

Green 10's Asks to the European Commission President, Ursula von der Leyen. For the joint meeting on 11 July 2025

The Green 10, representing over 50 million Europeans across all Member States and Candidate Countries, is pleased to have the opportunity to share civil society's recommendations for action.

Our asks respond to the new emerging world order and geopolitical developments, the need for EU security, the new distorting norm of disinformation, and the concerted attacks on civil society that are part of a wider playbook to undermine the European Green Deal (EGD), EU democracy and the European project.

Together with partners across civil society and progressive business, we are concerned that the EGD is at risk of being systematically unravelled. As noted in the June 2025 Eurobarometer: a large majority of Europeans continue to view climate change as a serious global threat, with 85% of citizens identifying it as a major problem.

The evidence is undeniable that the triple climate-nature-pollution crisis is undermining people, communities, business and society today and in the future. It needs urgent high level attention and there should be no back-tracking for immediate political expediency or short term economic benefits to the few, at the cost to society now and in the future.

In light of this reality, the G10 representatives of civil society across Europe call on the Commission President Ursula von der Leyen and the College of Commissioners to:

- 1. Step up to the needs of history and champion a green, social and sustainable business transition to a one planet economy in Europe. In these times of crisis, there is a need for an agenda of hope coming from the top of the European Commission. The EGD is also a key contributor to EU security by reducing fossil fuel dependency on Russia. For this:
 - Communicate a clear and unequivocal commitment to stay true to the EGD and commitments for a decarbonised Europe, zero pollution and restoring nature. Recognise that the EGD is deeply relevant for addressing EU security concerns, competitiveness through sustainability, and health and wellbeing, and, at the same time, essential to address the climate-nature-pollution crisis that risks undermining the future and sustainability.
 - Respond to the science, honour commitments and keep EGD on course: Maintain ambition and fully implement and enforce Fit for 55 (FF55). Do not backtrack on ETS2 or the 2035 car CO2 standards (see point 3 below), have an ambitious and net 2040 climate target and a long term climate investment plan, reflecting the need to end the fossil fuel era. Advance on climate adaptation and water resilience covering quantity and quality. Fund decarbonisation and nature restoration (see point 4 for details). Transition most impactful sectors, i.e. agriculture by redirecting subsidies to farmers that produce nutritious food in a nature friendly way). Help households with clean heating and renovation, especially vulnerable households. Fast track the circular economy with additional focus on reuse,

remanufacture and repair, combined with address resource use reduction targets adaptation (water, nature, health).

- Commit to tackling disinformation: A <u>study</u> by Poland's military counterintelligence service estimated that Russia spent <u>\$2-4 billion a year on disinformation</u>, including on climate, as part of a "long-term cognitive war" to sow division. A key action is to systematically provide good public information on the socio-economic benefits of regulation and costs of inaction, and stay true to evidence-based decision making.
- 2. Commit publicly and loudly to a strong and engaged civil society, that diverse voices are crucial to strengthen the operation and resilience of EU democracy, protect European values and the European project itself. Civil society engagement is a cornerstone of participatory democracy, enshrined in the Treaty on European Union.
 - Recognise that attacks on civil society are part of a wider playbook to weaken critical voices in the EU, through this to facilitate the roll back of the European Green Deal and first steps towards also weakening institutions, free press, judiciary and the European project itself.
 - Reaffirm publicly the legality of NGO funding and send a strong signal that public interest advocacy is a core part of EU democracy, and recognise that the narrative is not only damaging to civil society but also to the Commission itself, erodes trust in EU institutions and hence also in the European project.
 - Ensure that Civil Society is duly defended and supported in the upcoming Democracy Shield and Civil Society Strategy by defending rights to public participation, transparency and public protest, affirm the Rule of Law and Access to Justice to promote effective environmental governance, and fair treatment in courts.
 - Ensure dedicated financial support for civil society at EU and national levels to ensure a plurality of voices in decision-making and giving space to citizens.
- 3. Resist the calls for deregulation, and push back against those wishing the EU to mirror the US approach of unravelling environmental and social protections, that build on the false assumption that this will drive competitiveness.
 - Protect the rule of law and put a stop to the use of omnibuses as these represent the opposite of better regulation. Omnibuses are complicating legal frameworks instead of simplifying them, and they erode social and environmental protections and business responsibilities. Any simplification should focus on areas that enhance implementation without in any way compromising social and environmental protections. Weakening these protections undermines public trust and business predictability. For example, Omnibus 1 removes civil liability regimes in the CSDDD, denying victims access to EU courts, and alters due diligence requirements, making them ineffective to achieve its core objectives. The omnibus processes are deeply fraught: they violate citizens' fundamental rights, so far, they lack public consultation and impact assessments and contradict the Better Regulation agenda.
 - Do not undermine the Green Claims legislation as this is essential for the public to be able to make informed choices and trust products and the claims associated. Withdrawing this legislation would undermine trust in the EU and in business. It would be a pyrrhic victory for some businesses and a short term one at best. It will also embolden others to push for more withdrawals and risk further unravelling of the EGD.
 - In the REACH review, maintain and strengthen the environmental and health objectives to avoid public health failures and the significant human and costs as exemplified by the PFAS impacts costing 2 trillion EUR to clean up over the next 20 years. Regulation has the potential to catalyze innovation to help the EU chemical industry be a world leader on safe

and clean chemicals, while saving lives and preventing disease. The proposed chemicals omnibus should not undermine protections and put people's health at risk.

- Do not reopen environmental legislation that have already passed a fitness check and shown to be fit for purpose such as the Water Framework Directive and Birds and Habitats Directive. This would only create unnecessary uncertainty and risk compromising implementation efforts and hence undermine a key objective of your presidency.
- Do not reopen either the EU Deforestation Regulation: the Commission has already gone at great lengths to meet the requests of companies and national administrations with additional delays and the April simplification package. Now it is time to be firm and demand that operators comply with the law and national authorities enforce it. Any weakening of the law will reward laggards while allowing the destruction of forests.
- Deregulation will also compromise the joint commitments made by the Commission, Parliament and Council of the 8th Environment Action Programme for 2030.
- 4. Commit to a transformative Multiannual Financial Framework (MFF) that helps address today's challenges and leverage in the future:
 - Maintain and strengthen mainstreaming targets and dedicated funding for climate and the environment, mobilising at least 50% of the EU Budget.
 - Strengthen environmental criteria and conditions for accessing EU funds, including by improving the implementation of the Do No Significant Harm (DNSH) principle, notably through an explicit horizontal exclusion of all financial support via the EU budget to particularly harmful investments, such as new fossil fuel infrastructure and give a clear direction to end fossil fuels subsidies.
 - Do not discontinue the LIFE Programme: this has proven to be a highly cost-effective and performance-driven funding instrument for climate and environment supporting a broad range of stakeholders across Europe, from farmers and foresters to local authorities and small businesses. It should be continued as a strengthened and standalone programme, and retain a strong biodiversity and zero-pollution focus.
 - Ensure that social concerns are supported through the MFF, through continuation of the support for just transition regions phasing out fossil intensive industries and associated Social Climate Fund implementation, and other instruments to help address precarity and help all of society benefit from the transition. Recognising the needs of society, is ethically just, will help avoid the risk of more voters turning their backs on Europe, and reduce the risks that disinformation takes root. Without serious measures, there are risks for the future EU-ETS II, and the most vulnerable Europeans.
 - Complement the MFF with mandatory Green Public Procurement criteria, to make use of the potential that represents 15% of EU GDP. Ambitious non-price criteria are a key driver to increase the market pull for clean, safe and circular products across the economy, as well as affordable nutritious and sustainable foods. And make use of the policy reform part of the MFF to require national reform to accelerate GPP.
 - Ensure joint borrowing to increase the size of funds available at EU level for tackling the various crises of our times, while increasing long-term investments for climate, nature and the environment.

The undersigned signatories:

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