

Brussels,
12 March 2026

Letter to the Heads of State and Government in view of the European Council on 19-20 March – recommendations from environmental citizens organisations

Dear EU Leaders,

As you prepare to gather for the European Council on 19-20 March, where you will discuss simplification and reduction of administrative burdens through the lens of competitiveness and the next Multiannual Financial Framework, including its contribution to competitiveness and the financing needs for EU ambitions, we wish to share with you again some important considerations on behalf of Europe's largest network of environmental citizens' organisations - with over 190 members in 41 countries representing some 30 million individual members and supporters.

Simplification and Reducing Administrative Burden Linked to Competitiveness

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.

The evidence is unequivocal. OECD research shows that ambitious environmental policies **do not** harm productivity, jobs or growth. The European Commission itself has acknowledged that high environmental standards and competitiveness go hand in hand¹ - not least because European businesses depend directly on healthy soils, clean water, stable climates and functional ecosystems.

For decades, EU environmental legislation has provided clarity, predictability and a level playing field for businesses operating in a single market. One robust EU rule replaces 27 divergent national frameworks - meaning less paperwork, not more. Strong standards help frontrunners, providing certainty for investment, innovation and sustainability, while protecting the health of people and ecosystems. Deregulation does the opposite: it rewards laggards and penalises leaders.

Poor implementation and cost of inaction hinder competitiveness and threaten people's lives

The European Commission findings point to insufficient implementation at the national level, not complexity, and cost of inaction as the main obstacles to competitiveness. In fact, the Commission estimates that the lack and poor implementation of existing environmental laws costs us €180 billion

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

annually², that is, around 1% of the EU GDP, due to higher health costs and costs resulting from environmental damage (see Annex 1). 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 2050.³

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. As indeed it is not just about costs, it is about people’s health and lives.

To cite one troubling example affecting citizens in all of your countries, children living in polluted communities have PFAS blood levels more than 63 times higher than safe thresholds; in France, over 60,000 people can no longer drink tap water; in Belgium, residents of Ronse – just 54 km from Brussels – have discovered severe contamination of their environment and bodies; in Germany, a recent study found that 69% of fish are polluted with PFAS. This is just a glimpse of the social burden of the nearly 23,000 PFAS polluted sites in Europe.

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 be about smarter implementation and never used as a pretext or tool to weaken existing targets and obligations, as this risks doing the exact opposite and increases the costs of inaction. A major obstacle to competitiveness is often overly complex national processes, insufficient administrative capacity and investment level – not strong environmental protections. As the President of the European Commission noted in her speech during last month’s informal EU leaders’ retreat⁴, efforts should also address the national level, where improving implementation could deliver genuine simplification. Governments and EU institutions often move too slowly on existing agreements and implementation. Strengthening national administrative capacity, supporting companies and stakeholders in complying with existing EU rules, and improving implementation would make our economies more resilient. Practical steps such as aligning reporting deadlines, using digital tools, and removing duplicative procedures can further ease compliance.

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>

⁴ Statement by President von der Leyen with President Costa following the informal EU leaders’ retreat, 12 February 2026, https://ec.europa.eu/commission/presscorner/detail/nl/statement_26_405

Unfortunately, most of the simplification initiatives so far have gone beyond those and led to a weakening of protections. 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. Yet since the beginning of 2025, the European Commission proposed no less than 10 omnibus packages, without proper impact assessments, generally without meaningful public consultation, and with limited transparency.

Deregulation Undermines Trust for Businesses and Citizens - and EU Competitiveness

The European Ombudsman found that the Commission [committed maladministration](#) when preparing urgent legislative proposals (on corporate sustainability due diligence (Omnibus I), CAP and countering migrant smuggling). Her inquiry concluded that the Commission skipped or curtailed key Better Regulation guidelines, failing to justify the urgency, document derogations, or ensure transparent, evidence-based and inclusive preparation.

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, lack of sufficient clarity, 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, with more than 345,000 EU citizens urging European leaders to defend the laws that protect people and nature against deregulation that would dismantle European environmental protections. 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.

Preserve the integrity of the EU ETS to provide a case for decarbonisation investments

The EU ETS is a central pillar of Europe's climate and industrial policy architecture. Preserving its integrity, predictability and rules-based design is essential to ensure that the EU remains competitive, energy-secure, and firmly aligned with its climate neutrality pathway.

At a time of geopolitical instability and economic realignment, policy certainty is essential. Counting on a predictable and progressively higher carbon price, [many EU industrial operators](#) made important investment decisions to decarbonise their production processes.

Weakening the EU ETS would not only penalise frontrunners and jeopardise their investments but would also expose the EU to fossil fuel price volatility, increase regulatory risk and financing costs, delay final investment decisions, and weaken the EU's attractiveness for long-term industrial projects. In the current context of fossil fuel price hikes, given the war in the Middle East, it is essential to maintain measures that lead to resilience to price volatility from political developments.

We therefore call on the European Council to provide clear political backing for a strong and predictable carbon pricing framework insulated from short-term political intervention, uphold the agreed phase-out timeline of free allocation and deploy ETS auction revenues and the Innovation Fund to accelerate low-carbon and renewables-based investments, ensuring funds support electrification, circularity, renewable energy and innovation while avoiding fossil-based lock-in, and contributing to international climate finance.

Finally, we strongly believe that the ETS2 for buildings and transport must not be further delayed or weakened. The heat pump and electric vehicles manufacturers are clear that the price signal emanating from ETS2 is necessary to provide investment incentives. We understand the uncertainty about prices, but additional regulatory measures, national carbon floor prices and subsidies can reduce these concerns. Furthermore, with transparent redistribution of revenues to households, the impact on affordability can be contained; households can be supported. The reform of the Market Stability Reserve (MSR) already has significantly reduced the climate ambition of ETS2, further weakening is not acceptable, as Denmark, Sweden, Finland and Luxembourg have made clear.

The Next Multiannual Financial Framework (MFF)

Increased investments are essential to shield European people and businesses from the growing impacts of the climate crises. In fact, investment needs for our climate and environment are [estimated by the European Commission at €520 billion per year alone until 2030](#) and the EU would need to [invest about €70 billion per year until 2050 in climate adaptation](#). Evidence shows that EU environmental laws add value for the economy and society at large and [OECD studies](#) demonstrate that stricter environmental policies do not harm productivity, jobs or growth. EU companies depend directly on at least one ecosystem service.

However, this evidence and these needs are not reflected in the current Commission's proposals on the next MFF. On the contrary, the Commission plans significant reduction in committed funding for climate and nature, which risks threatening EU citizens and businesses' future and competitiveness itself. The announced increase in funding for nuclear energy will not translate into any tangible benefits for climate protection, energy affordability or geopolitical independence in the next decade or two – the nuclear industry has proven unable to deliver without very significant delays and major costs overruns and now constitutes a serious risk for our climate targets given that it squeezes out political interest and money for measures such as renewable energies, smart grid extensions and battery storage, that can deliver earlier and most cheaply, helping European energy autonomy and resilience to price hikes, while advancing in mitigating climate change impacts seen to be growing across the world.

The LIFE Programme

The LIFE programme is the EU's only funding programme exclusively dedicated to the environment and climate. For over thirty years, it has played a pivotal role in supporting the implementation of EU environmental and climate legislation, while delivering measurable benefits for biodiversity and local communities across Member States⁵.

In the current standing proposals for the next MFF, the LIFE programme would be repealed and part of its activities diluted in both the European Competitiveness Fund (ECF) and the National and Regional Partnership Plans (NRPPs), without a ringfenced budget. Thus, it is unclear how the EU will, in the future, deliver on its climate and environmental commitments and address the escalating climate and biodiversity crises, which risks just increasing the already enormous costs of inaction if there is no specifically dedicated instrument.

More institutional voices are speaking for LIFE. In their opinions on the interim report on the proposal for the multiannual financial framework for 2028–2034, both the Committee on Regional Development (REGI) on [25 February 2026](#) and the Committee on Environment, Climate and Food Safety (ENVI) of the European Parliament on [5 March 2026](#) underlined the importance of the programme for the EU's climate and environmental objectives, regretting its discontinuation and calling for it to be reinstated as a standalone programme.

We therefore call on you to **reestablish LIFE as a standalone programme with a separate and dedicated budget line. It should also remain under direct management by the European Commission and guided by multiannual work programmes** – as it is the case in the current LIFE Regulation – to ensure accessibility and predictability of the programme activities to a wide range of beneficiaries and to enable them to develop high-quality proposals for bottom-up projects.

⁵ WWF EU. 2025. LIFE matters – Advancing biodiversity and climate resilience in the next EU budget. <https://wwfeu.awsassets.panda.org/downloads/wwf-position-paper-life-in-the-next-mff.pdf>

The Climate and Environmental Spending Targets

We are particularly concerned about what appears to be a step backward by the Commission when it comes to mainstreaming and spending targets. While the Commission's proposal maintains the existence of a climate and environment spending target, its scope has been expanded to cover all six environmental objectives while being lowered from 40% to 35%. In real terms, this step will mean less money allocated to even more priorities than in the current budgetary period, together with the end of earmarking for biodiversity spending - which is 10% in current MFF for 2026 and 2027.

In its [opinion](#) on the budget expenditure tracking and performance framework, the European Court of Auditors (ECA) also identified several shortcomings in the performance model for the budget proposed by the Commission including missing impact indicators and potentially unreliable spending estimates for cross-cutting priorities like the environment

We therefore call on you to **ensure that at least 50% of the overall next EU budget is dedicated to genuine climate and environmental and just transition investments - including at least a dedicated 10% to genuine biodiversity objectives and that the methodology for tracking what counts as climate and environmental spending is improved to better reflect the actual environmental impact.**

The Do No Significant Harm Principle

While we welcome the Commission's intention to mainstream the Do No Significant Harm (DNSH) principle and requirements across the EU budget, we are concerned by the numerous dangerous derogations that will put at risk the effectiveness of the EU budget spending and ultimately EU's competitiveness.

We therefore call on you to **guarantee a strict implementation of the Do No Significant Harm principle by the Commission without exemptions through a simple and consistent approach that clearly labels harmful investments and reduces the administrative burden for beneficiaries and managing authorities alike.**

Support to Civil Society Organisations

Last but not least, 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.

We therefore call on you to **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.**

We hope that the above insights and recommendations help you in your exchange. 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 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,



Patrick ten Brink
Secretary General of the European Environmental Bureau

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.