

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, 25 June in Luxembourg Recommendations from environmental citizens organisations

Brussels, 18 June 2026

Dear Minister,

On behalf of the European Environmental Bureau, Europe's largest federation of environmental citizens organisations, we are writing to share our **recommendations ahead of the upcoming Environment Council on 25 June in Luxembourg.**

This meeting takes place at a moment of **sustained and deepening uncertainty for global and European governance, including environmental and climate action.** The United States' retreat from environmental multilateralism continues to weaken collective frameworks, while the **ongoing conflicts in the Middle East**, more recently in particular the US attack on Iran in violation of international law and the following escalation, is no longer a sudden shock but a persistent source of **geopolitical instability**, impacting the most vulnerable countries and people first.

The prolonged disruption of oil and gas flows, including through key chokepoints, has led to **sustained price volatility and inflationary pressures**, with energy prices expected to remain significantly elevated as well as increasing food prices. These impacts are cascading across societies and economies, contributing to rising costs of living and increased poverty, particularly affecting the **most vulnerable populations.** At the same time, these developments expose once again the **EU's structural risks of dependency on fossil fuels.**

This context further reinforces the urgent need to accelerate the **EU's transition towards energy independence** based on renewables, energy efficiency and sufficiency, smart grids, storage and circular systems. It also confirms that it is not environmental regulation or the expansion of renewable energy that drives high energy prices, but geopolitical instability and dependency on fossil fuels. On the contrary, high shares of renewables, electrification and energy efficiency and a **rapid end to fossil fuel** use remain key to **lowering costs and strengthening resilience.**

Europe's **opportunity to lead by example** to provide stability and reliability, leadership on environmental ambition, a rule-based order and a long-term vision has only grown – and we need the EU to live up to this responsibility. The European Green Deal, endorsed by the Commission and Member States, remains the EU's most coherent framework for building a **climate-neutral,**

zero-pollution and nature-positive future, based on a wellbeing economy and a just transition, on which we must build. Yet its foundations are increasingly strained by external pressures, disinformation, geopolitical shocks and deregulatory agendas, as well as short-term interests within the Union. The **Commission’s “simplification” initiatives risk weakening essential rules that protect** clean air and water, healthy food systems, restored ecosystems, fair working conditions and corporate accountability, thereby **undermining regulatory certainty** and a level playing field, rewarding laggards and penalising frontrunners.

At a time of accelerating climate and environmental impacts, widening inequalities and mounting global instability, Europe needs **stronger, future-oriented regulation, regulatory certainty** and accelerated decarbonisation, depollution and nature restoration. Increased and well-targeted investment is also essential to shield people and businesses from the escalating impacts of the climate, pollution and nature crises. Reinforcing Europe’s environmental leadership is therefore not only a matter of sustainability, but of **strategic resilience, economic stability and human security**, including climate, food, water, energy and social protection.

In parallel, negotiations on the **EU’s next Multiannual Financial Framework** have entered a decisive and highly political phase. The European Parliament has taken a clear position in favour of a significantly more ambitious EU budget, including a proposed increase of around €200 billion, roughly a 10% uplift, to ensure that new priorities, including climate action, energy transition and social resilience are adequately funded and do not come at the expense of existing programmes. By contrast, **several Member States continue to advocate for a more restrictive approach**, risking a growing gap between political ambition and financial means. The draft negotiating box from the Cypriot Presidency is a first positive step on climate and environment spending but is not enough to shield the EU from the impacts of the triple crisis. While it confirms the 35% earmarked spending on climate and environment proposed by the Commission, it does not propose to match the level of investments with the actual needs and does not provide earmarked spending on LIFE.

We also wish to express our **solidarity with environmental defenders and civil society organisations in Albania** who are currently mobilising to protect one of the country’s most pristine and ecologically valuable coastal areas from large-scale development in a movement that has already been labelled as the ‘Flamingo Revolution’. At a time when Europe should be scaling up nature’s protection and restoration, such developments run counter to shared commitments and long-term resilience. We call on EU Member States to **actively support civil society in Albania** and uphold the integrity of environmental safeguards.

It is equally important to **accelerate and reinforce the EU accession process** for candidate countries, ensuring a more unified and coherent approach to environmental governance across the region. We welcome that the **EU has formally opened the first cluster of accession negotiations with both Ukraine and Moldova**. The recent change in government in Hungary provides an opportunity to deepen cooperation, strengthen the rule of law and align more closely on climate, energy and biodiversity objectives. A credible, ambitious and timely accession pathway is essential for stability and for delivering shared environmental goals at scale.

We thank you in advance for considering our recommendation ahead of your meeting in Luxembourg.

A. Revision of the Regulation on CO₂ standards for new passenger cars and vans

Background:

The current automotive debate risks becoming increasingly disconnected from Europe's broader economic and geopolitical reality. At a moment when the EU faces a profound energy and affordability crisis, driven largely by continued dependence on imported fossil fuels, policy discussions are nonetheless shifting towards slowing down vehicle electrification, one of the most effective tools available to structurally reduce that dependence. Rather than consolidating progress, this risks reopening settled questions and narrowing the scope of ambition just as global competitors accelerate their own electrification strategies. There is an urgent need to reset the debate and expand the political horizon beyond short-term industry concerns, towards a coherent and forward-looking electrification agenda that strengthens energy security, industrial competitiveness, and climate resilience.

The EEB therefore calls on the Environment Council to:

- **Safeguard the credibility and stability of the EU's regulatory framework** by fully upholding the 2030 and 2035 CO₂ standards for cars and vans as agreed only three years ago and to firmly reject any attempts to weaken these targets;
- **Preserve this trajectory as essential to deliver on climate commitments**, provide certainty for investments and ensure European industries do not lose touch with technological and economic developments;
- **Reinforce, not dilute, the EU's electrification agenda**, ensuring that policy frameworks are aligned with the speed and scale of the transition required.

B. Nature, Business and Competitiveness: Managing the Risks of Biodiversity Loss (Exchange of views)

Background:

Nature is the foundation of the EU's economy since it is healthy ecosystems that underpin water availability, food production, climate resilience, and supply chain stability. A narrow focus on simplification of the EU's environmental acquis that has dominated the EU's agenda recently risks overlooking the underlying conditions that enable competitiveness, particularly in a context of supply chain disruptions, resource scarcity, increasing climate-related risks, and the continued degradation of nature. In addition, regulatory stability is a condition for competitiveness. Businesses require predictable and coherent frameworks that enable investment, innovation, and

long-term planning. Regulatory volatility undermines confidence, increases uncertainty, and raises system-wide costs.

The One Europe, One Market Roadmap prioritises finalising the simplification initiatives until the end of 2027. Co-legislators are already assessing some of these proposals, including the draft regulation on speeding up environmental assessments and permitting procedures. Other initiatives are expected soon, including the unfounded revision of the Water Framework Directive (WFD), or the stress-test of the Birds and Habitats Directives (BHD).

The BHD stress test by the Commission aims to assess whether they remain relevant, proportionate, and fit to achieve their objectives in a cost-efficient manner, including by identifying opportunities to reduce unnecessary administrative burden. The 2016 Fitness Check of the BHD already concluded that both directives were fit for purpose. That conclusion remains valid today. The primary challenges continue to lie in implementation, financing and effective delivery. In this context, the stress test should focus on identifying remaining implementation barriers, resource needs, and examples of good practice, rather than reopening the legislation itself. While reducing unnecessary administrative burdens is a legitimate objective, an assessment framed narrowly through this lens risks overlooking the broader role of the directives in safeguarding natural capital, reducing environmental risks and supporting long-term economic resilience. It would reinforce a flawed narrative that portrays environmental and nature legislation as “red tape”, rather than recognising it as an essential safeguard and foundation for the EU’s long-term competitiveness (see Annex with the NGO initial reflections on the BHD stress test).

Europe’s long-term competitiveness depends on maintaining the natural systems and regulatory certainty and instruments that underpin investment, resource security and economic stability. The recent report from [CINEA on the LIFE program and competitiveness is clear](#): LIFE projects not only support **long-term economic stability** by protecting natural capital, but they also act as a catalyst - transforming environmental challenges into economic opportunities and mobilising additional private investment. As such, it is not just an environmental fund—it is a strategic economic tool that strengthens EU competitiveness by turning sustainability into innovation, industrial opportunities and resilience.

The central challenge for EU policymakers is therefore not to weaken environmental ambition, but to improve implementation so that policies deliver effectively, consistently and predictably across Member States. This requires shifting attention from repeated legislative revisions towards stronger delivery, enforcement, and administrative capacity.

The EEB therefore calls on the Environment Council to:

- **Insist on the use of the stress tests as an implementation exercise** rather than a legislative review.
- **Oppose attempts to revise or weaken the BHD**, conservation objectives, or legal safeguards.
- **Ensure adequate financing and administrative capacity for implementation**, including by ensuring that the 2028–2034 EU budget allocates at least 50% of spending to climate and environment objectives, with a dedicated sub-target of 10% for biodiversity.

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- **Reinstate the LIFE funding as a standalone programme for 2028-2034**, following the Commission's proposal to discontinue it, would be essential considering that many national authorities rely on LIFE funding to support the implementation of EU nature legislation and considering its larger economic impacts.
- **Push for stronger integration of biodiversity objectives** across the relevant EU policies.

C. Water Resilience Strategy - One year after: state of play and the (Exchange of views)

Background:

The EEB [welcomed the focus of the European Commission's Water Resilience Strategy on the implementation of the EU's water acquis](#), which responded to warnings, including from the European Environmental Agency, that pollution, habitat degradation and over-abstraction of freshwater have not been sufficiently dealt with across the EU, and as a result put at risk the long-term access to clean and healthy water to sustain nature, people and industry. The Council conclusions on water resilience from October 2025 re-iterated the message from the Strategy. Stressing "the urgent need for improved implementation of existing EU water legislation across sectors". Therefore, we deeply regret recent initiatives by the Commission that risk weakening the very core objectives of the EU's main water protection law and diverting resources from its meaningful implementation and achievement of its objectives by 2027.

This regretful U-turn in the political priorities of the Commission concerns, in particular the Commission's commitment, in the RESource EU Action Plan, to review and already revise the Water Framework Directive, and the commitment in the Fertiliser Action Plan to expand the RENURE act to allow the application of digested manure above the limit set in the Nitrates Directive.

This is particularly concerning as the Commission has presented no evidence or justification that a revision or amendment of the current rules are needed or justified, which falls in a concerning pattern of using undemocratic processes to weaken safeguards. The European Ombudsman has recently acknowledged the EEB's concerns and [noted that the preparation and adoption of the RENURE act](#) - that allowed a near 50% increase in the permitted application of nitrogen from manure on fields – included procedural failings similar to those identified in earlier complaints where the Commission was found to have committed maladministration by departing from its own Better Regulation standards.

Several public authorities have stated that the WFD does not present an obstacle in the granting of permits to strategic projects. This was also confirmed by the Commission's recent guidance for the implementation of the Water Framework Directive during the permitting of new projects and existing activities that clearly outlines the range of flexibilities that Member States have when granting permits, including for the mining sector. On the contrary, the mining industry has failed so far to provide convincing evidence that the WFD has stopped strategic mining projects. Thus, the [revision of the WFD will most likely result in weakening of the WFD and will lead to more](#)

[pollution and nature destruction](#), undermining Europe's water resilience and citizens' trust in the EU.

The Commission's Fertiliser Action Plan, while recognising the vulnerability of the EU agri-food system, failed to acknowledge the environmental and socio-economic impacts resulting from the EU's structural dependency on fertiliser imports. Ensuring food security, protecting farmers against volatile fertiliser costs and strengthening Europe's strategic autonomy can be done in more efficient and sustainable ways than by weakening the environmental safeguards that protect our drinking water. An international expert group have recently [concluded that the current limit of nitrate in drinking water \(50 mg/L\) is insufficient to protect public health](#) and recommend lowering it to 6 mg/L to minimise the risk of colorectal cancer. [Nutrient pollution of water already cost EU taxpayers 22 billion yearly](#). Weakening the safeguards that regulate the key source of nitrate pollution of water in Europe – livestock production – will only increase the burden on public health and budgets. Yields will be better secured through shifting practices that enhance soil fertility and climate resilience, and by encouraging farmers to use less fertilisers, and more efficiently.

We regret the repeated framing of environmental protection as a hurdle and a burden and that decisions to weaken environmental protections are not made on clear evidence and in opposition to public opinion. [More than half a million of the Europeans](#) have called on you to defend the laws that protect people and nature, not bow to polluters and vested interests.

The EEB therefore calls on the Environment Council to:

- **Oppose the Commission's plans to revise and weaken the Water Framework Directive**, which is not supported by any clear evidence or justification;
- **Uphold the commitment to protect and restore Europe's waters by 2027 at the latest;**
- **Oppose the Commission's plans to extend the RENURE act** that further weaken the environmental safeguards by allowing the application of digested manure above the limit set in the Nitrates Directive;
- **Work to close reporting and implementation gaps** by only using exemptions in exceptional and well-justified cases, ensuring sufficient funding for environmental monitoring and measures and strengthening water protection in sectoral legislation.

D. The future of the REACH regulation (Exchange of views)

Background:

The Environment Council has consistently supported a high level of protection against hazardous chemicals through the Chemicals Strategy for Sustainability (CSS) and the modernisation of REACH. The Commission's decision not to pursue a comprehensive REACH revision should not mark the end of this ambition. Europeans are still exposed to harmful chemical pollution, and many of the commitments made under the CSS to better protect health and the environment

remain undelivered, including the implementation of the Restrictions Roadmap, the EU plan to swiftly phase out highly hazardous chemicals.

At the same time, evidence shows that the current system is not working as intended. ECHA's recent five-year report identifies widespread non-compliance with REACH and CLP obligations, including incomplete registration dossiers, persistent data gaps for key hazards such as endocrine disruption and nanoforms, and inadequate supply chain information. Notably, 54% of active REACH registrations were not updated between 2021 and 2025, while 16% had not been updated for over a decade, despite legal obligations to keep dossiers current. Combined with significant enforcement backlogs, these shortcomings delay risk management measures and leave people and the environment inadequately protected from hazardous chemicals.

The priority should therefore not be deregulation. Weakening REACH through simplification measures or comitology, as requested by CEFIC, would further undermine protection without addressing the real problems of implementation and compliance. Instead, the Council should reaffirm that strong chemicals legislation is essential for protecting health, enabling a safe circular economy and supporting long-term European competitiveness.

The EEB therefore calls on the Environment Council to:

- **Reaffirm the Council's commitment** to the objectives of the Chemicals Strategy for Sustainability and to a high level of protection under REACH.
- **Reject attempts to weaken REACH** through deregulation or reductions in information requirements.
- **Prioritise better implementation and enforcement of REACH** by:
 - accelerating the Restrictions Roadmap and increasing transparency on its implementation;
 - ensuring that authorisation and restriction processes function as intended and within legal timelines;
 - strengthening the "no data, no market" principle, including clearer obligations to update registration dossiers and effective sanctions for non-compliance;
 - improving transparency regarding non-compliant companies and ensuring robust Member State enforcement.
- **Support targeted modernisation of REACH** through comitology where it strengthens protection and fulfils outstanding CSS commitments, including:
 - improved information requirements to allow the identification of critical hazards properties and uses of chemicals;
 - better identification of carcinogens and other substances of concern;
 - the introduction of a mixture assessment factor;

The absence of a comprehensive REACH revision should not become an excuse for inaction. Until the promises of the Chemicals Strategy for Sustainability are delivered, urgent action remains necessary to reduce chemical pollution and ensure a high level of protection for human health and the environment.

The attached briefing includes NGO recommendations to improve enforcement and incentivise compliance as well as comitology measures to modernise REACH, should the Commission decide

to take the comitology route. Also find attached a document analysing the real impacts of CEFIC's proposals.

E. Climate resilience in Europe - progress and challenges (ministerial lunch)

The European Commission is developing a new European climate resilience framework to help Member States prevent and prepare for the growing impacts of climate change. The public consultation has shown strong support for ambitious action, with participants calling for mainstreaming of climate adaptation actions in all EU policies and budgets, as well as focusing on nature-based solutions and ecosystem-based adaptation. The Council also stressed "the foundational importance of healthy ecosystems and nature-based solutions as cost-effective means for climate resilience" in December 2025. Unfortunately, the public consultation survey, while listing several policy options for the Commission's proposal for a new climate resilience law, did not list scale up nature-based solutions among them.

The EEB therefore calls on the Environment Council to:

- **Reaffirm the Council's call on the European Commission to base their proposal for the European climate resilience framework on the principles of the ecosystem-based adaptation** promoting uptake of the nature-based solutions as a first line of defense against the impacts of climate change.

AOB:

a. Ahead of COP 31: Actions to strengthen the EU's negotiating position in international climate meetings –Cyprus' Presidency stocktaking

As you prepare for COP31, we urge EU Member States to demonstrate decisive leadership by stepping up concrete implementation of climate commitments. In line with the UNFCCC's call for more ambitious NDCs 3.0 and the COP31 Presidency's focus on accelerating action, the EU must present a strengthened, 1.5°C-aligned NDC, commit to a rapid fossil fuel phase-out, and scale up public climate finance. COP31's priorities, clean energy, electrification, methane reduction, resilient food systems, and circular economy approaches, require coherent EU policies and immediate action. We call on Member States to ensure the EU arrives at COP31 with a unified, ambitious, and implementation-ready agenda that reflects the urgency of the climate crisis.

b. Report on main recent international meeting: Fifteenth Meeting of the Conference of the Parties (COP15) to the Convention on the Conservation of Migratory Species of Wild Animals (Campo Grande, Brazil, 23-29 March 2026) - Information from the Presidency and the Commission

The EEB welcomes the outcomes of the 15th Conference of the Parties to the Convention on the Conservation of Migratory Species of Wild Animals (CMS COP15) in Campo Grande since they have turned previous general commitments into concrete mandates for action, defining critical points for monitoring, accountability and the transboundary cooperation necessary to safeguard the planet's migratory corridors. In particular, the decision on the marine flyways is one of the most significant advances in ocean conservation in recent years, and we applaud the COP15 for providing practical tools to help governments meet their global biodiversity commitments. Unfortunately, nearly half of CMS-listed migratory species populations continue to decline, and the real test now is implementation to ensure that the resolutions, decisions and action plans agreed in Campo Grande are delivered with the urgency the evidence demands. The EU needs to significantly step up its actions towards meeting global biodiversity commitments and repair the reputational damage it has suffered after adopting the unscientific decision to reverse decades of progress on wolf conservation.

c. Work programme of the incoming Presidency – Information from Ireland

The EEB welcomes the Irish Presidency programme and its commitment to work in the Environment Council to implement policies and measures to improve and protect our natural environment. Nevertheless, we are concerned by the objective of advancing the Environmental Simplification Omnibus process, which prioritises the short-term profitability of businesses at the expense of long-term environmental protection and social justice. For this reason, we urge the Presidency and the Environment Council to:

- I. Implement the European Green Deal and safeguard it in times of disinformation and foreign interference;
- II. Commit to a fossil free EU budget that meets the investment need to tackle the climate, pollution and nature crisis and protects Europeans from future shocks;
- III. Ensure a "Clean" Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration;
- IV. Build on the Strategic Dialogue for Agriculture and advance towards sustainable food systems and reform agricultural support to embrace social justice and sustainability;
- V. 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;
- VI. Deliver a nature-positive agenda for land, freshwater and oceans and fast track climate adaptation and resilience;
- VII. Maintain and deliver on zero-pollution objectives on air quality and noise;
- VIII. Advance a toxic-free environment and transform the transition of the chemicals sector through a future-proof, sustainable policy framework;
- IX. Address resource use and seize circular economy opportunities for the economy and society;
- X. Protect the rule of law, foster environmental and social justice and strengthen civil society engagement in environmental democracy.

In light of the recent PFAS high-level strategic dialogue hosted by Commissioner Roswall, the PFAS blood testing initiative taken by many Ministers in Denmark last year, and ECHA's scientific conclusions that PFAS are not adequately controlled, we also urge you to support an ambitious PFAS restriction covering both consumer and industrial uses, in line with the evidence and the need to protect human health and the environment (for further information, please see Annex IV).

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

Annex I: BHD stress test

Annex II: NGO recommendations to improve enforcement and incentivise compliance as well as comitology measures to modernise REACH

Annex III: analysis of the real impacts of CEFIC's proposals for comitology

Annex IV: Annex: PFAS – The need for a comprehensive EU PFAS restriction

Recent developments reinforce the urgent need for ambitious EU action to address PFAS pollution. Following more than three years of scientific assessment, ECHA's scientific Risk Assessment Committee has concluded that PFAS risks are not adequately controlled and that a broad restriction under REACH is the most appropriate EU-wide measure to protect human health and the environment. Their assessment confirms that all PFAS are extremely persistent, that every emission contributes to long-term pollution, and that derogations should remain limited, time-bound, and subject to strict conditions.

These conclusions were echoed during the recent Strategic Dialogue on PFAS convened by the European Commission, where stakeholders from civil society, affected communities, academia, public authorities and parts of industry recognised the urgency of reducing PFAS pollution, accelerating the development of safer alternatives, strengthening the polluter pays principle, and supporting monitoring and remediation efforts.

At the same time, the dialogue highlighted an important concern regarding the Commission's distinction between consumer and industrial uses of PFAS. Neither the original restriction proposal submitted by Member States nor ECHA's scientific assessment is based on such a distinction. Industrial uses account for a substantial share of PFAS emissions (63%), are associated with Europe's major contamination of hotspots, and contribute significantly to human exposure through contaminated food. A restriction that fails to address industrial uses would leave major sources of pollution untouched and undermine the effectiveness of the measure.

We therefore encourage Ministers to support a comprehensive PFAS restriction that follows the original proposal by Member States as well as the scientific evidence and the recommendations of ECHA, addresses both consumer and industrial uses, limits derogations to genuinely essential uses where alternatives are not yet available, and is accompanied by robust implementation of the polluter pays principle, remediation efforts, and support for the development and deployment of safer alternatives. Such an approach would protect human health and the environment while providing the regulatory certainty needed to drive innovation and strengthen Europe's long-term competitiveness.