

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 21 October in Luxembourg –
recommendations from environmental citizens organisations**

Brussels, 15 October 2025

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share our recommendations ahead of the next EU Environment Council, at a crucial time for European environmental and climate policies and the transition towards making our region sustainable and resilient. While we experience major shifts in geopolitical realities, 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 profit interests within the EU.

In what the European Commission has presented as an "unprecedented simplification effort," it aims at rolling back a wide range of rules for companies. While the Commission President stressed the need to stay on course of climate neutrality by 2050, she also celebrated the recent and upcoming omnibuses, many of which risk jeopardising the Green Deal objectives. She has recently explicitly called for "deregulation." Yet, what we do not need at a time of accelerating climate impacts, 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. 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 focus on Europe's own path and not be caught in the power struggles between the US, China and Russia. Europe can and should direct its own destiny.

One way of doing this is to significantly increase public investments in climate and environment, including from the EU budget. By accelerating and spearheading measures to tackle the climate, biodiversity and pollution crises, as well as social inequalities and the cost-of-living crisis, we can display leadership, develop new partnerships in a multipolar world, increase our autonomy and boost social and technological

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innovation. This path also requires a broad understanding of human security – beyond military security – to include climate security, food, water, clean water, air and soil, materials and energy autonomy, housing and energy, as well as good governance, transparency and the rule of law.

We invite you to consider our recommendations for the agenda items of the Council meeting, as well as our wider vision for a resilient, just and sustainable Europe.

A. European Ocean Pact: preserving marine biodiversity

Background

The Council Conclusions on the European Ocean Pact are a critical vehicle to translate the Ocean Pact's ambition into EU policy, most notably through the forthcoming Ocean Act. To deliver on this vision, the text must close the gap between high-level goals and real implementation in terms of fragmented governance and weak enforcement. The Council must also address the increasing pressures on ocean resources through a just and regenerative transition, supported by adequate EU funding.

The EEB therefore calls on the Environment Council to:

- Support a **legally binding, overarching Ocean Act**, bringing together all commitments and targets for ocean governance, linking the EU Marine Strategy Framework Directive (MSFD) to ensure all maritime activities contribute to Good Environmental Status and translating into binding objectives the EU's Commitment to protect 30% and strictly protect 10% of EU waters by 2030.
- Ensure **adequate EU funding for marine protection and restoration** in the next MFF, as well as support for the **just transition to a regenerative blue economy**, notably by improving the Performance Framework proposed by the European Commission.
- Promote **universal ratification and swift implementation of the [BBNJ Agreement](#)**.
- Agree that future measures are essential to preventing emerging **pressures like deep-sea mining and marine geo-engineering** before they impact the deteriorating health of marine ecosystems.

B. Conclusions on the preparations for COP 30 to UNFCCC

Background

Climate change had already led to unacceptable levels of impacts on human lives through heatwaves, fires, storms and flooding, on infrastructure and ecosystems and represents an ever-growing risk as highlighted by the EEA's [European Climate Risk Assessment](#) (2024). The report indicates, for instance, that the record-hot summer of 2022 has caused between 60,000 and 70,000 premature deaths in Europe. On 13 October 2025, scientists declared that the [World's First Climate Tipping Point Has Been Crossed](#). Considering the irrefutable and ever-growing evidence, and in advance of COP30, we invite you to support the following asks, in line with the ICJ's 2025 Advisory Opinion and the core demands put forward by [CAN Europe](#).

The EEB therefore calls on the Environment Council to:

- **Close climate ambition gap & align with 1.5°C.** COP30 is the first to follow the recent ICJ Advisory Opinion, which affirms 1.5 °C as the agreed Paris Agreement goal, but the Parties' climate plans are currently seriously behind. The EU must ensure its Nationally Determined Contributions reflect the highest possible ambition consistent with limiting warming to 1.5 °C.
- **Do not undermine the 2040 target.** We believe that the ambition of at least 90% target on reduction must be kept at all costs, as it is the minimum goal to achieve to attain our climate objective and thus try & reduce the damages from climate disasters.

- **Real action for real problems.** The proposed integration of international carbon credits within the 2040 climate target is sending the wrong signal: those credits are likely to delay real emissions reductions at home and undermine investment and market visibility, particularly if integrated into the Emission Trading System.
- **Deliver a Just Transition Mechanism.** The EU and its member states should support the creation at COP30 of an International Mechanism for Just Transition that embeds social protections, labour rights and ecosystem integrity into the transition away from fossil fuels.
- **Scale up climate finance to align with 1.5°C.** The EU and its member states need to expand public climate finance to meet their fair-share contributions by 2035, in line with previous commitments. In particular, the EU should support agenda space at COP30 to ensure accountability for developed countries' climate finance provisions.
- **Energy system transformation: renewables, energy efficiency and fossil fuel phaseout can contribute to fair energy access.** The EU and its member states should support tripling renewable capacity, doubling energy efficiency, and implementing a fossil fuel value chain phase-out roadmap, rejecting new fossil fuel expansion via new investments and subsidies. The nuclear energy industry cannot be relied on to deliver energy in time to reach important climate targets, and any public money spent needs to be monitored very carefully in the interest of protecting the public from unnecessary costs.
- **Defend civic space and the integrity of climate governance.** The EU and its member states should ensure the meaningful participation and safeguarding of civil society, environmental defenders, Indigenous Peoples, youth and marginalised groups, in part by advancing a strong Gender Action Plan with measurable outcomes at COP30. Additionally, the EU should push for reforms to COP Host Country Agreements (HCAs) towards making them transparent and based on human rights protections as a precondition.

C. Conclusions on the European Water Resilience Strategy

Background

Following decades of mismanagement, Europe's rivers, lakes and groundwater aquifers are no longer providing all the services they are capable of, from flood mitigation to groundwater recharge and water purification. These weakened lifelines are now under further pressure from climate change. The numbers speak for themselves: in 2024 alone, [storm and flood damage is estimated to have cost 18 billion EUR](#). The European Environmental Agency has pressed that Europe must urgently improve water resilience to ensure freshwater supplies for people, our economy and the environment.

Implementing existing water and nature laws, thereby protecting and restoring aquatic ecosystems and the natural water cycle, is a cornerstone for water resilience. This was a key message of the European Commission's Water Resilience Strategy, as well as the European Parliament's own initiative report on water resilience. Building a water-smart economy does not require legislative simplification, but rather consistency of the legal framework, and clear vision and policy goals.

30% of Europe's population is affected by water stress every year. In line with the Water Efficiency First principle's hierarchy of measures, the first line of action is to reduce consumption, followed by measures to increase efficiency. Expansion of water supply, such as desalination, should only be implemented as a last measure and as a complement to demand reduction and water efficiency measures.

Meanwhile, water pollution, not least from PFAS, is a growing concern for public and environmental health. With public budgets constrained across Europe and pollution levels rising, producers and importers need to take responsibility for the environmental and health impacts of their products throughout their life cycle. This is in line with the [Council Conclusions on the 8th Environmental Action Programme mid-term review](#) (2024)

in which the Council recalled “that the Polluter Pays Principle is key to financially tackling pollution, environmental damage and biodiversity loss and to compensating for negative impacts while supporting social fairness”.

The EEB therefore calls on the Environment Council to:

- Include a clear **endorsement of the objectives** of the Water Resilience Strategy, in particular the first pillar on restoring and protecting the water cycle;
- Clarify that **non-conventional water resources should only be a complement** of demand reduction and water efficiency measures.
- **Delete the reference to simplification of the water legislation**, as water resilience is based on the timely and effective implementation of the EU water acquis, and the [Council has just succeeded in revising the Water Framework Directive](#), granting Member States additional flexibilities;
- Include a commitment to the full application of the **Extended Producer Responsibility** as required under the revised Urban Wastewater Treatment Directive.

D. Reports on main recent international meetings: SPP OEWG 3.2 and the Intergovernmental Meeting establishing a Science-Policy Panel for the sound management of chemicals and waste and to prevent pollution (Punta del Este, Uruguay 14 - 20 June 2025)

Background

The decision to establish a Science-Policy Panel on chemicals, waste, and pollution was made by governments under the auspices of the UN Environment Assembly to strengthen the science-policy interface in this critical area. It aims to provide policymakers with authoritative, independent scientific advice to better manage chemicals and waste and prevent pollution, drawing lessons from the success of similar bodies like the IPCC for climate. The panel is being developed through a government-led process involving scientists, policymakers and civil society, with the support of UNEP. Civil society groups see the panel as vital for ensuring that science guides urgent policy action to protect human health and the environment, especially as hazardous chemicals and pollution disproportionately affect vulnerable communities and ecosystems globally.

The EEB therefore calls on the Environment Council to:

- The language on protecting human health and the environment in the objective in the panel is currently still in brackets. We call on EU member states to ensure language that grounds the goals of the panel in the **protection of human health**.
- Given high pressure from different industry sectors in the field of chemical pollution and waste, a strong policy to prevent **conflicts of interest** is imperative. We call on European member states to require disclosures of conflict of interest covering a reasonable time frame (i.e., not limiting it to current conflicts of interest), to demand the public disclosure of any conflict, to have the policy apply to all experts and participants, and to ensure that the disclosures are acted upon (i.e., that affected individuals are not allowed to participate in the work of the panel).
- Finally, while **observers' participation** in the panel has been agreed, this could be reopened at a later stage. We urge EU member states to ensure that the observer status is protected.

Key issues of concern for the Environment Council

Reflecting the environmental agenda in the Multiannual Financial Framework 2028-2034

We are deeply concerned that the European Commission's proposal would reduce the funding for environment and for biodiversity under the next EU budget. We therefore welcome the fact that there is a discussion in the Council at such an early stage.

The discontinuation of a dedicated biodiversity spending target will, without doubt, result in a reduction in investments. Experience has shown that if biodiversity is one of several objectives, it is consistently sidelined in favour of more straightforward industrial investments. The Recovery and Resilience Facility offer a clear example of this: Less than 2% of total spending delivered tangible benefits for nature.

This is made worse by the Commission's proposal to discontinue the tracking of biodiversity expenditure. Discontinuing the monitoring of biodiversity spending would put the EU at serious risk of failing to meet its reporting obligations under the global Kunming-Montreal 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. 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 depolarizing benefits brought by the tools at local scale. Without a ringfenced budget for nature, LIFE activities would be forced to compete with a wide range of other political priorities, risking their defunding and marginalisation in the next MFF. 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 latest Europe's Environment 2025 report from the European Environmental Agency, removing both a dedicated target and a dedicated fund would be a profoundly damaging policy choice and should urgently be corrected in the negotiations ahead.

The EEB therefore calls on the Environment Council to:

- **Allocate at least 10% (no backtracking) of the EU budget to genuine biodiversity objectives** based on a dedicated monitoring system for each of the six environmental objectives.
- **Provide a dedicated and adequately resourced budget line for LIFE actions under the EU Facility.** LIFE actions and activities under both the EU Facility and the European Competitiveness Fund should be implemented through multiannual work programmes, so that projects can rely on predictable and stable funding. To foster a wide-ranging dialogue with all stakeholders and channel the views of civil society, these programmes should continue to provide support to the functioning of non-profit-making entities which are involved in the development, implementation and enforcement of Union legislation and policy.
- **Transform National and Regional Partnership Plans (NRPPs) into genuine investment plans for climate and nature.** 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.

2025 Annual progress report on Simplification, Implementation and Enforcement

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. We witnessed through the ongoing simplification omnibuses and from the ongoing CAP simplification omnibus, for instance, that it *de facto* led to a weakening of environmental and climate protection at farm level (which has even been worsened through co-decision) jeopardising the chance of achieving our overarching targets.

The “environment omnibus” therefore raises 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). These concerns are strongly echoed by citizens, and 187 621 EU citizens took part in the call for evidence, asking for the Commission not to weaken existing standards and risk weakening our environmental acquis. 30 000 people marched in Brussels for climate action and against the weakening of the efforts started under the Green Deal on 5 October.

Omnibuses create legal uncertainty and jeopardise the overall objectives of the EUs 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 greater than the cost of action. As found in the 4th 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 Commission failed not only to conduct a public consultation on the omnibuses, but also to submit the required summary factual report for the call for evidence already conducted at the end of 2023. It also failed to publish an impact assessment (IA) for the omnibus, which is too complex to be waved through without proper analysis. The Commission has not provided any justification for reversing the logic set out in the previous impact assessments.

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 without weakening control, oversight and targets, strengthening staffing and capacity building of competent authorities, and stepping up inspections and enforcement.

The EEB therefore calls on the Environment Council 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.

Europe's Environment: Knowledge on environment, climate and sustainability 2025 and Europe's Environment 2030 - Building a more climate resilient and circular Europe

The EEAs [Europe's environment and climate: knowledge for resilience, prosperity and sustainability](#) 2025 report, launched on 30 September 2025, gives a clear picture: the state of Europe's environment is still deeply problematic. There was a clear deterioration of nature, climate, health, improvements were only seen as regards climate, CE, and ozone, and a lot of areas where progress was mixed. The human & economic costs of inaction, of not reaching the 8EAP targets agreed by Commission, Council and Parliament are far too high. There is a clear picture of inter-generational injustice.

The EEA report findings furthermore underline that for many areas, existing policies will not be adequate to meet commitments made by the three European institutions in the 8EAP. There is a clear case for strengthened policy implementation and additional measures to ensure a healthy, resilient environment for all that supports people's health and wellbeing, that helps address precarity and improve social injustice and creates incentives for innovation and opportunities for front-runner companies and farmers to flourish.

The EEB therefore calls on the Environment Council to:

- Respond to the EEA report findings and ask the European Commission for a **legislative response** – articulated in Council Conclusions, to address all gaps and include the necessary policy mix to meet the 8EAP commitments. [Article 42 of the 8EAP](#) notes that *to attain the thematic priority objectives, by 31 March 2025, where appropriate there should be a legislative proposal adding an annex to this Decision.*
- Support **Council conclusions on Europe's Environment 2030 - Building a more climate resilient and circular Europe** that goes part of the way towards calling for the needed legislative response to the 8EAP commitments. Strengthen these by:
 - **Calling for the identification of investment in nature-based solutions to support climate resilience** wherever cost-effective, considering the multiple benefits of ecosystem restoration, also via the increased provision of ecosystem services.

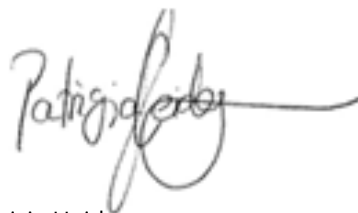
- Making explicit reference to the fact that **healthy ecosystems are a foundation for resilience to climate change** and, through the provision of ecosystem goods and services, support wellbeing, economy and competitiveness.
- Calling for the establishment of **an EU target on reducing resource use (material footprint) and its impacts (consumption footprint)** in line with planetary boundaries, mirroring the impactful emissions reduction targets which have unleashed transformative climate actions across the European and global economy (*see page 26 of EEB's Action Plan to the European Pact for the Future*).
- Making an explicit commitment that **simplification cannot and should not lead to a weakening of environmental and social protections**.
- Defining “administrative burdens” and make an **explicit distinction between “administrative burdens” and “responsibilities” to avoid pollution and resource impacts** that are, or should be, part of a license to operate. This will help reduce the intentional or accidental misuse of the unfortunately vague term “administrative burdens” to reduce responsibilities, by weakening social and environmental protections.
- Systemically ensure the **social dimension** of links to environmental degradation and/or improvements (i.e. costs of policy inaction/insufficient action and benefits of action) are understood and considered in policies, their implementation and funding.
- Call for the **Omnibus** process to consider the scientific facts of insufficient progress and focus on better implementation of objectives, and in no way roll back the environmental and social obligations that will only exacerbate the bleak picture presented by the EEA.
- Engage in the **MFF negotiations** to secure adequate funding to help meet the joint commitments.

We thank you, Ministers, for your consideration of the above points from civil society, and we hope that they are useful for your discussions, decisions and commitments. Please do not hesitate to get in touch if you would welcome further details on any of the above. We wish you all the best for your Council Meeting.

Yours sincerely,



Patrick ten Brink
Secretary General



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