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THE EEB'S MEMORANDUM

TO THE IRISH PRESIDENCY OF THE EU
10 GREEN TESTS FROM CIVIL SOCIETY

 JULY - DECEMBER 2026



Published July 2026

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With the support of the Austrian Ministry of Agriculture and Forestry, Climate and Environmental Protection, Regions and Water Management. The publication reflects the EEB's views and does not commit the donors.

 **Federal Ministry
Republic of Austria**
Climate Action, Environment,
Energy, Mobility,
Innovation and Technology

The EEB is Europe's largest network of environmental citizens' organisations. We bring together over 190 member organisations from 42 countries. Together, we work for a better future where people and nature thrive together.

The EEB is an International non-profit association/Association internationale sans but lucratif (AISBL).

EC register for interest representatives:

Identification number 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

With thanks to Seas at Risk and the EEB Board for input.



*With the support of the LIFE Programme of the European Union.
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Introduction

The Irish Presidency of the Council of the European Union, taking over on 1 July 2026, assumes its mandate at a critical juncture for the European project. This will be the eighth time Ireland holds the Presidency, launching a new Trio with Lithuania and Greece. It follows the Cypriot Presidency, which operated under intensifying geopolitical instability, including continued security pressures linked to Russia's war against Ukraine, conflict in the Middle East and US foreign interference, triggering further energy and economic shocks. In addition, the reduced respect for the international rule of law, multilateralism, justice and human rights has plagued international relations and policy-making.

The overlapping crises have reinforced a worrying trend towards short-term, end-of-pipe responses and renewed calls for deregulation—often at the expense of long-term resilience. Yet the accelerating climate, biodiversity and pollution crises demand the opposite: **strategic, forward-looking action grounded in systemic change, prevention, and effective implementation.**

At the same time, political pressure on civil society has intensified, including increased scrutiny of NGOs' role and funding. This weakens inclusive, evidence-based policymaking when it is most needed and risks undermining not only environmental protection, but also the democratic foundations of EU decision-making. In this context, **combating dangerous disinformation and ensuring science-based decision-making must be a central priority of the Presidency**, as misinformation continues to distort public debate and delay necessary and urgent action on the climate and environmental crises.

The European Environmental Bureau therefore welcomes the Irish Presidency's stated commitment to **promoting environmental awareness, supporting a just transition and sustainable behaviours, strengthening water resilience, reversing biodiversity loss, and progressing towards a zero-pollution environment—underpinned by coherent, science-based decision-making.** Delivering on these priorities will be essential to restoring trust, ensuring policy credibility, and translating ambition into tangible outcomes for people.

The current political context stands in stark contrast with the rapidly deteriorating reality on the ground. Europe remains off track on the vast majority of its 2030 climate and environmental targets, while extreme weather, biodiversity loss and pollution are increasingly affecting people's lives, livelihoods and health. **As the Irish Presidency begins, Europe has already experienced two major and unprecedented heatwaves in 2026—offering a stark illustration of the accelerating climate crisis and its direct impacts on people.**

Air pollution, chemical exposure, and climate impacts are placing a growing burden on public health systems and disproportionately affecting vulnerable communities. Crucially, persistent failures in implementation and enforcement—estimated to cost at least €180 billion annually—continue to distort markets, undermine competitiveness, and delay the transition. At the same time, citizens are calling for **more protection, not less**—for their health, their environment, and their future—as demonstrated by the mobilisation of over half a million people in support of the #HandsOffNature campaign

Against this backdrop, the Irish Presidency will play a **decisive role in redirecting the EU's policy and investment agenda.** It will steer key negotiations and potentially seal major agreements on the post-2027 Multiannual Financial Framework (MFF), advance work on the Common Agricultural Policy, and shape the direction of major legislative files, including the ETS revision and ongoing omnibus packages, while resisting pressure on attempts to dismantle EU key environmental pillars such as the Birds and Habitats Directive or the Water Framework Directive.

This moment requires a clear political choice. Recent debates have narrowed the EU agenda towards short-term competitiveness tools, often framed through deregulation and risk-shifting approaches. Yet evidence shows that Europe's long-term competitiveness, security and resilience depend on fully implementing and strengthening the European Green Deal—reducing dependencies, addressing structural environmental risks, and supporting a fair and just transition.

The Irish Presidency must therefore **re-anchor EU policymaking in science, implementation, and long-term public interest investment**, including by:

- ensuring that simplification translates into **better implementation—not deregulation**,
- restoring ambition and integrity in EU environmental law,
- safeguarding **civil society participation and democratic accountability**,
- and aligning the EU budget and economic governance with the realities of the **triple planetary crisis**.

Each Presidency is a “neutral broker”, balancing Member States’ positions while advancing strategic priorities. Ireland can lead by example through ambitious national initiatives and best practices in implementing EU climate and environmental law. As it starts a new Trio, it can and should set the path for Lithuania and Greece.

Building on consultation with over 190 members and civil society partners, the EEB has developed Ten Green Tests for the Irish Presidency, benchmarks for success aligned with our European Pact for the Future. These tests cover key Green Deal dossiers, international dimensions, and areas where Ireland can inspire others.

We look forward to working with the Presidency and Member States to deliver a green and social deal for a one planet economy, strengthening Europe's resilience for the challenges ahead.

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Patrick ten Brink
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10 Green Tests for the Irish Presidency



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Ten Green Tests for the Irish Council of the EU Presidency reflect our understanding that politics is the art of the possible. However, if we do too little now to avoid climate, biodiversity and pollution crises, and worse if we roll back on previous achievements, then the challenges in 2030, 2040 and 2050 will be impossible for society to deal with. The impossibility of living well in the future with unabated crises should make policy makers reconsider what is possible to negotiate today and up the level of ambition in policy formulation and subsequent negotiations. It is in this context that we have designed the Ten Green Tests. They may seem ambitious, but they are fundamentally necessary for the future we need, and that young people deserve to inherit.



1. Commit to a credible response to the triple crisis, oil price shocks, disinformation and disruptive foreign influence: implement the Green Deal

The ongoing climate, biodiversity and pollution crises, compounded by growing geopolitical instability—from Russia’s fossil fuel-financed war in Ukraine to escalating tensions in the Middle East—are exposing Europe’s structural vulnerabilities and strategic dependencies. At the same time, the real-world impacts of the climate and environmental crises continued to intensify, with two major early heatwaves already affecting Europe even before the Presidency starts, putting pressure on public health systems, ecosystems and economies.

Scientific evidence leaves no room for complacency. The EU remains the fastest-warming continent, and key Earth systems—from coral reefs to polar ice and major forest basins—are approaching or crossing irreversible tipping points. The European Environment Agency confirms that the EU is off track to meet nearly all of its 2030 environmental targets, including on biodiversity, climate resilience, pollution reduction and resource use.

In this context, strengthening Europe’s resilience—economic, social and security-related—must be the central guiding objective. The **European Green Deal** is not a constraint to competitiveness; it is its foundation. It is Europe’s most coherent strategy to reduce harmful dependencies, enhance energy and resource security, drive innovation, and protect citizens’ health and well-being.

Yet, instead of accelerating efforts to address the triple crisis, recent policy developments are moving in the opposite direction. Under the label of **competitiveness and simplification**, there has been a shift towards slowing progress and reopening key elements of environmental and health protections, with environmental pillars like the **Water Framework Directive or the Birds and Habitats Directive** at risk of weakening. These risks undermining both resilience and long-term economic stability at a moment when Europe can least afford it.

The evidence is clear. OECD analyses consistently show that stringent environmental policies strengthen productivity, employment and economic growth. The real burden lies not in EU legislation itself, but in its insufficient implementation: the European Commission estimates that the enforcement gap costs the EU around €180 billion annually due to environmental damage, health costs and lost ecosystem services.

Framing environmental acquis as “red tape” misrepresents reality. Common EU rules remain essential to avoid fragmentation into 27 divergent national systems, providing businesses with predictability and a level playing field. Simplification should focus on improving implementation—through better alignment of reporting obligations, digitalisation, and administrative streamlining—rather than reopening or weakening substantive protections.

Recent developments also highlight the growing gap between policy direction and societal expectations. More than half a million of citizens have called on the EU leaders to defend the laws that protect people and nature through the **“hands off nature”** petition. Businesses, too, have raised concerns, warning that policy instability risks undermining investment certainty and Europe’s competitive position.

In an increasingly contested and multipolar world, the EU must remain anchored in its strategic choice. Europe cannot afford to replicate deregulation models or engage in unsustainable subsidy races. Its competitive advantage lies in high-quality, safe, sustainable products, supported by a predictable and trusted regulatory framework.

At the same time, the policy debate is increasingly distorted by disinformation, external influence and coordinated attacks on civil society and environmental action. In a context of geopolitical tension, this represents a direct threat to democratic processes and Europe's resilience. Strengthening efforts to counter disinformation—rightly prioritised by the previous Trio— and protect civic space in decision-making must therefore remain a central pillar of the EU agenda.

In sum, a credible approach to competitiveness and security must reinforce—not weaken—the European Green Deal, close the implementation gap, and deliver the resilient, sustainable and future-proof Europe that citizens expect.

We therefore call upon the Irish Presidency to:

- A. Prioritise **implementation and enforcement of the European Green Deal** through:
 - a. Targeted financial support for national and local administrations;
 - b. Digitalisation and clear guidance;
- B. Ensure **simplification is about smarter implementation**, not dismantling existing targets or obligations;
- C. Guarantee that **simplification efforts are evidence-based**, proportionate, and subject to **impact assessments** and proper consultation (as requested by the Ombudswoman in her 'omnibus', 'CAP' and 'migration' cases);
- D. Restrict omnibus packages to **technical adjustments only**, avoiding substantive changes without proper scrutiny;
- E. **Pursue the efforts in quantifying and understanding the threats**, while encouraging the development of an EU strategy and practices to combat disinformation, to weed out inappropriate influence by foreign state actors, vested interests that are not aligned with public interests and science and strengthen public accountability and civic space. It is essential that decision-making has access to correct facts and is not biased by false information, and that civil society has the space and ability to communicate citizens' concerns;
- F. **Secure civil society space and integrity** through a meaningful implementation of the EU civil society strategy and firmly condemning unfounded attacks against CSOs' work and funding, aiming at muzzling them;
- G. **Ensure appropriate communication of the EGD** across the EU at national and local levels, starting with schools and universities;
- H. **Catalyse the development of a fact-checking portal and service**, also open to industry and civil society requests to immediately debunk false claims;

- I. **Better communicate environmental scientific consensus** and ensure scientific consensus remains at the centre of any expert groups, discussion groups, and civil society exchanges organised by the EU Institutions;
- J. **Promote the systematic communication of the benefits of action** (including cumulative benefits of action against the cost of inaction) of policies and measures;
- K. **Demonstrate solidarity with Ukraine and support EU enlargement:**
 - a. Maintain and accelerate the implementation of the EGD to ensure energy independence from hostile powers like Russia – through policies that support renewable energy, energy efficiency, and energy sufficiency roll out, supported by investments in a smarter, stronger and more interconnected and resilient European electricity grid;
 - b. Lead discussions in Council to stop Russian gas imports, including through indirect imports, and work with partners globally, to dry up Russia’s income on fossil fuels;
 - c. Counter the intention of Russian disinformation that seeks to scale back climate and environmental spending and weaken or undo the European Green Deal (EGD) to keep the EU’s dependency on Russian imports and commit publicly to the EGD and fossil fuel independence;
 - d. Advance accelerated enlargement to Ukraine, Moldova and other candidates, while safeguarding the Union’s capacity to act through decision-making reform.”
- L. **Lead by example:** Ensure that clear, convincing implementation measures and enabling mechanisms are in place in Ireland to fast-track the ecological, economic transition, and ensure these respond to the needs and lead to benefits and encourage engagement across rich, middle class and poor, so that it is a real green and social deal for a one-planet economy;
- M. **Ensure the systematic integration of gender equality and gender mainstreaming across European Green Deal implementation,** including through gender-responsive budgeting, inclusive governance, and targeted measures to address disproportionate impacts of environmental and economic crises on women and marginalised groups.

More information: [The European Pact for the Future: a green and social deal for a one-planet economy](#) • [EU leaders may miss a rendezvous with history](#) • [NGOs call for a social and green investment plan for a prosperous and just transition](#) • [Op-ed in Euractiv: Our Choice](#) • [Mid-term assessment of the European Green Deal](#) • [European Green Deal: One Year In](#) • [A Feminist European Green Deal](#) • [Turning fear into hope: Corona crisis measures to help build a better future](#) • [Reprotecting Europe: The EU Green Deal v The War on Regulations](#) • [Towards a wellbeing economy that serves people and nature](#) □ [EEB’s Feedback on the EU Taxonomy Delegated Acts](#) • [Beyond Growth Conference: Open Letter](#); • [Hands off Nature Campaign](#); • [EEB response to Environmental Omnibus Commission adoption](#) • [Briefing note on the smart implementation of the European Green Deal](#) • [EEB letter to the General Affairs Council June 2026 \(Omnibus packages and the EU legislative priorities for 2026\)](#) • [EU simplification explained – an FAQ](#) • [Q&A on NGO funding and transparency](#) • [Op-ed in EUobserver: What happens after Europe’s NGOs are dismantled?](#)



2. Commit to a sufficient EU Budget and wider financial tools to catalyse a credible and fair transition to a one planet economy – enabling a race to the top on sustainability

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 Commission's current proposals for the next **MFF**. On the contrary, the Commission plans a significant reduction in funding committed to 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.

The Irish Presidency will play a key role at a critical juncture in advancing negotiations on the post-2027 Multiannual Financial Framework (MFF), building on progresses made by the Cypriots on the negotiating box and partial general approaches on key instruments such as the **European Competitiveness Fund (ECF) and National and Regional Partnerships plans (NRPPs)**.

In a context of heightened geopolitical instability, the worsening of the triple crisis and rapidly growing climate impacts, the **MFF** must become a central instrument to shield Europe and strengthen the EU's long-term resilience. The **European Green Deal** and key instruments such as **LIFE** remain the EU's most coherent strategy to achieve this—by reducing dependencies, enhancing energy and resource security, and supporting sustainable, future-proof economic development across regions.

The Irish Presidency should ensure that such instruments are explicitly designed to support the green and just transition, recognising that Europe's economic resilience depends on addressing the structural costs of environmental degradation, climate impacts, and pollution.

Evidence is clear: failure to implement EU environmental legislation and key frameworks continues to generate market distortions, legal uncertainty, and barriers to innovation. At the same time, the costs of inaction on the triple crisis far outweigh the investments needed for transition.

Against this backdrop, the Irish Presidency should work to secure:

- A. **The Reestablishment of 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 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;
- B. **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. 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;
- C. **That there is an increase from 35% to 50% of the spending target for climate and environment** - including at least 10% dedicated 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;
- D. **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;
- E. **A full environmental and social conditionality across all MFF programmes**, including the strict and systematic application of the Do No Significant Harm (DNSH) principle, with no exemptions for harmful activities;
- F. **The reinforcement of the support for civil society organisations (CSOs)** through dedicated operating grants enabling participation in policy design, monitoring, and enforcement;
- G. The move towards **a fair and performance-based Common Agricultural Policy** linking budget disbursement to clear, measurable objectives, re-introducing ring-fenced funding for agro-environmental incentive payments, ending harmful subsidies via a science-based exclusion list, and targeting socio-economic support to farmers who need it most. It should also facilitate the transition towards resilient, diversified farming grounded in agroecology, including support for the livestock sector and farm-to-fork investments;
- H. **A holistic approach to Council negotiations** by involving all relevant working parties in cross-cutting files. For example, legislation related to the CFP and the European Ocean Pact should include input from the IMP and Environment Working Parties where relevant;
- I. **Advancing new EU own resources** through progressive taxation, including a permanent windfall profits tax on energy companies considering recent crises, alongside taxes on extreme wealth, frequent flyer levies, resource use and financial transactions. This is essential to close growing green and social investment gaps, particularly as the RRF ends in 2026, and to ensure fair burden-

sharing. Discussions on the Digital Euro should also support public investment capacity and financial inclusion;

- J. **A long-term EU Just Transformation Fund beyond 2026 to address the post-RRF investment gap** and ensure a fair transition for all. The next MFF should move away from derisking approaches that prioritise private profits, and instead strengthen public-led, strategic investment with strong social and environmental conditionalities to deliver a just and sustainable transition

More information: [The European Pact for the Future: a green and social deal for a one-planet economy](#) • [Briefing paper on LIFE in the next Multiannual Financial Framework \(MFF\)](#) • [Call for a dedicated EU Nature Restoration Fund](#) • [Joint statement: operationalising the do Not Significant Harm principle in the next long-term EU budget](#) • [Time for farmers and nature to thrive](#) • [The next EU budget: investing in ocean resilience and thriving coastal communities](#) • [Performance Regulation: Fixing the details – a joint assessment of Annex I](#) • [EEB letter to the General Affairs Council June 2026 \(on the next Multiannual Financial Framework\)](#) • [Op-ed in Sustainable Views: Europe needs a budget that works for Europeans – not fossil fuel regimes](#) .



3. Ensure a truly “Clean” Industrial Deal that helps EU industry be a global frontrunner in detoxification, de-pollution, decarbonisation and restoration

The **Clean Industrial Deal** must deliver for both people and the planet. Europe faces a triple crisis - climate breakdown, biodiversity loss, and pollution - alongside deepening inequality. True competitiveness cannot come from further degrading our environment, health, or social fabric.

A genuinely clean Deal must raise the regulatory bar, strengthen sustainable frontrunner solutions, and reinforce the transition towards low-emission production standards. It should promote sustainable competitiveness that serves people and future generations, as well as a thriving industrial sector based on renewable energy, circularity and material efficiency. Europe's strength lies in leadership rooted in strong social and environmental standards. By leading in detoxification, depollution, decarbonisation, and restoration, the EU can prove that a thriving industry and a healthy planet go hand in hand.

Moreover, secondary acts pursuant to the updated rules on industrial pollution prevention and reporting, the **Industrial and Livestock Rearing Emissions Directive (IED 2.0)** and the **Regulation establishing the Industrial Emissions Portal (IEP-R)**, need to be ambitious and coherently enforced. Key acts relate to the drafting of **EU Best Available Techniques (BAT) reference documents (BREFs)** for mining, landfills, inorganic chemicals, surface treatment of metals and plastics, battery giga-factories, iron and steel, pulp and paper and cement production. Operating rules for industrial-scale pigs and poultry livestock rearing activities are due to be published by 1 September 2026. Concrete delivery on the zero-pollution ambition will depend on the robustness and ambition level of these acts, where the Council has a key role to play in upholding integrity and setting direction. Secondary acts for ringfencing content of installation-level transformation plans for energy-intensive industries, and the obligation for more systematic substitution analysis of hazardous substances, are at risk from the Omnibus simplification/deregulation obsession of incumbent industry laggards.

Key votes that may be finalised under the Irish presidency will concern the **Industrial Accelerator Act (IAA)**, the review of the **Carbon Border Adjustment Mechanism (CBAM)** and the review of the pollutants list and reporting thresholds, as well as clarifications on what is considered contextual information and relevant raw materials subject to reporting rules for large-scale industrial activities under the **Regulation establishing the Industrial Emissions Portal**. It is crucial to ensure that digital reporting obligations serve progress on environmental performance benchmarking and accountability of decision-making. Similar political signals are expected in relation to the review of the **UNECE Pollutant Release and Transfer Register (PRTR) Protocol on reporting on industrial activities**. The trilogues for the environment omnibus (addressing both the IED2.0 and the Portal) are further (tentatively) expected to kick-off during the Irish Presidency.

A proposal for the revision of the **Public Procurement Directive**, has slipped into the term of the Irish presidency. It offers a large potential to drive sustainability, circularity, and decarbonisation of carbon-intensive industrial products like steel and cement. Linked to the standards of the **Eco-design for Sustainable Products Regulation (ESPR)** and the **Construction Products Regulation (CPR)**, mandatory public procurement of decarbonised industrial products offers potentially massive incentives to drive

competitive advantage for European industry, as well as fast-tracking innovation that will benefit the planet and its citizens.

A key policy driving industrial decarbonisation in Europe is the **Emission Trading System (ETS)**, the review of which is expected to take centre stage within the Irish Presidency. Several design elements are currently being discussed, and there is a risk that these tweaks to the instrument's functioning could reduce its ability to drive the industrial transformation Europe needs.

We therefore call upon the Irish Presidency to:

- A. Uphold a holistic zero-pollution-aligned ambition within acts to be adopted pursuant to the Clean Industrial Deal**, which can live up to its name only if it embeds the zero-pollution objective in its priorities, alongside climate goals and if it recognises the strategic value of pollution prevention and remediation. Accelerating the phase-out of fossil fuels/feedstocks and chemicals of concern - ending the use of all the most harmful chemicals in products is a prerequisite to a toxic-free circular economy. Accelerate the transformation of the steel value chain;
- B.** Ensure that the **Industrial Accelerator Act's** (IAA) scope is ringfenced only for industrial projects able to foster the phase out of fossil feedstocks, that low-carbon criteria linked to public procurement only award fossil-free and circular industrial products, that market quotas for low-carbon steel and cement are ambitious enough to spark their market and that permitting streamlining ensure that key EU rules on nature protection and public participation are not weakened. On buying sustainable and EU preference, the EU should adopt a "buy sustainable" policy with the aim to direct public procurement and other public finances to decarbonised and sustainable products to accelerate decarbonisation, reduce environmental damages, protect workers' rights and uphold high animal welfare standards. Economic operators of Union origin as defined by the IAA should receive the first preference in this approach, but if these operators are not able to match the sustainability and socially responsible criteria then there should be no exclusions to any economic operators who can satisfy the criteria;
- C.** Ensure **CBAM** is implemented as expected. Stay firm on the progressive phase-out of free allocation, as agreed during the last EU ETS review, and remove the potentially damaging Article 27a to provide essential legal certainty for industrial operators to plan investments. Resist calls to push for exemption of certain goods, recognising that this could fatally undermine business cases for investments in clean production in Europe;
- D.** Uphold the ambition and integrity of the **ETS** as an essential driver of industrial transformation and economic security. This ETS review comes as Europe is amid another energy crisis driven by its continued dependency on fossil fuels. Increased energy prices have led to calls to weaken the ambition of the ETS in a bid to provide 'relief' to European industry. However, any short-term 'relief' to industry would be extremely limited and must be weighed against the long-term impacts to European society of continued fossil fuel dependence because of delayed action;
- E.** Ensure that the ambition of the **revised Industrial Emissions Directive (IED 2.0) and the Regulation establishing the Industrial Emissions Portal (IEP-R)** will not be compromised during the Council discussions on the environmental omnibus: the goal shall be simplification to ensure better implementation - not deregulation. Maintain the obligation for operators of high-polluting activities to elaborate a site-level transformation plan (IED2.0 Article 27.d), and the requirement for a more

systematic risk assessment/substitution analysis of hazardous chemicals (IED2.0 Article 14a). Maintain mandatory reporting of consumption in the Industrial Portal;

- F. Ensure systematic internalisation of negative externalities** in relation to aspects linked to funding, state aid or other support schemes and methods of cost-benefit assessments. Ensure that any form of support for industrial operators is linked to clear and mandatory investments in low-emissions production routes, and a toxic-free and zero-pollution compatibility check;

- G. Secure user-friendly and transparent pollution benchmarking tools through ambitious implementation of the Regulation establishing the Industrial Emissions Portal**, notably by removing pollutant thresholds and adding further pollutant groups, in particular PFAS. Define the meaning of 'contextualisation of information.' Ensure public access to production volumes, operating hours, consumption data/key raw materials, and other key information, such as measures taken pursuant to the Environmental Management Systems, including IED 2.0 Transformation Plans;

- H. Secure political direction for a comprehensive UNECE Kyiv Protocol (on Pollutant Release and Transfer Registers)**, based on the IEP-R improvements (mentioned above), bridging with the digital product passport promoted through EU product policy and incorporating due diligence requirements from other EU acquis. Systematically allow for early and effective pre-consultation with civil society interest groups such as the EU ECO Forum;

- I. Secure mandatory environmental and socially responsible procurement criteria** in all procurement contracts. Ensure that procurement contracts only include products or services with the highest environmental performance linked with the product standards being developed in relevant sectoral legislations (e.g., best-in-class minimal requirements as per ESPR, or EU Ecolabel). Strengthen the use of life cycle costing through new or updated methodologies and software tools to calculate negative environmental externalities, customised and simplified for the specific use cases of procurement authorities. Secure better monitoring and reporting to track the progress of green public procurement and lower the thresholds. The revision of the EU procurement directives must also be conducted with the intention to actively encourage sustainable food procurement, as outlined in the Vision for Agriculture and Food and called for unanimously by agri-food stakeholders in the consensus report of the Strategic Dialogue on Agriculture and Food.

More information: [EEB briefing on the IAA](#) • [EEB briefing on the ESPR for iron and steel intermediate products](#) • [EEB steel and metals action plan](#) • [Joint Industry-NGO vision for a prosperous and sustainable industry: a positive blueprint for the future](#) • [Briefings on IED and IEP-R review](#) • [EU BREF specific website](#) • [EEB input to CID State Aid Framework \(CISAF\)](#) • [EEB briefing on Green Public Procurement](#) • [Climate impact of air pollution levels aligning with European Commission's proposed air quality standards](#) • [EEB position on buying sustainable](#).



4. Turning Dialogue into Action: Leveraging the Strategic Dialogue and CAP Reform for sustainable and just food and farming systems

Our current food production and consumption patterns are driving multiple environmental and health crises, while the accelerating climate and biodiversity crises are increasingly undermining our ability to produce food—both in Europe and globally.

The science is clear: we must urgently make our food systems sustainable, equitable, and resilient by addressing how we produce, distribute, and consume food. From nutrient pollution to nature collapse loss and the climate crisis, from household food insecurity to the growing burden of diet-related diseases, the challenges are complex and interrelated, requiring urgent, bold, and systemic policy and legislative solutions.

With discussions on the EU's long-term budget and reform of the **Common Agricultural Policy (CAP)** post-2027 picking up speed in 2026, and while the **post-2030 climate policy framework** and **future of the EU livestock sector** are also on the agenda, the Irish Presidency will have a crucial role to play in ensuring high sustainability ambition across these areas to support a Just Transition in our food and farming system. The historic consensus achieved in the **Strategic Dialogue on the Future of Agriculture** in mid-2024 is still very relevant and unique in its kind, as such it provides a crucial stepping stone for these efforts, which the Presidency should embrace and build on.

We therefore call upon the Irish Presidency to:

- A. **Support a move towards a fair and genuinely performance-based Common Agricultural Policy** that links budget disbursement to clear, measurable objectives, while re-introducing ring-fenced funding for agri-environmental incentive measures and for the transition towards resilient, diversified farming grounded in agroecology, including in the livestock sector. This ring-fencing should be raised from the current 28% to 35% of the total CAP budget. The CAP should also end harmful subsidies by adopting a science-based exclusion list of damaging activities that no longer qualify for EU support, and it must target socio-economic support to those farmers who need it most, as called for by the Strategic Dialogue;
- B. **Bring the topic of emissions reductions in the agriculture and land use sector centre stage**, as the Commission prepares its proposal on the EU's post-2030 climate policy architecture. It will be crucial to design sectoral climate targets and instruments, with a view to setting and achieving ambitious science-based emission reduction goals for the agriculture sector, as recommended by the Strategic Dialogue. So-called “flexibilities” need to be kept to a minimum, to ensure that the transition towards a climate- and nature-friendly economy takes place domestically in the EU, and across all sectors and Member States. Given the central role the carbon Removal and Carbon Farming (CRCF) will likely play in the proposal, it will be key to **scrutinise the final draft Delegated Act of the CRCF Carbon Farming methodologies** to ensure current concerns are addressed and that they are fit for purpose, deliver on sustainability requirements, and accurately quantify real climate benefits;

- C. **Facilitate an evidence-based exchange on the upcoming EU Livestock Strategy within the Council** to ensure it duly addresses the sector's strategic vulnerabilities and its environmental impacts, outlining a transition pathway to 2040 that can secure better jobs for farmers and workers across value chains, respect planetary boundaries, and support better health outcomes and animal welfare. **In parallel, ensure inclusive and evidence-based discussions on the upcoming EU Protein Action Plan**, to advance the debate on consumption-side policies related to the protein system, as announced in the Vision for Agriculture and Food;
- D. **Promote high ambition on animal welfare through EU legislative reforms** urging the European Commission to publish ambitious proposals for the revision of the EU's animal welfare legislation, including a ban on the use of cages in animal farming. **Conclude the revision of Animal Transport legislation** with high ambition, including a ban on live exports;
- E. **Increase the dialogue between the Agriculture Council and Environment Ministers and stakeholders**, including by inviting environmental NGOs to the Informal Agriculture Council and meeting with environmental representatives in the margins of Agriculture Council meetings, as was done by the Danish Presidency and is already customary with some agricultural representatives;
- F. **Set 2027 fishing opportunities below the Maximum Sustainable Yield (MSY) limits in line with the best available scientific advice** to operationalise the **Ecosystem-Based Fisheries Management approach under the Common Fisheries Policy**;
- G. **Champion an inclusive dialogue regarding the Vision 2040 for Fisheries and Aquaculture** and the necessary just transition to low-impact practices.

More information: [‘CAP: From a flawed proposal to real transition’: Joint policy brief on the post-2027 CAP proposal](#) • [‘Time for farmers and nature to thrive’: Joint policy brief on the future of EU agricultural policy](#) • [‘Putting a price on agricultural emissions’: EEB reflections on an EU Emissions Trading System for agriculture](#) • [‘Breaking Free’: EEB position paper on EU animal welfare](#) • [Joint Call for EU Action Plan for Plant-Based Foods](#) • [‘Recommendations to the EU and the UK on the setting of fishing opportunities’: Joint briefing](#) • [‘New Vision for fair, low-impact fisheries to inspire the future of EU seas’: Joint policy brief on the future of EU Fisheries](#)



5. Maintain commitment to the climate fight by confirming the trio of targets and accelerate electrification.

The definition of post-2030 targets and the level of ambition of the European delegation to COP 32 will shape the climate legacy of the Irish presidency. While the ongoing energy crisis linked to the conflict in the Persian Gulf underscores the urgency of action, the most effective response lies in accelerating investments in renewables, sufficiency and efficiency, particularly via electrification, to advance both energy independence and decarbonisation.

With limited time before the 2030 target and COP31 outcomes, the Irish Presidency should prioritise measures that can deliver immediate emissions reductions, anchored in a rapid scale-up of electricity networks and infrastructure through the Grids Package. This requires avoiding lock-in to fossil fuels or too costly and delayed technologies (new nuclear, overreliance on hydrogen, and CCS/CCUS), and instead ensuring a fair, efficient transition for citizens based on proved solutions: direct electrification, renewable energy, and flexibility. At the same time, the Presidency will need to advance key legislative files, including the revision of the Renewable Energy Directive and upcoming trilogues on permitting. All efforts must be made to maintain high ambition while safeguarding local communities and nature.

The scale and urgency of the transformation mean that limited public and political resources should be concentrated on what can be deployed quickly and reliably. In this context, the **Grids Package trilogues represent a critical opportunity to ensure the next steps for renewables and electrification deployment and** should be treated as a central climate delivery file for the presidency. At the same time, accelerated deployment must not come at the expense of **environmental integrity, legal certainty, or public trust**. Poorly designed permitting shortcuts risk increasing litigation, delaying projects, and ultimately slowing decarbonisation. The Presidency should therefore ensure that progress in trilogues delivers well-planned infrastructure rather than deregulation that undermines EU environmental law.

Carbon pricing remains a central tool for achieving emissions reductions, but its effectiveness is currently being weakened by the lack of adequate regulatory and complementary measures. **With ETS2** implementation risks increasing, decisive Council action in buildings and transport is essential, as delays in the delivery of Fit for 55 will directly translate into higher costs for households and businesses in the future. The discussion around the recast of the ETS directive should lead to improvements rather than watering down what has proven to be an effective climate tool for EU industry, and it will inevitably have a fallout effect on the ETS2. Whether this will be a positive or negative one will also be an important measure of this presidency's success.

We therefore call upon the Irish Presidency to:

- A. **Protect ETS2 from being used as a bargaining chip in the discussions around ETS in the Council.** This requires clearly explaining the need for swift adoption of the ETS2 directive in all Member States. It also requires safeguarding complementary policies that reduce emissions in **ETS2** sectors, such as the automobile fleet standards, the **Energy Performance of Buildings Directive, and the Energy Efficiency Directive**, which should not be reopened ahead of time;

- B. **Ensure that the post 2030 framework will retain the trio of targets that have secured climate commitment so far:** both EU and national energy efficiency and renewables' targets are instrumental to the climate one and represent a critical tool to ensure EU's energy independence. Faster electrification should be ensured by sectorial targets, namely in buildings, transport and industry;
- C. **Promote active discussion and the sharing of best practices on ETS2 revenue use, beyond the Social Climate Fund.** Direct payments to households are an extremely transparent way to build trust in carbon pricing, while providing effective relief to low- and middle-income households;
- D. **Protect EU funds by pushing back against attempts to channel EU funding towards late, expensive, and unreliable nuclear energy, particularly in the context of the MFF.** Only the nuclear industry would benefit, as this technology is proposed in place of renewables, and any new nuclear power plants would come online too late to meaningfully contribute to EU decarbonisation. Any national contributions must include safeguard provisions to address delays and cost overruns of a magnitude consistent with all recent nuclear projects in the EU;
- E. **Promote global climate ambition.** To align with the 1.5°C temperature limit and the principle of equity, advocate for **EU climate neutrality by 2040** at the latest, based on at least 92% domestic gross emissions reductions compared to 1990 levels. Ahead of COP31 in Australia, the Presidency can facilitate pre-COP coordination and mandate-building. In addition, bring the ambition of the **F-gas Regulation** to the global stage to prevent the widespread adoption of HFOs (PFAS) in developing countries. This is particularly important for countries like Ireland that are taking up the promotion of heat pumps and rely heavily on cooling for, e.g., data centres. Such action would also support European producers of greener alternatives, reduce import costs for Member States, and create a level international playing field, whether through the **Montreal Protocol** or bilateral agreements with key manufacturing economies;
- F. **Deliver progress on electrification and affordability.** The Presidency should advance and operationalise the **Electrification Action Plan**, ensuring that Council conclusions or guidance are reached before the end of 2026. Advocate for a stronger framework for electrification by addressing high electricity taxes and levies across many Member States and overcoming State aid barriers to enable 0% VAT on renewable technologies such as heat pumps.
- G. Lastly, **led by example** by prioritising national investment in renewable heating and cooling technologies and phasing out fossil fuels from the sector;
- H. The Presidency should ensure that negotiations on the Grids Package trilogues can maintain high environmental integrity while accelerating deployment:
 - a) Ensure permitting streamlining does not weaken Environmental Impact Assessment (EIA), Appropriate Assessments (Habitats Directive), or public participation rights.
 - b) Promote **early spatial planning, strategic environmental assessment, and avoidance-first** approaches rather than relying on ex-post mitigation.
 - c) Safeguard **legal certainty** for projects by preventing unclear shortcuts that increase the risk of litigation and delays.
 - d) Ensure that 'acceleration areas' and fast-track procedures are compatible with biodiversity protection and cumulative impact assessments, especially in cross-border and offshore contexts.

I. **Energy taxation Directive:** Finalise the revision of the **Directive** with a strong climate lens:

- a) **Remove fossil fuel subsidies** and avoid promoting unsustainable fuels under the guise of a “clean” transition;
- b) **Shipping Decarbonisation Strategy:** Embed a “Wind First” flagship initiative into EU maritime policy; prioritise energy efficiency and wind propulsion at the top of the shipping decarbonisation hierarchy; reform port planning so ports function as climate and justice hubs with safe, multi-fuel infrastructure; support fuels with robust full life-cycle GHG performance; avoid incentivising LNG or other high-emission alternatives; and advocate for strong IMO measures with strict limits on carbon credit use, full fund transparency, and robust sustainability criteria.

More information: [Creating positive impact with ETS2](#) • [Why direct payments are essential to make household carbon pricing work in the EU](#) • [Joint letter to establish an EU lending facility for ETS2 revenue for member states](#); • [Three Guiding Principles for National Social Climate Plans](#); [Comparative assessment on the designation of Renewable Acceleration Areas \(RAAs\) in selected EU countries](#) • [How renewables can help vulnerable households](#); • [EEB’s response to the Do No Significant Harm principle in the Social Climate Fund](#) • [CCS Reality Check – Risks and Priorities](#)



6. Deliver a nature-positive agenda for land, freshwater and oceans and fast-track climate adaptation and resilience

Our lives, health, well-being, economy, and resilience to the climate crisis depend on healthy, biodiverse ecosystems. Despite this urgent moral, economic, and environmental imperative, nature is in crisis. According to the 2025 **Europe's Environment Report**, human pressures remain high, and many EU policy targets remain off track. Urgent, transformative action is needed to protect and restore nature, the foundation of a healthy society and a stable economy. The EU must continue the course of implementing and strengthening the **EU Strategies on Adaptation, Biodiversity, Forests, Oceans, Soil and Water Resilience**, including smart implementation of EU nature, water and marine laws. Member States must swiftly transpose and start implementing without delay the recently adopted **Soil Monitoring Law** and the updated **Directive on priority water pollutants**, as well as uphold the integrity and accelerate the implementation of **the Nature Restoration Regulation, Nature Directives, the Nitrates Directive** and **the Water Framework Directive**. Strong Council leadership will be crucial to defend and make the most of the potential these laws offer to protect and restore nature, put soils on the path to recovery and tackle the accelerating water and climate crises.

During the Irish Presidency, the European Commission plans to support the roll-out of the **EU's Water Resilience Strategy**, including via Structured Dialogues with Member States, as an opportunity to close the water acquis implementation gap by 2027. It is also still due to publish the evaluation of the Nitrates Directive and decide on its future. We believe the **Nitrates Directive** is fit for purpose and should be maintained, but implementation, reporting, and enforcement should be strengthened in line with the European Court of Auditors' recommendations.

The von der Leyen II Commission's "simplification" agenda has driven major deregulation, using rapid, extensive, and undemocratic omnibus packages to roll back the **Green Deal** and longstanding environmental laws. The Presidency must lead the Council in defending core protections for nature, water, soil, and marine environments. Most alarming is the ongoing revision of the **Water Framework Directive**, which would allow more mining pollution into our waterways, threatening the EU's economy, climate resilience, and public health. The ongoing **stress test of the Birds and Habitats Directive** disregards the benefits these laws bring to people and the economy, and overlooks the opportunities their enhanced implementation and enforcement can bring about. In addition, negotiations are underway on several legislative proposals to speed up permitting for grids and other infrastructure projects, which risk significantly weakening rules linked to environmental assessments and permitting, and providing blank derogations from meeting the environmental objectives of the EU's laws. The Commission has also announced in the Fertiliser Action Plan an expansion of the **RENURE** Act to allow for digested manure above the limit set in the Nitrates Directive. This not only reinforces an Act that was prepared and adopted without following the Commission's own **Better Regulation** rules but also risks worsening agricultural pollution of water bodies.

In addition, the Presidency will represent the EU on the global stage, including preparatory meetings under the UN Convention on Biological Diversity (UNCBD), the 2026 UN Water Conference, and the **UN Convention to Combat Desertification**, to name a few. It is important that the Presidency provides strong leadership for the EU to fill the geopolitical vacuum and become a real leader in biodiversity

protection, water resilience and ocean stewardship, repairing the reputational damage on the global stage it has suffered after a political U-turn on wolf conservation.

The strong EU action to protect and restore nature is supported by citizens, scientists, civil society, mayors, and businesses, among others, and provides a progressive political agenda that broad sections of society can rally around.

We therefore call upon the Irish Presidency to:

➤ **Biodiversity and nature restoration:**

- A. Maintain the integrity of the EU's nature laws and **insist on the stress test of the Birds and Habitats Directives to bring about impactful implementation of these laws** backed by political will and funding;
- B. **Support the impactful roll-out of the Nature Restoration Regulation** across the EU by its legal deadlines, including the deadline for submitting draft National Restoration Plans that will occur during the Presidency tenure, following the NGO recommendations in order to fully use the law's opportunities in tackling the biodiversity, water and climate crisis;
- C. **Promote the need for stepping up implementation of the EU Biodiversity Strategy for 2030**, including review and ratcheting up of progress, as well as achievement of the commitments under the Kunming-Montreal Global Biodiversity Framework;
- D. Insist that **Member State reporting under the Nature Directives** remains based on science so that the upcoming State of Nature Report serves as a foundation for enhanced action to tackle the biodiversity crisis;
- E. **Uphold strict and clear rules on environmental assessments and permitting in the Council's negotiations on the Regulation on speeding up environmental assessments** that has been proposed under the Environment Omnibus. Safeguard permitting rules across sectors, including in interinstitutional negotiations on the **Grids Package** and the Council negotiations on the **Industrial Accelerator Act**;
- A. **Lead the Council in agreeing the EU's negotiating mandate for the CBD COP17** to ensure a strong, coherent and pro-nature position at the meetings in October. UN CBD COP 17 will include a Global Review of the Implementation of the Kunming-Montreal Global Biodiversity Framework and is an important milestone for accelerating implementation and continued ambition to halt biodiversity loss.

➤ **Water:**

- B. **Support ambitious rollout of the EU's Water Resilience Strategy**, including Efficiency-First recommendations to save water by curbing demand and prioritise nature-based solutions to enhance the contribution of healthy freshwater ecosystems to manage water scarcity and droughts and achieve climate-resilient water management in the EU;
- C. **Pushback against the Commission's unfounded decision to revise the Water Framework Directive** and **lead the Council's work** including as a co-chair of the Common Implementation Strategy of the Water Framework Directive as well as at the Ministerial level on the EU's action **to step up implementation and enforcement of the Water Framework Directive** (and related directives on floods and priority pollutants) to ensure that the environmental objectives of the

WFD are met by 2027. **Insist that Member States swiftly transpose and start implementing without delay the updated water pollutants standards. Oppose the construction of new dams and other damaging infrastructure, given** their negative biodiversity impacts and focus instead on barrier removal to restore free-flowing rivers;

D. **Insist that the Nitrates Directive is fit for purpose and organise the Council's support for impactful implementation** and zero tolerance of non-compliance with the Nitrates Directive and **insist on the need to complement it by additional action such as the promised Integrated Nutrient Management Action Plan** to finally address the nitrate pollution of our water environment. **Oppose the Commission's plans to further weaken the manure limit of the Directive** and insist that any amendments of the Directive are based on proper Impact Assessment, public consultation and climate consistency assessment in line with the Better Regulation Guidelines and EU law;

➤ **Demonstrate EU's global leadership on water protection and resilience by leading the Council towards adoption of the Council Conclusions ahead of the UN Water Conference in November 2026**, including meeting the Freshwater Challenge on freshwater ecosystem protection and restoration.

➤ **Soil:**

A. **Support the Member States in their efforts to transpose the first ever EU Soil Monitoring Law** and ensure its impactful implementation to put our soils on the path to recovery by 2030, and guarantee that they are brought back to health by 2050;

➤ **Forests:**

A. Ensure that the so-called "simplification" of the EU Deforestation Regulation (EUDR), as agreed by the EU institutions in December 2025, does not strip it of its capacity to tackle the growing global deforestation crisis. **Work with other EU institutions to prevent any further legislative proposals that could weaken the EUDR.**

➤ **Oceans:**

A. Champion the full implementation of the **Common Fisheries Policy**, and steer conversation in Council regarding the CFP's current evaluation to ensure that it leads to streamlined implementation in view of finally reaching its environmental and social objectives and fully implementing ecosystem-based fisheries management; as prescribed in the legislation;

B. Support the implementation of the **Ocean Pact** by driving the negotiations for an **ambitious Ocean Act** that will build a single, simplified and enforceable framework for all ocean-related policies. The Ocean Act must establish legally binding objectives and time-bound, measurable targets (including intermediate targets) for 2030, 2040 and 2050 to ensure the achievement of Good Environmental Status as prescribed in the Marine Strategy Framework Directive.

C. Support the parallel revision of the **Marine Strategy Framework Directive and the Maritime Spatial Planning Directive** to align both Directives and synchronise their implementation cycles. This alignment must be based on the recognition that **ocean health is the main shared goal for**

both legislations, as a central precondition to supporting thriving coastal communities and blue economy sectors;

D. Garner support to a moratorium on deep-sea mining and champion a swift ratification of the **BBNJ Treaty** by all EU Member States.

E. Convene a cross-sectoral **high-level Ocean Ministers meeting** to foster integrated marine governance and advance synergies between fisheries, climate, and biodiversity policies.

➤ **Ecosystem-based adaptation:**

A. Work with the European Commission to **ensure that the upcoming integrated framework for climate resilience**, which is expected to be published during the Presidency, **prioritises nature-based solutions** to adapt to climate change, aiming at making clean water available for nature and for people.

➤ **Lead by example:**

A. Lead by example in **insisting that the integrity of the EU's nature, water, soil and marine laws is maintained** and demonstrating progress in their smart implementation.

More information:

[Nature Priorities for the New EU Mandate](#); [Joint statement by 300+ civil society organisations calling for strict wolf protection to be maintained](#); • [NGO letter calling on EU Member States to now lower the protection status of the wolf](#) • [NGO assessment of NRP preparation processes](#) • [Letter to Commission President advocating against inclusion of the Nature Restoration Regulation in the environment omnibus ;](#) • [Protecting the foundations of life – Statement on the Soil Monitoring Law](#); • [Call for a dedicated EU Nature Restoration Fund](#); • [Benefits of the Forest Monitoring Law](#); • [The Changing Seascape of Deep Sea Mining in Europe](#) • [LRE letter on the environmental omnibus](#) • [EEB letter on RENURE](#) • [Industry Wish List](#) • [Going with the flow: barrier removal for healthier rivers](#) • [A Water handbook for the 2024-2029 mandate](#) • [EEB view on Water Resilience and Efficiency First Guidance and Recommendations For Ambitious Nature Restoration Plans](#); • [Call for a dedicated EU Nature Restoration Fund](#); • [Protecting the foundations of life – Statement on the Soil Monitoring Law](#); • [NGO statement on the urgent need to adopt the EU Soil Monitoring Law](#) • [Position paper: How could European forests best benefit from the EU Forest Monitoring Law?](#) • [Benefits of the Forest Monitoring Law](#); • [Hatchet Job on the Forest Monitoring Law – What Next?](#) • [The Changing Seascape of Deep Sea Mining in Europe](#) • [Ocean act position paper: Europe's Ocean Regulation](#) • [EEB Letter to Commissioner Roswall on the initiative to amend the Nitrates Directive](#);



7. Maintain and deliver on zero-pollution objectives on air quality and noise

Air pollution is the first environmental health risk in Europe, responsible for around 300,000 premature deaths every year. In September 2021, the **World Health Organisation published its latest Global Air Quality Guidelines**, setting clear indications on which air quality standards should be guaranteed to better protect people's health and the environment from air pollution. In 2021, the European Commission published its **Zero-Pollution Action Plan (ZPAP)** to achieve a zero-pollution ambition, announcing several key initiatives for cutting air pollution at the source and the revision of the **Ambient Air Quality Directives (AAQDs)**. This revision led to the adoption of a new AAQD, also establishing stricter limits on key air pollutant concentrations, aligning EU standards more closely with **World Health Organisation (WHO) guidelines**. Ecosystems protections have also been increased in the new legislation.

Under the Irish Presidency, Member States will continue to transpose the revised **Ambient Air Quality Directive**, which entered into force on 10 December 2024. The conclusions of the European Commission's Evaluation of the **National Emission Ceilings Directive** should help drive the necessary steps to secure further reductions after 2030 and meaningful actions on laggard sources of air pollution. Important decisions also need to be taken at the international level, within the framework of the **UNECE Long-Range Transboundary Air Pollution Convention**, namely for the ongoing revision of the **Gothenburg Protocol**. The commitment of EU Member States is key to driving the process towards an ambitious outcome.

We therefore call upon the Irish Presidency to:

- A. **Object to any simplification of the recently agreed Ambient Air Quality Directive and National Emission Reduction Commitments Directive's** requirements through the European Commission's Omnibus approach or through any other initiative which is not following the standard revision process and based on a solid impact assessment: European citizens need clarity and strict rules when it comes to the implementation of these key instruments aiming at protecting public health and the environment. Life-saving protective rules must be delivered within the identified timeline;
- B. Guarantee the **right to clean air** and reduce exposure, preventable mortality, and illness. The recently revised **Ambient Air Quality Directive** establishes more ambitious air quality standards to be achieved by 2030, and Member States' actions to secure compliance by the deadline are of utmost importance, without relying on any heavily priced postponement. Ireland should lead by example on this matter;
- C. Ensure the **Clean Industrial Deal** embeds meaningful air pollution reduction strategies and measures while also preventing any regression of the system through, i.e. oversimplification/deregulation or postponements;
- D. In line with the Evaluation of the **National Emission Reduction Commitments Directive**, which highlights both the need to fully implement the existing instrument and the need to further reduce air pollution, should help promote the necessary steps to define the EU strategy beyond the year 2030. Including setting the appropriate National Emission Reduction Commitments for the already covered pollutants and expanding the scope of the Directive to include methane, black carbon and mercury;

- E. Secure an ambitious positioning of the EU within the ongoing negotiations of the **UNECE Convention on Long-range Transboundary Air Pollution's Gothenburg Protocol**. The ongoing revision of the Gothenburg Protocol is a key opportunity to secure that meaningful action is taken also at UNECE level to cut air pollution through the definition of ambitious Emission Reduction Commitments for 2030, 2035 and 2040 for the already covered pollutants and also including methane, black carbon and mercury, which are not yet covered by the instrument, while not relying on flexibilities;
- F. Contribute to the **process of revision of EcoDesign standards** for stoves and boilers, having in mind the contribution that domestic heating makes to air pollution in the EU, with around half of PM2.5 emissions being generated by it and black carbon emissions. Given the urgent need for meaningful action to cut air pollution from domestic heating, ensure that existing air quality objectives are fully considered in, and delivered on, by the many recent initiatives launched by the European Commission, including the European Affordable Housing Plan and the debate around the post-2030 role of renewable energy (with a special focus on biomass);
- G. **Commit to meaningfully addressing air pollution from agriculture:** ammonia emissions are related to around 50% of secondary PM 2.5 emissions in the EU, and methane is a key precursor of ground-level ozone, with agriculture being responsible for over 90% of ammonia emissions in the EU and over 50% of methane emissions in the EU. Horizontal and sectoral policies and legislation must recognise the need to promote system change that does not rely on intensification and overproduction, ensuring that the agricultural sector does its part to allow the EU to deliver on what science recommends for air quality and to align with the WHO Air Quality Guidelines. Resist any attempt to dilute the scope or ambition of the Nitrates Directive, which would directly impact the EU's capacity to cut ammonia emissions and deliver on the National Emission reduction Commitments Directive;
- H. Make the case for the **swift revision of the Environmental Noise Directive:** environmental noise is Europe's second largest environmental health risk, and transport noise was responsible for around 66,000 premature deaths in the EU and around 50,000 cardiovascular disease cases in 2021. The revision of the Directive is especially needed to secure the definition of noise limit values, to guide the necessary changes, and to plan for the needed support.

More information: [Clean Air Forum 2025: EEB urges EU to commit to post-2030 emission reductions while securing implementation of existing legislation](#); [Ozone onslaught across Southern Europe continues with six alarm threshold spikes already this year](#); [New Report Confirms Action on Air Pollution Guarantees Triple Win](#); [Europe is unwell – and methane is one of its most dangerous symptoms](#).



8. Advance a toxic-free environment and transform the transition of the chemical sector through a future-proof, sustainable policy framework

Europeans are not adequately protected from harmful chemicals. Chemical pollution is increasingly undermining Europe's environment, public health and economic resilience, with widespread exposure linked to biodiversity loss, climate impacts and serious health risks, and disproportionate burdens on communities near industrial sites. The economic cost of inaction is already significant (€55 billion), while reliance on fossil-based, energy-intensive production continues to drive toxic pollution, climate change and biodiversity loss. The high level of protection promised under EU law has not been delivered. Supporting the goals of the **Chemicals Strategy for Sustainability** remains essential for tackling chemical pollution, which is both an environmental necessity and a key opportunity to build a cleaner, more resilient, and competitive European economy.

Although the EU's **REACH** made Europe a global leader in chemical safety, weak implementation has allowed hazardous substances to remain in use for decades, delaying the adoption of safer alternatives and the transition to a circular economy. Progress under the EU's restriction agenda through the **Restrictions Roadmap** has been slow, with continued delays on substances such as PFAS and bisphenols, while Europe is also losing ground in chemical innovation compared to other regions. As confirmed by the European Chemicals Agency's (ECHA) five-yearly report on the operation of REACH, progress, non-compliance, and information gaps in registration dossiers remain problems. The EU still lacks effective identification and management of endocrine disruptors and persistent chemicals under **REACH**; despite established criteria under the **CLP Regulation**, chemical manufacturers are not required to provide adequate data on these hazards. While other countries are advancing on issues such as chemical mixtures and polymers, Europe is lagging behind. Strengthening, rather than weakening, chemical regulation and enforcement is therefore essential to close protection gaps and restore EU leadership.

Without deep transformation, the industry has no future. The European Commission's **European Chemicals Industry Action Plan** and the new **Critical Chemicals Alliance** (CCA) will play a key role in shaping the sector's future. However, if "criticality" is defined primarily through the lens of industrial supply chain resilience rather than societal and environmental needs, there is a risk of reinforcing fossil-fuel dependence, increasing pollution, delaying innovation and safer alternatives, misdirecting public investment, and creating regulatory inconsistencies. The choices made now will determine whether Europe accelerates the transition to a sustainable chemicals sector or locks in existing harmful production models.

PFAS pollution is a ticking time bomb for Europe's health, environment, and economy. PFAS contamination clean-up across Europe would cost around €100 billion annually, while health impacts from PFAS exposure in Europe are estimated at up to €84 billion per year, according to the Nordic Council of Ministers and recent EU briefings. Found in soil, water, food, and even the blood of newborns, PFAS contamination is widespread, prompting governments in countries such as the Netherlands, Denmark, France, Italy, and Belgium to warn citizens against eating homegrown vegetables and eggs. EU biomonitoring confirms widespread exposure at levels that pose serious health risks, with many young people exceeding safety thresholds.

The Commission's proposal for a **Regulation on the European Chemicals Agency (ECHA)** is a welcome step toward improving the agency's governance, organisational structure, and financial model in light of its expanding mandate, but additional strengthening is needed to ensure ECHA can fully deliver on its mission. In particular, the regulation should more clearly affirm ECHA's core objective of protecting human health and the environment, including vulnerable groups and future generations; enhance the organisation and functioning of ECHA's committees by increasing capacity, transparency, and conflict-of-interest safeguards to ensure independent decision-making; and reinforce cooperation with other EU agencies so that, in cases of divergent opinions, decisions prioritise the high level of protection required under the One Substance–One Assessment framework.

Mercury and its compounds are highly toxic; they can damage the nervous system and are particularly harmful to foetal development. Mercury 'travels' globally, bioaccumulates up through the food chain, especially in certain predatory fish, and presents a human exposure risk. The EU mercury regulation was revised, including bans on mercury in dental amalgam by 1 January 2025 and in fluorescent and other lamps by December 2025 and 2026, depending on the categories.

At EU level, the Council and the European Parliament reached a provisional agreement on a new Customs Code in March 2026, almost 3 years after the Commission released the proposal. It includes new provisions to ensure a responsible actor is based in the EU for goods sold through e-commerce to the EU and a handling fee on small items sold through online sales, reinforcing the EU's toolbox for ensuring that products containing dangerous chemicals, such as mercury-added skin-lightening products, are not imported into the EU. Discussions concerning the responsibility of online platforms, including the sale of mercury-added cosmetics, have begun under the **EU Product Act**.

At the global level, the **Minamata Convention on Mercury** was adopted in October 2013 to protect human health and the environment from anthropogenic mercury emissions. The **Sixth Conference of the Parties (COP6)** to the Convention took place in November 2025 and, among other decisions, decided to ban the manufacture and trade of dental amalgam, a historic milestone. In a landmark decision, COP6 invited the Secretariat of the **Minamata Convention on Mercury** to work with Interpol, the World Customs Organisation and others to investigate the manufacture, import and export of mercury-added cosmetics. Further, the COP-6 decision invited the World Health Organisation to develop a reduction strategy for both mercury-added SLPs and for SLPs that may not contain mercury. This aspect of the decision is significant because it not only looks at the need to address the toxicity of SLPs, but also their cultural overtones related to promoting colourism and racism. The COP also decided to work towards closing the loopholes that legally allow the trade in mercury compounds, as this compromises the Convention's objective, particularly regarding the lacing of cosmetics with mercury.

The Seventh Conference of the Parties (COP7) to the Convention will take place from 6-10 September 2027 in Geneva. Important decisions are expected to further strengthen the Convention, among other things, by controlling mercury compounds, banning vinyl chloride monomer (VCM) production when mercury-free alternatives are available, strengthening the implementation of the ban on mercury-added cosmetics, and addressing trade and artisanal small-scale gold mining.

The relevant EU legislation and positions would need to be robust and future-oriented to ensure further opportunities to push the global debate.

The mercury-added skin-lightening cosmetics issue has drawn global attention, and enforcement of the relevant ban needs to be strengthened.

We therefore call upon the Irish Presidency to:

- A. Support strong implementation, enforcement, and comitology revision of REACH in line with the Chemicals Strategy for Sustainability** to ensure its core objective—a high level of protection of human health and the environment—is fully delivered. The Council should call on the European Commission to accelerate the Restrictions Roadmap, close key data gaps (in particular for endocrine disruptors and persistent chemicals), and speed up the enforcement and phase-out of hazardous substances, including by grouping chemicals and applying mixture assessment factors in risk assessments to accelerate decision-making, while avoiding any weakening of regulatory processes through the introduction of a formalised risk management option analysis (RMOA);
- B. Support a future-proof Chemicals Industry Action Plan and Critical Chemicals Alliance** – that includes a concrete roadmap for the transformation of the chemical industry, underpinned by clear environmental and social conditionalities. This roadmap, together with a strong definition of ‘criticality’, should guide the sector’s shift toward safe, sustainable chemicals and ensure public investments and support are tied to measurable progress on pollution prevention, detoxification, decarbonisation, worker protection, and just transition principles;
- C. Support a clarification on PFAS** that acknowledges the strong, science-based and democratic REACH restriction process; presents an EU-coordinated plan to address widespread PFAS pollution through effective remediation, alongside the application of the polluter pays principle; establishes a plan to support affected communities, guarantees access to justice and compensation; and actively promotes PFAS-free solutions and supports industries leading the way in safer, sustainable alternatives;
- D. Ensure that the final agreement on the Omnibus on chemicals legislation** reduces burdens on authorities while increasing the protection of people and the environment. The trilogues must uphold democratic and evidence-based procedures, in line with the latest Ombudswoman decision, by ensuring that all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact assessments;
- E. Ensure that the adopted text of the ECHA Regulation is strengthened** by clearly prioritising the protection of human health and the environment, and reinforcing transparency, independence and conflict-of-interest safeguards. The regulation should further ensure the adequate and independent functioning of ECHA’s committees, with provisions to enable future alignment across committees. A more stable and sustainable financial model should be established that fully applies the polluter-pays principle through revised and additional fees that reflect the real costs of ECHA’s work, including for non-compliant dossiers, and that supports enforcement, monitoring, pollution prevention and substitution. Finally, cooperation and procedures for resolving divergences with other EU agencies should be fully aligned with the agreed One Substance, One Assessment (OSOA) framework’s wording to guarantee coherent and high-level protection across the EU chemicals framework;
- F. Promote EU leadership in strengthening the Minamata Convention on Mercury** by, among others:
 - a. supporting and/or otherwise ensuring that resources are available to implement the work requested by the COP on mercury-added cosmetics, on preventing and combating illegal

supply and trade of mercury, as well as in relation to environmentally sustainable gold supply chains;

- b. actively engaging in the intersessional processes and the preparation of the COP7;
- c. taking the lead or supporting initiatives towards phasing out mercury use in Vinyl Chloro Monomer production;
- d. controlling and, where feasible, eliminating mercury compounds' trade;
- e. accelerating the closing of primary mines, eliminating loopholes in the Convention that benefit traffickers and illegal gold miners, improving comprehensive reporting on mercury trade, and identifying enhanced enforcement measures necessary to eliminate the illegal production, trade and use of mercury in Artisanal small-scale gold mining; and
- f. continue strengthening the enforcement of the mercury ban on cosmetics.

G. Facilitate cooperation among Member States for the swift and effective implementation of the revised EU Mercury Regulation. Accelerate, with the European Commission, the work on mercury compounds as per the EU Mercury Regulation, providing input to the global work; set the ground for developing a draft guidance on abatement technologies for mercury emissions from crematoria, as well as for assessing the need to further regulate remaining mercury uses and waste sources;

H. Ensure that the Council supports and strengthens, as relevant, a robust new EU Product Act, to be published by the Commission in September 2026, to **hold online platforms accountable** for selling illegal and dangerous chemicals and other products containing them, such as mercury-added skin-lightening products, and to ensure that failure to comply with those requirements results in meaningful consequences.

More information: [Options for improved implementation, enforcement, and modernization of REAC](#); Joint position: [Criticality Within Planetary Boundaries](#) and [Briefer](#); Chemical industry Action Plan: [EEB proposal for a modern, competitive, and sustainable chemical industry](#), and [10 key messages and demands](#); REACH: [Restrictions Roadblock Report](#), [Ensuring a Future-Proof EU Chemicals Policy - EEB proposals to ensure simpler, faster and bolder chemical policy goals](#); [Simplifying REACH for industry and authorities](#); and [Translating lobby speak: What chemical industry's 'simplification' plan really means](#); PFAS: [Let's clarify PFAS](#); Omnibus: [NGO comments CLP Omnibus](#); Mercury [joint statement on online platforms](#); [EEB feedback on cosmetics call for evidence](#); [ZMWG views and statements at COP 6](#); [ZMWG cosmetics reports](#) [Overall Zero Mercury Working Group news](#).



9. Address resource use and seize circular economy opportunities for the economy and society

Ireland enters its presidency at a crucial moment for the circular economy in the EU. Establishing a solid resource governance framework remains the best path for Europe to ensure resource independence and resilience. However, indications from the European Commission point towards a focus on harmonisation of existing legislation and recycling of secondary raw materials only. **The Circular Economy Act, the revision of the Waste Electric and Electronic Equipment (WEEE) Directive, the Product Act, the Affordable Housing Act, and the Digital Fairness Act** are all expected during the Irish presidency. Based on the Council Conclusions on Climate and Circular Economy from December 2025, these files mark key opportunities to steer the political direction towards higher ambition.

We therefore call upon the Irish Presidency to:

- A. **Set the tone for the Council position on the Circular Economy Act**, aiming to heighten the focus on prevention, reuse, repair and other higher value strategies, including a reform of extended producer responsibility (EPR) schemes, to avoid harmonisation to the lowest common denominator;
- B. Support an ambitious **Council position on the WEEE Directive revision** that goes beyond collection and recycling, by making waste prevention the guiding principle of a new Regulation. This should include binding waste prevention targets, separate reuse and recycling targets, and a harmonised EPR system for WEEE that supports eco-design, reuse, and repair, including through an EPR-financed repair fund;
- C. **Support ambitious action to address overconsumption**, including binding targets for resource use reduction and material demand mitigation across sectors, and encourage action to be taken before products are placed on the market (i.e. through the Digital Fairness Act and the EU Product Act). For textiles, this also includes advancing on a definition of (ultra) fast fashion, as well as supporting strong modulation of EPR fees – not letting the environment omnibus or CE act interfere with – the opportunity to set these based on the industrial and commercial practices of (ultra) fast fashion;
- D. **Inject social and environmental ambition into the Council position on the European Affordable Housing Act** to prioritise renovation and a better use of the existing building stock and ensure decent and affordable housing for all. Uphold and protect legislation that ensures a healthy, safe and sustainable built and natural environment;
- E. **Take a nature restoration-first approach to biomass**, anchored in principles of overall resource governance within planetary boundaries. Biotech Act II will be presented in the first half of the presidency, giving the Council an opportunity to strengthen safeguards regarding definitions, permitting for biorefineries and authorisation;
- F. **Uphold democratic and evidence-based procedures in dealing with the Environment (and other) omnibuses**, by ensuring that all legislative changes are grounded in scientific evidence, subject to transparent stakeholder consultation, and accompanied by thorough impact

assessments. Insist that legislation related to EPR scheme reform (including authorised representatives) are included in the Circular Economy Act and uphold data transparency, including maintaining the SCIP database;

- G. **Ensure that the EU continues to champion an ambitious Global Plastics Treaty at INC-6**, including binding provisions on plastic production, chemicals, product design, a robust financial mechanism, and effective decision-making processes;
- H. **Ensure that ResourceEU does not become a shortcut for cheap inputs at the expense of people's rights**, water protection and long-term resilience (e.g. by the revision of the Water Framework Directive). The Presidency should demand full transparency, strict due diligence for any joint purchasing or stockpiling, and a clear focus on reducing material demand. **ResourceEU must not weaken environmental safeguards, due diligence and reporting**, nor prioritise defence over renewables. The Presidency should steer the file toward a rights-based, accountable resource governance model that avoids a race to the bottom;
- I. Strengthen **transparency, accountability and democratic oversight** in the implementation of the Critical Raw Materials Act (CRMA), and ResourceEU, particularly regarding Strategic Projects. Ensure meaningful public participation and full alignment with environmental law, water protection, human rights and long-term resilience. We would like the Presidency to ask the Commission for more ambition with the Implementing Act for the National Circularity Plans under the CRMA, with more concrete demands and suggestions;
- J. Resist last-minute lobbying pushes to delay the application and reopen key provisions of circular economy measures adopted over the last mandate, notably the **Packaging and Packaging Waste Regulation**, in order to ensure timely implementation of waste prevention and reuse obligations, prevent the dilution of key environmental and health safeguards, and protect the integrity of the EU policy-making process.

More information: [Prevention is better than cure: EEB position on the Circular Economy Act](#) • [EEB response to the public consultation on the Circular Economy Act](#) • [Press release: Commission's Circular Economy Act risks missing the point](#) • [NGOs' position on the revision of the Waste from Electrical and Electronic Equipment \(WEEE\) Directive](#) • [Press release: New data reveal the extent of Europe's e-waste crisis](#) [Letter in support of Packaging & Packaging waste regulation signed by 160+ organisations](#) • [Due Diligence in EU product rules-policy briefing](#); [Legislative proposal on substantiating green claims- EEB position](#) • [EEB joint statement on online marketplaces and effective enforcement](#) • [Joint call for a strong Digital Fairness Act to protect people online](#) • [EEB response to the public consultation on the destruction of unsold products](#) • [Joint Statement on the European Affordable Housing Plan](#) • [Press release: EU housing vision falls short on affordability and sustainability](#) • [Prevention is better than cure: how circularity can put Europe ahead of the game](#) • [EEB reaction to EU Bioeconomy Strategy](#) • [EEB reaction to the announcement of the Environmental Omnibus](#) • [Joint call to maintain Authorised Representatives' obligation for EPR](#) • [EEB recommendations for the development of the Product Environmental Footprint](#) • [A resilient and resource-wise Europe: sufficiency at the heart of the EU's future](#) • [Joint statement on the European Affordable Housing Plan](#)



10. Protect the rule of law, foster environmental and social justice and strengthen civil society engagement in environmental democracy

At a time when the international legal order is becoming more fragmented and enfeebled by certain states undermining basic international norms, **EU Institutions should uphold, defend and promote international standards, especially those related to fundamental rights, including** those within its own **EU Treaties, the Charter, the European Convention on Human Rights, as well as the Aarhus Convention. The EU needs to remain a beacon** for environmental rights and democracy and needs to promote and safeguard the right to a clean, healthy, and sustainable environment.

The **Aarhus Convention is also at the crossfire of this shifting international order, where we are seeing more Parties to the Convention questioning the independence and authority of its unique Compliance Committee, as well as the influence of the Special Rapporteur on Environmental Defenders under the Aarhus Convention.** The Presidency of the EU has a crucial role to play in ensuring that the EU and its Member States' positions protect these fundamental aspects of the Convention, and that they support their work by mobilising the urgently needed funds. The UN liquidity crisis is having an impact across the board in all UN processes, and the Aarhus Convention is no exception. The dire financial situation of the Convention is galvanised by the lack of adequate financial contributions from its Parties.

The last years have also seen the rise of a more hostile environment for environmental democracy and for environmental defenders and NGOs to operate. While transparency on who influences decision-making is key to understanding the power imbalances and influences in politics, the politically motivated, exaggerated and disproportionate targeting of NGO funding does not aim at increasing transparency but at questioning the role of civil society's critical voice in the democratic process. If the campaign was targeted at increasing transparency, its proponents would allow for increased scrutiny for all beneficiaries of EU funding, including companies and business associations.

At the end of 2025, the Commission adopted the **European Democracy Shield, intended to protect the EU's democracy from attacks, including from foreign information manipulation and interference (FIMI) and disinformation.** How the various pillars and elements of this shield will be implemented is crucial: the shield should not become a cover for governments to crack down on legitimate NGOs, labour unions and CSOs, including attempts to limit advocacy activities and engagement in policy making, undermine political protests, restrict funding for civil society, shrink civic space, or damage innovative democratic participation that falls outside of traditional party politics.

In this context, the Commission's proposal for **Harmonised requirements on the transparency of interest representation by third countries risks mimicking some national legislation on foreign funding of NGOs in certain countries, which directly affect** organisations and individuals active in political debates and environmental protection. The Council will have an important role in pushing back against measures that hinder civil society and ensuring the EU does not follow the trend of introducing authoritarian-style laws.

We therefore call upon the Irish Presidency to:

- A. Protect democracy and the rule of law by promoting and safeguarding fundamental rights, including the universal **right to a clean, healthy, and sustainable environment, by also encouraging the EU to engage in such discussions at the Council of Europe;**
- B. Engage with the update and revision of the **Governance Regulation** (Regulation 2018/1999) with a view to ensuring minimum standards of transparency, public participation and access to justice, and to **align it with the requirements of the Aarhus Convention;**
- C. Support any strengthening of **Europol** and **Eurojust** that will aid in **combatting cross-border environmental crime** and to seriously consider the extension of the mandate of the **European Public Prosecutor's Office** to include environmental crime;
- D. Support the Commission's strategy on intergenerational fairness and consider an **inter-institutional declaration** recognising the rights of future generations;
- E. Supervise the European Commission's **adoption of better regulation guidelines and accompanying toolbox**, with a view to safeguarding and strengthening the **inter-institutional balance** in the legislative process, as well as ensure there are minimum standards for **impact assessments, especially in what the Commission deems to be urgent procedures;**
- F. Lead the EU and its Member States' position regarding the processes to gather experiences in engaging with the Aarhus Convention **Compliance Mechanism to ensure the process is truly open, participatory and neutral;**
- G. Call on all EU Member States and the European Commission to ensure **robust and sustained financial** resources for the Convention by contributing financially by the 1st of October and by further increasing financial contributions;
- H. **Counter the Commission proposal on Harmonised requirements on transparency of interest representation of third countries**, which risks taking the EU on the path of introducing an EU-wide Foreign Agents Law, and which would hugely undermine the democratic foundations of the European Union;
- I. **Engage with the Commission on the implementation of the EU Democracy Shield and the Civil Society Strategy, and be vocal about the need for them to not only defend the status quo of European democracy** (protecting EU democracy against foreign interference and disinformation and upholding the integrity of democratic processes across the EU), **but to nurture a prosperous and honest democratic space for public engagement and debate;**
- J. Be vocal about the need **to protect operating support for NGOs (e.g. LIFE) and to protect CSOs** from smear campaigns in order to safeguard democratic processes and protect the European Project as a whole.

More information:

[2025 reports on the State of Access to Justice, the State of Public Participation and the State of Access to Information; The EU's non-compliance with the Aarhus Convention: A brief history, Public participation and Social Climate Plans: the need for ongoing citizen engagement, Effective implementation: Transparency in the EU infringement process; Democracy for Transition Coalition position papers on Civil Society Strategy and Democracy Shield; BeLIFE: Report from Consultation with Environmental Defenders and Environmental Rights Report; Civil society attacks: Joint Statement on NGO Funding Attacks, EUObserver OpEd 'What Happens After Europe's NGOs Are Dismantled'; Environmental Crime: Joint NGO Position Paper on the Transposition of the European Crime Directive.](#)

Abbreviations

AAQD	Ambient Air Quality Directives
BAT	Best Available Techniques
BREFs	Best Available Techniques Reference Documents
CAP	Common Agricultural Policy
CBAM	Carbon Border Adjustment Mechanism
CLP	Classification, Labelling and Packaging
COP	Conference of the Parties
CPR	Construction Products Regulation
CRMA	Critical Raw Materials Act
CSOs	Civil Society Organisations
CSS	Chemicals Strategy for Sustainability
EC	European Commission
EED	Energy Efficiency Directive
ELD	Environmental Liability Directive
EGD	European Green Deal
EoLV	End-of-Life Vehicles
EP	European Parliament
EPR	Extended Producer Responsibility
EQS(D)	Environmental Quality Standards (Directive)
ESPR	Ecodesign for Sustainable Products Regulation
ETS	Emissions Trading System
EUCRA	European Climate Risk Assessment
GD	Groundwater Directive
GDP	Gross Domestic Product
IAA	Industrial Accelerator Act
IED	Industrial Emissions Directive
IEP-R	Industrial Emissions Portal
INMAP	Integrated Nutrient Management Action Plan
JRC	Joint Research Centre
MEPs	Minimum Energy Performance Standards
MFF	Multiannual Financial Framework
NRL	Nature Restoration Law
NRRPs	National Recovery and Resilience Plans
PP	Public Procurement
PFAS	Per- and polyfluoroalkyl Substances
PPWR	Packaging and Packaging Waste Regulation
PRTR	Pollutant Release and Transfer Register
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RED	Renewable Energy Directive
RoHS	Restriction on Hazardous Substances Directive
SDGs	Sustainable Development Goals
SML	Soil Monitoring Law
SLAPPs	Strategic Lawsuits Against Public Participation

UNECE	United Nations Economic Commission for Europe
UWWTD	Urban Waste Water Treatment Directive
WFD	Waste Framework Directive
WFD	Water Framework Directive
WHO	World Health Organisation
WTO	World Trade Organisation
ZPAP	Zero Pollution Action Plan

The EEB and its members welcome continued engagement and cooperation with the Presidencies of the Council of the European Union.

We develop an assessment following each Presidency on their environmental performances. [The assessment for the Cypriot Presidency can be found here.](#)

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