



**THE EEB'S  
MEMORANDUM  
TO THE CYPRIOT PRESIDENCY OF THE EU  
10 GREEN TESTS FROM CIVIL SOCIETY**



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The EEB is Europe's largest network of environmental citizens' organisations. We bring together over 190 member organisations from 41 countries. Together, we work for a better future where people and nature thrive together.

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## Introduction

*The Cypriot Presidency of the Council of the European Union, which takes over from the Danish Council Presidency on the 1 January 2026, will be the last in the trio and will begin in a challenging geopolitical context, as with its predecessors.*

*With global geopolitics marked by increasing instability and Russia's war against Ukraine still reshaping security dynamics, the Cypriot Council Presidency will assume a pivotal role in steering Europe through an increasingly complex landscape. This will be the second time Cyprus holds the Presidency, fourteen years after its first Presidency in 2012, and it must ensure that the EU resists any drift towards models of climate denial, deregulation, and fossil fuel expansion.*

*The Danish Presidency saw the European Commission simplification agenda morph into a vehicle for deregulation, with five omnibus packages launched making the total number of omnibuses reach ten since the beginning of Ursula von der Leyen second mandate - all of them threatening to dismantle environmental safeguards without scientific evidence, impact assessments, or proper citizen consultation - clear cases of maladministration, as highlighted by the European Ombudswoman in her findings on the sustainability omnibus, CAP simplification, and migration files. Such moves undermine democracy and jeopardise Europe's security.*

*As the latest US security strategy confirms, this agenda favours American corporate interests, not the EU. It is therefore urgent that we get back on track with the implementation of our strategic autonomy, competitive and peace agenda: the European Green Deal. The EU must reaffirm its position as the leading global force for a progressive, transformative agenda centred on decarbonisation, depollution, and biodiversity protection through a Just Transition. This is about rewarding frontrunners in our industry, not the laggards. As Vice President Teresa Ribera stated, the EU should remain a rule-maker rather than a rule-taker. This is not only about policy - it is about rights, justice, and hope for future generations.*

*Science leaves no room for complacency. The European Environment Agency's latest Europe's Environment report paints a stark picture: Europe faces continuous deterioration across biodiversity, ecosystems, soil, and climate resilience, and is off track on nearly all 2030 targets, including biodiversity, soil health, carbon removal, water quality, human health, waste reduction, circularity, and global impacts from EU consumption. The Environmental Implementation Review estimates the cost of non-implementation at €180 billion annually. These failures stem from insufficient funding, weak enforcement, and a lack of ambition. The reality of escalating impacts demands urgent and decisive action on implementation.*

*Against this backdrop, Cyprus will lead Council work on four inherited omnibus packages and initiate negotiations on three proposed ones covering the environment, food, and automotive sectors. It will also advance discussions on the next Multiannual Financial Framework (MFF) and Common Agricultural Policy (CAP) and will likely begin the Council's work on the upcoming REACH revision.*

*The MFF must prioritise financing the European Green Deal to ensure a fair transition that benefits all, especially vulnerable communities, while driving competitiveness and resilience. It must reflect the investments needed to protect Europeans from climate change and secure dedicated funding for nature. The REACH revision must ensure human health and environmental protection, not undermine them. We need stronger, not weaker, rules; faster, smarter decisions; toxic-free products as the norm; and better data to enable a safe, circular economy.*

*In an era when disinformation corrodes trust and fuels political interference, and the World Economic Forum has identified it as the top global risk for the next two years, the Cypriot Presidency must make combating disinformation a central priority, as its predecessors have done. This is vital for safeguarding Europe's security and democratic resilience.*

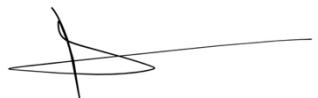
*Each Presidency is a “neutral broker”, balancing Member States’ positions while advancing strategic priorities. Cyprus can lead by example through ambitious national initiatives and best practices in implementing EU climate and environmental law. As it ends this Trio, it can and should set the path for the next one.*

*Building on consultation with over 195 members and civil society partners, the EEB has developed **Ten Green Tests** for the Cypriot Presidency, benchmarks for success aligned with our European Pact for the Future. These tests cover key Green Deal dossiers, international dimensions, and areas where Cyprus can inspire others. We look forward to working with the Presidency and Member States to deliver a green and social deal for a one-planet economy, strengthening Europe’s resilience for the challenges ahead.*



Patrick ten Brink

Secretary General



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Policy Director

# Ten Green Tests for the Cypriot Presidency



|    |   |    |
|----|---|----|
| 1  | Implement the European Green Deal in times of disinformation and disruptive foreign interference  | 6  |
| 2  | Commit to a sufficient EU budget and wider financial tools to catalyse a credible and fair transition to a one planet economy – enabling a race to the top on sustainability                | 9  |
| 3  | Ensure a truly “Clean” Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration                                      | 12 |
| 4  | Build on the Strategic Dialogue for Agriculture to advance towards sustainable and just food and farming systems  | 15 |
| 5  | Respond to the climate crisis by ensuring only the most efficient pathways to decarbonisation are supported, creating a fast track to a people and nature-positive renewable energy future. | 17 |
| 6  | Deliver a nature-positive agenda for land, freshwater and oceans and fast track climate adaptation and resilience   | 19 |
| 7  | Maintaining and delivering on zero-pollution: clean air for all   | 22 |
| 8  | Advancing a toxic-free environment and transforming the transition of the chemicals sector through a future-proof, sustainable policy framework   | 25 |
| 9  | Address resource use and seize circular economy opportunities for the economy and society   | 28 |
| 10 | Protect the rule of law and our health, foster legal and social justice and strengthen civil society engagement and democracy   | 30 |

*Ten Green Tests for the Cypriots Council of the EU Presidency reflect our understanding that politics is the art of the possible. However, if we do too little now to avoid climate, biodiversity and pollution crises, and worse if we roll back on previous achievements, then the challenges in 2030, 2040 and 2050 will be impossible for society to deal with. The impossibility of living well in the future with unabated crises should make policy makers reconsider what is possible to negotiate today and up the level of ambition in policy formulation and subsequent negotiations. It is in this context that we have designed the Ten Green Tests. They may seem ambitious, but they are fundamentally necessary for the future we need, and that young people deserve to inherit.*



# 1. Implement the European Green Deal in times of disinformation and disruptive foreign influence

The ongoing climate, biodiversity, and pollution crises, Russia's fossil fuel-funded invasion of Ukraine, the ever-starker evidence of poverty and inequalities in Europe, and the impacts of EU consumption and actions abroad have exposed the deep flaws and dependencies in our energy, economic, and governance systems. Scientists confirmed that Earth has crossed its first catastrophic climate tipping point - coral reefs are facing widespread dieback. They warned that Antarctica's ice systems are nearing irreversible collapse, and that the Amazon forest is approaching breakdown. The [EEA latest Europe's Environment report](#) shows continuous 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, environmental noise, water pollution, human health, waste generation, material consumption, circularity, and global impacts from EU consumption, while in European Climate risk assessment the EEA stated that the EU is the fastest warming continent.

Instead of accelerating efforts to tackle the triple existential crisis, the Ursula von der Leyen II Commission's mandate has unfortunately focused on slowing progress and, worse, rolling back elements of the European Green Deal, environmental protection, and health protection in the name of competitiveness.

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 analyses](#) consistently show that stringent environmental policies do not undermine productivity, employment, or economic growth.

Rather than complexity, the primary barrier to realising full benefits lies in poor national-level implementation. [According to the Commission](#), inadequate enforcement of existing environmental laws costs the EU approximately €180 billion annually due to increased health care expenses, environmental degradation, and lost ecosystem services.

These figures underscore that the real "burden" is the cost of non-compliance - not the legislation itself.

Without harmonised EU rules, businesses would face 27 divergent national frameworks, creating far more administrative complexity and compliance costs than a single, unified system. Calls to "cut red tape" often ignore this reality and overlook the economic and societal benefits of strong environmental governance, including reduced pollution-related health costs and enhanced resource efficiency.

Simplification should focus on streamlined implementation, such as:

- Aligning reporting deadlines across directives.
- Leveraging digital tools for compliance.
- Eliminating duplicative administrative steps.

Simplification must remain evidence-based, subject to impact assessments, and developed through inclusive consultation with civil society, public authorities, and affected stakeholders, as reminded by the ombudswoman [in her sustainability and CAP omnibuses case](#), where she found maladministration from the European Commission.

Omnibus packages are intended for technical adjustments - such as aligning legal references after treaty changes - not for substantive policy changes. Since the beginning of Ursula von der Leyen's second

mandate, the European Commission introduced no fewer than ten omnibuses. Many proposals affect environmental and sustainability rules beyond mere technicalities. The accelerated pace of these procedures undermines transparency, scrutiny, and democratic debate, risking significant changes slipping through unnoticed.

This approach erodes trust in EU law and creates investment uncertainty. Businesses require predictability to plan supply chains and compliance strategies. Instead, rushed consultations and opaque processes increase risk. Recent developments illustrate public concern:

- Nearly 200,000 citizens responded within 10 days to the environmental omnibus consultation, urging the European Commission not to weaken existing standards.
- On 4 October, around 30,000 people marched in Brussels demanding stronger climate action and rejecting deregulation.

Multiple business associations have issued open letters warning against deregulation, citing risks to competitiveness and investment stability.

Rooted in a commitment to implement the European Green Deal, the transformative agenda Europe needs can and should continue. Looking at the scientific facts, there is no alternative. This is about both responding to crises and seizing opportunities to make EU ecosystems more resilient, support quality of life, well-being, and livelihoods, enhance corporate sustainability, and strengthen economies by investing in Europe and becoming a globally competitive leader in sustainability. Given the shifts in the multi-polar world, the EU must recognise the urgency of stepping up and scaling up as the global leader on climate and environment.

The EU cannot afford to emulate the US deregulation model or China's heavy subsidy approach. Europe's competitive edge lies in the quality and trustworthiness of its products - safe, clean, repairable, and sustainable. Weakening environmental standards would jeopardise this advantage and penalise frontrunners who have invested in compliance, while rewarding laggards.

This dangerous deregulation drive is happening in a world where disinformation has become the new norm, underpinning political interference, fuelling bias, and threatening civil society, and where the World Economic Forum has identified disinformation as the greatest global risk over the next two years. The priority focus the Polish-Danish-Cypriot Trio put on the fight against disinformation was welcome and necessary.

Tackling disinformation is indeed a fight for Europe's security.

In the last couple of months, disinformation has intensified, taking the shape of a smear campaign against NGOs, threatening the freedom of association of civil society and their existence, and targeting the Green Deal. Behind those, it is the EU's resilience and democracy that are at risk.

The priority Poland and Denmark gave to combating disinformation should therefore not only continue but also be strengthened.

*We therefore call upon the Cypriot Presidency to:*

- A. Prioritise **implementation and enforcement of the European Green Deal** through:
  - a. Targeted financial support for national and local administrations;
  - b. Digitalisation and clear guidance;

- B. Ensure **simplification is about smarter implementation**, not dismantling existing targets or obligations;
- C. Guarantee that **simplification efforts are evidence-based**, proportionate, and subject to **impact assessments** and proper consultation (as requested by the Ombudswoman in her 'omnibus', 'CAP' and 'migration' cases);
- D. Restrict omnibus packages to **technical adjustments only**, avoiding substantive changes without proper scrutiny;
- E. **Pursue the efforts in quantifying and understanding the threats**, while encouraging the development of an EU strategy and practices to combat disinformation, to weed out inappropriate influence by foreign state actors, vested interests that are not aligned with public interests and science and strengthen public accountability and civic space. It is essential that decision-making has access to correct facts and is not biased by false information, and that civil society has the space and ability to communicate citizens' concerns;
- F. **Secure civil society space and integrity** through a meaningful implementation of the EU civil society strategy;
- G. **Ensure appropriate communication of the EGD** across the EU at national and local levels, starting with schools and universities;
- H. **Catalyse the development of a fact-checking portal and service**, also open to industry and civil society requests to immediately debunk false claims;
- I. **Better communicate environmental scientific consensus** and ensure scientific consensus remains at the centre of any expert groups, discussion groups, and civil society exchanges organised by the EU Institutions;
- J. **Promote the systematic communication of the benefits of action** (including cumulative benefits of action against the cost of inaction) of policies and measures.
- K. **Demonstrate solidarity with Ukraine and support EU enlargement:**
  - a. Maintain and accelerate the implementation of the EGD to ensure energy independence from hostile powers like Russia – through policies that support renewable energy, energy efficiency, and energy sufficiency roll out, supported by investments in a smarter, stronger and more interconnected and resilient European electricity grid;
  - b. Lead discussions in Council to stop Russian gas imports, including through indirect imports, and work with partners globally, to dry up Russia's income on fossil fuels;
  - c. Counter the intention of Russian disinformation that seeks to scale back climate and environmental spending and weaken or undo the European Green Deal (EGD) to keep the EU's dependency on Russian imports and commit publicly to the EGD and fossil fuel independence;
- L. **Lead by example:** Ensure that clear, convincing implementation measures and enabling mechanisms are in place in Cyprus to fast-track the ecological, economic transition, and ensure

these respond to the needs and lead to benefits and encourage engagement across rich, middle class and poor, so that it is a real green and social deal for a one-planet economy.

**More information:** [The European Pact for the Future: a green and social deal for a one-planet economy](#) • [EU leaders may miss a rendezvous with history](#) • [NGOs call for a social and green investment plan for a prosperous and just transition](#) • [OpEd in Euractiv: Our Choice](#) • [Mid-term assessment of the European Green Deal](#) • [European Green Deal: One Year In](#) • [A Feminist European Green Deal](#) • [Turning fear into hope: Corona crisis measures to help build a better future](#) • [Reprotecting Europe: The EU Green Deal v The War on Regulations](#) • [Towards a wellbeing economy that serves people and nature](#) • [EEB's Feedback on the EU Taxonomy Delegated Acts](#) • [Beyond Growth Conference: Open Letter](#); • [Hands off Nature Campaign](#); • [EEB response to Environmental Omnibus consultation](#).



## 2. Commit to a sufficient EU Budget and wider financial tools to catalyse a credible and fair transition to a one planet economy – enabling a race to the top on sustainability

The Cypriot Presidency will take forward the negotiations on the Commission's proposal for the next **Multiannual Financial Framework (MFF)** for after 2027, playing a crucial role in the move towards a political agreement and ensuring that the MFF sets the EU on a credible path toward a climate-neutral, socially just, and nature-positive future.

The next MFF must provide sufficient and stable funding for nature protection and restoration, for advancing decarbonisation, depollution, the circular economy, and the creation of a dedicated Oceans Fund, with strong environmental, climate, and social conditions applied consistently across all programmes.

As discussions evolve, it will be essential to ensure that the proposed competitiveness fund becomes an instrument for the green and just transition, recognising that Europe's true competitiveness depends on tackling the immense costs of inaction on the biodiversity, climate, and pollution crises. Failure to comply with EU environmental legislation and to implement key regulatory frameworks, such as **REACH**, continues to create market distortions, legal uncertainty, and barriers to innovation, slowing down the deployment of safer and more sustainable solutions.

The Cypriot Presidency should therefore work to ensure that funding for EU competitiveness in the next MFF mainstreams measures to address the climate, pollution, health, social, and biodiversity crises - as these are central to long-term productivity, stability, and resilience. Similarly, it should ensure that the **National and Regional Partnership Plans (NRPPs)** provide earmarked funding for nature. The MFF must also acknowledge the high socio-economic costs of inaction and commit to a smart, forward-looking implementation of the European Green Deal that supports all regions and sectors in the transition.

To ensure environmental integrity and accountability, the next MFF should include the rigorous and systematic application of the **Do No Significant Harm Principle** across all EU funds and programmes with no exemptions for harmful activities. It should also establish dedicated funding for nature restoration and significantly increase the share for LIFE, preserving its integrity and mandate. A new **Nature Restoration Fund** should be created to scale up innovation, best practices, and support for the implementation of the **Nature Restoration Law**.

To ensure the EU has the necessary resources to meet these challenges, the Cypriot Presidency should accelerate negotiations on new EU own resources, including fair taxation on wealth, fossil fuel windfalls, resource use, and speculative financial transactions, ensuring that these revenues are directly channelled to green and social priorities. In parallel, the Presidency should support the creation of a long-term **EU Just Transformation Fund** post-2026, designed to finance decarbonisation, depollution, climate adaptation, and social resilience - particularly for regions facing acute environmental and socio-economic pressures.

Finally, a strong democracy and transparent governance require adequate infrastructure and resources for citizens' voices to be heard. Civil society organisations (CSOs) are key partners in ensuring accountability and delivering the **European Green Deal**, yet they often lack stable and sufficient resources. The future MFF must therefore include dedicated operating grants to fund CSO participation in EU policy

development, implementation, and enforcement - ensuring that environmental and social ambition is anchored in democratic legitimacy and public trust.

*We therefore call upon the Cypriot Presidency to guide further negotiations on the MFF towards:*

- A. **Securing dedicated and increased funding for biodiversity and nature restoration**, including a dedicated spending target and earmarking funding for LIFE actions/environmental, nature and climate actions under the EU Facility, also providing operating support for ENGOs, and integrated nature targets across cohesion, agricultural, and recovery funds;
- B. **Setting robust climate funding targets and instruments** to address pollution at its source, in line with the zero-pollution ambition, while safeguarding the social dimension of investments to ensure fairness and inclusion;
- C. Ensuring the competitiveness fund is a genuinely **clean and transformative fund**, mainstreaming actions to tackle the climate, pollution, health, social, and biodiversity crises, while addressing regional inequalities and supporting a just transition;
- D. Including **strong safeguards for inclusive, transparent, and balanced consultation** on national plans, ensuring local authorities, civil society, and trade unions are meaningfully involved;
- E. **Applying the Do No Significant Harm principle rigorously across** all EU funds and programmes, closing loopholes for defence, fossil projects, and “projects of overriding public interest” to prevent greenwashing;
- F. **Reinforcing support for civil society organisations (CSOs)** through dedicated operating grants enabling participation in policy design, monitoring, and enforcement - particularly in smaller and peripheral Member States;
- G. Moving towards **a performance-based Common Agricultural, Food, and Land Stewardship Policy** linking budget disbursement to clear, measurable objectives, increasing ring-fenced funding for nature protection and agro-ecosystem restoration, ending harmful subsidies via a science-based exclusion list, and targeting socio-economic support to farmers who need it most. It should also facilitate the transition towards resilient, diversified farming grounded in agroecology, including support for the livestock sector and farm-to-fork investments;
- H. **Advancing discussions on new EU own resources, including** progressive taxes on extreme wealth, frequent flyer levies, resource-use taxes, excess profit taxes on fossil fuel companies, tourist taxes, and a financial transaction tax, to close green and social funding gaps fairly and ensure those who can afford it contribute most;
- I. Establishing a **long-term EU Just Transformation Fund post-2026** to finance green and social investments, ensuring all segments of society benefit from the transition, protecting social cohesion, and preventing austerity-style impacts on vulnerable communities. Public finance should prioritise sustainable and inclusive investments rather than diverting funds to military spending.

**More information:** The European Pact for the Future: a green and social deal for a one-planet economy • Call for a dedicated EU Nature Restoration Fund • Joint statement: operationalising the do Not Significant Harm principle in the next long-term EU budget • Time for farmers and nature to thrive •



### 3. Ensure a truly “Clean” Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration

The Clean Industrial Deal must deliver for both people and the planet. Europe faces a triple crisis - climate breakdown, biodiversity loss, and pollution - alongside deepening inequality. True competitiveness cannot come from further degrading our environment, health, or social fabric.

A genuinely clean Deal must raise the regulatory bar, strengthen sustainable frontrunner solutions, and reinforce the transition towards low-emission production standards. It should promote sustainable competitiveness that serves people and future generations, as well as a thriving industrial sector based on renewable energy, circularity and material efficiency. Europe’s strength lies in leadership rooted in strong social and environmental standards. By leading in detoxification, depollution, decarbonisation, and restoration, the EU can prove that a thriving industry and a healthy planet go hand in hand.

Moreover, secondary acts pursuant to the updated rules on industrial pollution prevention and reporting, the **Industrial and Livestock Rearing Emissions Directive (IED 2.0)** and the **Regulation establishing the Industrial Emissions Portal (IEP-R)**, need to be ambitious and coherently enforced. Key acts relate to the drafting of **EU Best Available Techniques (BAT) reference documents (BREFs)** for mining, landfills, inorganic chemicals, ceramics, and soon battery giga-factories, iron and steel, pulp and paper and cement production. Moreover, operating rules for industrial-scale pigs and poultry livestock rearing activities are due to be published by 1 September 2026. Concrete delivery on the zero-pollution ambition will depend on the robustness and ambition level of these acts, where the Council has a key role to play in upholding integrity and setting direction. Secondary acts for ringfencing content of installation-level transformation plans for the energy-intensive industries, and the obligation for more systematic substitution analysis of hazardous substances, are at risk of the Omnibus simplification/deregulation obsession of incumbent industry laggards.

Key votes that may be finalised under the Cypriot presidency will concern the review of the pollutants list and reporting thresholds as well as clarifications on what is considered contextual information and relevant raw materials subject to reporting rules for large-scale industrial activities under the **Regulation establishing the Industrial Emissions Portal**. It is crucial to ensure that digital reporting obligations serve progress on environmental performance benchmarking and accountability of decision-making. Similar political signals are expected in relation to the review of the **UNECE Pollutant Release and Transfer Register (PRTR) Protocol on reporting on industrial activities**.

The revision of the **Public Procurement Directive** offers a large potential to drive sustainability, circularity, and decarbonisation of carbon-intensive industrial products like steel and cement. Linked to the standards of the **Eco-design for Sustainable Products Regulation (ESPR)** and the **Construction Products Regulation (CPR)**, mandatory public procurement of decarbonised industrial products offers potentially massive incentives to drive competitive advantage for European industry, as well as fast-tracking innovation that will benefit the planet and its citizens.

Key acts driving industrial decarbonisation are expected to come into shape within the Cypriot Presidency, such as the Industrial Accelerator Act (IAA) and the review of the Carbon Border Adjustment Mechanism (CBAM).

*We therefore call upon the Cypriot Presidency to:*

- A. Uphold a holistic zero-pollution-aligned ambition within acts to be adopted pursuant to the Clean Industrial Deal**, which can live up to its name only if it embeds the zero-pollution objective in its priorities, alongside climate goals and if it recognises the strategic value of pollution prevention and remediation. Accelerating the phase-out of fossil fuels/feedstocks and chemicals of concern - ending the use of all the most harmful chemicals in products is a prerequisite to a toxic-free circular economy. Accelerate the transformation of the steel value chain (see EEB Steel and Metals Action Plan).
- B. Ensure that the Industrial Accelerator Act** provides the right incentives for the uptake of low-emissions steel and cement. Labelling schemes stemming from the IAA should reward only fossil-free production routes, prioritise pollution prevention in an integrated manner, promote the use of circular materials and be consistent with current legislation such as the ESPR and the CPR. Permitting streamlining should ensure that key EU rules on nature protection and public participation are not weakened, that Member States fully digitalise procedures, and increase the staff of permitting authorities.
- C. Make CBAM a driver for clean industrial processes and promote an evidence-based review when it comes to addressing possible loopholes and circumvention.** Stay firm on the progressive phase-out of free allocation as agreed during the last EU ETS review to provide essential legal certainty to industrial operators to plan investments.
- D. Ensure that the ambition of the revised Industrial Emissions Directive (IED 2.0) and the Regulation establishing the Industrial Emissions Portal (IEP-R) will not be compromised during the Council discussions on the environmental omnibus:** the goal shall be simplification to ensure better implementation – not deregulation. Maintain the obligation for operators of high-polluting activities to elaborate a site-level transformation plan (IED2.0 Article 27.d), and the requirement for a more systematic risk assessment/substitution analysis of hazardous chemicals (IED2.0 Article 14a). Maintain mandatory reporting of consumption in the Industrial Portal.
- E. Ensure systematic internalisation of negative externalities** in relation to aspects linked to funding, state aid or other support schemes and methods of cost-benefit assessments. Ensure that any form of support for industrial operators is linked to clear and mandatory investments in low-emissions production routes, and a toxic-free and zero-pollution compatibility check.
- F. Secure user-friendly and transparent pollution benchmarking tools through ambitious implementation of the Regulation establishing the Industrial Emissions Portal**, notably by removing pollutant thresholds and adding further pollutant groups, in particular PFAS. Define the meaning of 'contextualisation of information.' Ensure public access to production volumes, operating hours, consumption data/key raw materials, and other key information, such as measures taken pursuant to the Environmental Management Systems, including IED 2.0 Transformation Plans.

**G. Secure political direction for a comprehensive UNECE Kyiv Protocol (on Pollutant Release and Transfer Registers)**, based on the IEP-R improvements (mentioned above), bridging with the digital product passport promoted through EU product policy and incorporating due diligence requirements from other EU acquis. Systematically allow for early and effective pre-consultation with civil society interest groups such as the EU ECO Forum.

**H. Secure mandatory environmental and socially responsible procurement criteria** in all procurement contracts. Ensure that procurement contracts only include products or services with the highest environmental performance linked with the product standards being developed in relevant sectoral legislations (e.g., best-in-class minimal requirements as per ESPR, or EU Ecolabel). Strengthen the use of life cycle costing through new or updated methodologies and software tools to calculate negative environmental externalities, customised and simplified for the specific use cases of procurement authorities. Secure better monitoring and reporting to track the progress of green public procurement and lower the thresholds. The revision of the EU procurement directives must also be conducted with the intention to actively encourage sustainable food procurement, as outlined in the Vision for the Agriculture and Food and called for unanimously by agri-food stakeholders in the consensus report of the Strategic Dialogue on Agriculture and Food. On EU preference and resilience, ensure that the protection of lead markets is based on the reciprocity of the EU's environmental and social standards and efforts towards net-zero goals in other countries, rather than just carbon footprints, to support EU competitiveness on pollution prevention and industrial decarbonisation technologies.

**I. Guarantee the right to clean air** by cutting emissions and reducing exposure. This will result in reduced mortality and morbidities while also protecting ecosystems.

**More information:** [Joint Industry-NGO vision for a prosperous and sustainable industry: a positive blueprint for the future](#) • [Briefings on IED and IEP-R review](#) • [EU BREF specific website](#) • [EEB input to CID State Aid Framework \(CISAF\)](#) • [EEB briefing on Green Public Procurement](#) • [Climate impact of air pollution levels aligning with European Commission's proposed air quality standards](#).



## 4. Build on the Strategic Dialogue for Agriculture to advance towards sustainable and just food and farming systems

The way we produce and consume food is driving multiple environmental and health crises, while the climate and biodiversity crises threaten our ability to produce food, as is becoming increasingly apparent in Europe and across the globe. The science is clear: we must urgently make our food systems sustainable, equitable, and resilient by addressing how we produce, distribute, and consume food. From nutrient pollution to nature collapse loss and the climate crisis, from household food insecurity to the growing burden of diet-related diseases, the challenges are complex and interrelated, requiring urgent, bold, and systemic policy and legislative solutions.

With discussions on the EU's long-term budget and reform of the **Common Agricultural Policy (CAP)** post-2027 picking up speed in 2026, while the **post-2030 climate policy framework** and **future of the EU livestock sector** also on the agenda, the Cypriot Presidency will have a crucial role to play in ensuring high sustainability ambition across these areas to support a Just Transition in our food and farming system. The historic consensus achieved in the **Strategic Dialogue on the Future of Agriculture** in mid-2024 provides a crucial stepping stone for these efforts, which the Presidency should embrace and build on.

*We therefore call upon the Cypriot Presidency to:*

- A. **Support a move towards a genuinely performance-based Common Agricultural Policy** that links budget disbursement to clear, measurable objectives, while boosting ring-fenced funding for agri-environmental measures and for the transition towards resilient, diversified farming grounded in agroecology, including in the livestock sector. The CAP should also end harmful subsidies by adopting a science-based exclusion list of damaging activities that no longer qualify for EU support, and it must target socio-economic support to those farmers who need it most, as called for by the Strategic Dialogue;
- B. **Bring the topic of emissions reductions in the agriculture and land use sector centre stage**, as part of the discussions around Europe's post-2030 sectoral climate targets and instruments, with a view to setting ambitious science-based emissions reduction goals for the agriculture sector, as recommended by the Strategic Dialogue. **Scrutinise the final draft Delegated Act of the CRCF Carbon Farming methodologies** to ensure current concerns are addressed and that they deliver on sustainability requirements and accurate quantification of real climate benefits;
- C. **Champion an evidence-based and inclusive dialogue on the future of the EU's livestock sector and broader protein system** to explore transition pathways that can secure better jobs for farmers and workers across value chains, respect planetary boundaries, support better health outcomes, and strengthen the EU's strategic autonomy. **Support calls for an EU Action Plan for Plant-Based Foods**, to advance the debate on EU-level consumption-side policies as part of the transition to fair and sustainable food systems;

- D. **Promote high ambition on animal welfare through EU legislative reforms**, in particular, urging the European Commission to publish ambitious proposals for the revision of the EU's animal welfare legislation, including a ban on the use of cages in animal farming, as called for by 1.4 million European citizens. **Conclude the revision of Animal Transport legislation** with high ambition, including a ban on live exports;
- E. **Increase the dialogue between the Agriculture Council and Environment Ministers and stakeholders**, including by inviting environmental NGOs to the Informal Agriculture Council and meeting with environmental representatives in the margins of Agriculture Council meetings, as was done by the Danish Presidency and is already customary with some agricultural representatives;
- F. **Set 2026 fishing opportunities below the Maximum Sustainable Yield (MSY) limits in line with the best available scientific advice** to operationalise the **Ecosystem-Based Fisheries Management approach under the Common Fisheries Policy**.

**More information:** ['CAP: From a flawed proposal to real transition': Joint policy brief on the post-2027 CAP proposal](#) • ['Time for farmers and nature to thrive': Joint policy brief on the future of EU agricultural policy](#) • ['Putting a price on agricultural emissions': EEB reflections on an EU Emissions Trading System for agriculture](#) • ['Breaking Free': EEB position paper on EU animal welfare](#) • [Joint Call for EU Action Plan for Plant-Based Foods](#)



## 5. Respond to the climate crisis by supporting only the most efficient pathways to decarbonisation, creating a fast track towards a people- and nature- positive renewable energy future.

The scale of the transformation our societies face is so vast, and the urgency to act so acute, that we cannot afford to waste precious resources on technologies that have proven unable to deliver at scale, on budget, and on time. Rather than prioritising the clear winners of the energy transition (direct electrification, renewables and flexibility solutions), EU Member States continue to pursue technology neutrality by betting on new nuclear, over-relying on hydrogen, and extending fossil infrastructure, for example, through new LNG gas projects.

Carbon pricing is a very encompassing tool to address emissions reductions. However, its effectiveness is currently undermined by the lack of adequate regulatory and complementary measures. **ETS2** is now set to be significantly weakened, both by the postponement of its entry into force and by the loosening of the **Market Stability Reserve** rules. This increases the pressure on EU Member States to act decisively in the buildings and transport sectors.

Any measures taken at the national or EU level that genuinely reduce emissions will also lower **ETS2** prices. It is therefore crucial that all discussions in the Council reflect this reality. Delaying the implementation of Fit for 55 policies will only result in higher bills for citizens and businesses alike.

*We therefore call upon the Cypriot Presidency to:*

- A. **Protect ETS2 from further political attacks in the Council.** This requires clearly explaining the need for substantial national policies to achieve the required emissions reductions by 2030. It also requires safeguarding complementary policies that reduce emissions in **ETS2** sectors, such as the automobile fleet standards, the **Energy Performance of Buildings Directive, and the Energy Efficiency Directive**;
- B. **Promote active discussion and the sharing of best practices on ETS2 revenue use, beyond the Social Climate Fund.** Direct payments to households are an extremely transparent way to build trust in carbon pricing, while providing effective relief to low- and middle-income households;
- C. **Protect EU funds by pushing back against attempts to channel EU funding towards late, expensive, and unreliable nuclear energy.** Only the nuclear industry would benefit, and any new nuclear power plants would come online too late to meaningfully contribute to EU decarbonisation. Any national contributions must include provisions to address delays and cost overruns of a magnitude consistent with all recent nuclear projects in the EU;
- D. **Promote global climate ambition.** To align with the 1.5°C temperature limit and the principle of equity, advocate for **EU climate neutrality by 2040** at the latest, based on at least 92% domestic

gross emissions reductions compared to 1990 levels. Ahead of COP31 in Australia, the Presidency can facilitate pre-COP coordination and mandate-building. In addition, bring the ambition of the **F-gas Regulation** to the global stage to prevent the widespread adoption of HFOs (PFAS) in developing countries. This is particularly important for countries like Cyprus that rely heavily on cooling. Such action would also support European producers of greener alternatives, reduce import costs for Member States, and create a level international playing field, whether through the **Montreal Protocol** or bilateral agreements with key manufacturing economies;

E. **Promote electrification and lower bills for consumers.** The electrification action plan is expected in Q1 2026. More broadly on renewables, the Presidency should act as a convenor to address persistent bottlenecks such as permitting, grids, and interconnection, while tackling energy isolation. Advocate for a stronger framework for electrification by addressing high electricity taxes and levies in many Member States, and by overcoming State aid barriers to enable 0% VAT on renewable technologies such as heat pumps. Lastly, **lead by example** by prioritising national investment in renewable heating and cooling technologies and phasing out fossil fuels from the sector;

F. **Energy taxation Directive:** Finalise the revision of the **Directive** with a strong climate lens:

- **Remove fossil fuel subsidies** and avoid promoting unsustainable fuels under the guise of a “clean” transition;
- **Shipping Decarbonisation Strategy:** Embed a “Wind First” flagship initiative into EU maritime policy; prioritise energy efficiency and wind propulsion at the top of the shipping decarbonisation hierarchy; reform port planning so ports function as climate and justice hubs with safe, multi-fuel infrastructure; support fuels with robust full life-cycle GHG performance; avoid incentivising LNG or other high-emission alternatives; and advocate for strong IMO measures with strict limits on carbon credit use, full fund transparency, and robust sustainability criteria.

**More information:** [Creating positive impact with ETS2](#) • [Why direct payments are essential to make household carbon pricing work in the EU](#) • [Joint letter to establish an EU lending facility for ETS2 revenue for member states](#); • [Three Guiding Principles for National Social Climate Plans](#);• [How renewables can help vulnerable households](#); • [EEB's response to the Do No Significant Harm principle in the Social Climate Fund](#)• [CCS Reality Check – Risks and Priorities](#)

## 6. Deliver a nature-positive agenda for land, freshwater and oceans and fast-track climate adaptation and resilience

Our lives, health, well-being, economy, and resilience to the climate crisis depend on healthy, biodiverse terrestrial, freshwater, and marine ecosystems. Despite this urgent moral, economic, and environmental imperative, nature is in crisis. According to the 2025 **Europe's Environment Report**, human pressures remain high, and many EU policy targets remain off track. Urgent, transformative action is needed to protect and restore nature, the foundation of a healthy society and a stable economy. The EU must continue the course of implementing and strengthening the **EU Strategies on Adaptation, Biodiversity, Forests, Oceans, Soil and Water Resilience**, including smart implementation of EU nature, water and marine laws. Member States must swiftly transpose and start implementing the recently adopted **Soil Monitoring Law** and finalise the adoption of the revised Directive on priority water pollutants, as well as accelerate implementation of the **Nature Restoration Regulation, Nature Directives**, and the **Water Framework Directive**. Strong Council leadership will be crucial to make the most of the potential these laws offer to protect and restore nature, put soils on the path to recovery and tackle the water pollution and climate crisis.

During the Cypriot Presidency, the European Commission plans to support the roll-out of the **EU's Water Resilience Strategy**, including via Structured Dialogues with Member States, as an opportunity to close the water acquis implementation gap by 2027. It is also due to publish the evaluation of the Nitrates Directive and decide on its future. We believe the Nitrates Directive is fit for purpose and should be maintained, but implementation, reporting, and enforcement should be strengthened in line with the recommendations from the European Court of Auditors.

The von der Leyen II Commission's "simplification" agenda has driven major deregulation, using rapid, extensive, and undemocratic omnibus packages to roll back the **Green Deal** and longstanding environmental laws. The Presidency must lead the Council in defending core protections for nature, water, soil, and marine environments. Most alarming is the planned 2026 review of the **Water Framework Directive**, which would allow more mining pollution into our waterways, threatening the EU's economy, climate resilience, and public health.

In addition, the Presidency will represent the EU on a global stage, including preparatory meetings under the **Convention on Biological Diversity, the 2026 UN Water Conference and the Desertification Convention**, to name a few. It is important that the EU fills the geo-political vacuum and becomes a real leader on biodiversity protection, water resilience and ocean stewardship, repairing the reputational damage on the global scene it has suffered after a political U-turn on species protection.

The strong EU action on protecting and restoring nature is supported by citizens, scientists, civil society, mayors, and businesses, among others, and provides for a progressive political agenda that wide sections of society can rally around.

*We therefore call upon the Cypriot Presidency to:*

➤ **Biodiversity and nature restoration:**

- A. **Maintain the integrity of the EU's nature laws** and ensure clear progress within the EU on their impactful implementation backed by political will and funding;
- B. **Support the impactful roll-out of the Nature Restoration Regulation** across the EU by its legal deadlines, following the NGO recommendations in order to fully use the law's opportunities in tackling the biodiversity, water and climate crisis;
- C. **Promote the need for stepping up implementation of the EU Biodiversity Strategy for 2030**, including review and ratcheting up of progress, as well as achievement of the commitments under the Kunming Montreal Global Biodiversity Framework;
- D. Insist that **Member State reporting under the Nature Directives** remains based on science so that the upcoming State of Nature Report serves as a foundation for enhanced action to tackle the biodiversity crisis;
- E. **Follow the recommendations from more than 200 NGOs and support EU Member States in maintaining the highest protection status of the wolf**, ensuring science-based monitoring and reporting, and promoting co-existence between large carnivores and communities.

➤ **Water:**

- A. Support **ambitious rollout of the EU's Water Resilience Strategy**, including Efficiency-First recommendations to save water by curbing demand and prioritise nature-based solutions to enhance the contribution of healthy freshwater ecosystems to manage water scarcity and droughts and achieve climate resilient water management in the EU;
- B. **Engage in final adoption of the updated priority water pollutants** and insist that Member States start tackling pollution by these harmful pollutants without delay;
- C. **Pushback against the Commission's concerning decision to revise the Water Framework Directive in 2026** and lead the Council's work including as a co-chair of the Common Implementation Strategy of the Water Framework Directive as well as at the Ministerial level on the EU's action to step up implementation and enforcement of the Water Framework Directive (and related directives on floods and priority pollutants) to ensure that the environmental objectives of the WFD are met by 2027. Oppose the construction of new dams and other damaging infrastructure, given their negative biodiversity impacts and focus instead on barrier removal to restore free-flowing rivers;
- D. **Insist that the Nitrates Directive is fit for purpose** and organise the Council's support for impactful implementation and zero tolerance of non-compliance with the Nitrates Directive and the need to complement it by additional action such as the promised Integrated Nutrient Management Action Plan to finally address the nitrate pollution of our water environment;
- E. **Demonstrate EU's global leadership on water protection and resilience at the upcoming UN Water Conference in 2026**, including meeting the Freshwater Challenge on freshwater ecosystem protection and restoration.

➤ **Soil:**

A. **Support the Member States in their efforts to transpose the first EU Soil Monitoring Law** and ensure its impactful implementation to put our soils on the path to recovery by 2030, and guarantee that they are brought back to health by 2050.

➤ **Forests:**

A. Ensure that the so-called “simplification” of the EU Deforestation Regulation (EUDR), as agreed by the EU institutions in December 2025, does not strip it of its capacity to tackle the growing global deforestation crisis. **Work to prevent any further legislative proposals that could weaken the EUDR.**

➤ **Oceans:**

A. Champion the full implementation of the **Common Fisheries Policy**, and steer conversation in Council regarding the CFP’s current evaluation to ensure that it leads to streamlined implementation in view of finally reaching its environmental and social objectives.

B. Support the implementation of the Ocean Pact by driving the negotiations for an **ambitious Ocean Act** that will build a single, simplified and enforceable framework for all ocean-related policies. The Ocean Act must establish legally binding objectives, time-bound and measurable targets (including intermediate targets) for 2030, 2040 and 2050, to ensure the achievement of Good Environmental Status as prescribed in the Marine Strategy Framework Directive.

C. Support the parallel revision of the Marine Strategy Framework Directive and the Maritime Spatial Planning Directive to align both Directives and synchronise their implementation cycles. This alignment must be based on the recognition that **ocean health is the main shared goal for both legislations**, as a central precondition to supporting thriving coastal communities and blue economy sectors.

D. Convene a cross-sectoral high-level Ocean Ministers meeting to foster integrated marine governance and advance synergies between fisheries, climate, and biodiversity policies.

➤ **Ecosystem-based adaptation:**

A. Work with the European Commission to **ensure that the upcoming integrated framework for climate resilience prioritises nature-based solutions** to adapt to climate change, aiming at making clean water available for nature and for people.

➤ **Lead by example:**

A. Lead by example in **insisting that the integrity of the EU’s nature, water, soil and marine laws is maintained** and demonstrating progress in their smart implementation.

**More information:** [Nature Priorities for the New EU Mandate](#); [Joint statement by 300+ civil society organisations calling for strict wolf protection to be maintained](#); • [NGO letter calling on EU Member States to now lower the protection status of the wolf](#) • [NGO assessment of NRP preparation processes](#) • [Letter to Commission President advocating against inclusion of the Nature Restoration Regulation in the environment omnibus](#) ; • [Protecting the foundations of life – Statement on the Soil Monitoring Law](#); • [Call for a dedicated EU Nature Restoration Fund](#); • [Benefits of the Forest Monitoring Law](#); • [The Changing Seascape of Deep Sea Mining in Europe](#) • [LRE letter on the environmental omnibus](#) • [EEB letter on RENURE](#) • [Industry Wish List](#) • [Going with the flow: barrier removal for healthier rivers](#) • [A Water handbook for the 2024-2029 mandate](#) • [EEB view on Water Resilience and Efficiency First Guidance and Recommendations For Ambitious Nature Restoration Plans](#)[Guidance and Recommendations For Ambitious Nature Restoration Plans](#); • [Call for a dedicated EU Nature Restoration Fund](#); • [Protecting the foundations of life – Statement on the Soil Monitoring Law](#); • [NGO statement on the urgent need to adopt the EU Soil Monitoring Law](#) • [Position paper: How could European forests best benefit from the EU Forest Monitoring Law?](#) • [Benefits of the Forest Monitoring Law](#); • [Hatchet Job on the Forest Monitoring Law – What Next?](#) • [The Changing Seascape of Deep Sea Mining in Europe](#) • [LRE letter on the environmental omnibus](#) • [EEB letter on RENURE](#) • [Industry Wish List](#) • [Going with the flow: barrier removal for healthier rivers](#) • [A Water handbook for the 2024-2029 mandate](#) • [EEB view on Water Resilience and Efficiency First](#).



## 7. Maintaining and delivering on zero-pollution: clean air for all

Air pollution is the first environmental health risk in Europe, responsible for around 300,000 premature deaths every year. In September 2021, the **World Health Organisation published its latest Global Air Quality Guidelines**, setting clear indications on which air quality standards should be guaranteed to better protect people's health and the environment from air pollution. In 2021, the European Commission published its **Zero-Pollution Action Plan (ZPAP)** to achieve a zero-pollution ambition, announcing several key initiatives for cutting air pollution at the source and the revision of the **Ambient Air Quality Directives (AAQDs)**. This revision led to the adoption of a new AAQD, also establishing stricter limits on key air pollutant concentrations, aligning EU standards more closely with **World Health Organisation (WHO) guidelines**. Ecosystems protections have also been increased in the new legislation.

Under the Cypriot Presidency, Member States will continue to transpose the revised **Ambient Air Quality Directive**, which entered into force on 10 December 2024. Additionally, the conclusions of the European Commission's Evaluation of the **National Emission Ceilings Directive** will hopefully help drive the necessary steps to secure further reductions after 2030 and meaningful actions on laggard sources of air pollution. Important decisions also need to be taken at the international level, within the framework of the **UNECE Long-Range Transboundary Air Pollution Convention**, namely for the ongoing revision of the **Gothenburg Protocol**. The commitment of EU Member States is key to driving the process towards an ambitious outcome.

*We therefore call upon the Cypriot Presidency to:*

- A. **Object to any simplification of the recently agreed Ambient Air Quality Directive and National Emission reduction Commitments Directive's** requirements through the European Commission's Omnibus approach or through any other initiative which is not following the standard revision process and based on a solid impact assessment: European citizens need clarity and strict rules when it comes to the implementation of these key instrument aiming at protecting public health and environment. Life-saving protective rules must be delivered within the identified timeline.
- B. Guarantee the **right to clean air** and reduce exposure, preventable mortality, and illness. The recently revised **Ambient Air Quality Directive** establishes more ambitious air quality standards to be achieved by 2030, and Member States' actions to secure compliance by the deadline are of utmost importance, without relying on any heavily priced postponement.
- C. Ensure the **Clean Industrial Deal** embeds meaningful air pollution reduction strategies and measures while also preventing any regression of the system through, i.e. oversimplification/deregulation or postponements.
- D. In line with the recently published Evaluation of the **National Emission Reduction Commitments Directive**, which highlights both the need to fully implement the existing instrument and the need to further reduce air pollution, promote the necessary steps to define the EU strategy beyond the year 2030. Including setting the appropriate National Emission Reduction Commitments for the already covered pollutants and expanding the scope of the Directive to include methane, black carbon and mercury.

- E. Secure an ambitious positioning of the EU within the ongoing negotiations of the **UNECE Convention on Long-range Transboundary Air Pollution's Gothenburg Protocol**. The ongoing revision of the Gothenburg Protocol is a key opportunity to secure that meaningful action is taken also at UNECE level to cut air pollution through the definition of ambitious Emission Reduction Commitments for 2030, 2035 and 2040 for the already covered pollutants and also including methane, black carbon and mercury, which are not yet covered by the instrument, while not relying on flexibilities.
- F. Contribute to the **process of revision of EcoDesign standards** for stoves and boilers, having in mind the contribution that domestic heating makes to air pollution in the EU, with around half of PM2.5 emissions being generated by it. With a heavy impact on human health, the environment and climate, it also generates black carbon emissions.
- G. **Commit to meaningfully addressing air pollution from agriculture:** ammonia emissions are related to around 50% of secondary PM 2.5 emissions in the EU, and methane is a key precursor of ground-level ozone. Horizontal and sectoral policies and legislation must recognise the need to promote a system change which does not rely on intensification and overproduction, securing that the agricultural sector does its part to allow the EU to deliver what science recommends on air quality and to align with the WHO Air Quality Guidelines.
- H. Make the case for the **swift revision of the Environmental Noise Directive**: environmental noise is Europe's second largest environmental health risk, and transport noise was responsible for around 66,000 premature deaths in the EU and around 50,000 cardiovascular disease cases in 2021. The revision of the Directive is especially needed to secure the definition of noise limit values in order to guide the necessary change and plan for the needed support.

**More information:** [Clean Air Forum 2025: EEB urges EU to commit to post-2030 emission reductions while securing implementation of existing legislation](#); [Ozone onslaught across Southern Europe continues with six alarm threshold spikes already this year](#); [New Report Confirms Action on Air Pollution Guarantees Triple Win; Europe is unwell – and methane is one of its most dangerous symptoms](#).



## 8. Advancing a toxic-free environment and transforming the transition of the chemical sector through a future-proof, sustainable policy framework

The chemical industry is a major contributor to climate change, pollution, biodiversity loss and chronic diseases, with harmful substances like PFAS contaminating the environment and posing serious health risks. Without deep transformation, the industry has no future. **The Chemicals Industry Package** is a key opportunity to drive this shift, but it must break from business-as-usual.

**REACH**, the EU's main chemical regulation, is falling short: chemicals enter the market in no more than three weeks, but harmful ones remain for decades, and high levels of non-compliance persist. As the European Commission prepares a revision under the upcoming Cypriot Presidency, the focus must be on strengthening, not weakening, the rules. We need faster, smarter decisions; toxic-free products as the norm; and better data to enable a safe, circular economy.

**PFAS** pollution is a ticking time bomb for Europe's health, environment, and economy. PFAS contamination across Europe would cost **around €100 billion annually**, while health impacts from PFAS exposure in Europe are estimated at **up to €84 billion per year**, according to the Nordic Council of Ministers and recent EU briefings.

Found in soil, water, food, and even the blood of newborns, PFAS contamination is widespread, forcing governments in countries like the Netherlands, Denmark, France, Italy, and Belgium to warn citizens against eating homegrown vegetables and eggs. EU biomonitoring confirms widespread exposure at levels that pose serious health risks, with many young people exceeding safety thresholds. PFAS hotspots show exposure up to 100 times above average.

The simplification agenda promoted by the chemical industry is menacing to weaken chemical controls. The **Omnibus** on chemicals legislation threatens to undermine protections that have been agreed on by all institutions during thorough discussions with all actors involved and based on scientific evidence.

The Commission's proposal for a **Regulation on the European Chemicals Agency (ECHA)** is a welcome step toward improving the agency's governance, organisational structure, and financial model in light of its expanding mandate, but additional strengthening is needed to ensure ECHA can fully deliver on its mission. In particular, the regulation should more clearly affirm ECHA's core objective of protecting human health and the environment, including vulnerable groups and future generations; enhance the organisation and functioning of ECHA's committees by increasing capacity, transparency, and conflict-of-interest safeguards to ensure independent decision-making; and reinforce cooperation with other EU agencies so that, in cases of divergent opinions, decisions prioritise the high level of protection required under the One Substance–One Assessment framework.

**Mercury** and its compounds are highly toxic; they can damage the nervous system and are particularly harmful to foetal development. Mercury 'travels' globally, bioaccumulates up through the food chain, especially in certain predatory fish, and presents a human exposure risk. The EU mercury regulation was revised, including mercury bans for dental amalgam by 1 January 2025 and fluorescent and other lamps by December 2025 and 2026, depending on the categories.

At the global level, the **Minamata Convention on Mercury** was adopted in October 2013 to protect human health and the environment from anthropogenic mercury emissions. The Sixth Conference of the Parties (COP6) to the Convention took place in November 2025 and decided, among others, to ban the manufacture and trade of dental amalgam, a historic milestone. In a landmark decision, COP6 invited the Secretariat of the Minamata Convention on Mercury to work with Interpol, the World Customs Organisation and others to investigate the manufacture, import and export of mercury-added cosmetics. Further, the COP-6 decision invited the World Health Organisation to develop a reduction strategy for both mercury-added SLPs and for SLPs that may not contain mercury. This aspect of the decision is significant because it not only looks at the need to address the toxicity of SLPs, but also their cultural overtones related to promoting colourism and racism. The COP also decided to work towards closing the loopholes that legally allow mercury compounds to be traded, as this is compromising the Convention's objective, particularly related to lacing cosmetics with mercury.

The Seventh Conference of the Parties (COP7) to the Convention will take place from 14 to 18 June 2027 in Geneva. Important decisions are expected to further strengthen the Convention, among others, towards controlling mercury compounds, banning vinyl chloride monomer (VCM) production provided mercury-free alternatives are available, strengthening the implementation of the ban on mercury-added cosmetics, and in relation to trade and artisanal small-scale gold mining.

The relevant EU legislation and positions would need to be robust and future-oriented to ensure further opportunities to push the global debate.

The mercury-added skin-lightening cosmetics challenge has come to global attention, and the enforcement of the relevant ban needs to be strengthened.

*We therefore call upon the Cypriot Presidency to:*

- A. Support a Chemicals industry package** – that includes a concrete roadmap for the transformation of the chemical industry, underpinned by clear environmental and social conditionalities. This roadmap should guide the sector's shift toward safe, sustainable chemicals and ensure public investments and support are tied to measurable progress on pollution prevention, detoxification, decarbonisation, worker protection, and just transition principles;
- B. Adopt a general approach to the REACH revision** to initiate interinstitutional negotiations. The Council mandate must keep the Substances of Very High Concern ((SVHC) phase-out aim; make toxic-free products the default, not the exception; address critical data gaps, especially on polymers, the building blocks of plastics, to support a safe and circular economy; accelerate decision-making by grouping chemicals and applying mixture assessment factors in risk assessments, and avoid weakening regulatory processes through the introduction of a formalised risk management option analysis (RMOA);
- C. Support a clarification on PFAS** that acknowledges the strong, science-based and democratic REACH restriction process; presents an EU-coordinated plan to address widespread PFAS pollution through effective remediation, alongside with the application of the polluter pays principle; establish a plan to support affected communities, guarantees access to justice and compensation; and actively promoting PFAS-free solutions and support industries leading the way in safer, sustainable alternatives;

**D. Ensure that the final agreement on the Omnibus on chemicals legislation** reduces burdens on authorities while increasing the protection of people and the environment. The trilogues must uphold democratic and evidence-based procedures, in line with the latest Ombudswoman decision, by ensuring that all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact assessments.

**E. Ensure that the Council's general approach strengthens the ECHA Regulation** by clearly prioritising the protection of human health and the environment, and reinforcing transparency, independence and conflict-of-interest safeguards. The regulation should further ensure the adequate and independent functioning of ECHA's committees, with provisions to enable future alignment across committees. A more stable and sustainable financial model should be established that fully applies the polluter-pays principle through revised and additional fees reflecting the real costs of ECHA's work, including for non-compliant dossiers, and supporting enforcement, monitoring, pollution prevention and substitution. Finally, cooperation and procedures for resolving divergences with other EU agencies should be fully aligned with the agreed OSOA wording to guarantee coherent and high-level protection across the EU chemicals framework;

**F. Promote EU leadership in strengthening the Minamata Convention on Mercury** by, among others:

- supporting and/or otherwise ensuring that resources are available to implement the work requested by the COP on mercury-added cosmetics, on preventing and combating illegal supply and trade of mercury, as well as in relation to environmentally sustainable gold supply chains;
- actively engaging in the intersessional processes and the preparation of the COP7;
- taking the lead or supporting initiatives towards phasing out mercury use in Vinyl Chloro Monomer production;
- controlling and, where feasible, eliminating mercury compounds' trade; as well as towards accelerating the closing of primary mines, eliminating loopholes in the Convention that benefit traffickers and illegal gold miners, improving comprehensive reporting on mercury trade, and identifying enhanced enforcement measures necessary to eliminate the illegal production, trade and use of mercury in Artisanal small-scale gold mining; and
- continue strengthening the enforcement of the mercury ban on cosmetics.

**G. Facilitate cooperation among Member States for the swift and effective implementation of the revised EU Mercury Regulation.** Accelerate, with the European Commission, the work on mercury compounds as per the EU Mercury Regulation, providing input to the global work; set the ground for developing a draft guidance on abatement technologies for mercury emissions from crematoria, as well as for assessing the need to further regulate remaining mercury uses and waste sources;

**H. Promote the revision of regulatory tools such as the Cosmetic Products Regulation, the Market Surveillance Regulation, the New Legislative Framework, to hold online platforms accountable** for selling illegal and dangerous chemicals and other products containing them, such as mercury-added skin-lightening creams, and to ensure that failure to comply with those requirements results in meaningful consequences;

- I. **Ensure a swift agreement on the customs reform in trilogues with the Parliament and the European Commission to address the surge in non-compliant**, dangerous products entering the EU Single Market, such as mercury-added cosmetics, and the growing challenges of e-commerce.

**More information:** Chemical industry Action Plan: [EEB proposal for a modern, competitive, and sustainable chemical industry](#), and [10 key messages and demands](#); REACH: [Ensuring a Future-Proof EU Chemicals Policy](#) – EEB proposals to ensure simpler, faster and bolder chemical policy goals'; [Simplifying REACH for industry and authorities](#); and [Translating lobby speak: What chemical industry's 'simplification' plan really means](#); PFAS: [Let's clarify PFAS](#); [Omnibus](#); [NGO comments CLP Omnibus](#); [Mercury Joint statement on online platforms](#); [EEB feedback on cosmetics call for evidence](#); [ZMWG views and statements at COP 6](#); [ZMWG cosmetics reports](#) Overall Zero Mercury Working Group news.



## 9. Address resource use and seize circular economy opportunities for the economy and society

Cyprus enters its presidency amid recent calls for European resource self-sufficiency. Establishing a solid resource governance framework remains the best path for Europe to establish resource independence and resilience. However, indications from the European Commission point towards a focus on recycling of secondary raw materials and increased use of biomass as the main vehicle to ensure competitiveness in the EU. **The Circular Economy Act** public consultation analysis and impact assessment will take place during the Cypriot presidency. Together with the recently adopted Council Conclusions on Climate and Circular Economy, the Act marks a key opportunity to steer the political direction towards higher ambition.

*We therefore call upon the Cypriot Presidency to:*

- A. **Support ambitious action to address overconsumption**, including binding targets for resource use reduction and material demand mitigation across sectors, and encourage action to be taken before products are placed on the market (i.e. through the Digital Fairness Act);
- B. **Take a nature restoration-first approach to biomass**, anchored in principles of overall resource governance within planetary boundaries - **as the bioeconomy strategy** was presented in November 2025, and much of the burden of determining the best principles for use is left to Member States;
- C. **Make every possible effort to re-establish a majority in the Council for the Green Claims Directive**, and to resume interinstitutional negotiations. The Directive should be adopted with stringent provisions on the verification procedure for green claims and labels;
- D. **Engage with the actions proposed in the European Affordable Housing Plan** and notably support comprehensive National Building Renovations Plans and Council recommendations on fighting housing exclusion, to prioritise renovation and a better use of the existing building stock and ensure decent and affordable housing for all. Uphold and protect legislation that ensures a healthy, safe and sustainable built and natural environment;
- E. **Uphold democratic and evidence-based procedures in dealing with the proposal for an Omnibus on the environment and waste**, by ensuring that all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact assessments;
- F. **Ensure that the EU continues to champion an ambitious Global Plastics Treaty at INC-5.3**, including binding provisions on plastic production, chemicals, product design, a robust financial mechanism, and effective decision-making processes;
- G. **Follow the Commission's work on the newly announced ResourceEU plan**, and ensure that it does not become a race to the bottom to secure the cheapest resources for a never-ending consumption growth pattern;

**H. Ensure that ResourceEU does not become a shortcut for cheap inputs at the expense of people's rights**, water protection and long-term resilience (e.g. by the revision of the WFD). The Presidency should demand full transparency, strict due diligence for any joint purchasing or stockpiling, and a clear focus on reducing material demand. **ResourceEU must not weaken environmental safeguards, due diligence and reporting**, nor prioritise defence over renewables. The Presidency should steer the file toward a rights-based, accountable resource governance model that avoids a race to the bottom

**More information:** [A resilient and resource-wise Europe: Sufficiency at the heart of the EU's future](#) • [Due diligence in EU product rules – Policy Briefing](#) • [EEB position on legislative proposal on substantiating green claims](#) • [EEB joint statement on online marketplaces and effective enforcement](#) • [Prevention is better than cure: EEB position on the new Circular Economy Act](#) • [EEB reaction to EU Bioeconomy Strategy](#) • [EEB Circular Economy Act public consultation response](#) • [Joint Statement on the European Affordable Housing Plan](#)



## 10. Protect the rule of law and our health, foster legal and social justice and strengthen civil society engagement and democracy

At a time when the international legal order is becoming more fragmented and enfeebled by certain states undermining basic international norms, **EU Institutions should uphold, defend and promote international standards, especially those related to fundamental rights**, including the **European Convention on Human Rights** which enshrines safeguards for environmental rights and democracy, including by promoting and safeguarding the universal right to clean, healthy, and sustainable environment.

**The last years have also seen the rise of a more hostile environment for environmental democracy and for environmental defenders and NGOs to operate.** While transparency on who influences decision-making is key to understanding the power imbalances and influences in politics, the politically motivated, exaggerated and disproportionate targeting of NGO funding does not aim at increasing transparency but at questioning the role of civil society's critical voice in the democratic process. If the campaign was targeted at increasing transparency, its proponents would allow for increased scrutiny for all beneficiaries of EU funding, including companies and business associations.

In this context, the Commission's proposal for **Harmonised requirements on transparency of interest representation of third countries** risks mimicking some of the national legislations on foreign funding of NGOs in some countries, which have a direct effect on organisations and individuals active in political debates and environmental protection. The Council will have the important role to push back against measures that hinder civil society, to ensure the EU does not follow the trend of introducing authoritarian-style laws.

*We therefore call upon the Cypriot Presidency to:*

- A. Protect democracy and the rule of law by promoting and safeguarding fundamental rights, including the universal **right to a clean, healthy, and sustainable environment**;
- B. Engage with the update of the **governance of the Energy Union and Climate Action** (revision of regulation 2018/1999) with a view to ensuring minimum standards of **public participation** in planning obligations;
- C. Support any strengthening of **Europol** and **Eurojust** that will aid in **combatting cross-border environmental crime** and to seriously consider the extension of the mandate of the **European Public Prosecutor's Office** to include environmental crime;
- D. Support the Commission's strategy on intergenerational fairness and consider an **inter-institutional declaration** recognising the rights of future generations;

- E. Supervise the European Commission's revision of the **communication on better regulation** with a view to safeguarding and strengthening the **inter-institutional balance** in the legislative process, as well as minimum standards for **impact assessments**;
- F. Actively strengthen the Aarhus Convention's **Compliance Committee** and **Rapid Response Mechanism** and call on all EU Member States and the European Commission to ensure **robust and sustained financial support** for the mechanisms;
- G. Lead the Council in discussions on any revision of the **Environmental Liability Directive** and argue for the need to revise the seriously outdated legal framework despite delays in its evaluation;
- H. Lead by example on **implementation and enforcement of EU environmental law** via compliance with EU infringement proceedings and CJEU rulings, and by voluntary transparency of all infringement letters;
- I. **Adhere to and promote the international Rule of Law generally**, especially regarding international norms which affect environmental rights and fundamental freedoms, as interpreted by the **European Court on Human Rights**, as well as to promote the respect of multilateral environmental agreements such as the **UNFCCC and CBD**;
- J. **Counter the Commission proposal on Harmonised requirements on transparency of interest representation of third countries**, which risks taking the EU on the path of introducing an EU-wide Foreign Agents Law, and which would hugely undermine the democratic foundations of the European Union;
- K. **Engage with the Commission on the implementation of the EU Democracy Shield and the Civil Society Strategy, and be vocal about the need for them to not only defend the status quo of European democracy** (protecting EU democracy against foreign interference and disinformation and upholding the integrity of democratic processes across the EU), **but to nurture a prosperous and honest democratic space for public engagement and debate**. The shield for European democracy should not become a cover for governments to crack down on legitimate NGOs, labour unions and CSOs, including attempts to limit advocacy activities and engagement in policy making, undermine political protests, restrict funding for civil society, shrink civic space, or damage innovative democratic participation that falls outside of traditional party politics. **We therefore call on the Presidency to be vocal about the need to protect operating support for NGOs (e.g LIFE) and to protect CSOs from smear campaigns in order to safeguard democratic processes and protect the European Project as a whole.**

**More information:** [2025 reports on the State of Access to Justice, the State of Public Participation and the State of Access to Information](#); [The EU's non-compliance with the Aarhus Convention: A brief history](#), [Public participation and Social Climate Plans: the need for ongoing citizen engagement](#), [Effective implementation: Transparency in the EU infringement process](#); [Democracy for Transition Coalition position papers on Civil Society Strategy and Democracy Shield](#); [BeLIFE: Report from Consultation with Environmental Defenders and Environmental Rights Report](#); [Civil society attacks: Joint Statement on NGO Funding Attacks](#), [EUObserver OpEd 'What Happens After Europe's NGOs Are Dismantled'](#); [Environmental Crime: Joint NGO Position Paper on the Transposition of the European Crime Directive](#).

# Abbreviations

|        |  |
|--------|--|
| AAQD   | Ambient Air Quality Directives                                       |
| BAT    | Best Available Techniques  |
| BREFs  | Best Available Techniques Reference Documents                        |
| CAP    | Common Agricultural Policy   |
| CBAM   | Carbon Border Adjustment Mechanism                                   |
| CLP    | Classification, Labelling and Packaging                              |
| COP    | Conference of the Parties  |
| CPR    | Construction Products Regulation                                     |
| CRMA   | Critical Raw Materials Act   |
| CSOs   | Civil Society Organisations  |
| CSS    | Chemicals Strategy for Sustainability                                |
| EC     | European Commission  |
| EED    | Energy Efficiency Directive  |
| ELD    | Environmental Liability Directive                                    |
| EGD    | European Green Deal  |
| EoLV   | End-of-Life Vehicles   |
| EP     | European Parliament  |
| EPR    | Extended Producer Responsibility                                     |
| EQS(D) | Environmental Quality Standards (Directive)                          |
| ESPR   | Ecodesign for Sustainable Products Regulation                        |
| ETS    | Emissions Trading System   |
| EUCRA  | European Climate Risk Assessment                                     |
| GD     | Groundwater Directive  |
| GDP    | Gross Domestic Product   |
| IAA    | Industrial Accelerator Act   |
| IED    | Industrial Emissions Directive                                       |
| IEP-R  | Industrial Emissions Portal  |
| INMAP  | Integrated Nutrient Management Action Plan                           |
| JRC    | Joint Research Centre  |
| MEPs   | Minimum Energy Performance Standards                                 |
| MFF    | Multiannual Financial Framework                                      |
| NRL    | Nature Restoration Law   |
| NRRLPs | National Recovery and Resilience Plans                               |
| PP     | Public Procurement   |
| PFAS   | Per- and polyfluoroalkyl Substances                                  |
| PPWR   | Packaging and Packaging Waste Regulation                             |
| PRTR   | Pollutant Release and Transfer Register                              |
| REACH  | Registration, Evaluation, Authorisation and Restriction of Chemicals |
| RED    | Renewable Energy Directive   |
| RoHS   | Restriction on Hazardous Substances Directive                        |
| SDGs   | Sustainable Development Goals  |
| SFS    | Sustainable Food Systems Law   |
| SML    | Soil Monitoring Law  |

|        |   |
|--------|---|
| SLAPPs | Strategic Lawsuits Against Public Participation |
| UNECE  | United Nations Economic Commission for Europe   |
| UWWTD  | Urban Waste Water Treatment Directive           |
| WFD    | Waste Framework Directive                       |
| WFD    | Water Framework Directive                       |
| WHO    | World Health Organisation                       |
| WTO    | World Trade Organisation                        |
| ZPAP   | Zero Pollution Action Plan                      |

The EEB and its members welcome continued engagement and cooperation with the Presidencies of the Council of the European Union.

We develop an assessment following each Presidency on their environmental performances. **The assessment for the Danish Presidency can be found here.**

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# New Leaf

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