

Brussels,
12 June 2026

Letter to the Ministers responsible for European Affairs in view of the General Affairs Council on 16 June – recommendations from environmental citizens organisations

Dear Ministers,

As you prepare for the General Affairs Council on 16 June, which will discuss preparations for the next European Council, including a draft negotiating box for the 2028-2034 Multiannual Financial Framework (MFF), progress on the omnibus simplification packages and the EU's legislative priorities for 2026 under the "One Europe, One Market Roadmap", we wish to share some important considerations on behalf of Europe's largest network of environmental citizens' organisations:

Omnibus packages and the EU legislative priorities for 2026

In the last year and a half, under the banner of "simplification" and "competitiveness," we have witnessed a worrying shift: weakening regulatory certainty and undermining Europe's leadership in the green transition and health protections. The EU risks moving from rule-maker to rule-taker. Not only this threatens EU's leadership, but it also puts at risk its resilience and its economic viability. [OECD research](#) shows that ambitious environmental policies do not harm productivity, jobs or growth. The European Commission itself recognises that high environmental standards and competitiveness go hand in hand - not least - because European businesses depend on healthy soils, clean water, stable climates and functioning ecosystems. **Ambition is a strategic asset, not a burden.**

For decades, EU environmental legislation has provided clarity and a level playing field across the single market. One strong EU rule reduces fragmentation and administrative burden. By contrast, **deregulation rewards laggards, penalises frontrunners and creates uncertainty for investment and innovation.**

The real issue is not regulation, but implementation. The Commission estimates that [poor or incomplete implementation of environmental law costs the EU around €180 billion annually](#) - approximately 1% of GDP - through health impacts and environmental damage. The cost of inaction is even higher: [PFAS pollution alone could cost up to €1.7 trillion by 2050](#). These costs are not abstract. They affect citizens directly: contaminated drinking water, polluted food chains, and measurable health impacts across Europe on workers and children alike. This is not only an economic issue - it is about people's health and lives.

Simplification should therefore focus on **better implementation**, not weaker rules. Administrative complexity at national level, insufficient capacity, and lack of investment - not EU standards - are the main barriers. Practical improvements - such as aligning reporting, investing in administrative capacity,

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and supporting compliance - would strengthen both resilience and competitiveness. **If we are serious about competitiveness and fairness, we must stop blaming ambition and fix implementation - this is where Europe is losing time, money and credibility.**

However, recent initiatives often carried under the so-called omnibuses have too often gone beyond simplification and resulted in deregulation. The rapid succession of omnibus packages, often with limited consultation and transparency, risks undermining trust. [As highlighted by the European Ombudsman](#), key Better Regulation principles have not always been respected.

This matters. Businesses, investors and citizens need stability and predictability. Frequent, opaque changes create uncertainty, delay investment decisions and weaken confidence in EU law. Many stakeholders - including [businesses](#) - have [warned](#) that rushed processes and rollbacks risk undermining innovation and fair competition.

Public concern is equally clear. [More than half a million of citizens](#) have opposed the weakening of environmental laws, calling instead for their proper implementation and enforcement. And beyond this, surveys continue to be very clear: the vast majority of European believe that law makers need to do more to protect environment and climate.

At a time when climate change impacts keep worsening, biodiversity loss and pollution keep intensifying, the real burden is not regulation - but failure to implement it. Every delay locks in higher costs, greater damage and increased risks for citizens. **When we weaken environmental protection, we do not reduce pressure - we lose control and increase Europe's vulnerability.**

A competitive economy can only be built on a healthy population and a healthy environment. Sustained action on climate, pollution and nature strengthens resilience, energy security and long-term competitiveness - especially in today's volatile geopolitical context.

Regarding the Environmental Omnibus (VIII) in particular, we ask you to¹:

- On the Industrial Emissions Directive: **maintain the provisions on Environmental Management Systems**, in particular the requirement for a hazardous chemicals inventory and the substitution assessment, at least for hazardous chemicals present in significant quantities. We urge you to **reject any changes to other provisions not covered by the European Commission proposals**, as these would undermine the integrity of the framework. Should the co-decision process lead to a lowering of environmental protection levels, we ask you to request the withdrawal of the proposal.
- On the SCIP (Substances of Concern In articles as such or in complex objects (Products)) database: **reject the proposed discontinuation of the SCIP database.**

¹ Please refer to Annex 1 for further details on these demands

- On the Authorised Representatives for Extended Producer Responsibility: **halt the technical work** on this file and **use the Circular Economy Act** assess and implement **alternative solutions instead of suspending** the Authorised Representatives requirement.
- On the regulation on speeding up environmental assessments: ensure the **safeguarding of clear and high-integrity standards for environmental assessments** – especially in relation to articles 8, 14, 6, 5.
- On the revision of the Water Framework Directive (WFD): **oppose the Commission's unfounded plans to revise the WFD** that risk **diverting Member States away from meaningful implementation**.

The Next Multiannual Financial Framework (MFF)

Increased investments are essential to shield European people and businesses from the growing impacts of 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, it dismantles the successful and efficient LIFE programme and no longer foresees a separate target for biodiversity.

We therefore call on you to²:

- **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.
- **Ensure that the European Competitiveness Fund is aligned with environmental and climate objectives** by explicitly referencing nature-based solutions, circularity, renewable energy, and the mainstreaming of environmental and climate legislation in Article 3. In addition, Article 4 should include funding for LIFE, while Article 15 should enable multiannual LIFE financing decisions. Overall, the European Competitiveness Fund should be aligned with the European

² Please refer to Annex 2 for further details on these demands

Parliament's general position in its interim report, which calls for at least €3 billion in earmarked resources for LIFE.

- **Ensure support to the transition** towards more resilient agricultural systems, with Article 3 explicitly including biodiversity protection as part of farm stewardship. Funding for environmental and climate actions under Article 10 should be raised to 35% of total CAP spending, with the bare minimum acceptable being 28%, in line with the current CAP, while Annex I, Part C of the regulation should distinguish more clearly between the protection of carbon-rich soils and biodiversity protection.
- **Increase from 35% to 50% the spending target for climate and environment** in Article 4 to ensure 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, with biodiversity indicators also included in Annex I.
- **Support an ambitious package of new own resources**, including progressive and environmentally sound measures such as taxes on extreme wealth, excess fossil fuel profits, aviation, and financial speculation, and to ensure that future common borrowing is backed by genuine and sustainable EU revenues.
- **Ensure 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 has published 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, which we invite you to consult. 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: Omnibus packages and the EU legislative priorities for 2026

On the **review of the Industrial Emissions Directive**, we ask you to maintain the provisions on Environmental Management Systems, in particular the requirement for a hazardous chemicals inventory and the substitution assessment, at least for hazardous chemicals present in significant amounts. We ask you to reject any changes to other provisions not subject to European Commission proposals, which would undermine the integrity of the framework (such as proposed by the European Parliament's ITRE and AGRI reports - related to Art 15.3-15.5, extending deadlines for catching up with best available techniques, scope thresholds for pigs and poultry). Request the withdrawal of the proposal if the co-decision process goes out of hands, where protection levels are undermined, i.e. adoption of amendments of ITRE and AGRI.

Regarding **the SCIP database**, the Commission has proposed to discontinue the SCIP database for information on **Substances of Concern** in articles as such or in complex objects (**Products**), arguing that it will be replaced by upcoming Digital Product Passport (DPP) reporting requirements under Ecodesign for Sustainable Products Regulation (ESPR) or the chemicals regulation (REACH). However, reporting under REACH is not functionally equivalent to reporting under WFD/SCIP, both in terms of data points and – crucially – the public availability of data. Moreover, there is no guarantee that Digital Product Passports (DPP) under ESPR and other Union legislation will fulfil these functions in the future. Even if, theoretically, some of the functions could be met, requirements will only be introduced gradually through delegated acts from 2027, with the chemicals data platform under REACH expected only in 2030. This will create a significant gap during which certain data will not be collected and other data will not be publicly available. Therefore, we call on you to ensure that the discontinuation of the SCIP database is deleted.

Regarding the **Authorised Representatives for Extended Producer Responsibility**, if the obligation to appoint an Authorised Representative is suspended, EU manufacturers selling cross-border may no longer have a legally accountable entity in the Member State of sale. Enforcement authorities and consumers therefore would lack a directly reachable responsible entity at national level. The Commission is reviewing EPR schemes in the context of the Circular Economy Act, for the effectiveness, the administrative burden and the unintended barriers for the internal market, of the obligation to appoint authorised representatives as a safeguard for the producers' compliance with the 'polluter pays' principle. The intention is for this to lead to "alternative solutions which are more effective and less burdensome". We call on Ministers to halt the technical work on this file and use the Circular Economy Act to assess and implement alternative solutions instead of suspending the AR requirement.

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Regarding the proposed **Regulation on speeding up environmental assessments**, we are concerned about impacts on European ecosystems and human health. Instead of accelerating procedures, the proposal will complexify, and potentially slow down, existing systems, generalise derogations and heighten legal risk and uncertainty for Member States, public authorities and project developers alike, all while causing avoidable harm to ecosystems that are already in critical condition. While not tackling the root causes of lengthy procedures, such as lack of experts or funding, the proposed measures will increase administrative burden on Member State authorities. We are particularly concerned about:

- **Article 8** would lead to a reduction in the level of species protection under EU law and convert a carefully balanced derogation system into a general norm.
- **Article 14** expands a beneficial permitting regime to an undefined number and type of projects. This risks an erratic use of the concept of "public interest", a generalisation of derogations, and rushed and low-quality assessments.
- **Article 6** on substantial preclusion would effectively restrict access to justice and is in clear contradiction with EU case law and the Aarhus Convention.
- **Article 5** could allow major industrial facilities to indefinitely avoid an environmental assessment unless major works are undertaken, preventing the assessment of ageing infrastructure.

For these reasons, we call on you to ensure the safeguarding of clear and high-integrity standards for environmental assessments. For more information, please refer to [EEB's letter to Ambassadors](#) as well as an [in-depth analysis of our partner ClientEarth](#).

Regarding the Commission's plans to **revise the Water Framework Directive (WFD)** 'with aim to promote access to critical raw materials in Europe', we are concerned over the fact that this decision is not based on any justification or evidence that a revision is needed and goes counter to the ambition of the Water Resilience Strategy that pressed the need for better implementation of the EU water acquis.

Water and freshwater ecosystems have an immense economic value estimated to be over €11 trillion in Europe – about 2.5 times the GDP of Germany. Water resilience is a prerequisite to Europe's green, digital and economic transition, food security and the fulfilment of the Human Right to Water and Sanitation, but it cannot be achieved without strong and stable legal targets that drive the needed efforts and investments.

The recent fitness check evaluation concluded that the WFD is fit for purpose with sufficient flexibility. This is confirmed by several public authorities that have pointed out that the WFD is not an issue for the permitting process, and that it is possible to grant permits also for new extraction and processing projects. A revision on the other hand risk opening the floodgates for severe weakening of the

environmental safeguards, including core objectives, at the expense of ecosystems, drinking water and public budgets.

Therefore, we urge you to oppose the Commission's unfounded plans to revise the WFD that risk diverting Member States away from meaningful implementation.

For more information, please see the [recent briefing](#) of the Living Rivers Europe coalition that outlines five reasons why the WFD should not be revised.

Annex 2: The Next Multiannual Financial Framework (MFF)

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 States. 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. The European Parliament's adopted its position on the Multiannual Financial Framework (MFF) in [its interim report](#) approved on 28 April, highlighting the pivotal role of the LIFE programme in delivering targeted, long-term support for climate, environment and nature projects across Europe. In particular, it calls for dedicated, continued and predictable funding for LIFE, including earmarked resources of €3 billion under the European Competitiveness Fund and €2.4 billion under the EU Facility. [A Parliament study from March 2026](#) assessing the adequacy of the next long-term EU budget in addressing natural disasters also flags that the absence of a dedicated budget for LIFE could weaken support for climate resilience, with the programme acting as a catalyst for nature-based solutions, and cautions against integrating LIFE into a broader funding instrument, arguing that this could dilute its impact. This sends an important political signal ahead of the next phase of EU budget negotiations and reflects broad recognition of LIFE's effectiveness on the ground.

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.

The European Competitiveness Fund (ECF)

Europe's long-term competitiveness depends on resilient natural systems, resource efficiency, and the capacity to adapt to environmental and geopolitical pressures.

We therefore call on you to **ensure that the European Competitiveness Fund is aligned with environmental and climate objectives by explicitly referencing nature-based solutions, circularity, renewable energy, and the mainstreaming of environmental and climate legislation in Article 3. In addition, Article 4 should include funding for LIFE, while Article 15 should enable multiannual LIFE financing decisions. Overall, the European Competitiveness Fund should be aligned with the European Parliament's general position in its interim report, which calls for at least €3 billion in earmarked resources for LIFE.**

The National and Regional Partnership Plans (NRPPs)

The National and Regional Partnership Plans will become one of the main instruments shaping public investment across the Union. It is therefore essential that environmental protection, ecosystem resilience, and nature restoration are explicitly integrated into the objectives and governance of the Regulation. Dedicated financing for nature protection and restoration, including ring-fenced support for agri-environmental and climate measures, is necessary to provide long-term certainty for regions undertaking the transition towards more sustainable and resilient economies.

We therefore call on you to **ensure that the NRPPs become an effective tool for resilience, with environmental protection explicitly referenced in Articles 2, 3, and 22, while Article 6 should guarantee a transparent and inclusive partnership process. Article 10 should include a dedicated budget line for nature protection and restoration, including at least EUR 103 billion ring-fenced for CAP interventions supporting agri-environmental and climate measures. Furthermore, Article 22 should require NRP plans to correspond to the funding needs identified in National Nature Restoration Plans. Finally, LIFE funding should be included in Article 26, with multiannual financing decisions provided for in Article 31.**

The Common Agricultural Policy (CAP)

The long-term resilience and competitiveness of European agriculture depend on healthy soils, pollinators, water availability, and functioning ecosystems. Farmers are increasingly affected by droughts, floods, soil degradation, biodiversity loss, and extreme weather events. Strong environmental measures within the CAP are essential to safeguard food security, stabilise agricultural productivity, and reduce future economic risks for rural communities especially in a volatile geopolitical context.

We therefore call on you to **ensure support to the transition towards more resilient agricultural systems, with Article 3 explicitly including biodiversity protection as part of farm stewardship. Funding for environmental and climate actions under Article 10 should be raised to 35% of total CAP spending, with the bare minimum acceptable being 28%, in line with the current CAP, while Annex I, Part C of the regulation should distinguish more clearly between the protection of carbon-rich soils and biodiversity protection.**

The Performance Regulation (budget expenditure tracking, performance framework and other horizontal rules)

The Performance Regulation will play a key role in determining whether the next MFF can effectively support Europe's long-term resilience, preparedness, and strategic autonomy. Clear spending targets, credible tracking methodologies, and robust safeguards are necessary to ensure that EU funding

contributes to environmental and climate objectives and does not undermine the ecosystems that sustain Europe's economy, food systems, and social stability.

On 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 **increase from 35% to 50% the spending target for climate and environment in Article 4 to ensure 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, with biodiversity indicators also included in Annex I.**

On 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. For instance, the [Parliament study from March 2026](#) mentioned above assessing the adequacy of the next long-term EU budget in addressing natural disasters raises concerns about the "do no significant harm" principle, noting that certain CAP direct payments may undermine disaster prevention and calling for stricter implementation.

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. The contribution of intervention fields 42, 47, 48, 51, and 55 should be adjusted to better align with the Do No Significant Harm principle.**

On EU Own Resources

In its interim report on the next Multiannual Financial Framework (MFF), the European Parliament made clear that an ambitious EU budget requires ambitious new genuine own resources, not further pressure on national contributions or cuts to social, cohesion, climate, development, or humanitarian

spending. We welcome Parliament's call for fair and sustainable revenue sources capable of financing the Union's growing priorities while ensuring the repayment of NextGenerationEU borrowing. At a time of rising inequalities and urgent investment needs, the EU should ensure that the costs of transition and crisis response are shared fairly, in line with the polluter-pays principle, tax fairness, and the principle that those with the greatest capacity contribute the most.

We therefore call on you to support an ambitious package of new own resources, including progressive and environmentally sound measures such as taxes on extreme wealth, excess fossil fuel profits, aviation, and financial speculation, and to ensure that future common borrowing is backed by genuine and sustainable EU revenues.

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.**