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THE EEB'S MEMORANDUM

TO THE DANISH PRESIDENCY OF THE EU
10 GREEN TESTS FROM CIVIL SOCIETY



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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.

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Introduction

The Danish Presidency of the Council of the European Union, which takes over from the Polish Council Presidency on the 1st of July 2025, will be the second of the trio and will start during a challenging geopolitical context, like its predecessor. Indeed, with transatlantic relations reeling from the first months of the Trump administration and Russia's war of aggression against Ukraine entering a critical phase, the Danish Council Presidency will play an important role in guiding Europe through an ever more challenging environment. This will be the eighth time in its history that Denmark has the responsibility of holding the Council Presidency, and it is essential that it ensures that the US model of climate denial, expanded fossil fuel extraction, deregulation, and stepping out of international multilateral agreements is not copied by the EU. The EU is the only geopolitical bloc that can now take leadership driving forward a convincing progressive transformative agenda that the world needs. Denmark has the responsibility to actively step up its responsibility for EU leadership on decarbonisation, depollution, and the protection of biodiversity and natural resources through a Just Transition. This is about rights, justice and hope for youth and future generations.

During the six months of the Polish Presidency, the simplification agenda, instead of being targeted and aimed at smart implementation, became a dangerous vehicle for deregulation. Since February, the Commission launched five omnibuses while a sixth one is on its way, all of them risking dismantling key environmental protections with no basis in scientific evidence, nor impact assessments and proper consultation of EU citizens, at a time we urgently need to accelerate the transition. Not only is this antidemocratic, but it is also putting the EU's own security and economy at risk. Indeed, security is much more than military security. It is also about safeguarding human security: shielding citizens from climate impacts, pollution, harmful chemicals, and health crises. It means ensuring access to affordable healthcare, healthy food, preserving mental and physical health through nature access, and embracing the one-health approach that connects the wellbeing of people, animals, and the planet. Also, in the euro area alone, approximately 72% of companies (corresponding to around three million individual companies) are highly dependent on at least one ecosystem service.

It is in this context that the Danish Presidency will lead the work of the Council of the EU, inheriting five omnibus packages but also having to look at new upcoming ones (chemicals, agriculture, energy). It will also have to finalise the negotiations on priority substances and steer the beginning of the negotiations on the future MFF and CAP, while kicking off the work on the REACH revision at the end of the year and initiating discussions on the bioeconomy strategy proposal. The Presidency has set two overarching priorities: a secure Europe and a competitive and green Europe.

We welcome the recognition of the need for a green Europe in its overarching priorities and the explicit reference to the Green Deal and the 8th Environment Action Programme as key to advancing European solutions to key challenges related to the climate, resources, pollution, nature, and biodiversity.

In a world where disinformation has become the new norm, underpinning political interference, fuelling bias, and threatening civil society, and where the World Economic Forum has identified disinformation as the greatest global risk over the next two years, we can only welcome the recognition of the critical role that addressing disinformation plays in safeguarding Europe's security, thereby maintaining essential alignment with Poland's welcome efforts in prioritising this issue.

The high priority given to simplification should resist the deregulation move initiated during the Polish Presidency term and rather be focused on ensuring the efficiency in EU policies' implementation and target reach. Any deregulation attempt should always be confronted with the fact that regulating at the EU level significantly eases administrative burdens for businesses compared to navigating 27 different national

regulations and that the cost of inaction on climate pollution and biodiversity crises is already extremely high. Simplifying laws without robust safeguards could worsen environmental issues, leading to higher costs for companies and society, such as those related to floods, droughts, pollution, fires, and health impacts. Dismantling EU laws without solid evidence could create legal uncertainty for companies and investors, delaying investments and corporate decisions towards the green transition.

Last but not least, the focus on the Multi Annual Financial Framework (MFF) as a key tool for securing a competitive EU that is ready to deliver on future challenges should be centred on the need for financing to help implement the EGD – this is essential to ensure the whole of society (including the poor and disadvantaged) and the economy benefit from investments and the transition.

Each Council Presidency has the responsibility of being a “neutral broker” facilitating progress by listening to and balancing the positions of the 27 Member States considering the challenges and opportunities the EU faces. It needs to broker progress on the files and international negotiations while it has the freedom to raise topics considered of strategic importance by the Presidencies. Presidencies should also lead by example by showcasing ambitious national-level initiatives and good practices in implementing EU legislation on environment and climate.

The EEB, building on consultation with its over 190 members and wider civil society partnerships, has developed these Ten Green Tests for the Danish Presidency whose engagement, commitment, and leadership can make a lasting and fundamental difference. These have been approved by the EEB Board and Council with representatives from all EU Member States and many European networks. The Ten Green Tests that are inspired by our European Pact for the Future include policy dossiers coming from the EGD and wider EU policy and legal frameworks, the international dimension, and where Denmark could “lead by example” and inspire other countries. We propose the following Ten Green Tests that present a civil society vision as to what would constitute success by the Danish Presidency of the EU in the context of the challenges the planet and society face. We look forward to working with the Danish Presidency directly and via our members to support a successful Presidency that can help the EU advance in the transition to living within the limits of our one planet – and ideally embrace a green and social deal for a one-planet economy as a core priority of this and next legislative cycle. This will help build a more resilient EU. The Presidency relies upon the cooperation of the entire Council, and we therefore also call upon all Member States to take the Ten Tests as benchmarks for their Council engagement to make the most of the next six months.



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The above Ten Green Tests for the Danish Council of the EU Presidency reflects our understanding that politics is the art of the possible. However, if we do too little now to avoid climate, biodiversity and pollutions crises, and worse if we rollback on previous achievements, then the challenges in 2030, 2040 and 2050 will be impossible for society to deal with. The impossibility of living well in the future with unabated crises should make policy makers reconsider what is possible to negotiate today and up the level of ambition in policy formulation and subsequent negotiations. It is in this context that we have designed the Ten Green Tests. They may seem ambitious, but they are fundamentally necessary for the future we need, and that young people deserve to inherit.



1. Implement the European Green Deal in times of disinformation and disruptive foreign influence.

The ongoing climate, biodiversity, and pollution crises, Russia's fossil fuel-funded invasion of Ukraine, the ever-starker evidence of poverty and inequalities in Europe, and the impacts of EU consumption and actions abroad have exposed the deep flaws and dependencies in our energy, economic, and governance systems. Recently, [scientists warned](#) that the planet's remaining carbon budget to meet the international target of 1.5°C has just two years left at the current rate of emissions, showing how deep into the climate crisis the world has fallen and emphasised that every fraction of a degree of global heating increases human suffering, so efforts to cut emissions must be ramped up as quickly as possible.

Instead of accelerating efforts to tackle the triple existential crisis, the last couple of months have unfortunately been focused on slowing down progress and, worse, rolling back pieces of the EGD, environmental, and health protection.

The second Trump administration of the USA, which began in early 2025, was immediately followed by meddling in European affairs, weaponizing 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. This is not a path the EU can or should mimic.

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 power of corporate lobbies, the prioritisation of profit-making in the short term, and political ideologies against environmental and social protections have reigned during the first half of the year, putting our economy, security, and society at risk. This worked in conjunction with targeted disinformation campaigns aimed at civil society, muffling citizens' voices in the EU policy debate.

Climate denialism and delay, powered by disinformation, contribute directly to policy paralysis, even as extreme weather events surge. The World Economic Forum identified disinformation as the greatest global risk over the next two years, followed by extreme weather events, which it also lists as the greatest threat in the medium term. Disinformation makes climate change risks an ever more probable reality, accelerating the very threats we must urgently prevent.

The EGD, in helping push for fossil fuel and resource independence, for savings and efficiency, must remain the driver of social and economic resilience. The EGD is a peace project and a visionary investment in future Member State and EU resilience, stability, and economic prosperity. It is a security agenda and is key for competitiveness. It should be promoted and progressed and not undermined by erroneously heeding false arguments. Furthermore, the increase in energy prices and inflation levels has brought into stark focus the level of poverty and inequalities in Europe – energy poverty in particular, but also mobility poverty and the lack of affordable housing and general difficulties in making ends meet. Poverty often goes hand in hand with environmental inequalities where disadvantaged communities are, for instance, more exposed to environmental health threats. This underlines the need for greater social,

environmental, and economic justice and improved fair governance where short-term private interests do not trump the need to ensure wellbeing for all in Europe and beyond.

Deregulation must therefore urgently be resisted, bearing in mind that regulating at the EU level significantly eases administrative burdens for businesses compared to navigating 27 different national regulations. Simplifying laws without robust safeguards could worsen environmental issues, leading to higher costs for companies and society, such as those related to floods, droughts, pollution, fires, and health impacts. Dismantling EU laws without solid evidence could create legal uncertainty for companies and investors, delaying investments and corporate decisions towards the green transition.

Simplification should be targeted at smart implementation and be a tool for aligning with EU regulations efficiently, not a tool to deviate from them.

In this 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 foreign destructive 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, to fight disinformation at every level to ensure fact-based decision-making.**

We therefore call upon the Danish Presidency to:

A. Address the disinformation crisis undermining the EGD by: Pursuing the efforts of the Polish Presidency in quantifying and understanding the threats, while encouraging the development of an EU strategy and practices to combat disinformation, to weed out inappropriate influence by foreign state actors, vested interests that are not aligned with public interests and science and strengthen public accountability and civic space. It is essential that decision-making has access to correct facts and is not biased by false information, and that civil society has the space and ability to communicate citizens' concerns. For this, the Presidency should push for European debate and commitments, as well as lead by example on:

- Ensuring appropriate communication of the EGD across the EU at national and local levels, starting with schools and universities;
- Catalysing the development of a fact-checking portal and service, also open to industry and civil society requests to immediately debunk false claims;
- Ensuring good media balance;
- Better communicating environmental scientific consensus and ensuring scientific consensus remains at the centre of any expert groups, discussion groups, and civil society exchanges organized by the EU Institutions;
- Implementing and enforcing the green claims legislation to ensure a more fairly and correctly informed public and prevent greenwashing;
- Finally, promoting the systematic communication of the benefits of action (including cumulative benefits of action against the cost of inaction) of policies and measures.

B. Resist the temptation of deregulation by:

- Continuing to progress 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, in the spirit of commitments to a carbon neutral, zero pollution Europe;

- Ensuring simplification is not used as a tool to deregulate but strictly focuses on making the implementation of EU policies smarter and more efficient.
- Opposing the ongoing 'simplification' efforts that are conducted through omnibuses, at a fast pace, without evidence, impact assessment and without a roadmap. These arbitrary revisions create legal uncertainty, compliance headaches for businesses, and years of expert work thrown out.
- In addition, given the importance of having strong social measures so all in society benefit, supporting business within the reality of planetary boundaries, and addressing the triple climate-nature-pollution crisis, 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.

C. Demonstrate solidarity with Ukraine and supporting EU enlargement:

- Maintain and accelerate the implementation of the EGD to ensure energy independence from hostile powers like Russia – through policies that support renewable energy, energy efficiency, and energy sufficiency roll out, supported by investments in a smarter, stronger and more interconnected and resilient European electricity grid.
- Lead discussions in Council to stop Russian gas imports, including through indirect imports, and work with partners globally, to dry up Russia's income on fossil fuels.
- Counter the intention of Russian disinformation that seeks to scale back climate and environmental spending and weaken or undo the European Green Deal (EGD) to keep the EU's dependency on Russian imports and commit publicly to the EGD and fossil fuel independence.

D. Engage in global diplomacy for a green transition in a changing world order:

- Lead the EU in an ambitious UNFCCC COP 30 in Brazil, ensuring the EU can show a strong 2040 target of at least 90% emission reductions and ambitious European NDCs, as well as strong EU position and ambition on the roll out of a global Just Transition Mechanism.
- Do its very best to ensure a strong outcome at the upcoming International Negotiating Committee (INC 5.2) in Geneva to make sure a global Plastics Treaty is agreed upon to curb plastic pollution.
- Ensure the EU and its Member States have high ambitions for the 7th UN Environment Assembly in December, develop ambitious resolutions in close cooperation with partner governments in the Global South to support the development of global environmental governance on emerging issues.

E. Lead by example: Ensure that clear, convincing implementation measures and enabling mechanisms are in place in Denmark to fast track the ecological, economic transition, and ensure these respond to the needs and lead to benefits and encourage engagement across rich, middle class and poor, so that it is a real green and social deal for a one-planet economy.

More information: [The European Pact for the Future: a green and social deal for a one-planet economy](#) • [EU leaders may miss a rendezvous with history](#) • [NGOs call for a social and green investment plan for a prosperous and just transition](#) • [OpEd in Euractiv: Our Choice](#) • [Mid-term assessment of the European Green Deal](#) • [European Green Deal: One Year In](#) • [A Feminist European Green Deal](#) • [Turning fear into hope: Corona crisis measures to help build a better future](#) • [Reprotecting Europe: The EU Green Deal v The War on Regulations](#) • [Towards a wellbeing economy that serves people and nature](#) □ [EEB's Feedback on the EU Taxonomy Delegated Acts](#) • [Beyond Growth Conference: Open Letter](#)



2. Ensure a truly “Clean” Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration.

Europe (and the world) is threatened by a triple climate, biodiversity, and pollution crisis. Industry's sustainability and competitiveness cannot be secured by further degrading our climate, environment, health, and society 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.

Moreover, secondary acts pursuant to the updated rules on industrial pollution prevention and reporting—the **Industrial and Livestock Rearing Emissions Directive (IED 2.0)** and the **Regulation establishing the Industrial Emissions Portal (IEP-R)**—need to be ambitious and coherently enforced. Key acts relate to the drafting of **EU Best Available Techniques (BAT) reference documents (BREFs)** for mining, landfills, inorganic chemicals, ceramics, and soon battery giga-factories, iron and steel, and cement production. Moreover, operating rules for industrial-scale pigs and poultry livestock rearing activities are due to be finalised soon. Concrete delivery on the zero-pollution ambition will depend on the robustness and ambition level of these acts, where the Council has a key role to play in upholding integrity and setting direction. Secondary acts for ringfencing content of installation-level transformation plans for the energy-intensive industries, and the obligation for more systematic substitution analysis of hazardous substances, are at risk of the Omnibus simplification/deregulation obsession of incumbent industry laggards.

Key votes under the Danish presidency will concern the review of the pollutants list and reporting thresholds as well as clarifications on what is considered contextual information and relevant raw materials subject to reporting rules for large-scale industrial activities under the **Regulation establishing the Industrial Emissions Portal**. It is crucial to ensure that digital reporting obligations serve progress on environmental performance benchmarking and accountability of decision-making. Similar political signals are expected in relation to the review of the **UNECE Pollutant Release and Transfer Register (PRTR) Protocol on reporting on industrial activities**.

The revision of the **Public Procurement Directive** offers a large potential to drive sustainability, circularity, and decarbonization of carbon-intensive industrial products like steel and cement. Linked to the standards of the **Eco-design for Sustainable Products Regulation (ESPR)** and the **Construction Products Regulation (CPR)**, mandatory public procurement of decarbonised industrial products offers potentially massive incentives to drive competitive advantage for the European industry as well as fast-tracking innovation that will benefit the planet and its citizens.

We therefore call upon the Danish Presidency to:

- A. Uphold [a holistic Zero-pollution-aligned ambition within acts to be adopted pursuant to the Clean Industrial Deal](#)**, which can live up to its name only if it embeds the zero-pollution objective in its priorities, alongside climate goals and if it recognises the strategic value of pollution prevention and remediation. Accelerating the phase-out of fossil fuels/feedstocks and chemicals of concern - ending the use of all the most harmful chemicals in products is a prerequisite to a toxic-free circular economy. Accelerate the transformation of the steel value chain ([see EEB Steel and Metals Action Plan](#)).
- B. Ensure ambition in the secondary legislation stemming from IED 2.0 and prevent regulatory backtracking based on “simplification omnibus” focusing on: ambitious EU BAT reference documents, as per our [proposals for an EU BREF Process fit for the 2050 goals of climate neutrality, zero pollution, and circular economy](#)**: clear expectations with measurable and comparable installation-level transformation plans and object to any de-regulation/ “simplification” Omnibus of the substitution analysis of hazardous substances as part of the environmental management systems. Secure robust operating rules for livestock rearing, namely on methane emissions and safeguarding water quality from manure spreading.
- C. Ensure systematic internalisation of negative externalities** in relation to aspects linked to funding, state aid or other support schemes and methods of cost-benefit assessments.
- D. Promote inclusive governance, transparency and public accountability in decision-making**, notably by making the [EEA Industrial Emissions Portal fit for benchmarking and compliance promotion](#): also by integrating permit conditions, real time / annual compliance report information.
- E. Secure user-friendly and transparent pollution benchmarking tools through ambitious implementation of the Regulation establishing the Industrial Emissions Portal**, notably by removing pollutant thresholds and adding further pollutant groups, in particular PFAS. Define the meaning of ‘contextualization of information.’ Ensure public access to production volumes, operating hours, consumption data/key raw materials, and other key information such as measures taken pursuant to the Environmental Management Systems, including IED 2.0 Transformation Plans.
- F. Secure political direction for a comprehensive UNECE Kyiv Protocol (on Pollutant Release and Transfer Registers)**, based on the IEP-R improvements (mentioned above), bridging with the digital product passport promoted through EU product policy and incorporating due diligence requirements from other EU acquis. Systematically allow for early and effective pre-consultation with civil society interest groups such as the EU ECO Forum.
- G. Secure mandatory environmental and socially responsible procurement criteria** in all procurement contracts. Ensure that procurement contracts only include products or services with the highest environmental performance linked with the product standards being developed in relevant sectoral legislations (e.g., best-in-class minimal requirements as per ESPR, or EU Ecolabel). Strengthen the use of life cycle costing through new or updated methodologies and software tools to calculate negative environmental externalities, customised and simplified for the specific use cases of procurement authorities. Secure better monitoring and reporting to track the progress of green public procurement and lower the thresholds. The revision of the EU procurement directives must also be

conducted with the intention to actively encourage sustainable food procurement, as outlined in the Vision for the Agriculture and Food and called for unanimously by agri-food stakeholders in the consensus report of the Strategic Dialogue on Agriculture and Food.

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

More information: *: Joint Industry-NGO vision for a prosperous and sustainable industry: a positive blueprint for the future • Briefings on IED and IEP-R review • EU BREF specific website • EEB input to CID State Aid Framework (CISAF) • EEB briefing on Green Public Procurement • Climate impact of air pollution levels aligning with European Commission's proposed air quality standards.*



3. Commit 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.

The Danish Presidency will open discussions on the Commission's proposal for the next Multiannual Financial Framework (MFF) for after 2027, it will therefore play an instrumental role in setting the direction of travel of the negotiations.

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. Given that the new MFF proposal will likely include a dedicated competitiveness fund, it is important to highlight that the major competitiveness challenge is the immense cost of inaction on biodiversity, climate, and pollution crises. Lack of compliance with EU regulatory obligations and poor implementation of EU rules, like REACH, create an uneven playing field, long procedures, and uncertainty, hindering competitiveness on safer, greener solutions.

The funding for EU competitiveness in the next MFF must therefore mainstream actions to tackle the climate, pollution, health, social, and biodiversity crises – challenges that are at the heart of the EU's future competitiveness. Especially, the next MFF should take into account and act on the immense costs of inaction linked to these crises and commit to a smart implementation of the European Green Deal.

The next MFF should also mandate a rigorous and systematic application of the **Do No Significant Harm Principle to the entirety of EU funds and programmes** while establishing dedicated funding for nature and increasing the share for LIFE. The LIFE programme should therefore be preserved and its budget reinforced while a dedicated nature restoration fund to scale up innovation and best practices from LIFE and to support the implementation of the Nature Restoration Law should be included. It is also crucial to set robust climate funding targets within the EU budget and to establish an effective instrument to address pollution at its source, in line with the zero-pollution ambition.

Finally, **a thriving democracy needs infrastructure and resources for citizens' voices to reach policymakers.** CSOs often lack adequate resources, and it is essential the future MFF contains dedicated operating grants to fund CSOs' participation in EU policy development, implementation, and enforcement.

We therefore call upon the Danish Presidency to:

A. Deliver a first draft negotiating box to guide further negotiations on MFF which:

- Makes the competitiveness fund, **a clean competitiveness fund** – mainstreaming actions to tackle the climate, pollution, health, social and biodiversity crisis.
- Sets the necessary safeguards for proper public and balanced consultation on the national plans.
- Contains a rigorous and systematic application of the Do No Significant Harm Principle to the entirety of EU funds and programmes.
- Establishes dedicated funding for nature and increases the share for LIFE.
- Sets robust climate funding targets and instruments to address pollution at its source, in line with the zero-pollution ambition.
- Contains dedicated operating grants to fund CSO participation in EU policy development, implementation, and enforcement.
- Includes a move towards a genuinely performance-based Common Agricultural, Food, and Land Stewardship Policy that links budget disbursement to clear, measurable objectives, while boosting ring-fenced funding for nature protection and agro-ecosystem restoration and ensuring more effective environmental payments. End harmful subsidies by adopting a science-based exclusion list of damaging activities that no longer qualify for EU support. Target socio-economic support to those farmers who need it most, as called for by the Strategic Dialogue, and facilitate the transition towards resilient, diversified farming grounded in agroecology, notably in the livestock sector, through investment support and other measures from the farm to the fork (see also section 4)

B. Advance discussions for new EU own resources at the EU level, such as progressive taxes on extreme wealth, a frequent flyer levy, taxes on resource use, an excess profit tax on fossil fuel companies, tourist taxes and a financial transaction tax as proposed in the white paper published by the Polish Presidency to close green and social funding gaps. Given the scale of investment needed for infrastructure, decarbonisation, depollution, and nature restoration, it is further essential to advance 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. This should be done 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. It is critical to ensure that public finance is directed toward these priorities rather than being increasingly diverted into military defence.

A new fiscal approach is urgently needed to underpin a just and green transition.

C. In light of Denmark's strengths on green public procurement and the priority given to the Green Transition by the Danish Presidency, lead by example and encourage progress on sustainable and ethical Public Procurement at all relevant levels of governance. As public procurement accounts for 15% of EU's GDP, it should be considered a priority within the overall budget, beyond what was mentioned in the Clean Industrial Deal (CID) section. GPP should be leveraged as a strategic driver to incentivise investments that contribute to the deep transformation of the climate, environment, social and infrastructure envisioned for both the EGD

and the CID. This approach will help fast-track the development of the market, create economies of scale and make sustainable solutions more accessible and affordable. For example, a commitment to a robust transition to sustainable public procurement (and efforts for sustainable private procurement) to encourage the purchase of products ensuing from agroecology – will develop the market for these products, support farmers' incomes and deliver healthier, sustainable nutrition to citizens. [In 2020, 9.1%](#) of the EU's agricultural area was farmed organically, and retail sales doubled between 2015 and 2020. This trend needs to be supported and accelerated (see also next Test on agriculture).

More information: [The European Pact for the Future: a green and social deal for a one-planet economy](#) • [Call for a dedicated EU Nature Restoration Fund](#) • [Joint statement: operationalising the do Not Significant Harm principle in the next long-term EU budget](#) • [Time for farmers and nature to thrive](#) •



4. Build on the strategic Dialogue for Agriculture to advance towards sustainable and just food and farming systems.

The way we produce and consume food is driving multiple environmental and health crises, while the climate and biodiversity crises are also huge threats to our ability to produce food, as is becoming increasingly apparent in Europe and across the globe. The science is clear: we must urgently make our food systems sustainable, equitable, and resilient by addressing how we produce, distribute, and consume food. From nutrient pollution to biodiversity loss and climate change, 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.

With discussions on the EU's long-term budget, on a reform of the **Common Agricultural Policy (CAP)** post-2027, and on the **EU's climate goals for 2040** expected to kick off in Summer, the Danish Presidency will have a crucial role to play in ensuring high sustainability ambition across these areas to support a Just Transition in our food and farming system. The historic consensus achieved in the **Strategic Dialogue on the Future of Agriculture** provides a crucial stepping stone for these efforts, which the Presidency should embrace and build on.

We therefore call upon the Danish Presidency to:

- A. Support a move towards a genuinely performance-based Common Agricultural, Food, and Land Stewardship Policy** that links budget disbursement to clear, measurable objectives, while boosting ring-fenced funding for nature protection and agro-ecosystem restoration and ensuring more effective environmental payments. End harmful subsidies by adopting a science-based exclusion list of damaging activities that no longer qualify for EU support. Target socio-economic support to those farmers who need it most, as called for by the Strategic Dialogue, and facilitate the transition towards resilient, diversified farming grounded in agroecology, notably in the livestock sector, through investment support and other measures from the farm to the fork.
- B. Bring the topic of emission reductions in the agriculture and land use sector to the centre of the stage, as part of the discussions around Europe's climate pathway to 2040**, with a view to setting ambitious science-based emissions reduction goals for the agriculture sector, as recommended by the Strategic Dialogue. Scrutinise the final drafts of the first **Carbon Removal and Carbon Farming methodologies Delegated Acts** to ensure current concerns are addressed and that they deliver on sustainability requirements and accurate quantification of real climate benefits.
- C. Promote high ambition on animal welfare through EU legislative reforms**, in particular urging the Commission to publish ambitious proposals for the revision of the EU's animal welfare legislation, including a ban on the use of cages in animal farming, as called for by 1.4 million European citizens. Wrap up the **revision of Animal Transport legislation** with high ambition, including a ban on live exports.

- D. Champion dialogue on a just transition to more plant-based diets between policymakers, stakeholders, and civil society** to advance the debate on EU-level consumption-side policies to support a transition to fair and sustainable food systems, including an **EU Action Plan for Plant-Based Foods**.
- E. Increase the dialogue between the Agriculture Council and Environment Ministers and stakeholders**, including by inviting environmental NGOs to the Informal Agriculture Council and meeting with environmental representatives in the margins of Agriculture Council meetings, as is already customary with some agricultural representatives.
- F. Set 2026 fishing opportunities below the Maximum Sustainable Yield (MSY) limits in line with the best available scientific advice** to operationalise the **Ecosystem-Based Fisheries Management** approach under the CFP.

More information: [*'Time for farmers and nature to thrive': Joint policy brief on the future of EU agricultural policy*](#) • [*'Putting a price on agricultural emissions': EEB reflections on an EU Emissions Trading System for agriculture*](#) • [*'Breaking Free': EEB position paper on EU animal welfare*](#) • [*Joint Call for EU Action Plan for Plant-Based Foods*](#)



5. Respond 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.

The scale of the transformation of our societies is so large and the urgency to act so intense, we cannot afford to waste precious resources on technologies that have proven to be unable to deliver on scale, on budget, and on time. Rather than following technology neutrality and focusing on the winners of the energy technology race, direct electrification, renewables, and flexibility options, EU member states are betting on new nuclear, overly relying on hydrogen, and extending fossil infrastructure, for example, for LNG gas.

Carbon pricing is a very encompassing tool to address emissions reductions. However, it is currently being burdened by the lack of regulatory and other accompanying complementary measures. If the **ETS2** is relied upon to coordinate all decarbonisation efforts, carbon prices may rise, risking social discontent. By contrast, if especially the countries with large total emissions (Germany, Italy, France first) implement ambitious complementary policies such as a carbon price floor, regulatory climate policies, or targeted financial aids, prices can remain lower, aiding those with the least options to decarbonize in the short run.

We therefore call upon the Danish Presidency to:

- A. Protect ETS2 from political attacks in the Council.** This requires explaining the lack of credible alternative short-term proposals for the required drops in emissions by 2030.
- B. Promote active discussion and sharing of best practices on effective forms of social compensation for the use of all ETS2 revenues** beyond the **Social Climate Fund**. Direct payments to households are an extremely transparent measure to build trust in carbon pricing's intentions, as well as providing effective relief to low- and middle-income households.
- C. Frontloading of ETS2:** To achieve the highest possible leverage of the Social Climate Fund, we support the proposal to frontload the revenues from ETS2 to **add a social loan to the Social Climate Fund**. This could help improve social protection and further stabilise the ETS2 system.
- D. Promote global ambition on climate change:** To align with the 1.5°C temperature limit and the equity principle, advocate for climate neutrality at the EU level by 2040 at the latest, wholly based on at least 92% domestic gross emission reductions compared to 1990 levels. Ahead of **COP30 in Brazil**, a 2035 climate target in the **EU's Nationally Determined Contribution (NDC)** of at least 94% net emission reductions (including at least 82% gross emission reductions) would establish a credible foundation for higher global commitments. Furthermore, these future targets should reflect three separate and distinct targets and policies for a) **gross emissions reduction**, b) **net**

carbon dioxide sequestration in the land use (LULUCF) sector and c) **permanent industrial carbon dioxide removals** based on a thorough assessment of their sustainable scale-up, taking into account risks, benefits, and trade-offs -without recourse to EU funding as this can be more cost-effectively spent on renewable energies, energy efficiency, sufficiency, circular economy and smart grids. This must be accompanied by compulsory renewable and energy efficiency targets. Additionally, bring the ambition of the **F-gas regulation** to the global stage to prevent the widespread adoption of **HFOs (PFAS)** in developing countries. This will support European producers of green alternatives, many of which are Danish, and create a level playing field internationally, either through the Montreal Protocol or bilateral agreements with key manufacturing economies.

E. Promote electrification and lower bills for consumers: Land an agreement in the **Energy Taxation Directive** to ensure higher taxation for fossil fuels than renewables, thereby lowering taxation on renewable energies and potentially reducing consumer bills. Additionally, advocate to create a better framework for electrification, addressing high taxes and levies on electricity in many member states, and overcoming **State Aid regulation** barriers to enable 0% VAT on renewable technologies such as heat pumps. A coalition of willing member states, promoted by Denmark, could work towards these goals without waiting for the Energy Taxation Directive agreement.

F. Energy taxation Directive: Finalise the revision of the Directive with a strong climate lens:

- Remove **fossil fuel subsidies** and avoid promoting unsustainable fuels under the guise of a “clean” transition.
- **Shipping Decarbonisation Strategy:** Embed a “Wind First” Flagship Initiative into EU maritime policy; prioritize energy efficiency and wind propulsion in shipping decarbonisation hierarchy; reform port planning to serve as climate and justice hubs with eco-safe, multi-fuel infrastructure; back fuels with full life-cycle GHG performance; avoid incentivizing LNG or other high-emission alternatives; advocate for strong IMO measures with strict limits on carbon credit use, fund transparency, and sustainability criteria.
- **Leverage Denmark’s Arctic Council Chairship** to advocate for black carbon emission reductions in Arctic shipping.
- Support mandatory transition to polar fuels through the **FuelEU Maritime Regulation** and at **IMO** level.

More information: [Creating positive impact with ETS2](#) • [Why direct payments are essential to make household carbon pricing work in the EU](#) • [Joint letter to establish an EU lending facility for ETS2 revenue for member states](#); • [Three Guiding Principles for National Social Climate Plans](#); • [How renewables can help vulnerable households](#); • [EEB’s response to the Do No Significant Harm principle in the Social Climate Fund](#) • [CCS Reality Check – Risks and Priorities](#)



6. Deliver a nature-positive agenda for land, freshwater and oceans and fast track climate adaptation and resilience

Our lives, health, well-being, 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 of implementing and strengthening the European Green Deal**, including its commitments **to protect, restore, and sustainably use nature**. The negotiations and final adoption of some key Green Deal laws from the previous legislative mandate, such as the **Soil Monitoring Law (SML)** and **Forest Monitoring Law (FML)**, are still ongoing. The Danish Presidency must prioritise adopting those missing puzzle pieces to achieve coherence of the European Green Deal. Strong Council leadership and timely handling of the negotiations will be crucial to make the most of the potential to put biodiversity on the path to recovery that these new laws can provide.

Moreover, the simplification agenda of the Von der Leyen II Commission has so far resulted in significant deregulation and dismantling of the EU's environmental acquis using simplification omnibuses as a vehicle for dismantling Green Deal laws. It is essential that **the Danish Presidency leads the Council in defending the integrity of our flagship nature, water, soil, and marine laws**. What is needed for the competitiveness of the EU's economy, societal resilience to climate chaos, and ultimately our survival is proper implementation and enforcement of these laws, including adequate funding.

The implementation of the key EU Green Deal strategies for 2030 continues, including **EU Strategies on Biodiversity, Climate Adaptation, Forests, and Soil**. The mid-term review of the **8th Environmental Action Programme**, as well as the assessment of progress under several of these strategies, highlighted the need for EU Member States to step up their efforts in protecting and restoring nature as well as transforming the economy.

In addition, the Presidency will represent the EU on a global stage, including negotiations under the **Convention on Biological Diversity**, and will lead the preparation of the Council's input into the new policy initiatives by the von der Leyen II Commission, such as the **Water Resilience Strategy** and initiatives on biodiversity financing. It is important the Presidency organises the Council's work on the follow-up to the Commission proposals, making them true EU-wide tools to deliver for nature and people and ensuring they 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 Danish Presidency to:

- A.** Demonstrate the EU's global leadership on tackling the nature crisis and loss of biodiversity, especially **by maintaining the integrity of the EU's nature laws** backed up by clear progress within the EU on effective protected area management as well as stepping up efforts to achieve co-existence with large carnivores and maintaining their strictly protected status contrary to unscientific and politically motivated moves to downgrade it.
- B.** Recognise the opportunities the recently adopted **Nature Restoration Regulation** offers to tackle the biodiversity and climate crisis, the Presidency **should prioritise support for the establishment of proper governance as well as development of the EU wide implementation tools** to ensure the Regulation's impactful roll out across the EU by its legal deadlines.
- C.** Promote the need for the 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**.
- D.** Adopt the first **EU Soil Monitoring Law** and ensure an impactful and thorough implementation to put our soils on the path to recovery by 2030 and guarantees that they are brought back to health by 2050.
- E.** Prioritise negotiations on the **Forest Monitoring Law** and ensure the law is fit to 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.
- F.** 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 agriculture projects that improve water retention in the soil and prevent evaporation, forestry and land management techniques that help prevent landslides and floods.
- G.** 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 key agreements for the implementation of the Kunming-Montreal Agreement. In addition, the EU's credibility as a champion for biodiversity and nature needs strengthening, especially through action in the EU towards achieving co-existence with large carnivores and in tackling drivers of nature crisis.
- H.** 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.

- I. **Strengthen the EU Ocean Pact** by incorporating clear targets, timelines, and monitoring mechanisms to enhance ambition and accountability and **convene a cross-sectoral high-level Ocean Ministers meeting to foster integrated marine governance** and advance synergies between fisheries, climate, and biodiversity policies.
- J. Introduce **binding underwater noise reduction targets into the EU Maritime Strategy** and propose a ban on open- and closed-loop scrubber discharges in EU waters.
- K. **Lead efforts to secure rapid EU-wide ratification of the High Seas Treaty (BBNJ)**, ensuring the EU remains a global ocean governance leader. **Rally more EU Member States to support a moratorium or precautionary pause on deep-sea mining.** Highlight the latest scientific evidence and civil society consensus via Seas At Risk's new "[Changing Seascape](#)" report.
- L. Lead by example in the implementation of the **Nature Directives** and the **Nature Restoration Regulation** 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: [Nature Priorities for the New EU Mandate: Joint statement by 300+ civil society organisations calling for strict wolf protection to be maintained](#); • [Guidance and Recommendations For Ambitious Nature Restoration Plans](#); • [Protecting the foundations of life – Statement on the Soil Monitoring Law](#); • [Call for a dedicated EU Nature Restoration Fund](#); • [Benefits of the Forest Monitoring Law](#); • [The Changing Seascape of Deep Sea Mining in Europe](#)



7. Maintaining and delivering on zero-pollution: clean and safe water for all and clean air 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 the production of energy from hydropower, transportation of goods by inland navigation, or 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, as concluded by the European Commission in a recent WFD implementation report, 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.

The Nitrates Directive, which is a well-established EU Directive as well as part of the basic measures under the Water Framework Directive, plays an important role in reaching sustainable nutrient flows by setting rules for agricultural practices to limit the loss of nutrients to water, including limiting the amount of manure that can be spread on fields, and thereby indirectly regulating livestock intensity. The European Commission is due to publish the evaluation of the Nitrates Directive in the second half of 2025 and decide on its future. We believe the Nitrates Directive is fit for purpose and should be maintained, but implementation, reporting, and enforcement should be strengthened in line [with the recommendations from the European Court of Auditors](#). A revision of the Directive would hamper the impactful implementation, which should be the main priority backed by political will and sufficient resources.

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 over 2.5 years ago as part of the **EU's Zero Pollution Action Plan (ZPAP)**, but, unfortunately, the progress on agreeing them has been slow, risking that Member States will not plan any 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 and making the issue more difficult and costly to deal with in the following RBMPs.

Recognising the growing water risks, the European Commission has recently published the **EU Water Resilience Strategy** with the objective of restoring and protecting the water cycle, building a water-smart society, and ensuring clean and affordable water and sanitation for all. The Strategy recognises that implementation of the EU water and nature acquis is a basis for water resilience and promotes **Nature-Based Solutions** to store and release water. In addition, the Commission's recommendation on water efficiency calls for prioritization of curbing demand and over-abstraction, followed by efficiency measures. However, while recognizing the threat of pollution for ecosystems and water supply, the strategy fell short, in particular on closing the tap for PFAS via **a broad PFAS restriction**.

Air pollution is the first environmental health risk in Europe, responsible for around 300,000 premature deaths every year. In September 2021, the **World Health Organization published its latest Global Air Quality Guidelines**, setting clear indications on which air quality standards should be guaranteed to better protect people's health and the environment from air pollution. In 2021, the European Commission published its **Zero-Pollution Action Plan (ZPAP)** to achieve a zero-pollution ambition, announcing several key initiatives for cutting air pollution at the source and the revision of the **Ambient Air Quality Directives (AAQDs)**. This revision led to the adoption of a new AAQD, also establishing stricter limits on key air pollutant concentrations, aligning EU standards more closely with **World Health Organization (WHO) guidelines**. Ecosystems protections have also been increased in the new legislation.

Under the Danish Presidency, Member States will continue to transpose the freshly revised **Ambient Air Quality Directive**, which entered into force on the 10th of December 2024. Additionally, the process of reviewing the **National Emission Ceilings Directive** will conclude, with the European Commission's Staff Working Documents being presented during the Clean Air Forum in December. Important decisions also need to be taken at the international level, within the framework of the **UNECE Long-Range Transboundary Air Pollution Convention**, namely for the ongoing revision of the **Gothenburg Protocol**, also during an informal Head of Delegations meeting happening in Denmark and the Executive Body meeting in Geneva. The commitment of EU Member States is key to drive the process towards an ambitious outcome.

We therefore call upon the Danish Presidency to:

- A.** Conclude inter-institutional negotiations on the **update the list of water pollutants of surface and groundwater** and ensure that Member States are required to take measures on the proposed new priority pollutants in the next (2028-2033) RBMPs. Avoid weakening the **Water Framework Directive**, recognising the conclusions of the fitness check evaluation of the EU water policy that the existing legal framework provides sufficient flexibility for permits for sustainable projects.
- B.** 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.
- C.** Adopt impactful Council Conclusions on the **EU's Water Resilience Strategy** that support the Commission's recommendations to save water by curbing demand and prioritise Nature-Based solutions to enhance the contribution of healthy freshwater ecosystems to manage water scarcity and droughts and achieving climate resilient water management in the EU. Strengthen the weaker parts of the strategy, including by supporting a broad PFAS restriction and increased funding for nature restoration.
- D.** Insist that the Nitrates Directive is fit for purpose and organise the **Council's support for impactful implementation and zero tolerance of non-compliance with the Nitrates Directive** and the need to complement it by additional action such as the promised **Integrated Nutrient Management Action Plan** to finally address the nitrate pollution of our water environment.

- E. Ensure Member States provide comprehensive reporting on the implementation of the **Single-Use Plastics Directive** to support an evidence-based evaluation process.

- F. Champion rapid adoption and implementation of binding measures to tackle non-exhaust emissions, especially tyre abrasion, as part of the **Euro 7 Regulation**. Object to any simplification of the recently agreed Ambient Air Quality Directive requirements through the European Commission's Omnibus approach: European citizens need clarity and strict rules when it comes to the implementation of this key instrument aiming at protecting public health and environment. Life-saving protective rules must be delivered within the identified timeline.

- G. Guarantee the **right to clean air** and reduce exposure and preventable mortality and illness. The recently revised **Ambient Air Quality Directive** establishes more ambitious air quality standards to be achieved by 2030 and Member States' actions to secure compliance by the deadline is of outmost importance, without relying on any [heavily priced postponement](#).

- H. Ensure the **Clean Industrial Deal** embeds meaningful air pollution reduction [strategies and measures](#) while also preventing any regression of the system through i.e. oversimplification/deregulation or postponements' (as The **National Emission Reduction Commitments Directive** also set targets for the year 2030 and delivering on these legal obligations requires coherence and cutting of air pollution at the source).

- I. Recognise and enhance the role played by international instruments to drive the necessary change towards a pollution-free region and world, including the **UNECE Convention on Long-range Transboundary Air Pollution and its Gothenburg Protocol**. The ongoing revision of the Gothenburg Protocol is a key opportunity to secure that meaningful action is taken also at UNECE level to cut air pollution through the definition of ambitious Emission Reduction Commitments for 2030, 2035 and 2040 for the already covered pollutants and also including methane, black carbon and mercury which are not yet covered by the instrument, while not relying on flexibilities.

- J. Contribute to the **process of revision of EcoDesign standards** for stoves and boilers having in mind the contribution that domestic heating makes to air pollution in the EU, with around half of PM2.5 emissions being generated by it. With a heavy impact on human health, the environment and climate too, giving the generation of black carbon emissions too.

- K. **Commit to meaningfully address air pollution from agriculture**: ammonia emissions are related to around 50% of secondary PM 2.5 emissions in the EU and methane is a key precursor of ground-level ozone. Horizontal and sectoral policies and legislation must recognise the need to promote a system change which does not rely on intensification and overproduction, securing that the agricultural sector does its part to allow the EU to deliver what science recommends on air quality and to align with WHO Air Quality Guidelines.

- L. Make the case for the **swift revision of the Environmental Noise Directive**: environmental noise is Europe's second largest environmental health risk, and transport noise was responsible for around 66,000 premature deaths in the EU and around 50,000 cardiovascular disease cases in 2021. The

revision of the Directive is especially needed to secure the definition of noise limit values in order to guide the necessary change and plan for the needed support.

More information: [LRE Water Handbook for the 2024-2029 Mandate](#) · [NGOs recommendations for revised lists of priority substances for surface and groundwater](#) · [EEB Comments on the Revision of the Lists of Pollutants Affecting Surface and Groundwater and the Corresponding Regulatory Standards](#) · [The Final Sprint for Europe's Rivers](#) · [LRE joint position for a water resilient Europe](#) · [EEB NABU and BUND briefing on WFD implementation](#) · [EEB comments to Nitrates Directive evaluation](#) · [EEB feedback to the EC initiative to amend manure-application rules under the Nitrates Directive](#) · [EEB comments on the Integrated Nutrients Management Action Plan](#).



8. Advancing a toxic-free environment and transforming the transition of the chemical sector through a future-proof, sustainable policy framework.

The chemical industry is a major contributor to climate change, pollution, and chronic diseases, with harmful substances like PFAS contaminating the environment and posing serious health risks. Without deep transformation, the industry has no sustainable future. **The Chemicals Industry Package** is a key opportunity to drive this shift, but it must break from business-as-usual.

REACH, the EU's main chemical regulation, is falling short: chemicals enter the market in no more than three weeks, but harmful ones remain for decades, and widespread non-compliance persists. As the European Commission prepares a revision under the upcoming Danish Presidency, the focus must be on strengthening, not weakening, the rules. We need faster, smarter decisions; toxic-free products as the norm; and better data to enable a safe, circular economy.

PFAS pollution is a ticking time bomb for Europe's health, environment, and economy. Chemical pollution already costs the EU around €180 billion annually, with PFAS alone accounting for an estimated €100 billion per year in cleanup costs, forever, plus €84 billion in yearly health impacts. Found in soil, water, food, and even the blood of newborns, PFAS contamination is widespread, forcing governments in countries like the Netherlands, Denmark, France, Italy, and Belgium to warn citizens against eating homegrown vegetables and eggs. EU biomonitoring confirms widespread exposure at levels that pose serious health risks, with many young people exceeding safety thresholds. PFAS hotspots show exposure up to 100 times above average.

In addition, the simplification agenda promoted by the chemical industry is menacing to weaken chemical controls. The announced **Omnibus** on chemicals legislation threatens to undermine protections that have been agreed on by all institutions during thorough discussions with all actors involved and based on scientific evidence.

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. The EU mercury regulation was revised, including mercury bans for dental amalgam by 1 January 2025 and fluorescent and other lamps by December 2025 and 2026, depending on the categories.

At the 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 decided, among others, to ban the manufacture and trade of fluorescent lamps as well as 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, among others, towards controlling

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

The relevant EU legislation and positions would need to be robust and future-oriented to ensure further opportunities to push the global debate.

The mercury-added skin-lightening cosmetics challenge has come to global attention and the enforcement of the relevant ban needs to be strengthened.

We therefore call upon the Danish Presidency to:

- A.** Support a **Chemicals industry package** – that includes a concrete roadmap for the transformation of the chemical industry, underpinned by clear environmental and social conditionalities. This roadmap should guide the sector's shift toward safe, sustainable chemicals and ensure public investments and support are tied to measurable progress on pollution prevention, detoxification, decarbonisation, worker protection, and just transition principles.
- B.** Adopt a general approach to the **REACH revision** to initiate interinstitutional negotiations without delay. The Council mandate must keep the Substances of Very High Concern ((SVHC) phase-out aim; make toxic-free products the default, not the exception; address critical data gaps, especially on polymers, the building blocks of plastics, to support a safe and circular economy; accelerate decision-making by grouping chemicals and applying mixture assessment factors in risk assessments, and avoid weakening regulatory processes through the introduction of a formalised risk management option analysis (RMOA).
- C.** Support a **clarification on PFAS** that acknowledges the strong, science-based and democratic REACH restriction process; presents an EU-coordinated plan to address widespread PFAS pollution through effective remediation, alongside with the application of the polluter pays principle; establish a plan to support affected communities, guarantees access to justice and compensation; and actively promoting PFAS-free solutions and support industries leading the way in safer, sustainable alternatives.
- D.** Call on the Commission to uphold democratic and evidence-based procedures in any proposal for **Omnibus** on chemicals by ensuring that all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact assessments. Ensure that the Council general approach to the Omnibus on chemicals legislation reduces burdens on companies and authorities while safeguarding or increasing the protection of people and the environment.
- E.** **Raise public and political awareness of PFAS pollution** by inviting EU climate and environment ministers to undergo voluntary PFAS blood testing. This symbolic and science-based initiative would highlight the urgency of the crisis, demonstrate political leadership, and bring visibility to the widespread contamination affecting citizens across Europe.
- F.** **Promote EU leadership in strengthening the Minamata Convention on Mercury** by, among others, actively engaging in the intersessional processes and the COP; taking the lead or supporting initiatives towards firstly; widening the scope of mercury added products and processes to be phased out including dental amalgam and Vinyl Chloro Monomer and secondly;

controlling and where feasible eliminating mercury compounds' trade; as well as supporting a programme of work to better enforce the mercury ban on cosmetics.

- G. Facilitate cooperation among Member States for the swift **and effective implementation of the revised EU Mercury Regulation**, 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.
- H. Promote the revision of regulatory tools such as the **Cosmetic Products regulation**, to **hold online platforms accountable** for selling illegal and dangerous chemicals and other products containing them, such as mercury added skin-lightening creams, and to ensure that failure to comply with those requirements results in meaningful consequences.

More information: Chemical industry Action Plan: [EEB proposal for a modern, competitive, and sustainable chemical industry](#), and [10 key messages and demands](#); REACH: [Ensuring a Future-Proof EU Chemicals Policy](#) – EEB proposals to ensure simpler, faster and bolder chemical policy goals'; [Simplifying REACH for industry and authorities](#); and [Translating lobby speak: What chemical industry's 'simplification' plan really means](#); PFAS: [Let's clarify PFAS](#); Omnibus: [NGO comments CLP Omnibus](#); Mercury [Joint statement on online platforms](#).; EEB [feedback on cosmetics call for evidence](#); [ZeroMercury Working Group input to the mercury compounds study](#); [Overall Zero Mercury Working Group news](#).



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

Resource security, resilience, and competitiveness are on everyone's lips as Denmark enters its presidency. Establishing a solid resource governance framework would be an obvious way for Europe to establish resource independence and resilience. However, the main conversations are pointing towards a market for secondary materials and increased use of biomass to provide economic opportunities for "home-grown" inputs. **The Circular Economy Act** public consultation and stakeholder dialogue will be unveiled during the Danish presidency, which makes it an opportune moment to steer the political direction towards higher ambition.

The Council has made strong calls for resource reduction targets in its conclusion on the **8th Environment Action Plan** in June last year. Danish government delegates have been vocal about continuing down this path in various fora since then. It is therefore reasonable to expect that a resource view rooted in respect for planetary boundaries should underpin the presidency's actions on the circular economy.

We therefore call upon the Danish Presidency to:

- A. Support ambitious action to address overconsumption, including binding targets for resource use reduction and material demand mitigation across sectors.**
- B. As the bioeconomy strategy** will be presented during the second half of 2025, we urge the Danish Presidency **to take a nature restoration-first approach to biomass**, anchored in principles of overall resource governance within planetary boundaries.
- C. Take an ambitious stance on the proposal for a Regulation on Circularity Requirements for Vehicle Design and on Management of End-of-Life Vehicles (VDEoL)** and commence trilogue negotiations striving towards an agreement that ensures specific measures that reduce the material use and footprint of vehicles, strengthen vehicle repairability and the reuse of components, ensure disassembly of vehicles at EoL and at least maintain but ideally increase ambition on recycled content for plastics as well as other materials such as steel.
- D. Make every possible effort to re-establish a majority in the Council for the Green Claims Directive**, and to resume interinstitutional negotiations. The Directive should be adopted with stringent provisions on the verification procedure for green claims and labels.
- E. Engage with the preparatory work for the European Affordable Housing Plan** and call on the Commission to ensure a strong focus on making better use of the existing building stock.

- F. Call on the Commission to uphold democratic and evidence-based procedures in any proposal for **Omnibus on environment and waste** by ensuring that **all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact assessments.**

- G. Ensure that the EU leads in championing a high-ambition **Global Plastics Treaty at INC-5.2 in Geneva**, including binding provisions on plastic production, chemicals, product design, a robust financial mechanism and effective decision-making processes.

More information: [A resilient and resource-wise Europe: Sufficiency at the heart of the EU's future](#) • [Due diligence in EU product rules – Policy Briefing](#) • [EEB position on legislative proposal on substantiating green claims](#) • [EEB joint statement on online marketplaces and effective enforcement](#) • [EEB feedback on proposed Regulation on Vehicle Design and Management of End-of-Life Vehicles](#) • [Joint call for ambitious recycled plastic content targets in the EU vehicle regulation](#) • [Joint statement on reuse and recycling from end-of-life vehicles](#) • [Joint call for demand measures to boost the use of recycled steel in the automotive sector](#) • [Joint statement on repair in the EU vehicle law](#) • [Prevention is better than cure: EEB position on the new Circular Economy Act](#) • [EEB press release: Member States fall short of steering the automotive industry on a circular path](#) • [EEB reaction: Car recycling cartel exposed, NGOs demand accountability and transparency](#).



10. Protect the rule of law and our health, foster legal and social justice and strengthen civil society engagement and democracy.

The Danish Presidency will have the responsibility and privilege to coordinate the EU position which needs to be adopted for the Aarhus Convention Meeting of the Parties in November 2025. This is a momentous occasion which takes place every four years and it will be important that the EU's position adopted by the Council upholds rigorous international practice and that it reflects the full respect of the international rule of law and authority of the **Aarhus Convention Compliance Committee (ACCC)**. Specifically, the EU will need to take a position on whether it will endorse the findings by the ACCC in 2021 regarding access to justice in state aid decisions, under the so-called C128 case. The EU has previously damaged the international legal order by questioning the need for it to endorse findings of non-compliance against it, setting a devastating precedent internationally to undermine authoritative legal interpretations of international law. It will therefore be crucial that the EU breaks this cycle by endorsing all the findings of the Compliance Committee to ensure that no other Party, including the EU Member States, can put into question the need to comply with international law.

Similarly, and more generally, at a time when the international legal order is becoming more fragmented and enfeebled by certain states undermining basic international norms, **we count on the Presidency to uphold, defend and promote international standards, especially those related to fundamental rights**, including the **European Convention on Human Rights** which enshrines safeguards for environmental rights and democracy.

The last year has also seen the rise of a more hostile environment for environmental democracy and for environmental defenders and NGOs to operate. While transparency on who influences decision-making is key to understanding the power imbalances and influences in politics, the exaggerated and disproportionate targeting of NGO funding by certain Member States, and by certain factions in EU politics, does not aim at increasing transparency but at questioning the role of civil society's critical voice in the democratic process. If the campaign was targeted at increasing transparency, its proponents would allow for increased scrutiny for all beneficiaries of EU funding, including companies and business associations.

In this context, the Commission proposal for **Harmonised requirements on transparency of interest representation of third countries** risks mimicking some of the national legislations on foreign funding of NGOs in some countries which are having a direct effect on organisations and individuals active in political debates and environmental protection. The Council will have the important role to push back against measures that hinder civil society to ensure the EU does not follow the trend of introducing authoritarian-like laws.

We therefore call upon the Danish Presidency to:

- A. Ensure that the EU endorses all of the Aarhus Convention Compliance Committee findings at the 8th Meeting of the Parties in November**, regardless of the internal state of compliance with those findings, to ensure that the EU does not perpetuate undermining international practice and the rule of law. We count on the Danish Presidency to counter any possible Commission proposal to question the authority of the Compliance Committee and to engage in an open and timely manner with NGOs in preparation to the 8th Meeting of the Parties.
- B. Adhere and promote the international Rule of Law generally**, especially regarding international norms which affect environmental rights and fundamental freedoms, as interpreted by the **European Court on Human Rights**, as well as to promote the respect of multilateral environmental agreements such as the **UNFCCC and CBD**.
- C. Counter the Commission proposal on Harmonised requirements on transparency of interest representation of third countries**, which risks taking the EU on the path of introducing an EU-wide Foreign Agents Law, and which would hugely undermine the democratic foundations of the European Union.
- D. Implement** commitments established under the existing **Ambient Air Quality Directive** and be on track for delivering on the new one by 2030 at the latest; fully deliver on the obligations established by the **National Emission Reduction Commitments Directive**, commitments under the **NRL** and enforce EU law such as **WFD and BHD**.
- E. Engage with the Commission on the EU Democracy Shield and the Civil Society Strategy, and be vocal about the need for them to not only defend the status quo of European democracy** (protecting EU democracy against foreign interference and disinformation and upholding the integrity of democratic processes across the EU), **but that they nurture a prosperous and honest democratic space for public engagement and debate**. The shield for European democracy should not become a cover for governments to crack down on legitimate NGOs, labour unions and CSOs activity including attempts to limit advocacy activities and engagement in policy making, undermine political protests, restrict funding for civil society, shrink civic space, or damage innovative democratic participation that falls outside of traditional party politics. **We therefore call on the Presidency to be vocal about the need to protect operating support for NGOs (e.g LIFE) and to protect CSOs from smear campaigns in order to safeguard democratic processes and protect the European Project as whole.**

More information:

[The EU's non-compliance with the Aarhus Convention: A brief history](#); [EEB Comments on EU's final progress report Aarhus Convention MOP Request 4 relating to the EU's compliance with access to justice provisions in state aid decisions](#); [EU Democracy Shield: Why protective gear is not enough](#); [CSE's recommendation on the Defence for Democracy Package](#); [Civil Society Letter on LIFE](#); [CIEL blog post on a Right to a Healthy Environment](#); [CSE's Q&A: The proposed Directive on third-country interest representation](#).

Abbreviations

AAQD	Ambient Air Quality Directives
BAT	Best Available Techniques
BREFs	Best Available Techniques Reference Documents
CAP	Common Agricultural Policy
CLP	Classification, Labelling and Packaging
COP	Conference of the Parties
CRMA	Critical Raw Materials Act
CSOs	Civil Society Organisations
CSS	Chemicals Strategy for Sustainability
EC	European Commission
EED	Energy Efficiency Directive
ELD	Environmental Liability Directive
EGD	European Green Deal
EoLV	End-of-Life Vehicles
EP	European Parliament
EPR	Extended Producer Responsibility
EQS(D)	Environmental Quality Standards (Directive)
ETS	Emissions Trading System
EUCRA	European Climate Risk Assessment
GD	Groundwater Directive
GDP	Gross Domestic Product
IED	Industrial Emissions Directive
IEP-R	Industrial Emissions Portal
INMAP	Integrated Nutrient Management Action Plan
JRC	Joint Research Centre
MEPs	Minimum Energy Performance Standards
MFF	Multiannual Financial Framework
NRL	Nature Restoration Law
NRRPs	National Recovery and Resilience Plans
PP	Public Procurement
PFAS	Per- and polyfluoroalkyl Substances
PPWR	Packaging and Packaging Waste Regulation
PRTR	Pollutant Release and Transfer Register
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RED	Renewable Energy Directive
RoHS	Restriction on Hazardous Substances Directive
SDGs	Sustainable Development Goals
SFS	Sustainable Food Systems Law
SML	Soil Monitoring Law

SLAPPs	Strategic Lawsuits Against Public Participation
UNECE	United Nations Economic Commission for Europe
UWWTD	Urban Waste Water Treatment Directive
WFD	Waste Framework Directive
WFD	Water Framework Directive
WHO	World Health Organisation
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 an assessment following each Presidency on their environmental performances. [The assessment for the Polish Presidency can be found here.](#)

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