

**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, 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](#). 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.

We would also refer you to the multiple other statements recently published which we urge that you take these 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](#)

In conclusion, 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.

Signatory organisations (in alphabetical order):

1. Above Ground (a project of MakeWay, Canada)
2. Accountability Counsel
3. ACT Alliance EU
4. Act Church of Sweden
5. ActionAid International
6. ALTSEAN-Burma
7. AMDH Maroc
8. Anti Slavery International
9. Arisa
10. Asociación por la Paz y los Derechos Humanos Taula per Mèxic
11. Asociația Mai bine
12. Avocats Sans frontières
13. Basel 2030
14. Bir Duino Kyrgyzstan
15. Broederlijk Delen, Belgium
16. Bulgarian Foundation for Business and Human Rights
17. Business & Human Rights Resource Centre
18. Campagna Abiti Puliti
19. Campagna Impresa 2030
20. Canadian Network on Corporate Accountability
21. Caritas Europa
22. CCFD-Terre Solidaire

23. Centro de Documentación en Derechos Humanos “Segundo Montes Mozo S.J.” (CSMM)
24. Centro de Investigación y Promoción de los Derechos Humanos, CIPRODEH
25. Centro de Políticas Públicas y Derechos Humanos (Perú EQUIDAD)
26. CIDSE
27. Civil Society Institute - Armenia
28. Clean Clothes Campaign
29. ClientEarth
30. Climate Action Network (CAN) Europe
31. Climate Alliance Switzerland
32. ClimateKIC
33. Coalition for Equality Kyrgyzstan
34. Collectif Ethique sur l'Étiquette
35. Conectando Derechos
36. Coordinadora Estatal de Comercio Justo
37. Coordination Climate Justice Sociale
38. CorA-Netzwerk für Unternehmensverantwortung
39. Corporate Justice Coalition
40. Covenants Watch
41. Deutsche Umwelthilfe / Environmental Action Germany
42. E3G
43. Earth4All
44. Earthsight
45. ECONOMY FOR THE COMMON GOOD
46. ECOS (Environmental Coalition on Standards)
47. Educo
48. Eetti (Pro Ethical Trade Finland)
49. Entraide & Fraternité
50. Entrepueblos/Entrepobles/Entrepobos/Herriarte
51. Environmental Defense Fund Europe
52. Environmental Investigation Agency (EIA)
53. Estwatch
54. ETUC
55. EU LAT Network
56. Eurogroup for Animals
57. European Center for Constitutional and Human Rights e.V. (ECCHR)
58. European Coalition for Corporate Justice
59. European Environmental Bureau
60. European Federation of Public Service Unions
61. FAIR
62. Fair Finance International
63. Fair Trade Advocacy Office
64. FairFin
65. Fairtrade International
66. FEBEA - European Federation of Ethical and Alternative Banks and Financiers
67. FIAN Belgium
68. FIAN Germany
69. FIDH - International Federation for Human Rights

70. Finanzwende
71. Finnish League for Human Rights
72. FOCSIV Italian federation Christian NGOs
73. Focus Association for Sustainable Development
74. Fondazione Finanza Etica
75. Forest Peoples Programme
76. Forum Fairer Handel
77. FOS, Belgium
78. Frank Bold
79. Fundación Libera contra la Trata de Personas y la Esclavitud en Todas sus Formas
80. GLOBAL 2000 - Friends of the Earth Austria
81. Global Witness
82. Goliathwatch, Germany
83. GongGam Human Rights Law Foundation
84. Green REV Institute
85. Homa - Instituto Brasileiro de Direitos Humanos e Empresas
86. Human Rights Law Centre
87. Human Rights Watch
88. Informationsstelle Peru e.V.
89. Initiative Lieferkettengesetz
90. Initiative pour un devoir de vigilance
91. Interfaith Center on Corporate Responsibility
92. International Corporate Accountability Roundtable
93. International Dalit Solidarity Network
94. Investor Alliance for Human Rights
95. Irish Coalition for Business and Human Rights
96. Justiça Global
97. La Strada International
98. L'organisation guinéenne de défense des droits de l'homme et du citoyen OGDH
99. La Coordinadora de ONGD (Spain)
100. La Strada Foundation
101. Labour Behind the Label
102. LDH (Ligue des droits de l'Homme)
103. Liga voor de Rechten van de Mens
104. Ligue Burundaise des droits de l'homme Iteka
105. Mani Tese ETS
106. Milieudefensie - Friends of the Earth Netherlands
107. MiningWatch Canada
108. MOVIMENTO CONSUMATORI APS
109. MVO Platform
110. National Trade Union of Self-Employed WBREW
111. NaZemi, Czechia
112. NeSoVe - Netzwerk Soziale Verantwortung
113. Nordic Center for Sustainable Finance
114. Norwegian Helsinki Committee
115. Notre Affaire A Tous
116. Observatorio Ciudadano
117. Observatorio RSC

118. OEW-Organisation für Eine solidarische Welt
119. Open Gate/La Strada
120. Organisation
121. Organisation Nationale des Droits de l'Homme (ONDH)
122. Oxfam
123. Partner Suedmexikos e.V.
124. Peace Brigades International
125. PIC - Legal Center for the Protection of Human Rights and the Environment
126. Plataforma por Empresas Responsables
127. Polish Institute for Human Rights and Business
128. Positive Money
129. Proyecto sobre Organización, Desarrollo, Educación e Investigación (PODER)
130. Rainforest Alliance
131. Reclaim Finance
132. Red europea de Comités Oscar Romero (SICSAL)
133. Regulatory Communication
134. REVO Prosperidad sostenible
135. ROBIN WOOD e.V.
136. Schone Kleren Campagne (Clean Clothes Campaign Netherlands)
137. SETEM
138. ShareAction
139. Sherpa
140. Solidair met Guatemala
141. Solidaridad
142. SOMO, Centre for Research on Multinational Corporations
143. SÜDWIND-Institut, Germany
144. Südwind, Austria
145. Sustainable Banking Coalition
146. Sustainable Finance Lab
147. Swedish Society for Nature Conservation (SSNC)
148. Swedwatch
149. T&E
150. The Circle
151. The Good Lobby Italia
152. The Sunrise Project
153. Trócaire
154. Tunisian Association of Democratic Women
155. Vredesactie
156. Werkstatt Ökonomie
157. WeWorld
158. World Benchmarking Alliance