



Ursula von der Leyen
President, European Commission

Jessika Roswall
Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Christophe Hansen
Commissioner for Agriculture and Food

Brussels, 16 February 2026

Subject: Lack of transparency and civil society inclusion in Commission implementation dialogues

Dear President von der Leyen,
Dear Commissioner Roswall,
Dear Commissioner Hansen,

As representatives of civil society, we are writing to express serious concerns regarding the way “implementation dialogues” and other stakeholder consultations are currently being conducted by the European Commission.

In its Communication *A Simpler and Faster Europe*, the Commission had presented these dialogues as a tool to improve enforcement and implementation of EU law through balanced engagement with all main stakeholder groups, including civil society. However, recent practice raises questions as to whether this commitment to balance and transparency is being upheld.

The “Implementation Dialogue on EU Environmental Directives” is set to take place this week with the farming community, touching on essential elements of the EU’s environmental acquis, including the Water Framework Directive, the Nature Directives and the Nitrates Directive. However, based on the scarce available information, civil society involvement appears to be extremely limited, and excludes those NGOs who have long engaged in the implementation of these directives, and who participated in the Strategic Dialogue on Agriculture in 2024.

In the past, invitations were sent to the most relevant NGOs operating at EU level and representing the voices of hundreds of national members ensuring the most suitable representative to join dialogues or expert groups. Sidelining these experts in this structural manner creates the perception that such “dialogues” primarily serve specific sectoral interests, rather than facilitating balanced discussions on effective implementation. This goes directly against the spirit of how these dialogues were presented by the Commission.

Implementation dialogues should support the practical application of existing legislation, identify genuine implementation challenges, and foster consensus. They should not become informal arenas to question existing EU laws or to pave the way for environmental deregulation. We insist that any potential legislative



revision must remain subject to full impact assessments and open public consultations in line with the established Better Regulation principles and EU decision-making procedures.

We have observed similar shortcomings in other recent formats, including the October 2025 high-level roundtable on the simplification of environmental laws, where transparency on participant selection and stakeholder balance was lacking, despite the roundtable later being cited in Commission communications on simplifying environmental reporting as a source of input. Another example is the simultaneous announcement of a review and revision of the Water Framework Directive in Q2 2026 in the REsourceEU Action Plan, which already pre-empts the results of the review, does not leave sufficient time for a proper impact assessment, and has not been so far leading to any transparent stakeholder consultation process, despite Commissioner Roswall stressing that this exercise would build on stakeholders' input. The experience of the 2024 Strategic Dialogue on the Future of EU Agriculture further illustrates the importance of ensuring that stakeholder engagement is meaningful through proper methodology and that its conclusions are respected and implemented, not disregarded.

We also recall the recent ruling of the European Ombudsman, which heavily criticised the Commission for "maladministration" regarding the rapid, non-transparent weakening of environmental rules within the 2024 Common Agricultural Policy (CAP) and 'Omnibus I' simplification packages, pointing to a lack of impact assessments and public consultation, and "emergency" procedures used to bypass standard legislative processes. It underlined the importance of transparency, balanced representation and sound administrative practice in Commission stakeholder interactions. These principles must be systematically applied to implementation dialogues and other informal consultation formats. If this implementation dialogue were used to justify any revision of legislation, it would be in direct contradictions to the findings of the European Ombudsman.

We therefore call on the Commission to clarify, within the Better Regulation framework, that the primary purpose of implementation dialogues is to support the smart implementation of existing policies and laws, and not to reopen discussions on EU-level rules or explore potential revisions with a limited group of stakeholders.

Trust in EU decision-making depends on openness, equal representation of interests and respect for established procedures. We remain committed to constructive engagement and stand ready to contribute to implementation dialogues that genuinely strengthen compliance and environmental outcomes.

Yours sincerely,

Ester Asin, Director, WWF European Policy Office

Ariel Brunner, Director, BirdLife Europe & Central Asia

Magda Stoczkiewicz, Programme Director, Greenpeace European Unit

Patrick ten Brink, Secretary General, European Environmental Bureau