

Preamble

#WeAreEurope – an independent association of European professionals acting as an Observatory of sustainable business practices and opinions – is **encouraging leaders and members of the European Union institutions** to **withstand the attempt to dismantle the regulatory structure built for "accountable, transparent and responsible business behaviour and sustainable growth" represented by the "Omnibus I" package of proposals targeting the Corporate Sustainability Reporting Directive (CSRD), the EU Taxonomy and the Corporate Sustainability Due Diligence Directive (CSDDD). This complex system took over a decade to build and is now facing the risk of being watered down before even having the chance to prove its efficiency in "promoting society's interests and a route to sustainable and inclusive recovery" and contributing to the European Green Deal4.**

"The Union is founded on the respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights as enshrined in the EU Charter of Fundamental Rights and in Article 2 of the Treaty on the European Union. Those core values that have inspired the Union's own creation, as well as the universality and indivisibility of human and environmental rights, and respect for the principles of the United Nations Charter and international law, should guide the Union's action on the international scene."

Amendments adopted by the European Parliament on 1 June 2023 on the proposal for a directive [...] on Corporate Sustainability Due Diligence

#WeAreEurope therefore calls for **leaders and members of the European business community** to co-sign the following **opinion editorial (Op-Ed)** and thus join the ever-growing community of companies, business associations and consultants, academia, NGOs and even committees⁵ of the European Parliament warning about Omnibus I being a "broad sweeping deregulation [...] creating regulatory uncertainty for companies, barring proper access to justice for those harmed, also hampering the availability of quality, comparable and granular sustainability data that is much called for by investors and business partners alike."

"Many companies are worried about the current attempts to dismantle the framework of the European Green Deal and don't feel listened to nor represented. If you represent a company active in Europe and, like us, you believe that business transparency on environmental, social and governance impacts, risks and opportunities across the value chain is a tool to future-proof our economy and ensure fair business competitiveness by levelling the regulatory playfield, do sign this open letter. The voice of European companies needs to be heard. We are Europe!"

Alexis Kryceve, President #WeAreEurope

¹ European Parliament resolution of 6 February 2013 on corporate social responsibility: accountable, transparent and responsible business behaviour and sustainable growth (2012/2098(INI))

European Commission's package of proposals to simplify EU rules, boost competitiveness, and unlock additional investment capacity "Omnibus I"

European Parliament resolution of 6 February 2013 on corporate social responsibility: promoting society's interests and a route to sustainable and inclusive recovery (2012/2097(INI))

⁴ The European Green Deal

<u>Draft Opinion</u> of the Committee on Employment and Social Affairs



Opinion Editorial

European politicians, don't let businesses down

Op-ed by XXXX European business leaders to the Heads of State of Member States and Members of the European Parliament

The current debate on the 'simplification shock' in Europe has gone too far. In the name of so called competitiveness, some are proposing to roll back entire sections of the European Green Deal and to water down fundamental texts such as the Corporate Sustainability Reporting Directive (CSRD) or the Due Diligence Directive (CSDDD). We, heads of European companies of all sizes and from all sectors, call on European policymakers to maintain the course towards a protective and proportionate framework for the sustainability of the European economy.

According to a recent survey conducted by HEC Paris and #WeAreEurope among 1,000 companies of all sizes accross 26 European countries, 84% of companies support the sustainability goals of Europe, and 61% are satisfied or very satisfied of the CSRD. 62% even consider this directive a tool in favor of European sovereignty.

A majority of us do call for a simplification of regulations as much as support and flexibility from authorities. But we also know the importance to prepare ourselves for a changing world, and we strongly believe that these regulations are a precious tool for the resilience and the competitiveness of our businesses.

The Omnibus project is a deregulation that threatens Europe's stability

Europe has built a unique model. An economy that cares about social cohesion and respects the rights and health of diverse individuals. European countries and their companies top the rankings and studies on sustainable development, such as the Sustainable Development Report 2024 and Corporate Knights' TOP 100 2024 ranking. This global leadership is a unique chance which we should not jeopardize.

Weakening the foundation of transparency built with the CSRD does not help companies. It leaves them to fend for themselves. Unfortunately, it is the most vulnerable ones who will be least able to meet the challenge of sustainability and, without a framework setting clear rules for all, will be left behind.

It is **thanks to a clear, demanding and fair common framework** that companies of all sizes can move forward with confidence and clarity. Removing this framework would weaken the entire structure.

Deregulation is not protecting us: on the contrary, it means exposing us to global competition based on the lowest bidder, where social, environmental and tax rules are generally weaker.

A Europe without a compass is an economy without a direction

According to the World Economic Forum's *Global Risks Report 2025*, six of the ten short term risks identified by leaders are social or environmental in nature, and four are geopolitical or technological. Not a single one is economic.

In today's world, running a business without sustainability reporting is like driving at night without headlights or a dashboard. It means depriving ourselves of data to understand our vulnerabilities, our value chain, our impacts and our levers for transformation. It means weakening our ability to anticipate, convince, finance and recruit. It is therefore not surprising that sustainability reporting frameworks are currently being adopted around the world. The current European setback risks isolating us from the international framework and leading to our decline.

As representatives of companies active in Europe, we call to systematically include companies in the legislative process, grounded in facts, studies, and science. We believe it is crucial to preserve the strategic foundations of the CSRD - double materiality, stakeholder mapping, and value chain analysis - while simplifying requirements: reducing the number of reporting data points, ensuring alignment with international standards (GRI, ISO, Ecovadis) and building a single, scalable framework tailored to company size. The CSRD threshold should return to 500 employees, as originally planned, to avoid excluding the majority of affected businesses and ensure a protective level-playing field. We also urge for manageable audit requirements, with significant cost reductions, and an equal treatment for non-European companies (same timeline and revenue treshold of 150m€ for non EU companies, as initially planned). Smaller and less prepared companies must be supported through concrete aid, sector-specific guidance, a phased timeline, and a digital feedback platform.

These are not calls for deregulation, but for smart, proportionate adjustments to ensure a transparent, fair, and sustainable European economy while controlling the ESG risks.

We call for the reaffirmation of a committed, shared and supported European ambition for sustainability in the interest of long-term competitiveness.

Europe will be strong and autonomous by affirming an economic model based on sustainability, transparency and long-term performance.

Our businesses, all over Europe, from all sectors and sizes are ready. But we cannot commit without a clear, stable and protective framework.

Rise to the challenge and do not let us down. We need you more than ever.

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