

## **Civil Society Stakeholder input to the European Commission Roundtable Consultation on Simplification**

**Subject: Request that the European Commission does not create further confusion and uncertainty through re-opening agreed legislative texts**

Dear President Ursula von der Leyen,  
Dear Executive Vice-President Stéphane Séjourné,  
Dear Commissioner Valdis Dombrovskis,

Please consider this statement as joint input to the European Commission Roundtable Consultations on 'Simplification' due to take place on 5 and 6 February.

We are representing a broad range of stakeholders who have worked for decades in the protection of human rights and the environment, and are now focused on the intended application of key European Union sustainability legislations.

We are deeply concerned by the current direction of policy making within the European Commission, particularly regarding the introduction of measures that can potentially weaken or undermine previously agreed legislation crucial to the EU's sustainability goals.

In particular, we wish to state unequivocally that we firmly oppose any re-opening of previously agreed legislation, such as the Corporate Sustainability Due Diligence Directive<sup>1</sup>, at level one. We believe that such a move would risk creating regulatory uncertainty, jeopardising investments already made and necessary future investments, undermining rights of citizens who have been affected by companies' operations, delaying progress, penalising companies that have already invested significantly in compliance, and eroding the trailblazing EU leadership on corporate sustainability standards.

We reaffirm our strong support for focusing on the effective application of the laws through further interpretative measures and guidance, as was foreseen and agreed. We understand that both business and stakeholders need further clarifications on the key provisions of the rules, and we remain committed to working on these both through the planned implementing stages and expected guidance, including with national supervisors, governments, and international platforms.

We also take this opportunity to publicly express our concern regarding the way the "consultations" for this potentially very harmful decision-making process are being conducted. While we note that the Commission has committed to act quickly, we consider that the current approach is not in line with the European Commission's own Better Regulation framework<sup>2</sup>. The current approach, marked by the lack of a thorough impact assessment, absence of evidence, disregard of previous political consensus, and limited transparency and inadequate and business-biased stakeholder inclusion is simply inadequate in view of the nature and potentially far-reaching scope of this Omnibus initiative. This threatens to erode trust in the EU's legislative process and undermine the legitimacy of crucial sustainability measures at a time when inclusive governance is most needed.

**Therefore, we reiterate our firm request that the European Commission does not create further confusion and uncertainty through re-opening agreed legislative texts, but instead focuses on practical application through an inclusive and transparent process.**

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<sup>1</sup> [Directive \(EU\) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive \(EU\) 2019/1937 and Regulation \(EU\) 2023/2859 \(Text with EEA relevance\)](#)

<sup>2</sup> [European Commission Better Regulation Toolbox](#)

We would also refer you to the multiple other statements recently published which we urge that you take into consideration:

- [Major businesses urge Commission to ensure 'Omnibus' approach will not allow renegotiation of agreed texts, incl. CSDDD](#)
- [European NHRIs raise concerns in relation to the European Commission's Omnibus proposal](#)
- [Joint statement by over 170 members of civil society, human rights and environmental defenders, trade unions and climate activists on how omnibus proposal will create costly confusion and lower protection for people and the planet](#)
- [Over 150 Business & Human Rights experts from legal practice, business, consulting & academia voice grave concerns regarding 'Omnibus' proposal](#)
- [Multi-stakeholder statement "Smart implementation of EU sustainability reporting standards: make complying with rules easy"](#)
- [Open letter to the European Commission: 230 researchers, mainly economists, warn against the Omnibus proposal](#)
- [Investors warn Omnibus package could weaken EU sustainability disclosures, harming investment and economic competitiveness](#)
- [400 Chief Sustainability Officers in French Companies ask EU not to water down ESG rules](#)

Signatory organisations (in alphabetical order):

Above Ground (a project of MakeWay, Canada)  
Accountability Counsel  
ACT Alliance EU  
Act Church of Sweden  
ActionAid International  
ALTSEAN-Burma  
AMDH Maroc  
Anti Slavery International  
Arisa  
Asociación por la Paz y los Derechos Humanos Taula per Mèxic  
Avocats Sans frontières  
Basel 2030  
Bir Duino Kyrgyzstan  
Broederlijk Delen, Belgium  
Bulgarian Foundation for Business and Human Rights  
Business & Human Rights Resource Centre  
Campagna Abiti Puliti  
Campagna Impresa 2030  
Canadian Network on Corporate Accountability  
Caritas Europa  
CCFD-Terre Solidaire  
Centro de Investigación y Promoción de los Derechos Humanos, CIPRODEH  
Centro de Políticas Públicas y Derechos Humanos (Perú EQUIDAD)  
CIDSE  
Civil Society Institute - Armenia  
Clean Clothes Campaign  
ClientEarth  
Climate Action Network (CAN) Europe  
Climate Alliance Switzerland  
ClimateKIC  
Coalition for Equality Kyrgyzstan

Collectif Ethique sur l'Étiquette  
Conectando Derechos  
Coordinadora Estatal de Comercio Justo  
Coordination Climate Justice Sociale  
CorA-Netzwerk für Unternehmensverantwortung  
Corporate Justice Coalition  
Covenants Watch  
Deutsche Umwelthilfe / Environmental Action Germany  
E3G  
Earth4All  
Earthsight  
ECONOMY FOR THE COMMON GOOD  
ECOS (Environmental Coalition on Standards)  
Educo  
Eetti (Pro Ethical Trade Finland)  
Entraide & Fraternité  
Environmental Defense Fund Europe  
Environmental Investigation Agency (EIA)  
Estwatch  
ETUC  
EU LAT Network  
Eurogroup for Animals  
European Center for Constitutional and Human Rights e.V. (ECCHR)  
European Coalition for Corporate Justice  
European Environmental Bureau  
European Federation of Public Service Unions  
FAIR  
Fair Finance International  
Fair Trade Advocacy Office  
FairFin  
Fairtrade International  
FIAN Belgium  
FIAN Germany  
FIDH - International Federation for Human Rights  
Finanzwende  
Finnish League for Human Rights  
FOCSIV Italian federation Christian NGOs  
Focus Association for Sustainable Development  
Fondazione Finanza Etica  
Forest Peoples Programme  
Forum Fairer Handel  
FOS, Belgium  
Frank Bold  
Fundación Libera contra la Trata de Personas y la Esclavitud en Todas sus Formas  
GLOBAL 2000 - Friends of the Earth Austria  
Global Witness  
Goliathwatch, Germany  
GongGam Human Rights Law Foundation  
Green REV Institute  
Homa - Instituto Brasileiro de Direitos Humanos e Empresas  
Human Rights Watch  
Informationsstelle Peru e.V.  
Initiative Lieferkettengesetz  
Initiative pour un devoir de vigilance  
Interfaith Center on Corporate Responsibility

International Corporate Accountability Roundtable  
International Dalit Solidarity Network  
Investor Alliance for Human Rights  
Irish Coalition for Business and Human Rights  
Justiça Global  
La Strada International  
La Coordinadora de ONGD (Spain)  
La Strada Foundation  
Labour Behind the Label  
LDH (Ligue des droits de l'Homme)  
Liga voor de Rechten van de Mens  
Ligue Burundaise des droits de l'homme Iteka  
L'organisation guinéenne de défense des droits de l'homme et du citoyen OGDH  
Mani Tese ETS  
Milieudefensie - Friends of the Earth Netherlands  
MiningWatch Canada  
MOVIMENTO CONSUMATORI APS  
MVO Platform  
National Trade Union of Self-Employed WBREW  
NaZemi, Czechia  
NeSoVe - Netzwerk Soziale Verantwortung  
Nordic Center for Sustainable Finance  
Norwegian Helsinki Committee  
Notre Affaire A Tous  
Observatorio Ciudadano  
Observatorio RSC  
OEW-Organisation für Eine solidarische Welt  
Open Gate/La Strada  
Organisation Nationale des Droits de l'Homme (ONDH)  
Oxfam  
Partner Suedmexikos e.V.  
Peace Brigades International  
PIC - Legal Center for the Protection of Human Rights and the Environment  
Plataforma por Empresas Responsables  
Polish Institute for Human Rights and Business  
Positive Money  
Proyecto sobre Organización, Desarrollo, Educación e Investigación (PODER)  
Rainforest Alliance  
Reclaim Finance  
Red europea de Comités Oscar Romero (SICSAL)  
Regulatory Communication  
REVO Prosperidad sostenible  
ROBIN WOOD e.V.  
Schone Kleren Campagne (Clean Clothes Campaign Netherlands)  
SETEM  
ShareAction  
Sherpa  
Solidair met Guatemala  
SOMO, Centre for Research on Multinational Corporations  
Südwind, Austria  
SÜDWIND-Institut, Germany  
Sustainable Banking Coalition  
Sustainable Finance Lab  
Swedish Society for Nature Conservation (SSNC)  
Swedwatch

T&E  
The Circle  
The Good Lobby Italia  
The Sunrise Project  
Trócaire  
Tunisian Association of Democratic Women  
Vredesactie  
Werkstatt Ökonomie  
WeWorld  
World Benchmarking Alliance