

Brussels,
17 October 2025

Letter to the Ministers responsible for European Affairs in view of the General Affairs Council on 21 October – recommendations from environmental citizens organisations

Dear Ministers,

As you prepare to gather for the General Affairs Council meeting on 21 October, where the agenda will include discussions on the EU's Multiannual Financial Framework (MFF) 2028-2034 and will take note of a progress report on omnibus simplification legislative packages, as well as the preparations for the October European Council meeting, we wish to share with you some important considerations on behalf of Europe's largest network of environmental citizens organisations:

The EU's Multiannual Financial Framework (MFF) 2028-2034

The next Multiannual Financial Framework (MFF) comes at a time when increased investments are essential to shield European people and businesses from the growing impacts of the climate crisis. Investment needs for our climate and environment are [estimated by the European Commission at €520 billion per year alone until 2030](#), rising further by 2040. These needs are not reflected in the current Commission's proposals. On the contrary, the Commission plans a significant reduction in committed funding for climate and nature and discontinues the tracking for biodiversity expenditures which risk threatening EU citizens' and businesses' future.

Furthermore, the MFF needs to be seen in the context of the latest European Environment Agency (EEA) flagship report- [Europe's environment and climate: knowledge for resilience, prosperity and sustainability](#) 2025, launched on 30 September 2025 which shows a continued deterioration across biodiversity, ecosystems, soil, and climate resilience - and finds the EU off track on nearly all 2030 targets, including biodiversity, soil resources, carbon removal from the atmosphere, environmental noise and impacts on human health, water pollution and human health, waste generation and material consumption, circular use of materials and global impacts from EU consumption.

This presents a dramatic picture of loss and stagnation caused by lack of funding, implementation and enforcement of existing policy. Only two are on track to meet targets – greenhouse gas emissions (though the 1.5 degrees target has been passed globally now) and on ozone-depleting substances & fluorinated gases – both now at risk from the Omnibus packages. The commitments made by the Commission, Parliament and Council in the 8EAP will not be met. The human and

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economic costs of inaction are already far too high and will rise unless the next MFF secures adequate funding.

The discontinuation of a dedicated biodiversity spending target will, without doubt, result in a reduction in investments and weaken accountability. Experience shows that when biodiversity is one of several objectives, it is sidelined in favour of more straightforward industrial investments. The Recovery and Resilience Facility offer a clear example, where less than 2% of total spending delivered tangible benefits for nature.

Ending tracking, as suggested by the Commission, would also put the EU at risk of breaching its reporting obligations under the Kunming-Montreal Global Biodiversity Framework. We are especially concerned about the proposal to end the LIFE programme, the EU's only dedicated instrument for nature, climate and environment. LIFE has enabled many of the EU's most successful biodiversity projects across the EU and has supported civil society participation in the development and monitoring of environmental legislation, which is essential for a healthy EU democracy. Abolishing it and absorbing some of its elements into two new mega-funds, would jeopardise these achievements and undermine the implementation of EU nature legislation on the ground. It also puts at risk the social and depolarising benefits brought by the tools at local scale and, most importantly, threatens our ability to mitigate and adapt our economy and society to climate change as nature protection and restoration is our best ally for the fight against climate change. Without a dedicated budget line, these activities risk being dropped.

The EU budget currently delivers more than 50% of all biodiversity funding across the 27 member states. At a time when investment needs to protect and restore nature and ensure the implementation of the Nature Restoration Regulation are higher than ever, also to achieve our climate goals as unequivocally highlighted by the EEA's latest Europe's Environment 2025 report, removing both a dedicated target and a dedicated fund (LIFE) would be a profoundly damaging policy choice and should urgently be corrected in the negotiations ahead.

To ensure that the EU's long-term budget provides the needed predictability to deliver on our long-term priorities, including the ecological transition and health protection, we therefore ask you to consider the following urgent changes in the upcoming negotiations:

- **Dedicate at least 50% of the overall next EU budget to genuine climate and environmental investments and just transition investments, including at least 10% to genuine biodiversity objectives based on a dedicated monitoring system for each of the six environmental objectives.**

The current proposals are a step backwards when it comes to mainstreaming and spending targets. Indeed, while the Commission's proposal maintains the existence of a spending target, its

scope has been expanded to cover all six environmental objectives and has been lowered from 40% to 35%¹.

In real terms, this step will mean less money allocated to even more priorities than in the current budgetary period and the end of earmarking for biodiversity spending (10% in the current MFF for 2026 and 2027).

- **Provide a dedicated and adequately resourced budget line for LIFE actions under the EU Facility.**

To ensure stable funding and effectively support the achievement of the EU's environmental and climate goals through LIFE projects, it is necessary that there is a dedicated budget line for LIFE actions within the EU Facility, together with consistency and long-term planning in the implementation of LIFE actions by delivering them through multi-annual work programmes under both the EU Facility and the European Competitiveness Fund.

- **Guarantee a strict implementation of the Do No Significant Harm (DNSH) principle by the Commission without exemptions to end the support for environmentally harmful subsidies.**

While we welcome the Commission's intention to streamline the DNSH principle and requirements across the EU budget, we are concerned by the numerous dangerous derogations that will put at risk the effectiveness of the EU budget spending and ultimately EU's competitiveness.

What is needed is a simple and consistent approach that clearly labels harmful investments and reduces the administrative burden for beneficiaries and managing authorities alike.

- **Ensure that National and Regional Partnership Plans (NRPPs) continue to provide dedicated funding for the transition to a climate-neutral, nature-positive and zero-pollution economy.**

NRPPs should continue to provide dedicated funding for the transition to a sustainable economy.

The Commission proposes that NRPPs need to deliver on Member States' National Energy and Climate Plans. This requirement should be extended to other existing policy frameworks, notably the National Restoration Plans, to support implementation of the EU Nature Restoration Regulation. To that end, Member States should dedicate at least 15% of their NRPPs to biodiversity objectives.

Also, there should be earmarked funding for climate and nature under the Common Agricultural Policy and Cohesion Policy, to support farmers, rural areas, households, SMEs and regions in their

¹ Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities, 16 July 2025, available [here](#). 16 Jul

transition and guarantee predictability and long-term delivery on Europe's climate and environmental commitments.

- **Provide stronger guarantees that the European Commission will continue to deliver directly managed funding for CSOs across all sectors, including for NGOs active in the areas of environment and climate.**

Civil Society Organisations (CSOs) play a vital role in a thriving democracy by bringing together citizens. CSOs serve the public interest and should be supported by public funding to provide a counterbalance to corporate and other interests.

Operating grants have played a vital role in enabling civil society to function independently and to contribute citizen-driven, evidence-based perspectives to EU policymaking. These organisations help bridge the gap between local concerns and EU institutions, ensuring that grassroots voices are represented in Brussels.

Simplification Measures and Omnibuses

Evidence shows EU environmental laws add value for the economy and society at large without creating unnecessary burdens, despite political claims to the contrary. [OECD studies](#) confirm that stricter environmental policies do not harm productivity, jobs or growth – a finding also supported by the European Commission's own extensive data. Instead, findings point to poor implementation at the national level, not complexity, as the main obstacle.

The Commission estimates that the lack of and poor implementation of existing environmental laws costs us €180 billion annually², due to higher health and environmental damage costs (*See Annex 1 for more details on the cost of inaction*). Moreover, without common EU rules, businesses would face 27 different national laws instead of one unified framework — far more paperwork, not less. Beyond the direct costs of poor implementation, calls to “cut red tape” often ignore the immense cost of inaction and the benefits of implementation and enforcement of our environmental laws. Simplification should therefore be about smarter implementation and never be used as a tool and pretext to remove the existing targets and obligations. Aligning reporting deadlines, using digital tools, or dropping duplicative steps can ease compliance and, in the end, implementation.

But simplification must be evidence-based, developed with input from civil society and stakeholders, and must not weaken the law's ambition, targets, enforceability, or timelines.

Omnibuses are not fit for this; on the contrary. Omnibus packages are indeed for technical adjustments to laws, such as aligning legal references or procedures after treaty changes. Since autumn 2024, the European Commission proposed no less than six omnibus packages, and

² COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS 2025, Environmental Implementation Review
Environmental implementation for prosperity and security, 7 July 2025, available [here](#).

several others are in the pipeline. Many of these proposals have direct implications for environmental and sustainability rules and aren't technical adjustments.

The pace of procedures leaves no time and space for proper scrutiny of the proposed changes and for meaningful public debate. It also risks letting significant changes to existing laws slip through unnoticed.

The speed and opacity of these changes create confusion for policymakers, stakeholders, and the public, while undermining trust in the stability of EU law. It risks eroding trust in the EU and is also harming investments. Close to 200.000 EU citizens responded within just 10 days to the environmental omnibus consultation, urging the European Commission not to weaken existing environmental and health standards (the EU environmental acquis). A few days later, around 30.000 citizens marched in Brussels on Sunday 4th of October calling for stronger climate action and rejecting deregulation.

Many businesses have also warned that the process feels rushed and unpredictable. Short consultation periods leave little space to assess economic or legal impacts, making it harder to plan investments, adapt supply chains, or prepare for compliance. Instead of predictability, the agenda creates risk and uncertainty. Businesses need predictability, and the Omnibus process is doing the opposite. In recent [statements](#) and [open letters](#), they warn against deregulation and the risks posed by rapid-fire Omnibus packages. Delays or rollbacks penalise our frontrunners, while rewarding laggards. It leads to unfair competition and weakens incentives for genuine transition.

We therefore call on you to:

- **Ensure that simplification is only about smarter implementation and is never used as a tool and pretext to remove the existing targets and obligations.**
- **Prioritise the enforcement of existing environmental laws, as indeed environmental laws can only achieve their full potential, including boosting EU competitiveness, if streamlined and properly implemented. This requires targeted financial support for local, regional, and national administrations, where implementation often breaks down, but also digitalisation and guidance.**
- **Ensure that simplification efforts are evidence-based, proportionate, based on an impact assessment, and carried out in consultation with practitioners, including public authorities, civil society organisations and affected stakeholders.**
- **Ensure that omnibuses are not used for anything that touches on the substance of the laws.**

In the global competitiveness context, the EU cannot afford to follow the US path of deregulation or the Chinese model of heavy subsidies. Europe's competitive advantage lies in the quality and trust associated with EU products - reliable, safe, clean, and repairable. Upholding strong

standards, the rule of law, and investments in education, training, and environmental infrastructure will attract investment and strengthen Europe's economic base. Going beyond simplification to deregulation in the omnibus would only undermine this unique path open to the EU.

We hope that the above insights and recommendations help you in your General Affairs Council deliberation and decisions. We also remind you of [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.](#)

We remain available to discuss with you these practical visions and look forward to working together towards a sustainable and resilient Europe, as indeed, there is no competitiveness on an ever more degraded planet.

Yours sincerely,



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Secretary General of the European Environmental Bureau



Faustine Bas-Defossez
Policy Director of the European Environmental Bureau

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.