

To: Environment Ministers of EU Member States

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

Meeting of the EU Environment Council Meeting on 18 September in Brussels – recommendations from environmental citizens organisations

Brussels, 15 September 2025

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share our recommendations ahead of the forthcoming EU Environment Council at a time that is crucial for European environmental and climate policies and the transition towards making our region sustainable and resilient. While we experience major shifts in geopolitical realities and see a new world order emerging, we need to get our compass right and ensure that Europe is among the global leaders driving progress towards carbon neutrality, zero pollution and nature restoration, as well as an economy that works for all.

Ursula von der Leyen committed her Commission to the European Green Deal and its objectives in her Political Guidelines, as have the Heads of State and Governments in their Strategic Agenda. However, we are concerned that our common objective of long-term sustainability, social and economic resilience and human security are being pushed aside not only by outside forces such as Russia's disinformation drive to undermine the European Green Deal and deregulatory pressure from the US, but also by ideological and short-term private interests within the EU.

In what the European Commission has presented as an “unprecedented simplification effort”, it aims at rolling back rules for companies by up to 35%. In her State of the Union speech last week, the Commission President referred to the power of the European Green Deal and the need to stay on course of climate neutrality by 2050, but she also celebrated the recent and upcoming omnibuses many of which jeopardise the Green Deal objective.

Yet, what we do not need at a time of accelerating climate impact, deteriorating ecosystems and deepening inequalities, is the deregulation of the very rules aimed at providing us with clean air and water, healthy food, restored nature, fair and safe working conditions, corporate accountability and fairness.

What we need is a science-based climate target for 2040, and an ambitious Nationally Determined Contribution (NDC) for the EU as a key element to propel the EU to assume a leadership role at the global level, and regulations that secure social and environmental protections for people are not

weakened. The human, economic and reputational costs of unravelling the EGD and the protections will far outweigh the savings through administrative “burdens” that others would regard as responsibilities and part of a license to operate.

Furthermore, stringent and future-oriented rules, regulatory certainty and the rule of law are competitive advantages for Europe, and so is an acceleration of decarbonisation efforts. We need to refocus on Europe’s own path instead of becoming an agenda-taking hostage, wrong-footed by the unpredictable and anti-EU policies and positions of the volatile US administration, and caught in the crossfire of the power struggles between the US, China and Russia. Europe can and should direct its own destiny.

Part of this is through significantly increasing public investments in climate and environment – including from the EU budget. By accelerating and spearheading measures to tackle the climate, biodiversity and pollution crisis, as well as social inequalities and the cost-of-living crisis, we can showcase leadership, develop new partnerships in a multipolar world, increase our autonomy and boost social and technological innovation. This path also requires a broad understanding of human security – beyond military security – to include climate security, food and water security, materials and energy autonomy, access to housing and energy, as well as good governance and the rule of law.

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

1. European Climate Law amendment

Being responsible for around one-fifth of total global CO₂ emissions since the Industrial Revolution and as one of the wealthiest regions globally, the EU has a responsibility in setting a credible path to drastically cut climate-altering emissions - keeping the increase in global warming to below 1.5°C by the end of the century.

As shown in our [Paris Agreement Compatible \(PAC\) scenario](#), the EU can and should achieve climate neutrality by 2040. It is not only technically feasible, but also a wise investment. If Europe had increased decarbonisation efforts a decade ago, it could have unlocked at least €1 trillion in direct benefits by 2030. The faster fossil fuels are phased out, the more energy security and economic gains Europe stands to achieve (please see the Paris Agreement Compatible (PAC) scenario’s [executive summary](#) prepared by CAN Europe).

The Commission’s amendment proposal to the European Climate Law lags the appropriate levels of ambition, contradicting both the Commission’s own Impact Assessment and the [advice](#) of the European Scientific Advisory Board on Climate Change (ESABCC). By upholding a strong position in Council discussions, you have a chance to align this key piece of EU legislation with the most compelling scientific evidence, making EU climate action a vector of increased health and economic benefits.

We call upon the Environment Council to:

- **Agree on an ambitious domestic EU target of at least 90% net emission reduction by 2040** – heeding the calls of science, of [civil society organisations](#) and of [thousands of European citizens](#).
- **Reintroduce three separate targets for gross emissions cuts, industrial removals, and nature-based sequestration** – ensuring clarity and transparency.
- **Exclude the use of international carbon credits** (Art. 6 of the Paris Agreement) – aligning with the calls by the [ESABCC](#) and [civil society](#).

2. EU submission of an updated Nationally Determined Contribution (NDC) to the United Nations Framework Convention on Climate Change (UNFCCC)

Far from being the climate leader that the world needs after the exit of the US, the EU is now in the embarrassing situation of lagging behind in submitting its NDC. The EU must show leadership by setting an ambitious NDC as soon as possible under the Paris Agreement ahead of COP30. This is the Union's responsibility as a historic emitter and wealthy region and can encourage other major emitters to take ambitious action on climate change. In its recent Advisory Opinion, the International Court of Justice also [made it clear](#) that to comply with the obligations under the Paris Agreement, the content of the NDC must be an “adequate contribution” to the achievement of the 1.5°C objective following clear criteria, to be assessed in light of the principle of common but differentiated responsibilities and respective capabilities.

We call upon the Environment Council to:

- **Present an ambitious NDC at the UN Secretary-General's High-Level Special Event on Climate Action** on 24 September and at COP30.
- **Align the domestic EU NDC for 2035 with a robust – i.e. 90% or more net emissions reduction – 2040 climate target.** This translates to a more-than-linear target for 2035, as mitigation efforts will become more difficult as we move towards 90%. Hence, only an EU-NDC of more than 72.5% will be credibly compatible with 90% in 2040.

We understand that certain Member States are concerned about potential high prices in the EU's carbon pricing scheme for transport and heating, the Emissions Trading System 2 (ETS2). We have [analysed the proposals](#) for a reform of the Market Stability Reserve of the ETS2 and find that while the proposals for better information sharing and earlier sale of emissions (proposals 1 and 2) are welcome, options 3-5 amount to large increases in emissions from ETS2. Forecast high prices signal persistent high demand for emissions. Increasing the supply of allowances cannot be the answer. Technological solutions in these sectors are available, national-level policies to support electrification are essential and national carbon floor prices in wealthy countries can help stabilise ETS2 prices without increasing emissions.

In addition, we would like to draw your attention to the following points on the Council's wider agenda:

Environment omnibuses and simplification agenda :

Simplification should not be used as a tool and pretext to remove the existing targets and obligations established in EU environmental and sustainability laws that offer important social and environmental protections. The past omnibus initiatives and the upcoming ones, in particular the "environment omnibus", raise serious concerns as regards those risks. Environmental laws are not only vital, but they have also been proven effective through thorough Fitness Checks (e.g. Nature and Water Directives). Omnibuses create legal uncertainty and jeopardise the overall objectives of the EU's environmental acquis (as well as Europe's ability to meet its global commitments.) Environmental laws can only achieve their full potential, including boosting EU competitiveness, if streamlined and properly implemented. Indeed, regulating at the EU level eases administrative burdens for businesses compared to 27 separate national regulations. The primary reason for the introduction of a common environmental policy in the 1970s was that diverse environmental standards could result in trade barriers and competitive distortions in the Common Market. The cost of climate and environmental inaction is way greater than the cost of action. As found in the 4th European Commission Environmental Implementation Review (EIR), the failure to fully implement existing environmental laws already costs citizens 180 billion annually, equivalent to 1% of the EU's GDP.

Additionally, dismantling EU laws without solid evidence creates legal uncertainty for companies and investors, delaying investments and corporate decisions towards the green transition. It also rewards laggards and undermines responsible industry leaders who have made investments. Deregulation would therefore undermine industry engagement and competitiveness.

Omnibuses also contradict Better Regulation principles. The first omnibuses have gone far beyond rationalising reporting and harmonising legislation. The scope, pace and process of this agenda is unprecedented. There has not been adequate consultation, transparency and evidence to inform the process, and the implications for environmental protection, rule of law, legal certainty and democratic accountability are therefore unknown. The omnibus procedure run by policymakers who are not subject-matter-experts should not be used for anything that touches on the substance of the laws. It is essential that the "environment omnibus" is evidence-based, proportionate, based on an impact assessment, and carried out in consultation with practitioners, including public authorities, civil society organisations and affected stakeholders. The potential for mistakes is too high without due process, and it weakens the credibility of the community method.

Real simplification is possible, but the focus should be on tools that improve smart implementation and enforcement. It could be via leveraging digital innovation, better guidance and encouragement of active stakeholders' engagement, improvement of national public administration efficiency, reduction of administrative burdens for beneficiaries of EU funds without weakening control, oversight and targets, strengthening staffing and capacity building of competent authorities, and stepping up inspections and enforcement.

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We therefore call on EU Environment Ministers to reject and counter environmental deregulation and ensure that the ongoing simplification effort- especially the environment omnibus- is evidence-based, proportionate, based on an impact assessment, and carried out in consultation with practitioners, including environmental public authorities.

MFF 2028-2034

We have examined the European Commission's proposals on the 2028- 2034 MFF and are deeply concerned that, if adopted without amendments, they would result in a substantial real-terms reduction in funding commitments for climate and nature and ultimately in a rollback in our chances to achieve climate neutrality and tackle the triple crisis. This comes at a time when increased investment is critical to protect European citizens and businesses from the escalating impacts of climate change. Such a reduction would directly contradict the estimated €520 billion investment needed by 2030 for climate and environmental action—an amount expected to rise further by 2040.

As it stands, the package lacks the required ambition and represents a step backwards compared to achievements under the current long-term budget.

To ensure the EU's long-term budget delivers the predictability needed to meet our strategic priorities—including ecological transition and health protection—we **call on EU Environment Ministers** to consider the following essential adjustments in the upcoming negotiations:

- **Allocate at least 50% of the next EU budget to genuine climate and environmental investments and dedicate at least 10% to biodiversity**, to reflect growing investment needs inter alia stemming from the new Nature Restoration Regulation.
- **Improve the “mainstreaming” of the environmental objectives across the entire EU budget** based on robust tracking methodologies, ex-ante earmarking of funds, as well as closing the loopholes in the application of the Do No Significant Harm principle to ensure harmful subsidies are phased out of the EU budget.
- **Establish a clear and dependable budget for long-term EU priorities, with dedicated funding for LIFE programme objectives.** For more than 30 years, the LIFE programme has served a wide range of stakeholders, encouraging cooperation to address the increasing risks emanating from climate change and environmental degradation. The EU budget needs to continue to support these beneficiaries. Shielded from other (at times competing) policy objectives, the LIFE programme has delivered targeted, cost-effective results for nature, climate and public health that are essential for Europe's competitiveness and security.
- **Maintain dedicated funding within National and Regional Partnership Plans for the transition to a climate-neutral, nature-positive, and zero-pollution economy.** In particular, the weakening of the conditions for disbursement of the Social Climate Fund, no longer targeted at vulnerable households and small businesses, is unacceptable; and so is the lack

of ringfenced budget for agri-environmental measures and objectives under the Common Agricultural Policy.

- **Strengthen guarantees that the European Commission will continue to provide directly managed funding for civil society organisations** across all sectors, including climate and environment

We call upon the Environment Council to:

- **Organise a solid debate at the earliest Council meeting and make impactful recommendations on how the environmental dimension of the MFF can be improved,** including maintenance of the LIFE funding programme.

Adoption of the Council's first reading position on the Soil Monitoring Law

Considering the upcoming Council vote on its first reading position on the Soil Monitoring Law, we would like to highlight the urgency to adopt a strong law that will put our degraded soils on the pathway to recovery. Despite soil being the foundation of healthy terrestrial ecosystems, [60 to 70 percent](#) of EU soils are in a bad condition, which puts at risk food systems, farmers' livelihoods, societal well-being as well as human, animal and planetary health.

In April, after months of negotiations, the co-legislators reached a provisional agreement on the Soil Monitoring. This agreement is the result of carefully crafted compromise and represents the absolute minimum of what this law should contain. It was supported by EU Deputy Ambassadors in May and the European Parliament's Environment Committee in June. This signalled clear political backing for this file and mirrors the calls from more than [250 representatives](#) EU citizens, business, farmers, scientists and civil society organisations.

While the provisional agreement on the Soil Monitoring Law falls disappointingly short in several critical areas – most notably by including excessive flexibilities as well as lacking legally binding targets and concrete measures for sustainable soil management – it nonetheless marks a critical milestone. As the EU's first ever law protecting our soils, the Soil Monitoring Law represents a vital starting point for bringing soils in Europe back to health.

For this reason, we call on EU Environment Ministers to lead the way towards Europe's First Soil Monitoring Law. EU institutions must act as responsible co-legislators and seal the deal as a matter of urgency.

We hope that the above insights and recommendations help you in your Environment Council deliberation and decisions. We also remind you of the **The European Pact for the Future, signed by hundreds of organisations and more than a thousand individuals, our vision for a sustainable and resilient Europe and its Action Plan.**

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

Yours sincerely,



Patrick ten Brink
Secretary General



Patrizia Heidegger
Deputy Secretary General

Annex 1:

The Cost of Inaction: Why Environmental Standards are Key to EU Competitiveness

There are immense costs of inaction in addressing the climate, pollution, and biodiversity crises—costs that our economy and society cannot bear much longer. These challenges must be at the heart of any discussion on the EU's future competitiveness.

The Cost of Inaction

Climate:

The [World Economic Forum](#) estimates that for every \$1 invested in climate adaptation today, we can avoid \$2–\$10 in future costs.

Biodiversity, Water, Air, and Soil:

The European Environment Agency (EEA) reports that the loss of ecosystem services could cost the EU hundreds of billions of euros annually. Soil degradation alone costs Europe at least [€97 billion per year](#), with the costs of inaction outweighing action by a factor of six. These costs primarily burden [farmers and society at large](#).

The remediation of contaminated soil with PFAS is even more costly, potentially exceeding €2 trillion across Europe. Water purification alone is estimated at [€238 billion](#) within the EU. Overall, removing PFAS from the environment at current emission rates could surpass [10% of global GDP](#)—excluding damages to animals or property values.

Air Pollution:

Between 2012 and 2021, industrial air pollution from the EU's largest industries cost an estimated €2.7–4.3 trillion. Researchers highlight that the only viable mitigation measures include stringent pollution controls, phasing out carbon-intensive fuels, and electrification.

Health:

The Nordic Council of Ministers estimates that direct healthcare costs from PFAS exposure in Europe are [€52–84 billion](#) annually. It would cost around [€100 billion every year](#) to remove short-chain and ultrashort-chain PFAS, even partially, from the environment and to destroy them. That is more than two trillion over 20 years. The societal costs of PFAS have been estimated at [\\$17.5 trillion \(about \\$54,000 per person in the US\)](#) annually, while manufacturers make only \$4 billion (about \$12 per person in the US) in profits. In other words, while the average market price of PFAS is about €19 for each kilogram, the price spikes to about €18,734 for each kilogram when societal costs are factored in. The European Commission has estimated that the health benefits of banning the most harmful chemicals in everyday products outweigh industry costs by a factor of ten.

These figures reveal an unsustainable and unaffordable industrial model. While the EU chemical industry remains strong—with production growing from €537 billion in 2011 to [€785 billion](#) in 2023, and a trade surplus of €198 billion—the far greater costs of pollution are externalised to society. If producers were held accountable for their pollution, many would face bankruptcy.

Acting now is the only wise investment for the future.

Shortcomings of Draghi's Report

On [Mario Draghi's report](#) on the future of European competitiveness. We must highlight several concerns:

- **Lack of Diverse Input:**
 - The report is based on biased consultation processes that excluded organisations like ours.
- **Inaccuracies and Omissions:**
 - The report's failure to address societal and environmental costs—particularly in the chemicals sector, the most energy-intensive industry—undermines its credibility. While acknowledging this sector's economic importance, the report inaccurately portrays EU regulations, like REACH, as barriers to industry rather than essential safeguards that prevent market failures, ensure safe manufacturing, and drive innovation.
- **Misrepresentation of PFAS Regulation:**
 - The report frames PFAS regulation as a burden, overlooking [market-driven trends](#) to phase out PFAS due to health, environmental, and [litigation costs](#). The ongoing PFAS restriction proposal balances innovation with exemptions for essential uses, encouraging innovation and providing market certainty. Companies across industries have already invested in safer [PFAS-free alternatives](#), aligning economic and environmental goals.

A truly competitive chemicals sector must embrace comprehensive accounting for its environmental and societal impacts.

A Predictable Path to Sustainable Prosperity

A strong regulatory framework is not a constraint; it is the foundation of long-term competitiveness. The European Green Deal provides industry with a predictable path to sustainable prosperity. Backtracking would penalise industry frontrunners and force innovation out of the EU. As highlighted by a recent joint industry-CSO letter, "EU standards on nature, biodiversity, and climate are not the problem but a vital part of the solution." [1]

As our joint industry-CSO demand for a 'Clean' Industrial Deal, that works for the planet and its people, states: we must harness climate positive sustainable frontrunner solutions and raise the regulatory bar for industry. Our joint demands emphasise that the EU can lead globally in detoxification, de-pollution, decarbonisation, and restoration while maintaining a thriving industrial base. Competitiveness must serve as a tool to protect both the planet and its people, not come at the expense of health or the environment.

We urge you to consider the voices of progressive businesses and civil society when agreeing on your conclusions. Rewarding laggards at the expense of frontrunners would harm both our economy and our planet.

- [1] [A business perspective: Strong Environmental Standards foster long term competitiveness](#)
- [2] [Joint CSO and business demand A “Clean” Industrial Deal that works for the planet and its people](#)
- [3] [European Pact for the Future + Action Plan + Industrial Blueprint](#)
- [4] [Briefing note on smart implementation](#)
- [5] [Joint CSOs \(+180\) statement urging the incoming European Commission to prioritise effective implementation of climate and environmental laws](#)