced (25 June and October 2025).

Good

- The Polish Presidency led by example on the need to swiftly start the **transposition of the new AAQD**: the process is ongoing at the national level and occasions to secure the possibility to share contributions from different stakeholders had been created.

Poor

- Unfortunately, no explicit position was declared during the negotiation process for a revised **Gothenburg Protocol**, regarding the need to expand the scope of the instrument and include reduction objectives for methane, black carbon and mercury emissions.
- The ongoing process for reviewing the **National Emission reduction Commitments Directive** was not in the Presidency's radar, with no public debate or dedicated initiatives being organised during the semester.
- No dedicated initiatives were taken regarding the topic of environmental noise, or the need to revise the **Environmental Noise Directive**.

Despite the challenging phase that the European Union is going through, air pollution and the related health and environmental burden are not to be dismissed. No visibility was given, and no dedicated initiatives were organised on the topic of air quality at EU level. Poland moved forward at national level with its responsibility to swiftly transpose the new AAQD. For these reasons the assessment **is mixed on effort and poor on outcome**.



8 Drive a green transition towards safer, sustainable and competitive European chemicals and supply chains

The verdict



on effort



on outcome

[The eighth Ten Test](#) urged the Presidency to: adopt strong conclusions supporting the European Commission's **Clean Industrial Deal**, aligning it with the European Green Deal to foster a sustainable, zero-pollution, and socially just industrial transition. This includes ensuring the **Chemicals Industry Package** complements the **Chemicals Strategy for Sustainability (CSS)** and promotes innovation in safer, sustainable alternatives. It urged the adoption of the '**One Substance, One Assessment**' (OSOA) package to streamline chemical assessments, enhance data use, and improve risk response systems. It also pressed for the conclusion of negotiations on **Toys and Detergents safety Regulations** to ban harmful substances like **PFAS** and endocrine disruptors. Finally, it called for full delivery on the CSS, including enforcing the **Restrictions Roadmap**, halting exports of banned chemicals, and securing resources for the European Chemicals Agency, urging national leadership if the Commission fails to act by mid-2025. On mercury, we called for promoting EU leadership in strengthening the **Minamata Convention on Mercury**; facilitating cooperation among Member States for the swift and effective implementation of the revised **EU Mercury regulation**; and promoting the revision of the **Cosmetics Regulation**, holding e-platforms selling dangerous chemicals to account.

Key developments

- On 20 March, the Environment Council published [conclusions](#) on competitiveness, European defence and security and migration, where the **Clean Industrial Deal** was welcomed to achieve the climate objectives. **The Chemicals Industry Package** was not mentioned.
- The French proposal for a "[Critical Chemicals Act](#)" was discussed at an EU Competitiveness Council on 12 March. This proposal aims to ensure that the production of crude oil-based chemicals remains within the EU via myriad measures, including better access to financing, favourable state aid and the use of existing trade defence mechanisms.
- On June 12, 2025, the EU institutions reached political [agreement](#) on all three legislative proposals within the '**One Substance, One Assessment**' (OSOA) package. The formal adoption is expected in Q3/Q4 of 2025.
- On 10 April, the Council and the European Parliament reached a provisional [deal](#) on a regulation updating the safety requirements for **toys** sold on the EU single market.
- On June 14, 2025, the Council and the European Parliament reached a provisional agreement on the update of the **Detergents Regulation**.
- The Polish Presidency created space for some cross sectoral and civil society-led discussions, such as *1st International Conference: Preventing Diseases by Reducing Exposure to Harmful Chemicals*, organised by HEAL on June 10, that included discussion on the implementation of the **EU CSS** and opportunities under the **REACH revision**.
- A call for evidence on the **Cosmetics Regulation** was published in spring, followed by public consultation in May.

Good

- The **new rules on safety requirements** significantly strengthen toy safety by expanding bans on additional hazardous chemicals, including endocrine disruptors, bisphenols, skin sensitisers, biocidal treatments, fragrance

allergens, and certain PFAS, particularly in products for young children.

- The **OSOA legislation** will strengthen the knowledge base on chemicals and facilitate early detection and action on emerging chemical risks. New elements were added during the interinstitutional negotiations that improve protection of people and the environment like information on safer alternatives for substances of concern and
- human biomonitoring across all EU member states.
- The **new detergents regulation** sets the stage for reducing the environmental impacts of detergents through new biodegradability criteria, future monitoring of harmful ingredients and improved consumer information. Some progress was made on the **Cosmetics Regulation** as the revision process has re-started with a call for evidence and public consultation.

Poor

- The Council's position on the **Clean Industrial Deal** focused primarily on the decarbonisation of the chemical industry and other energy-intensive sectors but fell short of aligning with the broader objectives of the European Green Deal, namely a zero-pollution, toxic-free, socially just, and resource-efficient industrial future. Instead, it
- emphasised the need for affordable energy and increased public investment as requested by the chemical industry.
- The AOB on the **Critical Chemicals Act** proposal undermines the green transition objectives of the European Green Deal by supporting crude oil and fossil fuel-derived chemicals.

Overall, the Presidency's narrow focus on climate, while overlooking chemical pollution, represents a missed opportunity for the deep transformation needed in the chemical industry. However, the Polish Presidency did successfully conclude ongoing negotiations with the European Parliament on the OSOA package, a key deliverable of the CSS, the Toys Regulation and the Detergents and Surfactants Regulation. As a result, our verdict is **mixed on effort and good in outcome**.



9 Address resource use and seize circular economy opportunities for the economy and society

The verdict



on effort



on outcome

[The ninth Test](#) called on the Polish Presidency to progress on the introduction of binding EU targets on reducing **resource use** in line with planetary boundaries; urge the European Commission to put forward a holistic strategy for **sustainable resource management**, avoiding a limited and short-sighted approach focused only on recycling and managing waste; take an ambitious stance on the targeted revision of the **Waste Framework Directive (WFD)** and conclude trilogue negotiations; finalize work on the **Green Claims Directive**; 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)**; work towards closing legal loopholes in the regulation of imports via online marketplaces; catalyse the discussions around a reduced use of **critical raw materials** to moderate supply and price risks; ensure the right to information, participation, and access to justice for all communities affected by planned new lithium mining sites and battery factories; promote public transportation and active transport instead of a one-to-one replacement of all combustion engine cars with EVs; prefer collaboration with battery manufacturers who follow the highest environmental and social standards in line with all EU legislation.

Key developments

- The Presidency concluded the work on the **Waste Framework Directive** with targets for food waste and extended producer responsibility for textiles.
- It completed first trilogues on **Green Claims**, but the conclusion of the file seems challenging now that the Commission announced its withdrawal in June.
- It made progress on the proposed **Regulation on Circularity Requirements for Vehicle Design** and on **Management of End-of-Life Vehicles**, [agreeing a Council position on the 17th of June](#).

Good

- The Presidency concluded trilogues on the **targeted revision of the Waste Framework Directive**. We welcome that the agreement encourages Member States to give EPR schemes for textiles more teeth by linking the fee levels to companies' commercial practices.
- It advanced on technical work and a political agreement regarding the **proposed Regulation on Circularity Requirements for Vehicle Design and on Management of End-of-Life Vehicles** towards a general approach in June 2025.

Poor

- There were no developments on providing binding **EU targets reducing resource use**, or strategies for sustainable resource management. A very small number of Member States called for targets during the Environment Council in March, but no ambitious calls were put forward by the presidency. The Polish Presidency has failed to provide meaningful leadership on critical raw materials, allowing the European Commission to operate with a troubling lack of transparency, particularly regarding the selection and governance of Strategic Projects.
- While trilogues on the **targeted revision of the Waste Framework Directive** were concluded, the outcome fails to meet the textile and food waste crisis. Regarding **food waste**, target levels fall short of the commitments made under the SDGs as well as in the 2018 WFD, and no consideration is given to food loss at primary production. On **textile waste**, it is a lost opportunity that the agreement pushes back

the consideration of textile waste management targets until 2029 and that it contains no mechanism for the transfer of **EPR fees** to regions that receive high volumes of used textile exports from the EU.

- While we appreciate the efforts made by the Presidency to advance negotiations on the **Regulation on Circularity Requirements for Vehicle Design and on Management of End-of-Life Vehicles**, we regret that the Presidency was not able to introduce and strengthen measures on key issues such as: addressing the material use and footprint of vehicles, strengthening repairability of cars and the reuse of components, the disassembly of vehicles at
- EoL and enabling the transfer of **Extended Producer Responsibility (EPR)** fees to third countries outside the EU. Not maintaining and increasing ambition on recycled content for plastics as well as other materials such as steel is a further missed opportunity.
- Regarding the **Green Claims Directive**, Poland made reasonable efforts to schedule meetings and suggest compromises. But an agreement could not be found contrary to Poland's ambition to conclude trilogues. However, this can be attributed to last-minute attempt by EPP, ECR, and PEF in the European Parliament to halt the process, and a surprise announcement by the Commission to possibly withdraw the file.

While the Polish presidency made efforts to move ahead the circular economy files and reached agreement on the Waste Framework Directive, the targets for food waste are not ambitious, the EPR for textiles is late and its final adoption was postponed until October, leaving the impact yet further in the future. The presidency could not conclude on the Green Claims Directive due to the Commission's last-minute withdrawal of the proposal. While the Commission put forward a communication to tackle online marketplaces and non-compliant products, these were based mainly on enforcement of existing measures, with no noteworthy progress on this front championed by the Polish presidency. Overall, the Polish presidency did what was planned during their term in terms of scheduling meetings to advance ongoing circular economy files, **so it neutral/mixed on progress but poor on outcomes.**



10 Foster environmental and social justice through improved legal participation mechanisms and support for environmental defenders

The verdict on effort on outcome

[The tenth Test](#) called on the Polish Presidency to: lead the Council in negotiations of the final remaining files of the **European Green Deal** with relevant provisions on **environmental democracy rights** such as the right to access to justice in the **Green Claims Directive** and the **Priority Substances Law**; support the Commission in a revision of the **Governance Regulation on National Energy and Climate Plans**; support and promote the adoption of an additional **Protocol to the European Convention on Human Rights**; push for a **European Civil Society Strategy and civic dialogue**; scrutinise any proposals under the defence for **democracy shield** and action plan; start the preparations for the 8th meeting of the parties of the **Aarhus Convention**; promote and financially support the mandate of the **Aarhus Convention Compliance Mechanism**; support the Commission in any efforts towards the harmonised implementation of the **Polluter Pays Principle**; and champion the **implementation and enforcement of EU environmental law**.

Key developments

- The legal framework which could have been influenced by the Polish Presidency has not been altered for the worse, although we have not heard much from the Presidency on the need to defend **civic space and environmental defenders** in these times when the rollback of environmental democracy rights is being pushed for in some Member States and even in EU politics.

Good

- The Presidency has been welcoming and open to NGOs expressing their positions at the **Council's Working Group on International Environmental Issues (WPIEI)** to prepare the EU for the upcoming **Aarhus Convention 29th Working Group of the Parties** in July. They have helped facilitate this exchange and also seem to appreciate the importance of collaborating with the upcoming Danish Presidency, helping them to prepare for the latter part of 2025 when the Aarhus Convention Meeting of the Parties will take place.

Poor

- There has been little public reaction from the Presidency on the increasing problems which NGOs face in being part of environmental decision-making beyond supporting statements at the informal meeting of environmental ministers in Warsaw, April 2025, and therefore overall, the Presidency has not been a staunch defender of environmental rights.

Overall, the Polish Presidency has conducted itself with professionalism and clearly maintained a position of a neutral broker when it comes to issues of environmental and social justice and the increasing issues faced by environmental defenders. However, given the seriousness of the times, the Presidency could have led more strongly on defending civic space and expressed itself more politically on these fundamental rights issues. This is why the verdict is **mixed on both effort and outcome**.

Abbreviations

| | |
|-------|---|
| 8EAP | 8th Environmental Action Programme |
| AAQD | Ambient Air Quality Directives |
| CAP | Common Agricultural Policy |
| CSS | Chemicals Strategy for Sustainability |
| EAP | Environmental Action Programme |
| EC | European Commission |
| EEB | European Environmental Bureau |
| EESC | European Economic and Social Committee |
| EGD | European Green Deal |
| EMD | Electricity Market Design |
| EPR | Extended Producer Responsibility |
| ETD | Energy Taxation Directive |
| EUDR | Regulation on Deforestation-free Products |
| FML | Forest Monitoring Law |
| IED | Industrial Emissions Directive |
| IEP-R | Industrial Emissions Portal |
| INMAP | Integrated Nutrient Management Action Plan |
| NGOs | Non-Governmental Organisations |
| NGTs | New Genomic Techniques |
| NRR | Nature Restoration Regulation |
| OSOA | One Substance, One Assessment |
| PFAS | Per- and polyfluoroalkyl substances |
| PPWR | Packaging and Packaging Waste Regulation |
| REACH | Registration, Evaluation, Authorisation and Restriction of Chemicals |
| SML | Soil Monitoring Law |
| VDEoL | Regulation on Circularity Requirements for Vehicle Design and on Management of End-of-Life Vehicles |
| UNECE | United Nations Economic Commission for Europe |
| UWWTD | Urban Waste Water Treatment Directive |
| WFD | Water Framework Directive |
| WFD | Waste Framework Directive |

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

We develop a paper before each Presidency. The [Memorandum addressed to the Danish Presidency can be read here](#).

For more information, please contact:

Patrick ten Brink
Secretary General
Patrick.tenBrink@eeb.org



European Environmental Bureau
Rue des Deux Eglises 14-16
B-1000 Brussels, BELGIUM
Tel +32 2 289 1090
eeb@eeb.org | www.eeb.org



Keep up to date with the latest
environmental news at the
EEB's news channel

meta.eeb.org