

**To: Environment Ministers of EU Member States**

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

**Meeting of the EU Environment Council Meeting,  
16 December in Brussels  
Recommendations from environmental citizens organisations**

Brussels, 8 December 2025

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share our recommendations ahead of the upcoming Environment Council. This meeting comes at a decisive moment for Europe's environmental and climate policies, as we work to build a sustainable and resilient region and embrace global responsibilities. Europe must be a global leader in advancing carbon neutrality, zero pollution and nature restoration, while ensuring an economy that benefits all.

The European Green Deal, endorsed by the Commission and Member States, sets this course. Yet we are concerned that long-term sustainability and resilience are being undermined by external pressures—such as disinformation campaigns and deregulatory agendas—as well as short-term interests within the EU. The Commission's recent "simplification" initiatives risk weakening essential rules that safeguard clean air and water, healthy food, restored ecosystems, fair working conditions and corporate accountability. At a time of accelerating climate impacts, widening inequalities and global instability, Europe needs stronger, future-oriented regulation, regulatory certainty and accelerated decarbonisation, not deregulation.

We urge Ministers to reinforce Europe's leadership by increasing public investment in climate and environmental action, including through the EU budget. Addressing the climate, biodiversity, and pollution crises alongside social inequalities will strengthen autonomy, innovation and human security—defined broadly to include climate, food, water, energy, housing, governance, and the rule of law. We invite you to consider our recommendations for the Council agenda and our vision for a resilient, just, and sustainable Europe.

## A. Bioeconomy strategy

### Background

With the Bioeconomy Strategy published on 27 November, the European Commission missed an opportunity to chart a clear path towards aligning Europe's resource use with the ecological boundaries of our planet. Instead, it is positioned as growth strategy that assumes switching from fossil to bio-based materials will solve EU's strategic dependencies. It states that "any growth" should stay within planetary boundaries, which is an impossibility given that the current use of biomass already exceeds safe operating limits. Sustainable use of biomass is not the main framing, rather it is cushioned in vague language in chapter 3 after chapters on scaling up innovation, investments and developing lead markets.

Regarding global partnerships, the strategy notes that the EU is "90% self-sufficient in biomass supply", a statement that masks severe differences between industries and hides strong dependencies e.g., in livestock feed, that have the potential to lock the EU into unsustainable consumption patterns.

Finally, it mentions at least ten different fora for stakeholder involvement, ranging from an Innovators and Regulators Forum to a Youth Ambassadors Programme, to a Bioeconomy Stakeholder Platform. It remains undefined how these will interact, how they will be governed, and how resources will be allocated between them.

### *The EEB therefore calls on the Environment Council to:*

- Adopt Council conclusions on the bioeconomy that call for a stronger framework for defining efficient use of biomass and prioritise considerably reducing pressure on ecosystems.
- Call for appropriate governance regarding stakeholder involvement in the implementation of the bioeconomy strategy, ensuring balanced representation in decision-making fora.
- Proactively phase out subsidies and other support measures that prioritise combustion and short-term use over long-term material use.
- Call on the Commission to include food for direct human consumption in their further work on the bioeconomy, upholding a holistic food systems approach to policymaking, relying on a multi-DG governance structure, and bringing back the long-awaited proposal for a legislative framework for sustainable food systems.

## B. Conclusions on Europe's Environment 2030 - Building a more climate resilient and circular Europe

### Background

The EEAs [\*Europe's environment and climate: knowledge for resilience, prosperity and sustainability\*](#) was launched on 30 September 2025. It is clear: the state of Europe's environment is increasingly concerning. There was a clear deterioration of nature, climate, health, while improvements were only seen as regards air pollutant's emission reduction, circular economy, and ozone, and a lot of areas, such as reducing chemical pollution and transitioning towards the circular economy, where

progress was mixed. The human and economic costs of inaction, of not reaching the 8EAP targets agreed by Commission, Council and Parliament are far too high. There is a clear picture of inter-generational injustice.

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

***The EEB therefore calls on the Environment Council to:***

- Respond to the EEA report findings and request to the Commission, based on Article 5(2) of the 8th EAP, to present a legislative proposal to add an annex to the 8th EAP with actions for the period post-2025 to maintain its continuity and ambition. [Article 42 of the 8EAP](#) notes that *to attain the thematic priority objectives, by 31 March 2025*, where appropriate there should be *a legislative proposal adding an annex to this Decision*.
- Ensure **Council conclusions on Europe's Environment 2030 - Building a more climate resilient and circular Europe** call for the needed legislative response to the 8EAP commitments:
  - **Explicitly acknowledging and addressing the triple crisis** of climate change, biodiversity loss and pollution, and calling for **integrated, cross-cutting solutions** to tackle these challenges holistically.
  - **Calling for supporting adequate public investments in nature-based solutions (NbS) to foster climate resilience**, considering the multiple co-benefits, and cost-efficiency, of NbS for ecosystem restoration, allowing sustainable and continuous provision of vital ecosystem services (water availability and quality, droughts and flood prevention, pollination, etc.).
  - Making explicit reference of **healthy ecosystems being the cornerstone of mitigation and adaption to climate change** and, through the provision of ecosystem goods and services, are vital to wellbeing, social stability and democracy, strategic autonomy, a thriving economy and long-term competitiveness.
  - Remind the European Commission that the Water Framework Directive is the foundation for the achievement of the EU's water resilience and **insist that the European Commission reconsiders its unsubstantiated decision to revise the WFD** since it has already created major uncertainty for water operators and national authorities.
  - Calling on the European Commission to ensure that the forthcoming legal proposal for the **integrated framework for climate resilience** is coherent with other key EU initiatives such as the **Water Resilience Strategy**.
  - Calling for the completion of the **EU Chemicals Strategy for Sustainability's** outstanding commitments, in particular the revision and modernisation of the **REACH Regulation** and the **PFAS action plan**, including the universal restriction, to reduce chemical pollution and achieve stronger protection on human health, wildlife, and the economy. Also committing to address ambiguities and

inconsistency between waste, product, and chemical legislation to ensure recycling effectively leads to non-toxic material cycles.

- Ensuring that the **Chemicals Industry Action Plan** drives the fundamental transformation of the chemical sector, supporting decarbonisation, detoxification, and the transition to clean and circular chemicals and materials, to meet the dual goals of protecting health, climate, and the environment while strengthening EU competitiveness.
  - Calling for the establishment of **an EU target on reducing resource use (material footprint) and its impacts (consumption footprint)** in line with planetary boundaries, mirroring the impactful emissions reduction targets which have unleashed transformative climate actions across the European and global economy (*see page 26 of EEB's Action Plan to the European Pact for the Future*).
  - Calling for the upcoming Circular Economy Act to reflect a **holistic approach to the transition towards a circular economy operating within planetary boundaries** by focusing on **sustainable resource use** and reflecting a clear prioritisation of the **top tiers of the waste hierarchy**: prevention, reuse and repair before recycling.
  - Making an explicit commitment that **simplification cannot and should not lead to a weakening of environmental and social protections** and that private funding cannot replace the necessary public investment.
  - Defining “administrative burdens” and making an **explicit distinction between “administrative burdens” and “responsibilities” to avoid pollution and resource impacts** that are, or should be, part of a license to operate. This will help reduce the intentional or accidental misuse of the unfortunately vague term “administrative burdens” to reduce responsibilities, by weakening social and environmental protections.
- Systemically ensure the **social dimension** of environmental degradation and/or improvements (i.e. costs of policy inaction/insufficient action and benefits of action) is understood and duly considered in policies, their implementation and funding.
  - Engage in the **MFF negotiations** to secure adequate funding to help meet joint commitments.

## C. AOB:

### a. Sixth conference of the Parties to the Minamata Convention on Mercury (COP 6)

#### Background

A historic milestone was reached with Parties agreeing to a global phase out of manufacture and trade of dental amalgam by 2034 (with special medical need exemptions, to be reviewed in 3 years). On cosmetics, in a landmark decision, the Secretariat of the Minamata Convention on Mercury, subject to the availability of resources, was invited to work with Interpol, the World Customs Organization and others to investigate the manufacture, import and export of mercury

added cosmetics. The World Health Organisation, together with the UNEP Global Mercury Partnership, were invited to prepare an illustrative national public health system-wide strategy, focused on reduction measures for mercury added cosmetics as well as skin lightening products that may not contain mercury. COP-6 also decided to continue working towards closing loopholes legally allowing mercury compounds to be traded, as this is compromising the Convention's objective — particularly related to lacing cosmetics with mercury.

However, the continuation of primary mercury mining and illegal trade of mercury remain extremely problematic areas under the treaty and compromise efforts made to control and eliminate where possible, mercury use, such as most importantly in artisanal and small-scale gold mining (ASGM).

***The EEB therefore calls on the Environment Council to:***

- Support and/or otherwise ensure that resources are available to fulfil the work requested by the COP on mercury added cosmetics.
- Accelerate, with the European Commission, the work on mercury compounds as per the EU Mercury Regulation providing input to the global work and eventually take timely action so the Convention is amended, as relevant, to close loopholes on their trade and to eliminate the detrimental use of mercury compounds in not allowed uses, such as in skin lightening cosmetics.
- Support and ensure implementation of COP decisions towards preventing and combating illegal supply and trade of mercury.
- Support and ensure implementation of COP decisions related to gold supply chains: strengthening their environmentally sustainable management, and developing or improving open data practices, with a view to encourage transparency and discouraging mercury use and illicit gold trade.
- Prepare the ground and take initiative towards making recommendations to COP-7 to accelerate the closing of primary mines, eliminate loopholes in the Convention that benefit traffickers and illegal gold miners, improve comprehensive reporting on mercury trade, and identify enhanced enforcement measures necessary to eliminate the illegal production, trade and use of mercury in ASGM.

## **b. The 37<sup>th</sup> Meeting of the Parties to the Montreal Protocol (MOP37)**

### **Background**

The 37th Meeting of the Parties to the Montreal Protocol (MOP37), held in Nairobi from 3–7 November 2025, focused on strengthening ozone protection while addressing the climate impacts of hydrofluorocarbons (HFCs) and other substances. Delegates discussed enhancing atmospheric monitoring, funding mechanisms, and accelerating implementation of the Kigali Amendment. While important decisions were taken—such as advancing work on emission reductions, improving data collection, and commemorating the 40th anniversary of the Vienna Convention—environmental organisations expressed concern over the *lack of urgency* and limited ambition, warning that geopolitical tensions and deregulatory pressures risk undermining progress. They

urged governments to seize the Montreal Protocol's proven success to deliver stronger climate action, particularly as the world approaches the 10-year anniversary of the Kigali Amendment

***The EEB therefore calls on the Environment Council to:***

- Strengthen HFC phase-down implementation: ensure full compliance with the Kigali Amendment by accelerating the transition to climate-friendly refrigerants.
- Boost atmospheric monitoring capacity: invest in monitoring stations to improve detection of ozone-depleting substances and HFC emissions.
- Increase financial contributions: provide robust support to the Multilateral Fund to help developing countries adopt future-proof, sustainable cooling technologies.
- Promote innovation in refrigeration: support R&D and deployment of low-emission, energy-efficient cooling systems.
- Integrate ozone and climate policy: Align Montreal Protocol commitments with EU Green Deal objectives, ensuring coherence between ozone protection, decarbonisation and zero-pollution strategies
- Lead diplomatically: Use EU influence to push for greater ambition at MOP38, especially on emission reductions and monitoring transparency.

**c. 30<sup>TH</sup> Conference of the Parties (COP30) to the United Nations Framework Convention on Climate Change (UNFCCC)**

**Background**

At COP30 in Belém, governments delivered the Belém Action Mechanism (BAM) as a long-overdue institutional home for just transition, but failed to agree the broader “justice package” that civil society, including CAN Europe, had called for: fossil fuel phase-out language disappeared from the final text and adaptation finance was delayed and diluted.

The Global Methane Status Report from UNEP and the CCAC, launched at the Global Methane Pledge Ministerial, confirms that global methane emissions are still rising and that, under current NDCs and national methane plans, countries are on track for only about an 8% reduction by 2030 compared with 2020 – far short of the 30% cut promised under the Global Methane Pledge. At the same time, the report shows that over 80% of the technical reduction potential to 2030 can be delivered at low cost, mainly in the energy and waste sectors, with agriculture still treated as a “hard to tackle” sector even though it is the largest global source of methane.

Without stronger action on high-emitting livestock systems and dietary change, methane emissions could still increase by 5% by 2030 and 21% by 2050 relative to 2020, pushing climate limits further out of reach.

Full deployment of available measures could prevent more than 180,000 premature deaths and around 19 million tonnes of annual crop losses by 2030, underscoring methane's role as both a climate and clean-air lever.



During COP30, the COP Presidency and CCAC also launched new implementation vehicles - including the Super Pollutant Country Action Accelerator and the “No Organic Waste” plan - but these remain modest compared to the scale of the problem.

***The EEB therefore calls on the Environment Council to:***

The European Council should:

1. **Integrate explicit methane pathways into the EU’s updated NDC.** Request that the upcoming EU NDC update include: (i) a time-bound fossil fuel phase-out pathway, and (ii) an explicit methane reduction curve with sectoral milestones, so that the EU arrives at future COPs as a high-ambition driver.
2. **Deliver a comprehensive EU strategy for agricultural methane and food-system transformation.** Instruct the Council and Commission to:
  - a. embed binding methane-reduction objectives into NECD, CAP Strategic Plans and national climate plans;
  - b. phase down the most methane-intensive livestock production and support a just transition for farmers toward diversified, agroecological systems; and
  - c. adopt policies that enable healthier, more sustainable diets.
3. **Call for all Member States to prepare sectoral methane action plans** integrated with air-quality planning so that health and crop-loss co-benefits are fully captured in decision-making.

Please find Climate Action Network Europe’s [full statement after COP 30 here](#).

## **d.8th meeting of the parties to the Aarhus Convention, Public Participation in Decision-making and Access to Justice in Environmental Matters (MOP 8)**

### **Background**

The 8th Meeting of Parties (MOP) to the [United Nations Economic Commission for Europe Aarhus Convention](#) showed that, in a rapidly deteriorating democratic landscape, the Convention should hold the line for those working to defend our planet. Despite this, the meeting turned out to be a rollercoaster. The EU and UK sought to delay adoption of Compliance Committee findings against them. Under pressure the EU backtracked on this request to align with the Convention’s adoption by consensus approach, but the UK held out, forcing postponement and jeopardising international cooperation.

[Michel Forst](#), the current Special Rapporteur on Environmental Defenders, was reappointed, meaning his critical work protecting defenders can continue for four more years. The Convention’s Secretariat warned that their work is at imminent risk due to lack of funding.

Parties adopted the Geneva Declaration, acknowledging the triple planetary crisis and recommitting to early, meaningful public participation in line with the urgency of the present moment.

It was concerning to see that at several moments, it looked like consensus – which has traditionally underpinned Aarhus' processes – would not be reached. In the end, Parties managed to maintain the spirit of the convention, agreeing to move things forward. The Aarhus Convention's principles were stress-tested but held, offering a much-needed anchor in an era of democratic backsliding.

***The EEB therefore calls on the Environment Council to:***

- Reinforce their support for the Aarhus Convention and its mechanism with financial and institutional support;
- Cooperate with and support the Special Rapporteur for Environmental Defenders, Michel Forst, and take steps to ensure that the EU and all Member States implement the [Guidelines on the Right to Peaceful Environmental Protest and Civil Disobedience](#);
- Take steps to fully implement the three pillars of the Aarhus Convention at all levels of environmental governance.

## **Key issues of concern for the Environment Council**

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

The next Multiannual Financial Framework (MFF) comes at a critical time when major investments are needed to protect people and businesses from climate impacts. The European Commission estimates climate and environmental investment needs at €520 billion annually until 2030, increasing by 2040. Yet, the Commission's proposal reduces funding for environment and biodiversity, which is deeply concerning. We welcome early Council discussions.

Current proposals weaken mainstreaming and spending targets: the target drops from 40% to 35% and now covers all six environmental objectives, ending the 10% biodiversity earmark for 2026–2027. Ending biodiversity expenditure tracking further risks EU compliance with global reporting under the Kunming-Montreal Biodiversity Framework.

We are especially concerned about abolishing the LIFE programme, the EU's only dedicated instrument for nature, climate and environment. Folding LIFE into two mega-funds—the European Competitiveness Fund and the EU Facility under NRPPs—would jeopardise proven successes and force LIFE projects to compete with other priorities. A dedicated LIFE budget line and multi-annual work programmes are essential to maintain consistency and support EU environmental goals.

Climate and nature funding should also be earmarked under the Common Agricultural Policy and Cohesion Policy to support farmers, rural areas, SMEs and regions.

While streamlining the DNSH principle is welcome, dangerous derogations risk undermining EU budget effectiveness and competitiveness. A clear, consistent approach is needed to identify harmful investments and reduce administrative burdens.

Finally, Civil Society Organisations (CSOs) are vital for democracy, bridging citizens and EU institutions. Operating grants enable CSOs to provide independent, evidence-based input and ensure grassroots voices are heard in Brussels. Public funding for CSOs must continue.



***The EEB therefore calls on the Environment Council to:***

- Dedicate at least 50% of the overall next EU budget to genuine climate and environmental investments and just transition investments, including at least 10% to genuine biodiversity objectives based on a dedicated monitoring system for each of the six environmental objectives.
- Provide a dedicated and adequately resourced budget line for LIFE actions under the EU Facility, together with multi-annual work programmes for LIFE actions implementation under the European Competitiveness Fund and the EU Facility.
- Guarantee a strict implementation of the Do No Significant Harm (DNSH) principle by the Commission without exemptions to end the support for environmentally harmful subsidies.
- Ensure that National and Regional Partnership Plans (NRPPs) continue to provide dedicated funding for the transition to a climate-neutral, nature-positive and zero-pollution economy
- Provide stronger guarantees that the European Commission will continue to deliver directly managed funding for CSOs across all sectors, including for non-governmental organisations (NGOs) active in the areas of environment and climate.

**2025 Annual progress report on Simplification, Implementation and Enforcement**

Simplification must not weaken EU environmental and sustainability laws. It should focus on smarter implementation, not dismantling protections. Yet, recent “simplification” initiatives, such as omnibus I and the CAP omnibus have weakened climate and environmental safeguards, jeopardising EU targets.

Omnibus procedures create legal uncertainty and undermine the EU’s environmental acquis and global commitments. Environmental laws boost competitiveness when properly implemented, reducing burdens compared to 27 national rules. The cost of inaction exceeds action: failure to implement existing laws costs €180 billion annually (1% of EU GDP), as noted in the 4th Environmental Implementation Review.

Dismantling laws without evidence delays green investments, rewards laggards, and penalises frontrunners, responsible businesses. Deregulation erodes competitiveness and the methods used contradict Better Regulation principles. [The European Ombudswoman found maladministration](#) in urgent omnibus proposals (e.g., CAP, corporate sustainability due diligence), citing skipped impact assessments and poor stakeholder consultation. She called for consistent application of Better Regulation rules, mandatory climate assessments, and minimum consultation standards.

Omnibus procedures led by non-experts should never alter substantive law. The “environment omnibus” lacks evidence, proportionality, impact assessment, and stakeholder input, raising serious concerns.

True simplification should focus on improving implementation and enforcement, not weaken targets, controls and rules. Solutions include digital innovation, better guidance, and

encouragement of active stakeholders' engagement, improvement of national public administration efficiency, reduction of administrative burdens for beneficiaries without weakening control, oversight and targets, strengthening staffing and capacity building of competent authorities, and stepping up inspections and enforcement.

***The EEB therefore calls on the Environment Council to:***

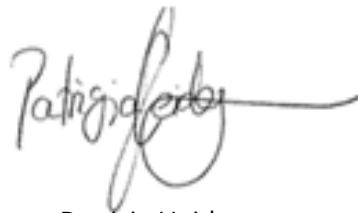
- Reject and counter environmental deregulation and ensure that the ongoing simplification effort are evidence-based, proportionate, based on an impact assessment, and carried out in consultation with practitioners, including environmental public authorities.
- Firmly reject omnibuses and simplification proposals that are not evidence based and that do not respect better regulation guidelines (proper consultation etc...) like the environment omnibus

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

Yours sincerely,



Patrick ten Brink  
Secretary General



Patrizia Heidegger  
Deputy Secretary General