











13 January 2025

Ursula von der Leyen: Protect people, nature, and democracy in EU regulations

We, the undersigned civil society and trade union organisations, urge the European Commission to uphold rules that protect health, nature, climate, and social justice, including workers' and trade union rights. The Commission must provide guarantees against the rollback of social and environmental standards and for the regulations necessary for the socio-ecological transition at both EU and national levels. Prioritising the narrow interests of certain businesses over the public interest is neither acceptable nor sustainable as an economic strategy.

The risks of misguided simplification

The emphasis by the new team of EU Commissioners on "competitiveness through simplification" has raised concerns. While simplifying procedures can improve efficiency, there is a growing and very real risk that this agenda may translate into deregulation of essential EU social [1], environmental, democracy and human rights protections, which some industry actors view as "burdensome".[2]

Food safety, public health, social protection, workers' rights and labour regulations, animal welfare and environmental protections are not regulatory burdens — they are the very foundation of a well-functioning, resilient and fair society. The Commissioners must honour their commitments made during hearings [3] to ensure that simplification does not equate to deregulation or undermine the policy objectives of the EU acquis. Unfortunately, we already see discrepancies between reassurances given and plans being laid out — often to a dangerous point.[4]

For example, under a "one in, one out" rule, introducing critical new energy efficiency measures could require scrapping another regulation deemed part of the "regulatory burden". [5] This approach is deeply flawed and risks undermining the very frameworks needed for the green and just transition. Similarly, reducing reporting requirements without considering the policy objectives they pursue risks jeopardising the effective enforcement of the EU acquis. The Commission's plans to change EU laws related to sustainable development and social justice like the directives on corporate sustainability and due diligence were only recently adopted, yet their imminent revision is one first outcome of corporate lobbying.

Deregulation is not the answer

The challenges facing certain industries are not due to excessive regulation but rather the failure of governments and corporations to plan ahead, invest and adapt to necessary transitions. For instance, the crisis in the German car industry stems not from too many rules but from a lack of innovation and vision and a delayed shift to electric vehicles. Companies continued to prioritise the combustion engine instead of a future-proof business model and felt confident that their lobbying influence could maintain the status quo of fossil-fuel vehicle primacy, without adequately considering global climate and innovation contexts. [6] Any deregulation now would create uncertainty, penalise first movers and those who invested significant sums to catch up with emerging leaders outside of the EU. It would open the door to unfair competition, and reward laggards — counter-productive to innovation and sustainability.

How the economy can benefit from strong regulations

Far from hindering economic growth, implementing and enforcing EU environmental laws could save the EU economy around €55 billion annually in health and environment-related costs.[7] Well staffed and resourced permitting and regulatory agencies at national and European level are crucial for timely permit delivery and necessary enforcement. Clearly, inaction and lax enforcement also come at a cost. Recent tragedies, such as the flood disaster in Valencia, illustrate the dangers of dismantling systems designed to protect people and ecosystems. Dissolving emergency coordination units and ignoring urban planning principles have exacerbated the impacts of the climate crisis [8], leading to human tragedy and immense material damage. This could have been avoided if local and national regulations had been enforced. Our societies need rules, and they need governance and the capacity that these rules are applied to all equally. The enforcement of these rules thanks to labour inspectors, tax inspectors, etc. will ensure a level playing field.

Regulations for a thriving society

Lawmaking should aim to maximise benefits for society, not minimise costs for businesses. It should focus on responsibility to act, responding to societal, human and wider costs of inaction and not short term costs of action. Rules and regulations are the tools that help society evolve, through the exercise of democracy at all levels. Repeating the mantra that "there are too many rules" does nothing to address Europe's most pressing challenges. On the contrary, deregulation of essential protections would deepen inequality and insecurity among Europeans, undermining citizens' trust in public institutions and

Climate:

The World Economic Forum estimates that for every \$1 invested in climate adaptation today, we can avoid \$2-\$10 in future costs.

Biodiversity, Water, Air, and Soil:

The European Environment Agency (EEA) reports that the loss of ecosystem services could cost the EU hundreds of billions of euros annually. Soil degradation alone costs Europe at least €97 billion per year, with the costs of inaction outweighing action by a factor of six. These costs primarily burden farmers and society at large.

Between 2012 and 2021, industrial air pollution from the EU's largest industries cost an estimated €2.7–4.3 trillion. Researchers highlight that the only viable mitigation measures include stringent pollution controls, phasing out carbon-intensive fuels, and electrification.

Health: The European Commission has estimated that the health benefits of banning the most harmful chemicals in everyday products outweigh industry costs by a factor of ten.

¹ The Cost of Inaction:

feeding into the narratives of anti-democratic movements that exploit these fears to gain electoral support.

The European Commission must lead with boldness and integrity, ensuring that EU regulations prioritise public welfare over corporate interests. Europe's ability to tackle the climate, biodiversity and pollution crisis, and foster social justice and progress depends on it.

To ensure a fair and sustainable future for Europe, we call on the European Commission to:

- Maintain, complement, strengthen and implement rules that enable a deep, socially just, and ecological transformation of our societies.
- Provide **strong guarantees** that "simplification" will not obstruct or delay the regulations necessary for the socio-ecological transition at both EU and national levels.
- **Prevent any rollback** of social, environmental, and human rights standards.
- Ensure that enforcement of existing laws and new EU regulations:
 - o Hold companies accountable for their social and environmental impacts.
 - o Foster social dialogue, active citizen participation and **strengthen democratic governance**.

Initiated by

Climate Action Network Europe (CAN Europe)

Corporate Europe Observatory (CEO)

European Environmental Bureau (EEB)

European Public Service Union (EPSU)

European Trade Union Confederation (ETUC)

Friends of the Earth Europe (FoEE)

Supported by 265 other organisations:

EU and Europe

BirdLife Europe and Central Asia

CHEM Trust

ChemSec

CIDSE

Citizens' Climate Europe

ClientEarth

Compassion in World Farming

Counter Balance

Defend Democracy

Environmental Coalition on Standards (ECOS)

EU LAT Network

EuroMemo Group - European Economists for an Alternative Economic Policy in Europe

Eurogroup for Animals

European Anti-poverty Network (EAPN)

European Coalition for Corporate Justice (ECCJ)

European Coordination Via Campesina (ECVC)

European Trade Justice Coalition

European water movement

Fern

Food & Water Action Europe

foodwatch

Foundation the London Story

Generation Climate Europe

Greenpeace

Health and Environment Alliance (HEAL)

Organising Bureau of European School Student Unions

Oxfam

PAN Europe

Panoptykon Foundation

People vs Big Tech

REScoop.eu

Seas At Risk

The Good Lobby

T&E

WWF EU

Austria

AK EUROPA

Attac Austria

fair sorgen! Wirtschaften fürs Leben

Umweltdachverband

GLOBAL 2000 - Friends of the Earth Austria

Protect Our Winters Europe

Queer Base

Solution, Sozialforschung & Entwicklung

Südwind

Talente-Tauschkreis

transform.at

Belgium

ACV-CSC Belgium

Bond Beter Leefmilieu

BRAL - citizens action brussels

CNCD

Denktank Minerva

11.11.11

Entraide et Fraternité

Join For Water

Jesuit European Social Centre

Mouvement d'Action Paysanne - Ecole Paysanne Indépendante

Mutualités Libres - Onafhankelijke Ziekenfondsen

Les Amis de la Terre - Belgique asbl

Viva Salud

Vredesactie

Bulgaria

Air4Health

Environmental Association Za Zemiata

Institute for Circular Economy

Croatia

Earth Trek (Zemljane staze)

Institute for Political Ecology

Zelena akcija / FoE Croatia

Cyprus

Friends of the Earth (Cyprus)

Czechia

Hnutí DUHA - Friends of the Earth Czech Republic

Limity jsme my

Denmark

Global Aktion

International Dalit Solidarity Network (IDSN)

International Network for Sustainable Energy – Europe

NOAH - FoE Denmark

Plastic Change

Estonia

Estonian Green Movement

Zero Waste Estonia SA

France

AVICENN @VeilleNanos

ActionAid France - Peuples Solidaires

Adéquations

Association SOS MCS (Sensibilité Chimique Multiple)

Attac France

BLOOM

Cantine sans plastique France

CCFD-Terre Solidaire

Collectif Ethique sur l'Etiquette

Générations Futures

Les Amis de la Terre France

Objectif Zéro Plastique

On Est Prêt

No Plastic In My Sea

Notre Affaire à Tous

Réseau Action Climat

Reclaim Finance

Sciences Citoyennes

WECF France

Germany

Attac Germany

bendnotbreak

Bund für Umwelt und Naturschutz Deutschland e.V. (BUND)

CorA-Netzwerk für Unternehmensverantwortung

Dachverband Entwicklungspolitik Baden-Württemberg DEAB e.V.

Deutsche Umwelthilfe /Environmental Action Germany

Fair Finance Institute

FEMNET

FIAN Deutschland

Forum Fairer Handel

Global Policy Forum Europe e.V.

Initiative Lieferkettengesetz

INKOTA-netzwerk

International Federation for the Economy for the Common Good

Jugend im Bund für Umwelt und Naturschutz Deutschland (BUNDjugend) e.V.

Leave it in the Ground Initiative (LINGO)

LobbyControl

PowerShift e.V.

Romero Initiative (CIR)

SÜDWIND e.V.

WEED (World Economy Ecology and Develoment)

Werkstatt Ökonomie

Women Engage for a Common Future

Greece

Consumer Association the Quality of Life-EKPIZO

ECOCITY

Electra Energy

EYATH trade union (Thessaloniki water union)

Naturefriends Greece

SOS te to NERO

Hungary

Csermely Environmentalist Association

Climate Alliance Hungary

E-misszó Association

ELTE Nature Conservation Club

FAUNA Foundation for Animal Wellfaire and Nature Protection

Green Action Association

Guta Environmental Law Association

Hungarian Society for Environmental Education

Hungarian Society for Environmental Protection

Karátson Gábor Kör

Magosfa Foundation for Environmental Education and Eco-tourism

National Society of Conservationists - Friends of the Earth Hungary

Protect the Future/Védegylet

Reflex Environmental Association

Tavirozsa Association for Environmental Protection and Nature Conservation

Ireland

Africa Solidarity Centre Ireland

An Taisce, the National Trust for Ireland

Bat Conservation Ireland

Coastwatch

Friends of the Earth Ireland

Friends of the Irish Environment

Hedgerows Ireland

Irish Coalition for Business & Human Rights

Irish Peatland Conservation Council

The Environmental Forum

Italy

A Sud Ecologia e Cooperazione

Campagna Abiti Puliti

CRS - Centro per la Riforma dello Stato

FAIR

Fondazione Finanza Etica (Banca Etica Group)

Forum Italiano dei Movimenti per l'Acqua" (FIMA - Italian Forum of Water Movements)

ISDE, International Society of Doctors for Environment

Legambiente

Osservatorio Fairwatch

ReCommon

Latvia

Green Liberty

Luxembourg

Action Solidarité Tiers Monde

Fondation Partage Luxembourg

Mouvement Ecologique asbl

Malta

Friends of the Earth Malta

Portugal

Acréscimo - Associação de Promoção ao Investimento Florestal

Iris - Associação Nacional de Ambiente

Linha Vermelha

Quercus - Associação Nacional de Conservação da Natureza

SEO/BirdLife

TROCA - Plataforma por um Comércio Internacional Justo

ZERO - Association for the Sustainability of the Earth System

Poland

Fundacja Zielone Światło

Fundacja Kupuj Odpowiedzialnie/Buy Responsibly Foundation

Polish Ecological Club in Krakow Gliwice Chapter

Stowarzyszenie Ekologiczne EKO-UNIA

Zielone Wiadomości

Romania

Asociația "Clubul de ciclism și ecologie IASIBIKE" Iași

Asociația "Codrii Iasilor"

Asociația Mai bine

Spain

Associació Internacional d'Enginyeria sense Fronteres

ATTAC España

Confederación General del Trabajo (CGT)

Confederación Sindical Comisiones Obreras (CCOO

CICrA Justicia Ambiental

Debt Observatory in Globalisation (ODG)

Ecologistas en Acción

Entrepueblos

Federación de Consumidores y Usuarios (CECU)

Fundació Pau i Solidaritat - CCOO de Catalunya

Fundación Renovables

Justicia Alimentaria

La Coordinadora de ONGD

LaCoordi - Coordinadora pel Comerç Just i les Finances Ètiques de Catalunya

Observatori DESCA

Plataforma por Empresas Responsables

Retorna.org

SEAE- Sociedad Española de Agricultura Ecológica y Agroecología

SETEM Catalunya

Solidaridad Internacional Andalucía

Slovenia

Alpe Adria Green internacional

CIPRA Slovenia

Focus Association for Sustainable Development

Institute for Health and Environment

Institute InTeRCeR

Morigenos – Slovenian Marine Mammal Society

PIC - Legal Center for the Protection of Human Rights and the Environment

Umanotera

Sweden

Jordens Vänner, Friends of the Earth Sweden

Stad- och Landnätverket

Swedwatch

Vision Fackförbund

The Netherlands

Arisa

Clean Clothes Campaign - International Office

Fair Finance International

Fair Trade Advocacy Office

FNV Overheid

Leefmilieu

Milieudefensie - Friends of the Earth Netherlands

Schone Kleren Campagne

Solidaridad

SOMO (Centre for Research on Multinational Corporations)

Transnational Institute

Women Engage for a Common Future

International

ActionAid International

Anti-Slavery International

Avaaz

Balanced Economy Project

Center for International Environmental Law

Child Rights International Network

ClientEarth International

CorpWatch

Fair Finance International

Fairtrade International

FIAN International

Forests of the World

Global Social Justice

HEJSuppor

Hivos

Mighty Earth

Naturefriends International

Permacultura ATTA

Rainforest Alliance

Slow Food International

350.org

Trócaire

3rd countries

Association ZORA (Bosnia and Herzegovina)

Attac Suisse

Center for Environment / FOE Bosnia and Herzegovina

Centre for the Politics of Emancipation (Serbia)

Centro de Políticas Públicas y Derechos Humanos (Perú EQUIDAD)

Coffee Watch (USA)

CSO "Living Nature", Settlement Glamoč, Goražde (Bosnia and Herzegovina)

Common Weal (Scotland)

Earth Thrive Serbia/UK

Earthsight (UK)

Environmental Investigation Agency (UK)

Environmental center for Development Education and Networking - EDEN (Albania)

Friends of nature EKO ELEMENT Bugojno, (Bosnia and Herzegovina)

Genç Düşünce Enstitüsü (Türkiye)

Gallifrey Foundation (Switzerland)

Help Initiative for Social Justice and Humanitarian Development (Nigeria)

NRDC (Natural Resources Defense Council (US/Canada)

OT Watch (Mongolia)

Rainforest Foundation Norway