

EEB Reaction to Commission's 2026 Work Programme: Europe cannot deregulate its way out of crisis

The European Commission's 2026 Work Programme offers little reassurance that the EU is ready to face the scale of the environmental and social crises unfolding across the continent.

With few new legislative proposals and a heavy focus on non-legislative “fixes” and omnibus *deregulation* packages, the 2026 agenda risks missing the moment. Europe’s environment is at a tipping point – as the [EEA’s latest assessment](#), the [European Climate Risk Assessment \(EUCRA\)](#), the [Global Tipping Points](#) report and many others warn – yet political will remains dangerously out of sync with the evidence.

Despite widespread public support for strong environmental action – from the 200,000 Europeans who joined the [“Hands off Nature” campaign](#) to the tens of thousands [marching for climate action](#) this autumn and the [75% of Europeans who want companies to be held accountable for what happens in their value chains](#) – the Commission’s work programme seems more attuned to the loudest business associations in Brussels than to citizens’ calls for change. Also, a [majority of companies](#) express support for climate transition plans, sustainability reporting, and due diligence obligations, and [call for regulatory stability](#) to preserve a clear, credible long-term direction.

The Multiannual Financial Framework (MFF) revision also fails to align resources with priorities – supporting the loudest voices rather than the most pressing needs. Citizens and businesses alike are calling for investment certainty, healthy natural resources, and climate resilience, not policy backtracking.

The upcoming EU Climate Adaptation Strategy and the Circular Economy Act could be among the few major agenda items with real potential for 2026. But their success will depend on their direction. Europe must avoid maladaptive, short-term techno fixes and instead focus on restoring nature and reducing resource use as its best defence against climate and environmental risks.

With COP30 on the horizon, the EEB joins the overwhelming call for immediate and unprecedented action from leaders and policymakers worldwide. Yet the Commission's working programme shows little appetite for nature, climate or energy legislation, offering only simplification of existing rules or even worse: withdrawal of important law proposals like the one on EU forest monitoring and a non-legislative electrification plan. Europe’s electrification rate is stuck at 23%, well below the 32% target for 2030, while China has already reached 29%. If the EU wants to stay competitive in the global clean tech race, it needs strong, binding policies that drive real investment.

Thematic Reactions

Energy

and

Industry

- The Commission's stated focus on **industrial competitiveness and the race to net-zero** contrasts sharply with the content of its energy proposals.
- The **Omnibus simplification package** carries clear **deregulation risks**, while the **non-legislative Electrification Plan** lacks binding measures.
- Europe's electrification rate remains **stuck at 23%**, far below the 32% target for 2030, while China has already reached 29%.
- To stay competitive in the global clean tech race, the EU needs **strong, enforceable policies** that drive real investment—not half-measures or procedural streamlining.
- The announcement of a post-2030 energy efficiency framework (Q3) is a welcome surprise. Early legislative planning can support long-term coherence, but must include strong governance and accountability.
- With time running out for the EU to curb its emissions and reach climate neutrality by 2050, the **planned design of the post 2030 climate policy architecture will be essential** to ensure success. Before we get to that, we are still missing a crucial step: an agreement on an ambitious, science-based, loophole-free 2040 climate target.

Economic

Transition

- The upcoming **Advanced Materials Act** could play a central role in supporting the green and digital transition if it integrates sustainability, transparency, and resource efficiency throughout value chains.
- The proposed **Defence Omnibus** aims to streamline regulatory procedures and accelerate defence-related investments. However, it presents several systemic risks:
- **Environmental and social safeguards:** Fast-tracking projects without proper checks could heighten water stress, local opposition, and exposure to hazardous substances.
- **Climate inconsistency:** Accelerated defence production may increase emissions and fossil fuel dependency, conflicting with EU climate and biodiversity goals.
- **Prioritising defence spending** risks diverting resources from green and social investments, including renewables and just transition measures.
- **Governance risks:** Simplified procurement and relaxed state aid rules may concentrate market power among major contractors, undermining transparency and accountability.
- **EU Own Resources:** We regret the withdrawal of the **Financial Transaction Tax (FTT)**, one of the few progressive tools for stable, fair EU revenues. The remaining proposals—linked to ETS, CBAM, and profit-based resources—are **insufficient in scope**. Without instruments like an FTT,

wealth tax, or permanent windfall levy, the EU risks relying on narrow and regressive funding streams.

- **Housing:** New legislation on short-term rentals could help rationalise platforms like Airbnb.

Biodiversity,

Water,

and

Soil

- The Work Programme **fails to acknowledge the urgency of Europe's nature crisis**, as highlighted in the latest *State of Europe's Environment* report. Few new legislative initiatives address biodiversity loss or pollution.
- We **welcome** implementation steps for the **Water Resilience Strategy**, including the Digital Action Plan and the Water Resilience Platform.
- We also **welcome** the plan to develop an **integrated framework for climate resilience** by 2026, but stress that ecosystem-based adaptation must remain central.
- The proposed **Ocean Act**—merging the Marine Strategy and Maritime Spatial Planning Directives—is a positive step for improved ocean governance. However, the **withdrawal of the Forest Monitoring Law** is a serious setback. Its weakening in Council and Parliament reflects a lack of political will and undermines Europe's ability to protect its forests.

Law

and

Justice

- **Democratic procedures:** We remain concerned about the Commission's repeated use of *irregular legislative processes* justified by claims of urgency.
- **Energy Omnibus:** The reopening of the **Governance Regulation (EU) 2018/1999** is welcome but should strengthen, not weaken, **public participation**, in line with Aarhus Convention findings.
- **Better Regulation:** Updating the agenda must prioritise **transparency, accountability, and balanced stakeholder input**. The Ombudsman's ongoing investigation into recent Omnibus procedures underscores this need.
- **Intergenerational Fairness Strategy:** We welcome this initiative and encourage alignment with the *Future Generations Initiative's* recommendations.
- **Europol and Eurojust:** Strengthened cooperation offers opportunities for better implementation of the **Environmental Crime Directive (2024)**.
- **Environmental Liability Directive:** Its continued absence from the agenda is concerning, given long-standing calls for reform.

Agriculture

- Despite multiple promises, the long-awaited revision of **on-farm animal welfare legislation** is **missing** from the work programme. As 84% of Europeans want farmed animals to be treated better and 1.4 million called to “End The Cage Age” in a European Citizens' Initiative this is deeply disappointing. The planned **Livestock Strategy** is a **welcome development** as reform is urgently needed to align with broader goals on health, sustainability, and resilience

Chemicals

- The **REACH revision** appears to remain scheduled for Q4 2025; we urge an ambitious proposal that protects health and the environment while supporting innovation.
- The **Intergenerational Fairness Strategy** should explicitly address **chemical pollution's impact on children and future generations**.
- The **Chemicals Omnibus** proposes amendments to the CLP and Cosmetics Regulations without sufficient consultation, raising concerns about transparency and consumer safety.
- We **welcome** the proposal for a new **European Chemicals Agency Regulation** but stress the need for adequate resources and staffing.
- The **Defence Omnibus** could undermine REACH by broadening defence derogations; we urge clear criteria and oversight to prevent misuse.
- The **withdrawal of the 2016 proposal** to list D4 under the Stockholm Convention is a **major setback** for global chemical safety and EU leadership.
- The removal of the **workers' protection codification directive** is regrettable, as it delays long-needed updates to occupational health safeguards.

Circular

Economy

- The **European Product Act** is a concrete opportunity to protect consumers and companies against the massive import of illegal products sold online, which do not comply with EU rules and pose a threat to the environment, people's health, and the competitiveness of European industry.
- The **Circular Economy Act** can put Europe ahead of the game if it will focus on sustainable resource management with concrete measures to prevent waste and promote reuse and high-quality recycling.
- The planned **initiative on short-term rentals** is a welcome opportunity to address housing pressures in cities and ensure more equitable access to affordable housing.

Next Steps

Each policy team will continue to assess the legislative and non-legislative initiatives as the Commission's detailed 2026 planning advances.