

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 Directive¹, 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 framework². 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.

¹ [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 \(Text with EEA relevance\)](#)

² [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
NaZemí, 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