EEB
European
Environmental
Bureau

Brussels,
17 November 2026

Letter to the Ministers responsible for European Affairs in view of the General Affairs Council on 19 November – recommendations from environmental citizens organisations

Dear Ministers,

As you prepare for the General Affairs Council on 19 November, which will discuss the **Commission work programme 2027** and **the Omnibus simplification packages**, we wish to share some important considerations on behalf of Europe's largest network of environmental citizens' organisations:

Commission work programme 2027

On 4 November, the European Commission presented its 2027 Work Programme. We would therefore like to share the following recommendations regarding the initiatives planned for the year ahead:

- **Proposal on permitting acceleration**: Considering the already wide-ranging implications to permitting which the Proposal for a regulation on speeding-up environmental assessments may be introducing, the Commission's proposal on permitting acceleration expected in 2027 raises two fundamental questions. Firstly, it is questionable and unclear what such a proposal could contain which differs from what is already being discussed in the current legislative process, and whether such a proposal would further hollow out environmental legislation. Secondly, such a proposal raises questions about the Commission's own convictions that the Proposal for speeding-up environmental assessments will have its desired effect. This new initiative is scheduled for 2027 Q3, which is too early to properly assess the impacts of the Regulation on speeding-up environmental assessments. It risks duplicating efforts, creating associated legal uncertainty and thereby going against simplification which the Commission says it is intent on achieving. Predictable legal frameworks are key to sound long-term planning and decision-making by all actors involved. Frequent changes to existing rules risk undermining this.

- **European Corporation on Critical Raw Materials**: It is important that the proposed Corporation has a clear public-interest mandate, with its responsibilities and relationship to the Critical Raw Materials Centre defined to avoid duplication and accountability gaps. Decisions on public financing, purchasing and stockpiling should be subject to parliamentary scrutiny, strict conflict-of-interest rules and meaningful participation by independent civil society and affected communities. Public support should carry enforceable environmental, human rights and labour conditions, including respect for Indigenous peoples' free, prior and informed consent, with transparent project assessments, disclosure of beneficiaries and mechanisms to suspend or withdraw support where conditions are breached. Its mandate should prioritise reducing primary raw material demand through sufficiency, resource efficiency, reuse, repair and recycling, supported by transparent assessments of material

needs and alternatives. All supported activities must uphold water, nature and chemicals protections, public participation and access to justice.

- **Post-2030 framework and simplification package**: Achieving higher shares of renewable energy will require a more flexible energy system, with storage and demand response playing a key role in ensuring that renewable electricity is available when needed and reducing pressure on the grid. At the same time, the persistent price gap between electricity and fossil fuels continues to hinder electrification and must be addressed. Both the EU-wide renewable energy and the energy efficiency targets have been essential in advancing Europe's energy independence, industrial competitiveness and climate objectives. They must therefore remain at the heart of the post-2030 framework, with binding targets and sub-targets at both EU and national levels, supported by clear trajectories to provide predictability and investment certainty. Moving to an energy-intensity target would undermine Europe's attempt to decrease energy imports and ultimately slow down the path to energy independence and carbon neutrality. While the Governance Regulation provides a solid foundation, stronger enforcement mechanisms are needed to ensure effective implementation, prevent insufficient ambition and reinforce the role of National Energy and Climate Plans (NECPs) in delivering results. For these reasons, we firmly believe that maintaining the three-target framework for climate, renewable energy and energy efficiency, supported by effective policies and governance, is the best way to deliver lasting benefits for Europe's energy independence, climate objectives, air quality and public health. We therefore urge the European Commission to consistently defend and promote this approach in the ongoing discussions on the post-2030 framework.

- **Housing simplification package**: We urge you to ensure that the forthcoming Housing Simplification Package does not pursue deregulation or prioritise new construction at the expense of environmental, social, and health standards. The package should prioritise the better use of Europe's existing building stock, by facilitating the renovation and conversion of vacant and underused buildings into affordable homes. This should include streamlined and predictable permitting procedures for energy renovations and adaptive reuse, improved vacancy data systems, support for collective renovation in multi-apartment buildings, and stronger municipal capacity through integrated technical, administrative and financial assistance. Crucially, simplification must not come at the expense of environmental protection, energy performance, health or building quality. Existing EU legislation, including nature protection and building energy efficiency requirements, provides essential social and environmental safeguards and should be properly implemented, not weakened. Any accelerated procedures must also include additional robust social safeguards, protecting tenants against rent increases, eviction and displacement, and ensuring the right to return following renovation. The package should be assessed against its contribution to genuinely affordable, healthy and climate-resilient housing, including renovation and adaptive reuse, rather than simply the number of new homes delivered.

- **European water initiative**: The cost of climate extremes is rapidly increasing, estimated to more than €270 billion in the last five years, according to the European Environment Agency.

While extreme weather events, like intense heat and prolonged periods without precipitation, followed by torrential rain are becoming more frequent as a result of climate change, the resulting impacts are closely linked to water and land management. For centuries, draining of wetlands, straightening of rivers and degradation of soils, Europe has lost a substantial part of is natural capacity to capture, store and slowly release rainfall making the continent highly vulnerable. The EU must urgently improve its watershed resilience by embracing restoration and protection of the natural water-storage features of landscapes as the first line of defence against wildfires, droughts and floods. The existing water acquis offers Member States multiple tools to do so, for example by ensuring sustainable water abstractions as required by the Water Framework Directive (WFD), but they remain under-used. Flagship actions under the Water Resilience Strategy, like the Sponge Facility and the Green and Blue Corridors initiative provide promising avenues to increase water retention and support the restoration of the natural water cycle. The upcoming Water Initiative should be designed in line with the better regulation principles as an add-on to the existing water protection policies by supporting actions to accelerate the implementation and enforcement of the WFD and integration of water protection objectives into sectoral policies and funding mechanisms (in particular agriculture), and refrain from any revision of the WFD as outlined in our Living Rivers Europe coalition Policy brief.[1]

- **Review of nature protection directives including Birds, Habitats, Natura 2000**: We urge you to ensure that the review announced by the Commission does not lead to any revision of the Birds and Habitats Directives. Such a revision would run directly counter to the EU's 2030 biodiversity objectives, especially as the EU has just reaffirmed its commitment to the Kunming-Montreal Global Biodiversity Framework at CBD COP17 in Yerevan, endorsing the need to accelerate the implementation of global biodiversity targets and to mainstream nature protection across all policies and economic sectors. At the Birds and Habitats Directives implementation dialogue convened by Commissioner Roswall on 23 October, a clear majority of stakeholders, including scientists and industry representatives, opposed reopening the Directives. More than 1.25 million EU citizens have called on the EU not to weaken or reopen the Directives. In addition, more than 2,100 EU scientists have called for the Birds and Habitats Directives to be safeguarded. What is needed is better implementation and enforcement, supported by clearer guidance and adequate resources.

- **Pact against gold-plating**: We urge you to consider very carefully the definition of gold-plating and the implications this pact could have if the typology is too wide-ranging. We are concerned that the Commission seems to be considering including "higher standards" and "broader scope" as part of the typology, without a clear focus on addressing administrative burden for Member States in the strictest sense. Union policy on the environment shall aim at a high level of protection based on the four core foundational principles: precautionary principle, prevention principle, pollution prevention at source and polluter pays. This mislabelling could potentially pose a threat to the sovereignty of Member States and the

[1] https://eeb.org/fr/library/policy-brief-on-eu-water-policies-in-times-of-climate-extremes/

explicit guarantees provided by the EU Treaties to adopt more protective or more stringent measures (article 193 TFEU), as well as the subsidiarity principle.

- **Green Claims Directive withdrawal**: Considering the anticipated withdrawal of the Green Claims Directive, we urge you to swiftly enforce the complementary Empowering Consumers for the Green Transition Directive (ECGT) and ensure a high level of protection against greenwashing nonetheless.

Omnibus simplification packages

This "summer of truth", as described by the European Commission President, with record-breaking heatwaves, wildfires and droughts, made clearer than ever that we need to invest in nature as our first line of defence and that delaying our action is not an option. Implementing existing EU environmental legislation is central to this effort. Failure to do so already costs EU citizens around €180 billion every year.

Yet, over the past two years almost, under the banner of "simplification" and "competitiveness", we have seen a worrying shift towards deregulation, weakening regulatory certainty and Europe's leadership on the green transition, pollution prevention and health. The EU risks moving from rule-maker to rule-taker, undermining both its resilience and long-term economic viability.

OECD research shows that ambitious environmental policies do not harm productivity, jobs or growth. European businesses themselves depend on healthy soils, clean water, a stable climate and functioning ecosystems. Environmental ambition is a strategic asset, not a burden. This is particularly true for chemicals, where delayed action can lock in pollution and exposure for decades.

For decades, EU environmental legislation has provided clarity and a level playing field across the Single Market. One strong EU rule reduces fragmentation and administrative burden. Deregulation does the opposite: it rewards laggards, penalises frontrunners and creates uncertainty for investment and innovation.

The real problem is not regulation, but inadequate implementation. The Commission estimates that poor or incomplete implementation of environmental law costs the EU around €180 billion annually, roughly 1% of GDP. The cost of inaction can be even greater: PFAS pollution alone could cost up to €1.7 trillion by 2050. These costs translate into contaminated drinking water and food chains, and real health impacts for workers, families and children. Delaying action simply shifts the bill onto citizens, public authorities and future generations.

Simplification should therefore mean better implementation, not weaker rules. For chemicals, this means properly implementing and enforcing REACH while maintaining an ambitious pipeline for restricting substances of concern. Aligning reporting requirements, strengthening administrative capacity and supporting compliance would deliver genuine simplification while improving resilience and competitiveness.

Instead, the omnibus initiatives so far have too often gone beyond simplification into deregulation, one of the striking examples relates to the review of the Industrial Emissions Directive. Their rapid development, often with limited consultation and transparency, risks undermining trust. The European Ombudsman has raised concerns about respect for Better Regulation principles, while businesses and investors and other stakeholders have warned that rushed rollbacks can undermine predictability, innovation and fair competition. More recently GlobeScan survey of 350 senior European business leaders revealed that 91% of the respondent view the shift to a low-carbon economy as essential for long-term competitiveness and more than half of the respondent see deregulation as a threat to their business operations

Public concern is equally clear. More than 1.25 million EU citizens have opposed weakening environmental laws and called instead for their proper implementation and enforcement.

At a time of worsening climate impacts, biodiversity loss and pollution, the real burden is not environmental regulation, but the failure to implement it. Every delay locks in higher costs and greater risks. A competitive European economy ultimately depends on healthy people, a healthy environment and stable rules. Sustained action on climate, pollution and nature is therefore not the opposite of competitiveness. It is a precondition for Europe's resilience, security and long-term prosperity.

Regarding the Environmental Omnibus (VIII) in particular, we ask you to[2]:

- On the **Industrial Emissions Directive (IED)**: **maintain the provisions on Environmental Management Systems**, **in particular the requirement for a hazardous chemicals inventory and the substitution assessment,** at least for hazardous chemicals present in significant quantities, as well as the need for energy-intensive industries to develop an installation-level transformation plan. We urge you to **reject any changes to other provisions not covered by the European Commission proposals**, as these would undermine the integrity of the framework. The European Parliament proposes further significant deregulation proposals such as changes to provisions related to the uptake of improved environmental performance achieved by the use of Best Available Techniques, access to information and public participation rights (incl. exclusion of civil society from the EU information exchange on standardisation process) and undermining scope and requirements applicable to intensive livestock rearing activities (see more here). Should the co-decision process lead to a lowering of environmental protection levels, we ask you to request the withdrawal of the proposal.
- On the **SCIP** (Substances of Concern in articles as such or in complex objects (Products)) database: reject the proposed **discontinuation of the SCIP database** and instead improve its usability, to ensure continued access to information on hazardous substances in products and support safe and circular material flows.
- On the **Authorised Representatives for Extended Producer Responsibility**: **halt the technical work** on this file and **use the Circular Economy Act to assess** and implement **alternative solutions instead of suspending** the Authorised Representatives requirement.
- On the **Regulation on speeding up environmental assessments**: oppose the weakening of EU rules on permitting and environmental assessments and **safeguard clear and high-integrity**

[2] Please refer to Annex 1 for further details on these demands

standards for environmental protection – especially in relation to Article 8 on protected species, Article 14 on strategic sectors, Article 6 on substantial preclusion and Article 5 on changes to projects.

- On the revision of the Water Framework Directive (WFD): **oppose the Commission's unfounded decision to revise the WFD** that risks **diverting Member States away from meaningful implementation**.

We would also like to reaffirm our priorities[3] for the year ahead, which are consistent with our broader long-term priorities set out in the **EEB leaders declaration.** In this declaration, leaders of national and European environmental civil society organisations, representing over 30 million people, call on EU leaders to invest in the EU's long-term resilience, credibility and leadership by accelerating the transition through progressive environmental, chemicals and climate policies, complemented by a social deal that safeguards people's rights and supports a thriving one-planet economy.

We hope that the above insights and recommendations help you in your exchange. To contribute to this effort, the EEB has published a European Pact for the Future: A Green and Social Deal for a One-Planet Economy - signed by over 400 organisations - along with its Transformation Tracker, which assesses progress against a shared vision in 2025 and identifies priority actions for 2026, which we invite you to consult. We will share the next Transformation Tracker, looking back at 2026, in January-February 2027. We remain available to discuss with you and your administrations these practical visions and look forward to working together towards a sustainable and resilient Europe, as indeed there is no competitiveness on an ever more degraded planet.

Yours sincerely,

Patrick ten Brink

Secretary General of the European Environmental Bureau

Faustine Bas-Defossez

Policy director for Nature, Health and Environment

[3] See Annex "Six Priorities for the 2027 Commission Work Programme" by Birdlife Europe & Central Asia, CAN Europe, EEB, T&E, WWF EPO

Annex 1: Omnibus simplification packages

On the **review of the Industrial Emissions Directive**, we ask you to maintain the provisions on Environmental Management Systems, in particular the requirement for a hazardous chemicals inventory and the substitution assessment, at least for hazardous chemicals present in significant amounts. Further, the installation-level Transformation Plans (Art 27d) for operators of energy-intensive activities should be maintained. Those plans should provide information on how they will transform the installation during the 2030-2050 period, so to progress towards clean, circular and climate neutral production and provide clarity to the meaning of "deep industrial transformation". It is one of the only forward-looking provisions aimed to generate information on transformative state-of-the-art production. We ask you to reject any changes to other provisions not subject to European Commission proposals, which would undermine the integrity of the framework (such as proposed by the European Parliament - related to Art 13, 14, 15.3-15.5, Art 21 undermining or extending deadlines for catching up with best available techniques or weakened scope thresholds for pigs and poultry). For more details see the main issues website and joint industry – NGO statement. Request the withdrawal of the proposal if the co-decision process goes out of hands, where protection levels are undermined, i.e. adoption of amendments of ITRE and AGRI or other changes made to key provisions pre-cited.

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

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

Regarding the proposed **Regulation on speeding up environmental assessments**, we are deeply concerned about the Commission proposal, as well as their potential impacts on European ecosystems and human health. Instead of accelerating procedures, the proposed Regulation would add complexity to, and potentially slow down, existing systems, generalise derogations and heighten legal risk and uncertainty for Member States, public authorities and project developers alike. This would go far beyond a technical adjustment, causing avoidable harm to ecosystems that are already in critical condition. While the proposal fails to address the root causes of lengthy procedures, such as lack of experts and funding, as well as fragmented governance, the proposed measures will increase administrative burden and pressure on Member State authorities. Taking note of the Council's negotiation mandate, adopted on 30 September 2026, we are particularly concerned about the following points:

- **Article 8 on protected species** would significantly weaken the EU's species protection regime and convert a carefully balanced derogation system into a general norm. Particularly concerning are the Council's proposed extension to forestry management works and recurring maintenance activities for infrastructure projects or watercourses, as well as to the destruction of, and damage to, nests and eggs**.**
- **Article 14 on projects in strategic sectors or categories** expands 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, decarbonisation 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.
- **Article 6 on substantial preclusion** could effectively restrict access to justice. In this regard, the European Commission's proposal is in clear contradiction with EU case law and the Aarhus Convention. We welcome the positive additions made to this Article by the Council but highlight that these improvements remain insufficient.
- **Article 5 on changes to projects** could allow major industrial facilities to indefinitely avoid an environmental assessment unless major works are undertaken, thereby preventing the assessment of ageing infrastructure. We welcome the Council's proposal to delete this Article.

Weakening environmental standards in permitting processes will not eliminate potential risks but rather make them more difficult to detect before they materialise, while shifting the financial, legal and ecological consequences onto public authorities. For these reasons and with the upcoming interinstitutional negotiations, we call on you to safeguard clear and high-integrity standards for environmental assessments. For more information, please refer to EEB's letter to Ambassadors as well as an in-depth analysis of our partner ClientEarth.

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

of the Water Resilience Strategy that pressed the need for better implementation of the EU water acquis.

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

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

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

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

Six Priorities for the 2027 Commission Work Programme

Input to the European Parliament

September 2026

On 16 September, President von der Leyen delivers her State of the Union address, opening negotiations on the 2027 Commission Work Programme. She does so against a backdrop that makes the case, better than any speech could, that ***only increased EU-level action on climate, nature and pollution will protect Europe's citizens and economic future****: a summer of record heatwaves and wildfires has caused widespread human suffering, while a second major fossil fuel-driven price shock in four years has once again left millions of Europeans paying the price of continued fossil fuel dependence.*

Our organisations, representing over 200 member organisations and more than 45 million supporters across Europe, set out six priorities for the European Parliament to press the Commission on ahead of the 2027 Work Programme. These concern initiatives specific to 2027, rather than outstanding environmental and climate files still due in 2026, such as the Circular Economy Act, the post-2030 climate and energy framework, and Ocean Act.

Where ambitious EU legislation already exists, the priority in 2027 must be effective implementation, enforcement and delivery of results, rather than regulatory revisions and rollback. This should be complemented by new EU action where regulatory, policy or implementation gaps remain.

1. Follow through on a fossil fuel exit plan

More than 200 organisations, including industry associations such as Eurelectric, SolarPower Europe and WindEurope, are calling for a science-based roadmap to phase out fossil fuels, modelled on the approach behind the Draghi report, and announced at the State of the Union. The EU still spent €335 billion on fossil fuels in 2025, with the US-Iran conflict already amounting to $78 billion in gross extra costs. Each crisis confirms that only reducing dependence reduces Europe's economic vulnerability. What is needed is a roadmap setting out the fastest, most cost-effective pathway for each sector to exit fossil fuels and quantifying the true cost of continued dependence, including price shocks and environmental damage.

Ask the Commission for: commission an independent, science-based report with one goal: make this fossil fuel crisis Europe's last one. This should be followed up in 2027 with concrete Commission initiatives translating the report's roadmap into sector-by-sector milestones, targeted support for households and businesses, and measures to strengthen and implement

existing targets and pending legislative proposals. This should include a fossil gas exit strategy with a binding annual demand reduction pathway and a roadmap to end LNG import dependence, using the Russian gas phase-out commitment as the blueprint.

2. Permanently tax fossil fuel profits

Emissions from oil and gas produced by EU-headquartered companies since the Paris Agreement are set to cause an estimated €1.5 trillion in climate damages worldwide, and 87% of adults across Germany, France, Italy and Spain support taxing fossil fuel companies to help pay for it. Meanwhile, eight of the world's largest oil and gas companies, reported almost $93 billion in profits in the second quarter of 2026 alone, nearly doubling their earnings compared to the same period last year. Six Member States have asked the Irish Presidency for an EU-wide framework, and finance ministers are set to discuss the issue at the informal ECOFIN in Dublin on 18 and 19 September. The Commission maintains that taxation is a national competence, but this is a choice, not a constraint: the 2022 solidarity contribution was itself an EU framework. National measures alone also do not work on their own terms, since companies can shift profits to whichever jurisdiction taxes them least. Windfall taxes are structurally too weak too: temporary by design, they offer no lasting fix for a crisis that keeps recurring and cannot durably redirect capital toward the transition. Additionally, a recent study found that taxing profits or capital income is far less likely to be passed on than energy price increases.

Ask the Commission for: A proposal for a permanent, EU-wide tax on fossil fuel profits, with revenues reserved for vulnerable consumers, for scaling renewables, renewables-based electrification, grids, storage and efficiency, and for international climate finance, coupled with anti-avoidance measures.

3. Fully implement nature and water laws, not revise them, and invest in nature-based solutions for climate resilience

The stress test of the Birds and Habitats Directives (BHD) and preparatory work on a potential unfounded revision of the Water Framework Directive (WFD) will conclude by the end of the year, placing any follow-up in the 2027 Commission Work Programme. Over 600,000 people have signed a petition calling on the EU to defend, not weaken, its nature laws and a recent Eurobarometer survey found that 94% of Europeans consider protecting nature important for the EU's long-term economic prosperity. The 2016 Fitness Check of the BHD already confirmed they are fit for purpose, and nothing fundamental has changed since. The framework is already flexible, and decades of guidance and case law are what give business legal certainty across the Single Market. Similar conclusions were reached during the more recent 2020 Fitness Check of the WFD. Reopening these laws would destroy that certainty and generate new bureaucracy, not less. The real barriers are the lack of adequate administrative capacity, funding and planning.

At the same time, Europe's escalating climate impacts, underline the importance of fully implementing existing nature and water legislation. Together, the BHD, the WFD and the Nature Restoration Regulation provide the foundation for a more climate-resilient Europe. Healthy

rivers, wetlands, forests and coastal ecosystems help secure water supplies, reduce flood risks, mitigate extreme heat and strengthen resilience to climate-related disasters. The economics are clear as well: Natura 2000 delivers €200 to €300 billion a year in ecosystem services for our economies against roughly €10 billion in management costs, while failing to implement EU environmental law costs society around €180 billion annually.

Ask the Commission for: An implementation and funding package rather than any legislative changes to the BHD and WFD: administrative capacity in Member States, early science-based and strategic spatial planning, digitalisation and species sensitivity mapping, and coherence between other sectoral policies such as those on agriculture and fisheries, and nature objectives. The upcoming Climate Resilience Framework should make nature-based solutions the first line of defence against climate hazards.

4. Preserve LIFE as a standalone programme for environmental action and climate resilience

The LIFE Programme is the EU's only financial instrument dedicated exclusively to the environment and climate. Through its distinct sub-programmes on nature and biodiversity, circular economy, climate mitigation and adaptation, and clean energy, it addresses interconnected challenges that no other EU fund can tackle in a similarly integrated way. LIFE has a unique role in developing, testing and demonstrating innovative solutions on the ground, from nature-based approaches to climate adaptation to nature restoration and resource efficiency, before successful models are replicated and scaled up through larger funding instruments.

LIFE is also a clear example of EU added value. It provides regional and local authorities, research institutions, SMEs and civil society organisations with direct access to funding to support the implementation of EU objectives in practice. It also contributes to competitiveness, resilience and strategic autonomy by accelerating environmental innovation and reducing Europe's exposure to climate and environmental risks.

Despite its proven success, the Commission's 2028–2034 MFF proposal would dismantle LIFE across two broader funds, with no mandatory earmarking available for LIFE activities. Opposition is broad. In October 2025, 820 signatories, including regional authorities, municipalities, trade associations and researchers, wrote to the Commission President. In April 2026, Parliament voted with cross-party backing across the political spectrum to continue all LIFE-supported actions. In June 2026, fourteen Member States have warned that losing a standalone budget line would leave biodiversity projects and the Nature Restoration Law underfunded, with allocations already lower than present levels. The political signal is unambiguous, and the Commission has yet to act on it.

Ask the Commission for: a dedicated legislative proposal maintaining LIFE as a standalone programme with its own legal basis, governance and budget line; a strengthened budget to support innovation, implementation and replication of environmental and climate solutions;

continued bottom-up accessibility for local actors and civil society; and the continuation of operating grants for stakeholders that help deliver EU environmental objectives.

5. Deliver a toxic-free environment and accelerate action on the most harmful chemicals

Chemical pollution is one of the major environmental and public health challenges facing Europe, with hazardous substances accumulating in people and ecosystems and imposing growing costs on society. The EU already has the policy framework to address these risks, but delivery has been too slow. The Commission's 2020 Chemicals Strategy for Sustainability made a toxic-free environment a core objective of the European Green Deal. 2027 should be the year to turn that commitment into action. The universal restriction of PFAS will be a crucial test of whether Europe can effectively prevent widespread and irreversible chemical pollution, while action on other groups of substances of highest concern must also accelerate.

Europe must move from strategies and commitments to concrete action that delivers a genuinely toxic-free environment for people, nature and future generations.

Ask the Commission for: the adoption in 2027 of a universal PFAS restriction based on ECHA's proposal, alongside a faster REACH restrictions pipeline that prioritises the most harmful substances and groups of substances, while fully applying the precautionary principle and the societal essential-use concept where relevant. The Commission should also strengthen implementation and enforcement of existing chemicals legislation across the EU.

6. Align EU policies and public investment to deliver healthy, sustainable and just food systems

Europe's food system sits at the intersection of multiple challenges: food security, climate change, biodiversity loss, public health and farmer livelihoods. Yet the accelerating climate and nature crises are increasingly undermining the foundations of food production itself. Following record-breaking heatwaves across Europe in the summer of 2026, grain harvest forecasts were revised down by around 9 million tonnes, representing almost €2 billion in lost revenues for farmers and highlighting the growing vulnerability of Europe's food system to climate change. The choices made now will determine whether Europe can maintain a secure and affordable food supply while restoring the soil, water and biodiversity on which agriculture depends, improving public health, and ensuring farmers can earn a fair and viable living.

Ask the Commission for: a fair and genuinely performance-based Common Agricultural Policy that aligns public funding with environmental, climate and social outcomes. Building on the Strategic Dialogue on the Future of EU Agriculture, the Commission should, in 2027, present a coordinated package of measures to improve food environments and affordability, ensuring that healthy and sustainable diets become the default choice for consumers.