

Brussels,
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Letter to the Heads of State and Government in view of the Informal EU leaders' Retreat on 12 February – recommendations from environmental citizens organisations

Dear EU Leaders,

As you prepare to gather for the informal EU leaders' retreat on 12 February, where you will discuss the current geo-economic context and how to continue providing political impulse to the area of competitiveness, we wish to share with you some important considerations on behalf of Europe's largest network of environmental citizens organisations.

In the last couple of months, under the heading of simplification and competitiveness, we have seen the weakening of regulatory certainty and the risk of undermining Europe's leadership in the green transition. Once a rule maker, the EU has made a dangerous move towards a rule taker.

While the EU environmental acquis has been the target of ongoing deregulation efforts, it is crucial to remember that these rules were set for providing clarity, stability, and a level playing field to businesses – while protecting human health and the ecosystems our societies and economies depend on. It helps make EU companies benefit from strong standards that favour frontrunners and predictable rules and was and remains a powerful tool of simplification and competitiveness in itself. Deregulation will only reward the laggards and undermine the leaders.

Evidence shows that EU environmental laws add value for the economy and society at large without creating unnecessary burdens, despite some political claims to the contrary. [OECD studies](#) demonstrate that stricter environmental policies do not harm productivity, jobs or growth. The European Commission itself recognises that high environmental standards and competitiveness are not contradictory but rather two sides of the same coin, noting that EU companies depend directly on at least one ecosystem service. It argues that winning the competitiveness race requires embracing green and digital drivers¹.

Poor Implementation and Cost of Inaction Hinder Competitiveness

The European Commission has also gathered extensive data to back this up. Findings point to poor implementation at the national level, not complexity, and cost of inaction as the main obstacles. In

¹ Remarks by Executive Vice-President Ribera, Commissioner Dombrovskis and Commissioner Roswall on the environmental simplification package, 10 December 2025,

https://ec.europa.eu/commission/presscorner/api/files/document/print/en/speech_25_3004/SPEECH_25_3004_EN.pdf

fact, the Commission estimates that the lack and poor implementation of existing environmental laws costs us €180 billion annually², that is, around 1% of the EU GDP, due to higher health costs and costs resulting from environmental damage (see Annex 1). Moreover, without common EU rules, businesses would face 27 different national laws instead of one unified framework - far more paperwork, not less. Beyond the direct costs of poor implementation, calls to “cut red tape” often ignore the immense cost of inaction and the benefits of implementation and enforcement of our environmental laws. A recent study published by the Commission estimates that the current levels of only four PFAS (‘forever chemicals’) pollution could cost the EU approximately €1.7 trillion by 2050³. These costs - including high healthcare expenses, environmental damage, and lost productivity - are borne by citizens and in fact, also by the States and cannot be borne much longer. Beyond the economic impact, they have serious consequences for the health of European citizens. A competitive economy can only and must be built and sustained for the benefit of a healthy population and a healthy environment.

Smart Implementation, Not Deregulation, Drives Competitiveness

Simplification should therefore be about smarter implementation and should never be used as a tool and pretext to remove the existing targets and obligations. Aligning reporting deadlines, using digital tools or dropping duplicative steps can ease compliance and, in the end, implementation. Unfortunately, most of the simplification initiatives so far have gone beyond those. Simplification must be evidence-based, developed with input from civil society and stakeholders, and must not weaken the law’s ambition, targets, enforceability or timelines.

Omnibuses are not fit for purpose; on the contrary. Omnibus packages are meant for technical adjustments to laws, such as aligning legal references or procedures after treaty changes. Since the beginning of 2025, the European Commission proposed no less than 10 omnibus packages, and several others are in the pipeline. Many of these proposals have direct implications for environmental and sustainability rules and are not technical adjustments; they contain dangerous rollback of hard-won and long-negotiated social and environmental protections put in place for a good reason and that remain important.

In fact, the European Ombudsman recently found that the [Commission committed maladministration](#) when preparing urgent legislative proposals - namely on corporate sustainability due diligence (Omnibus I), the CAP, and countering migrant smuggling. Her inquiry showed that the Commission skipped or curtailed essential steps of its own Better Regulation rules, failing to fully justify the urgency of the proposals, document its reasoning for derogations, or ensure transparent, evidence-based, and inclusive preparation. The Ombudsman herself has called on the Commission to apply the Better Regulation rules consistently and predictably and issued further suggestions when creating new

² COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS, 2025 Environmental Implementation Review, 7 July 2025, https://environment.ec.europa.eu/document/download/05a3b495-14b1-4e21-b12f-e90750a486ed_en?filename=COM_2025_420_F1_COMMUNICATION_FROM_COMMISSION_TO_INST_EN_V6_P1_4037868.PDF

³ European Commission: Directorate-General for Environment, Ricardo, Trinomics and WSP, *The cost of PFAS pollution for our society – Final report*, Publications Office of the European Union, 2026, <https://data.europa.eu/doi/10.2779/9590509>

proposals and managing or evaluating existing legislation - among them mandatory climate assessments for all proposals and clearer minimum standards for stakeholder consultations in urgent cases.

The pace of procedures leaves no time or space for proper scrutiny of the proposed changes or for meaningful public debate. It also risks letting significant changes to existing laws slip through unnoticed. More and more voices claim that simplification is not simple and is leading to complexification.

Deregulation Undermines Trust for Businesses and Citizens - and EU Competitiveness

The speed and opacity of these changes create confusion for policymakers, businesses, wider stakeholders, and the public, while undermining trust in the stability of EU law. It also risks eroding trust in the EU and is harming investments. And indeed, many businesses say the process feels rushed and poorly timed. Short consultation periods leave little space to assess economic or legal impacts, making it harder to plan investments, adapt supply chains, or prepare for compliance. Instead of predictability, the agenda creates risk and uncertainty.

In [statements](#) and [open letters](#), they warn of the dangers of deregulation and the risks posed by rapid-fire Omnibus packages. Opaque processes, unclarity, delays or rollbacks penalise our frontrunners and innovators, while rewarding laggards who will ultimately slow down innovation and progress. It leads to unfair competition and weakens incentives for genuine transition. And there is now [investigation work](#) showing foreign US interference from fossil fuels companies seeking to weaken EU standards for their interests.

A competitive economy is created by and for citizens, yet many have raised concerns over deregulation in the name of simplification and competitiveness - moves that risk achieving the opposite. Indeed, nearly [200,000 citizens](#) already opposed weakening EU environmental laws when the Commission published a call for evidence on the Environmental Omnibus.

A [petition](#) is now circulating, urging European leaders to defend the laws that protect people and nature against deregulation that would dismantle European environmental protections. At the time of writing and only two days after its launch, nearly 100,000 EU citizens had already voiced their support. This shows how deeply Europeans value strong environmental safeguards — and how firmly they reject the idea that competitiveness should come at the expense of the environmental laws that protect the health of people and businesses alike.

Dear leaders, the EU must chart its own path and act as a history-maker and rule-setter — guided by an ambitious, science-based roadmap that strengthens competitiveness while delivering for people and the planet. The Union cannot afford to dismantle the very pillars of its resilience and strength: its environmental and health standards. Not in today's shifting geopolitical landscape, and not while facing an existential triple crisis of climate, nature, and pollution.

To contribute to this effort, the EEB launched a [European Pact for the Future: A Green and Social Deal for a One-Planet Economy](#) - signed by over [300 organisations and 1100 individuals](#) - along with its Transformation Tracker, which assesses progress against a shared vision in 2025 and identifies priority actions for 2026.

We hope that the above insights and recommendations help you in your informal retreat exchange and that you will decide to make history for the future of EU citizens and our children as indeed another future is possible; It hinges on EU leaders finding the courage and vision to be the global bloc willing to champion a credible green transition and an agenda of hope.

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

Yours sincerely,



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Secretary General of the European Environmental Bureau

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ID number: 06798511314-27 • *BCE ID number: 0415.814.848* • *RPM Tribunal de l'entreprise francophone de Bruxelles*

Annex 1 - *The Cost of Inaction*

Climate:

The [World Economic Forum](#) estimates that for every \$1 invested in climate adaptation today, we can avoid \$2–\$10 in future costs.

Biodiversity, Water, Air, and Soil:

The European Environment Agency (EEA) reports that the loss of ecosystem services could cost the EU hundreds of billions of euros annually. Soil degradation alone costs Europe at least [€97 billion per year](#), with the costs of inaction outweighing action by a factor of six. These costs primarily burden [farmers and society at large](#).

The remediation of contaminated soil with PFAS is even more costly, potentially exceeding €2 trillion across Europe. Water purification alone is estimated at [€238 billion](#) within the EU. Overall, removing PFAS from the environment at current emission rates could surpass [10% of global GDP](#)—excluding damages to animals or property values.

Air Pollution:

Between 2012 and 2021, industrial air pollution from the EU's largest industries cost an estimated €2.7–4.3 trillion. Researchers highlight that the only viable mitigation measures include stringent pollution controls, phasing out carbon-intensive fuels, and electrification.

Health:

The Nordic Council of Ministers estimates that direct healthcare costs from PFAS exposure in Europe are [€52–84 billion](#) annually. It would cost around [€100 billion every year](#) to remove short-chain and ultrashort-chain PFAS, even partially, from the environment and to destroy them. That is more than two trillion over 20 years. The societal costs of PFAS have been estimated at [\\$17.5 trillion \(about \\$54,000 per person in the US\)](#) annually, while manufacturers make only \$4 billion (about \$12 per person in the US) in profits. In other words, while the average market price of PFAS is about €19 for each kilogram, the price spikes to about €18,734 for each kilogram when societal costs are factored in. The European Commission has estimated that the health benefits of banning the most harmful chemicals in everyday products outweigh industry costs by a factor of ten.

These figures reveal an unsustainable and unaffordable industrial model. While the EU chemical industry remains strong—with production growing from €537 billion in 2011 to [€785 billion](#) in 2023, and a trade surplus of €198 billion—the far greater costs of pollution are externalised to society. If producers were held accountable for their pollution, many would face bankruptcy.

Acting now is the only wise investment for the future.