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From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	7 July 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject:	ANNEX to the COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS 2025 Environmental Implementation Review Environmental implementation for prosperity and security

Delegations will find attached document COM(2025) 420 annex.

Encl.: COM(2025) 420 annex



EUROPEAN
COMMISSION

Brussels, 7.7.2025
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ANNEX

ANNEX

to the

***COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT,
THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND
THE COMMITTEE OF THE REGIONS***

2025 Environmental Implementation Review

Environmental implementation for prosperity and security

{SWD(2025) 300 final} - {SWD(2025) 301 final} - {SWD(2025) 302 final} -
{SWD(2025) 303 final} - {SWD(2025) 304 final} - {SWD(2025) 305 final} -
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Annex 1 – List of priority actions

		AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
	Circular economy and waste																												
1	Develop a unified circular economy strategy focusing on waste prevention and resource efficiency, especially for priority waste streams.													X													X		
2	Adopt measures to increase the circular material use rate.			X	X			X	X	X	X	X		X	X	X		X	X	X			X	X	X	X	X	X	
3	Speed up the transition to a circular economy by implementing an updated national strategy and the EU framework and recommendations, in particular to complement it with upstream circularity measures.	X	X			X	X		X		X		X	X	X	X	X		X	X	X		X	X	X			X	
	Waste management																												
4	Implement, harmonise, and gradually increase landfill taxes to phase out landfilling of recyclable and recoverable waste.					X				X				X	X	X	X											X	
5	Complete closure of non-compliant landfills.				X				X	X							X						X		X			X	
6	Further shift reusable and recyclable waste away from incineration, including through economic instruments.		X			X	X	X	X							X			X			X				X			
7	Ratify international conventions on ship recycling.			X	X										X		X						X		X				
8	Improve separate collection at source e.g. through economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness.		X		X	X				X	X		X		X	X				X	X		X		X				
9	Increase reuse of products and scale up waste recycling infrastructure associated with the higher steps of the waste hierarchy. In particular, improve collection and increase treatment capacity for bio-waste.			X					X	X	X			X	X		X						X		X			X	
10	Improve municipal waste preparation for reuse and recycling.			X		X		X		X	X		X	X	X	X	X	X	X		X	X		X	X	X	X	X	
11	Increase the recycling rates of packaging waste.				X	X				X				X	X	X					X			X	X				
12	Increase the collection and recycling rate of waste electronic and electric equipment (WEEE).	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	
13	Adopt measures to increase recycling of critical raw materials.	X																											
14	Introduce the deposit and return system(-s) (DRS), as mandated by the new Packaging and Packaging Waste Regulation, to capture more recyclable materials and improve the quality of recyclates.																		X								X		
15	Improve the system for managing the quality of data on packaging waste in order to build coherent and verifiable data sets.				X					X															X		X		
16	Invest in waste prevention measures to reduce the total amount of waste generated.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
17	Implement and expand the pay-as-you-throw system for businesses and households.					X							X								X							X	
18	Extend a pay-as-you-throw system to all households, and fully introduce the cost-coverage rules as part of extended producer responsibility for packaging.																					X	X						
19	Develop EPR schemes for problematic waste and introduce fee modulation.					X			X					X	X				X				X						
20	Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the Early Warning Reports where applicable.			X	X		X		X	X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	
	Water quality and management																												
	Water Framework Directive																												
21	Improve river continuity and ecological flows, boosting efforts on nature-based solutions to reduce hydromorphological pressures.	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	-	X		X	X	-	X	X	-	X	X	-	X
22	Ensure periodic reviews of permits for discharges, abstractions and other water uses, including hydropower pressures.	X	X	-	X		X		X		X	X	X	X	X		X	X	X	X		X	X		X	X	-		
23	Reduce pollution from nutrients, chemicals, metals and saline discharges.	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	-	X	X	X	X	-	X	X	-	X	X	-	X
24	Better justify exemptions to the achievement of good status.	X	X	-	-	X	X	X	X	-	X	X	X		X	-	X	X	X	X	X	-	X	X	-	X		-	
25	Improve the classification of water bodies and strengthen monitoring systems.	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	-	X	X	X	X	-	X	X	-	X	X	-	X
26	Develop more robust programmes of measures, tackle obstacles identified in the implementation of measures and ensure adequate financing for implementation, including through better use of the cost recovery and polluter pays principle.	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	-	X	X	X	X	-	X	X	-	X	X	-	X

		AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK	
	Floods Directive																												
27	FRMPs should provide details on how the FHRMs were used in the choice of measures and how to consider pluvial flooding.	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	X	X	X	X	X	-	X	X	-	X	X	X	-
28	Consider future climate scenarios in FRMPs.	X	X	-	-	X	X			-	X				X			X	X		-		X	-	X			-	
29	Better explain the choice and implementation of flood prevention and protection measures (prioritisation, monitoring, costs of measures).	X	X	-	-	X	X	X	X	-	X	X	X	X	X	X	X	X	X	X	X	-	X	X	-	X	X	X	-
30	Improve public consultation and stakeholder involvement.			-	-	X				-	X		X	X	X	X		X	X		-	X	X	-	X	X	X	-	
	Drinking Water Directive																												
31	Take actions to ensure full compliance with the Drinking Water Directive.				X			X					X		X	X	X						X			X			
	Nitrates Directive																												
32	Tackle nutrients pollution, especially nitrates from agriculture through the implementation of the Nitrates Directive.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
	Urban Waste Water Treatment Directive																												
33	Take the necessary measures to ensure full implementation of the current urban wastewater treatment directive, taking into account the new requirements of the recast directive.		X	X	X	X			X	X	X	X	X	X	X	X	X		-		X		X	X	X	X	X	X	
	Clean air																												
34	As part of the NAPCP, take action towards reducing emissions of air pollutants.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
35	Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
36	Upgrade and improve the air quality monitoring network, and ensure timely reporting of air quality data.																								X				
37	Accelerate the ratification of relevant international conventions and protocols.			X						X					X		X				X		X	X					
	Industrial emissions																												
38	Complete the correct transposition of the IED 1.0.	X				X	X		X					X									X						
39	Ensure compliance with the reporting obligations under the IED for the years 2021-2023 and under the E-PRTR for the years 2020-2022.																				X								
40	Reduce industrial air pollution damage and intensity.	X	X	X	X	X	X		X	X	X	X	X	X	X		X	X	X	X		X	X	X	X	X	X	X	
41	Reduce industrial releases to water and their intensity.	X	X	X		X	X			X	X	X	X		X		X				X	X	X	X	X	X		X	
42	Address current transposition issues related to indirect release of pollutants to water.								X																				
43	Continue addressing pollution from the ex-ILVA steel plant in Taranto, in order to bring this plant into compliance with EU industrial emissions legislation.																	X											
44	Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely update of permits following publication of BAT conclusions.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
45	Ensure effective public participation and access to justice in relation with the IED.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
	Major industrial accidents prevention – SEVESO																												
46	Strengthen compliance with requirements on safety measures to prevent major accidents and ensure appropriate preparedness and response in relation to UTEs, in particular as regards reviewing, testing and updating EEPs, at intervals of no more than three years.	X					X	X		X	X			X			X	X		X		X	X	X		X		X	
47	Ensure access to transparent and clear information towards citizens on risks and behaviour in case of accidents.						X	X		X	X		X	X			X	X		X			X	X				X	
48	Ensure full and correct transposition of the Seveso III Directive.					X	X			X			X		X								X						
49	Improve reporting on implementation of Seveso III Directive.									X																			
50	Sign and ratify the UNECE Convention on the Transboundary Effects of Industrial Accidents.																X				X								

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	Mercury regulation																											
51	Take effective action against illegal gold mining in Guyana.												X															
	Noise																											
52	Complete noise mapping.			X						X	X		X		X		X			X		X		X	X		X	X
53	Complete and implement action plans on noise management.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Chemicals																											
54	Upgrade the administrative capacities in implementation and enforcement towards a policy of zero tolerance for non-compliance.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
55	Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REFs.	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X				X	X	X	X	X		X	X
56	Increase customs controls and controls of products sold online with regard to compliance with chemicals legislations.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Global Biodiversity Framework																											
57	Submit to the CBD an updated NBSAP or national targets following the adoption of the Kunming-Montreal Global Biodiversity Framework.		X	X					X	X								X		X		X	X	X	X			X
	Nature protection and restoration – Natura 2000																											
58	Complete the Natura 2000 site designation process.				X					X	X		X	X		X	X	X		X	X	X	X	X	X	X		
59	Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.	X	X	X	X		X	X	X	X	X	X	X	X			X	X					X	X			X	X
60	Ensure the effective implementation of Natura 2000 management plans and sufficient administrative capacity and financing both for Natura 2000 and the implementation of the Nature Restoration Regulation. Ensure implementation of Prioritised Actions Framework 2021-2027 (PAFs).				X	X			X	X	X			X	X		X		X	X	X	X		X	X		X	
	Recovery of species																											
61	Strengthen the integration of biodiversity actions into other policies, e.g. energy, agriculture, fisheries, forestry, urban and infrastructure planning and sustainable tourism, and promote communication between stakeholders.					X		X			X	X	X	X	X	X			X	X				X		X	X	X
62	Enhance efforts to collect reliable data on the conservation status of habitats and species as well as their occurrence at site level. In view of this, consider the creation of a body in charge of monitoring and reporting, to ensure that data are not provided only ad hoc on a contract basis.									X		X	X								X				X			
63	Strengthen the implementation of national anti-poaching measures.				X													X			X							
64	Reinforce action for habitats and species in unfavourable conservation status, for example through restoration measures, increased connectivity, better policy coordination and integration, and increased funding.	X	X	X			X	X			X		X		X	X	X	X	X	X	X	X	X	X		X	X	X
	Recovery of ecosystems																											
65	Step-up efforts to further reduce nitrogen deposition, in particular in Natura 2000 sites with nitrogen-sensitive species and habitats.		X																X			X						
66	Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of [MS].	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
67	Implement and scale-up the uptake of organic farming practices.		X	X	X		X						X		X	X		X	X		X	X	X		X			
68	Promote active management of grasslands through extensive grazing to maintain the condition of these semi-natural habitats.								X						X				X	X	X							
69	Ensure sustainable management of forests, i.a. by adopting the National Forest Programme post-2020 and consider the conservation objectives of Natura 2000 forest sites when developing the National Forest Management Plan.					X			X		X																	
70	Implement Forest State Aid and the latest recommendation provided by Commission. Restore afforested areas that cause impact on habitats and species (e.g. bogs, hen harrier, freshwater pearl mussel).															X												
71	Reduce the excessive area of sealed and artificialised soil and remediate degraded areas of soil. If appropriate, consider formally committing to targets for land-degradation neutrality under the relevant United Nations Convention to Combat Desertification agreement.														X		X		X		X							
72	Designate the competent authority responsible for fulfilling the obligations arising from the EUDR and inform the Commission of the names, addresses, and contact details of said competent authority.									X											X		X					

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73	Improve conservation status of forests by promoting sustainable forest management and ensuring compliance with the Habitats Directive before granting/renewing permits for forest logging.		X					X	X						X	X				X	X	X				X		X
74	Implement peatland conservation and restoration measures and include such measures and objectives in the national restoration plans.						X	X	X		X					X		X		X		X	X		X	X		
75	Implement the Court ruling to ensure public access to justice regarding forest management plans. Ensure long-term protection for old-growth and ecologically or socially significant forests, including the Białowieża Forest, in compliance with the Court's judgment.																						X					
76	Bring levels of nitrogen deposition under the critical threshold to allow forest habitat types protected under the Habitats Directive to recover.		X																X			X						
77	Take action against illegal logging activities, apply appropriate penalties and remedy the damage done to Natura 2000 sites.																								X			
	Marine ecosystems																											
78	Report its updates on the assessment of the state of its marine waters, its targets, and its determinations of GES which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.				X			X		X	X		X	X				X		X	X	X	X	X			X	
79	Ratify the Offshore Protocol to the Barcelona Convention and ICZM Protocol to the Barcelona Convention.																X											
	Prevention and management of invasive alien species (IAS)																											
80	Step up implementation of the IAS Regulation, including with regard to enforcement and capacity of inspection authorities.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
81	Ensure regional cooperation with neighbouring Member States to address predominant pressures.																		X			X						
82	Ratify the International Convention for the Control and Management of Ships' Ballast Water and Sediments of 2004 (BWM Convention).	X				X									X		X		X						X		X	X
	Ecosystem assessment and accounting																											
83	Support development of national business and biodiversity network.	X		X	X	X			X						X			X		X	X		X		X			X
84	Ratify the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization (ABS) to the Convention on Biological Diversity.					X											X	X		X		X					X	
	Climate action																											
85	Implement all policies and measures that are needed to achieve targets laid down in the Effort Sharing Regulation (ESR) and the Land Use and Land-Use Change and Forestry (LULUCF) Regulation. More detailed priority actions are set out in the assessment of the final National Energy and Climate Plan (NECP).	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Environmental governance																											
86	Make spatial data more widely accessible and prioritise environmental datasets in implementing the Inspire Directive, especially those identified as high-value spatial datasets for implementing environmental legislation.				X	X	X		X	X	X		X	X	X	X	X	X		X		X	X	X	X	X	X	X
87	Ensure that relevant information on EIA and SEA procedures (including on public participation opportunities and on publication of final decisions) is electronically accessible in a timely manner, through at least a central portal or easily accessible points of access, at the appropriate administrative level.	X	X		X	X		X	X	X	X	X			X	X	X			X		X	X	X	X			X
88	Provide information on the average duration of all steps in the EIA process.	X	X			X	X				X		X			X	X					X		X				
89	Ensure correct transposition of the revised EIA Directive.	X						X				X	X	X	X	X							X			X		X

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90	Ratify the amendment to the UNECE Convention on Transboundary Environmental Impact Assessment and the Protocol on Strategic Environmental Assessment.		X													X												
91	Ratify the amendment to the UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.									X				X														
92	Improve access to courts in national environmental cases by the public concerned and eliminate practical barriers, such as length of proceedings and excessive costs in some Member States.	X	X	X	X	X	X				X	X		X	X	X	X			X			X	X	X	X	X	X
93	Encourage the use of training programmes provided by the Commission (or developed at the national level) covering the ELD and its interactions with the other national liability related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
94	Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
	Financing																											
95	Use more national funding (for instance by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X