

Brussels, 28 September 2026

To: Coreper II, Permanent Representatives of EU Member States

CC: Environment attachés

Dear Ambassadors,

As Coreper II prepares to convene on 30 September to agree on its position on the **Regulation on speeding up environmental assessments**, we would like to highlight our concerns about this text and call on you to take a strong stance in defence of EU rules on environmental assessments and permitting. More than 900.000 citizens have, to date, been calling on EU leaders to defend the laws that protect nature and people¹.

Robust environmental assessments are essential for a resilient and durable transition in a volatile geopolitical context². They help prevent damage to critical ecosystems, protect water resources, and safeguard the health and livelihoods of communities. They also provide the much-needed insight for project developers on the potential impacts of activities and ways to address them.

Strong environmental rules are not an obstacle to Europe's competitiveness, prosperity and decarbonization, but, instead, their precondition. Europe's economy and long-term competitiveness depend on nature. According to the European Central Bank, [more than 70%](#) of companies in the euro area are highly dependent on at least one nature-related service that healthy ecosystems provide. In a [recent survey](#), 91% of business executives said the EU's green transition makes them more competitive in the long term, while the survey also identified as key consequences of the EU's simplification efforts increased uncertainty, wasted compliance-preparation investments and a weakened business case for sustainability.

As it stands, the Regulation on speeding-up environmental assessments will undoubtedly weaken environmental rules with potentially irreversible consequences for Europe's ecosystems and human health. The proposed changes will make it harder to detect risks before they materialise, and will shift the financial burden onto citizens and local authorities. If projects cause pollution or environmental damage, it is often local administrations who ultimately bear the cost of clean-up and remediation.

¹ As part of the [Hands Off Nature campaign](#) that aims to stop attempts to weaken EU environmental protections under the guise of simplification.

² EU rules on environmental assessments help avoid impacts that would lead to massive ecological and socioeconomic costs. They de-risk projects for operators and public authorities, by making sure that scientific evidence is included, local communities consulted and adverse environmental impacts avoided. This reduced the likelihood of expensive project redesigns or failures and lower the legal and financial risk of the project itself. Environmental assessments are also a key tool for local actors, such as landowners and municipalities, as they provide them with clear information about how a project could affect their land and property.

The proposed measures do not tackle the root causes of lengthy procedures, such as insufficient administrative capacity, governance fragmentation and coordination failures. Instead of accelerating processes, the Regulation will **complexify, and potentially slow down existing systems, generalise derogations and heighten legal risk and uncertainty for Member States, public authorities and project developers alike**, all while causing avoidable harm to ecosystems that are already in critical condition.

We therefore urge you to consider the following elements in your upcoming discussion:

- **Article 8 on protected species:**

- As it stands, this Article would alter the EU's strict protection regime at its core. It would overturn decades of case law, guidance and administrative practice, creating substantial legal uncertainty for both nature protection authorities and project developers. Fundamentally departing from the prevention logic of these provisions calls into question whether the objectives of the Birds and Habitats Directive could ever be reached.
- For this reason, we urge you to **oppose this Article** in its entirety. At the very least, we recommend that you limit its negative impacts by **(i) excluding the damage to, or destruction of, nests and eggs, (ii) limiting its application to species with favourable conservation status, (iii) opposing the extension to forestry management and recurring maintenance activities, and (iv) ensuring that cumulative impacts are expressly assessed by the competent authority.**

- **Article 14 on projects in strategic sectors or categories:**

- This Article would expand a beneficial permitting regime, previously reserved for specific sectors, to an extensive and open-ended list of strategic sectors, without objective limiting criteria, and including projects which do not contribute to resilience, decarbonization or resource efficiency. This risks broadening the notion of "strategic" to the point where it entirely ceases to fulfil its intended purpose. Rather than accelerating projects that are genuinely critical for the Union's energy transition, the designation risks diluting already limited administrative resources and reducing the effectiveness of the acceleration regime itself.
- For this reason, we urge you to **oppose this Article** in its entirety. At the very least, we recommend that you **restrict Article 14 to strategic projects already defined in sectoral Union legislation pursuing clearly identified Union energy and climate objectives** – e.g. an explicit condition that projects contribute to the Union targets under Regulation (EU) 2021/1119; or limit it to projects contributing to the plans adopted in accordance with Article 3 of Regulation 2018/1999.

For further details on these recommendations, please refer to the briefing in the Annex.

European Environmental Bureau

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The concerns listed above are compounded by the absence of an impact assessment for the proposed Regulation, contrary to the European Commission's own "Better Regulation" Guidelines. According to the Commission's assessment of stakeholder positions for this proposal, only 5% of the contributions to the [Call for Evidence on environmental simplification](#) that offered substantive input on authorisation processes came from public authorities. Given that they play a key role in implementing permitting procedures, their limited representation raises concerns about the robustness of the evidence base underpinning the proposal.

The Regulation risks creating lasting damage to Europe's ecosystem, while delivering none of its promised benefits. We therefore urge you to take a strong stance at the Coreper II meeting in favour of a continued commitment to robust environmental assessments and permitting rules. We remain available to provide further analysis if needed.

Yours faithfully,



Sergiy Moroz

Policy Manager for Nature

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