



Lobbying - How the private sector hijacked the Omnibus Directive

Introduction

The European Commission's focus on deregulation has seen it slowly become an echo chamber for the demands of the business lobbies. The main focus is the Omnibus I law, which is the responsibility of the Commission's Executive Vice-President, Stéphane Séjourné¹. Documents obtained by Reclaim Finance, including an analysis of the meetings held by the European Commission, show just how active this lobbying has been.

The Omnibus I legislation, unveiled on February 26, 2025, was presented as a "simplification" text that provides for the revision of a number of major directives which impose constraints on companies to protect human and social rights, the environment, and the climate. The text is, in reality, a full-on-attack on the environmental and social laws adopted in recent years.

As such, it seeks to weaken the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD), and directly contradicts what Stéphane Séjourné said on November 12, 2024 before the European parliamentarians:

"Nevertheless, allow me to clarify one specific point here, because we must not get this wrong: I want to debureaucratize and simplify as much as possible, including with genuine political will. **This does not mean deregulation.**

This mandate will also be one of investment. **We are all aware of the colossal amounts that will be needed to achieve our climate and digital ambitions and to remain in the industrial race. We will first need to mobilize private investment**"².

Yet, the first part of this mandate is a deregulation proposal that makes it more difficult to mobilize private investment to finance the green transition. By attacking the CSRD in particular, the European Commission is setting aside its climate objectives and its goal of mobilizing the private sector.

¹ Also designated EVP in European institutions and below.

² Parlement européen, [Confirmation hearing of Stéphane Séjourné](#), 12 novembre 2024, p. 5.
Translation by Reclaim Finance from French.

What is the "Omnibus I" proposal?

The legislative proposal amends significant parts of two directives adopted during the previous legislature: the Corporate Sustainability Due Diligence Directive (CSDDD) and the Corporate Sustainability Reporting Directive (CSRD).

The CSDDD allows the European Union to ensure that companies benefiting from the European market comply with European and international regulations. A company that employs child labor in its value chain or is responsible for large polluting emissions would be subject to sanctions. This law therefore acts as a guarantee for Europeans that their consumption does not fuel human rights violations or the destruction of ecosystems, and encourages companies to adopt more responsible practices worldwide.

The CSRD is a law that allows for a better understanding of the socio-environmental impact and risks of companies and thus permits comparisons between them. Companies operating on the European market must provide information on their activities through the preparation of an extra-financial report. This law thus helps to avoid greenwashing and favors the most virtuous companies in terms of climate, the environment, human rights and biodiversity.

What are the main setbacks in the text proposed by the Commission?

CSDDD

- The "value chain" covered by the due diligence is now limited to the company's direct partners ("Tier 1"), with some exceptions.
- The company's regular assessment of its situation, which was required to be carried out annually, is extended to five years.
- Removal of the obligation to "implement" climate transition plans.
- Removal of the review clause, eventually allowing the inclusion of financial services.
- Civil liability: Removal of the harmonised civil liability regime for the CSDDD.
- Breaking off contractual relations with a business partner involved in a violation is no longer a measure that can be required of companies.
- Adjustment of sanctions for companies.

CSRD

- Reduction of the number of companies concerned by more than 80% by limiting it to companies with more than 1,000 employees and €50 million in revenue.
- Removal of sector-specific reporting standards.
- Drastic reduction in the number of "data points" on which companies must provide information (to come in a further delegated act).

This new political direction has been largely influenced by external actors who have submitted their grievances to the Commission in general and to Commissioner Séjourné in particular, as shown by the documents obtained by Reclaim Finance. Between his appointment last

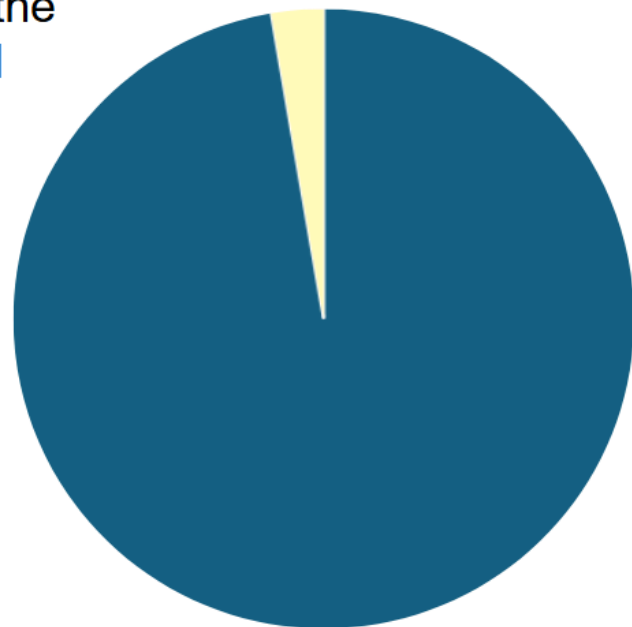
November and today, Stéphane Séjourné and his team have met with many actors. And while it is healthy for political power in a democracy to consult widely before making a decision, such consultation must include a full range of stakeholders, including representatives from civil society, those who advocate for human rights or the environment, and cannot be limited to businesses and their organisations.

However, an analysis of the meetings of the Commissioner and his office, as well as documents obtained by Reclaim Finance following freedom of information requests, suggest that such an open consultative process did not take place. On the contrary, efforts have focused almost exclusively on understanding and integrating businesses' demands. This is reflected in particular in the removal of the clause opening the door to the inclusion of financial services within the scope of the Due Diligence Directive.

I. The meetings organised by Stéphane Séjourné and his Cabinet

Before presenting Omnibus I, the European Commissioner met with 37 different stakeholders. Aside from a field visit to the Romanian National Institute for Aerospace Research, organised with the Romanian Ministry of Economy, all 36 stakeholders met represented private economic or financial interests. None of them have the objective of defending the climate cause, human rights, or biodiversity. All, however, promote particular interests.

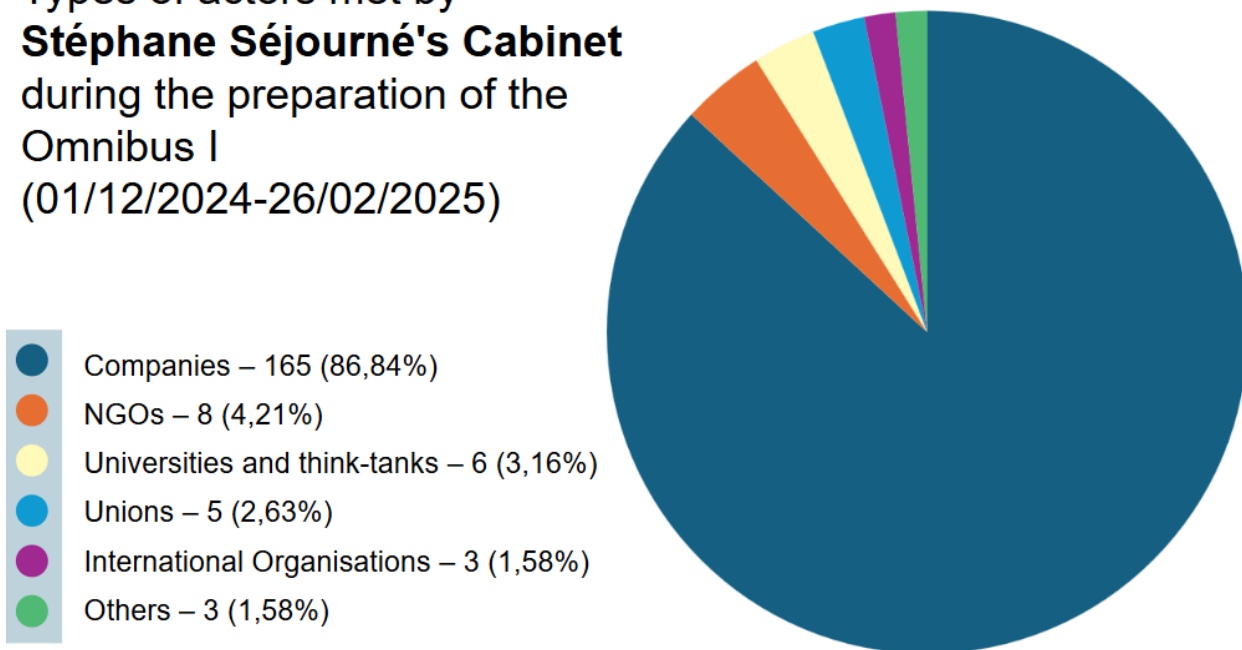
Types of actors met by Stéphane Séjourné during the preparation of the Omnibus I (01/12/2024-26/02/2025)



In another file (the future of the automotive sector), Stéphane Séjourné organised two strategic dialogues, including an NGO among the 15 participants (93.33% of which were companies). In these cases, given the weight of industry in these meetings, the "strategic dialogues" are classified in the business category.

³Stéphane Séjourné's office (i.e., the close civil servants responsible for supporting him in his political duties and preparing the direction of the texts)⁴ devoted almost 9 out of 10 meetings to business representatives. Of the 190 meetings held, the office of the Executive Vice President organised 165 meetings with companies or private interest groups (including multiple meetings with Société Générale, MEDEF or BusinessEurope). Only 25 meetings (13.14%) were organised with representatives who did not have an overtly profit-making goal. These included eight meetings with NGOs, six with representatives from the research world, five with unions, and six with various and/or international stakeholders (IFRS, the EU Chamber of Commerce in China, the World Economic Forum, and a Polish foundation).

Types of actors met by Stéphane Séjourné's Cabinet during the preparation of the Omnibus I (01/12/2024-26/02/2025)



To prepare his major environmental and social deregulation bill, Stéphane Séjourné met exclusively with companies affected by these laws. It is therefore not surprising to see that the law largely meets the demands of businesses.

By deliberately excluding trade unions, NGOs, and academics—who have all spoken out unanimously against environmental deregulation—the Executive Vice President sent a clear signal about both his working methods and his intentions. Civil society representatives have struggled to establish meaningful dialogue with him. Those who managed to secure only meetings with his staff, rather than with the EVP himself, remain largely unheard, especially when compared to the prominent influence granted to business and private interest representatives

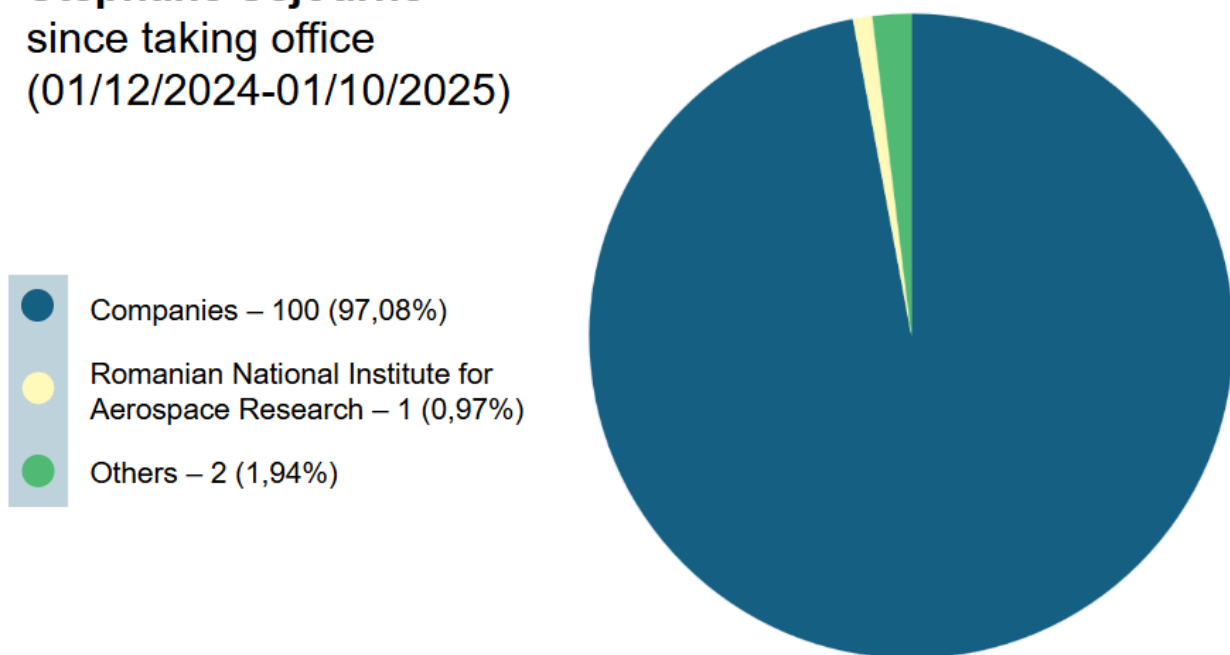
³ Meetings with different categories of stakeholders, such as strategic dialogues, were classified as "others," with the exception of meetings where more than 85% of the stakeholders around the table represented the same interests. For example, a meeting with 43 business representatives and two NGO representatives (i.e. 95.56% of businesses representatives) was classified as "business."

⁴ Data relating to Stéphane Séjourné's appointments should be used separately from those of his office. In some cases, the EVP's Cabinet participated in meetings with Stéphane Séjourné. Adding the Cabinet's appointments and those of the EVP here would amount to counting certain appointments twice.

The desire of Stéphane Séjourné and his office to meet almost exclusively with private stakeholders with economic and financial priorities is not limited to the "consultation" period⁵ for the Omnibus I proposal. Overall, the first ten months of Stéphane Séjourné's term—which includes the period leading up to the Omnibus and the months following this announcement, i.e., from December 1, 2024, to October 1, 2025—show that stakeholders representing private interests account for more than 90% of the meetings.

With the exception of a visit to the Romanian National Institute for Aerospace Research and two meetings with coalitions of businesses and unions (employers and employees) and NGOs—meetings in which business voices represented more than three-quarters of the participants—Stéphane Séjourné held 100 of his 103 meetings with private stakeholders with economic or financial expectations (i.e., 97.08%). He never met NGO representatives alone.

Types of actors met by Stéphane Séjourné since taking office (01/12/2024-01/10/2025)

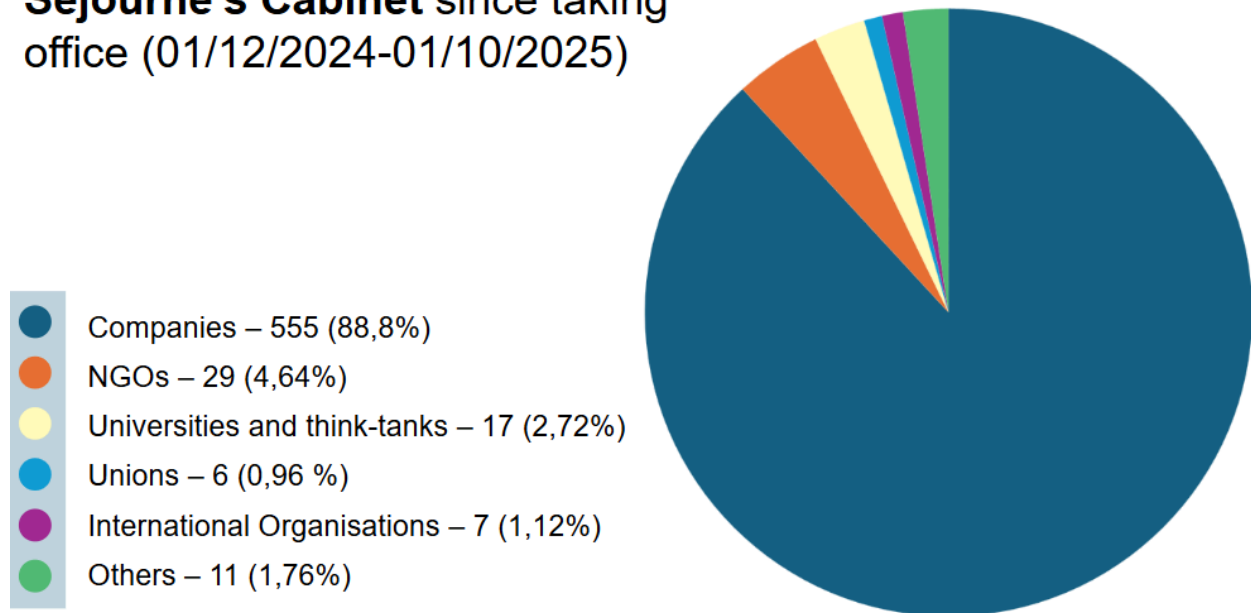


In the following months, his office continued to meet with as many private stakeholders as during the preparation period for the Omnibus Law. Since taking office on December 1, out of a total of 624 meetings, the VPE's office met with businesses 550 times (88.14%), 29 NGOs

⁵ The notion of "consultation" is largely questionable here. Contrary to the European Commission's commitments regarding "[better regulation guidelines](#)," no real multi-stakeholder consultation was organised prior to the presentation of the Omnibus Act. The European Commission is also under [investigation by the European Ombudsman](#) following a complaint filed by eight European NGOs. In their complaint, the NGOs notably recalled [Reclaim Finance's analysis](#), which showed that 70% of lobbying requests had been included in the Omnibus.

(4.65%), 17 research institutes and think tanks (2.72%), 6 unions (0.96%), 7 international organisations (1.12%), and 15 unclassifiable organisations (2.4%)⁶.

Types of actors met by Stéphane Séjourné's Cabinet since taking office (01/12/2024-01/10/2025)



II. Case study: lobbying against due diligence obligations for financial services

Article 36(1) of the Due Diligence Directive adopted in 2024 required the European Commission to prepare a report demonstrating the relevance – or otherwise – of establishing specific rules for the service and investment activities of financial actors. The European Commission would subsequently have been tasked with preparing a legislative proposal if it deemed it necessary to regulate financial services and investments.

Article 36

Review and reporting

1. The Commission shall submit a report to the European Parliament and to the Council on the necessity of laying down additional sustainability due diligence requirements tailored to regulated financial undertakings with respect to the provision of financial services and investment activities, and the options for such due diligence requirements as well as their impacts, in line with the objectives of this Directive.

The report shall take into account other Union legislative acts that apply to regulated financial undertakings. It shall be

⁶ Among these unclassifiable organizations are foundations, round tables organized with employers' and employees' unions, public or parapublic institutions, etc.

published at the earliest possible opportunity after 25 July 2024, but no later than 26 July 2026. It shall be accompanied, if appropriate, by a legislative proposal. »

This article is crucial in the CSDDD. According to the results of the European Commission's report, it could indeed lead to a regulation for financial institutions. In short, an insurer would be responsible for the socio-environmental consequences of the projects it insures. An asset manager could be liable for its investments in coal, which cause numerous illnesses and deaths while fueling global warming. A bank should think twice before committing to providing services to companies attacked from all sides for their human rights violations.

Financial institutions have objected to the possibility that a European Commission report could conclude that it was necessary to regulate finance. With their lobbying efforts in 2024-2025, financial stakeholders sought to achieve what they failed to fully achieve during the CSDDD review between 2022 and 2024.

The inclusion of financial services in the CSDDD had indeed led to two completely opposing positions by the EU Council and the European Parliament. Led by France, the Council sought to exclude financial services from the Directive. On the other hand, the European Parliament voted in favor of tailored rules to include financial services in the CSDDD. Among the MEPs who voted for the compromise amendments, which were supposed to regulate financial services, was Stéphane Séjourné, then president of the Renew Europe group⁷.

The French asset management lobby, for example, sent emails to Stéphane Séjourné's office to organize a meeting. The French Asset Management Association (AFG), which represents asset management companies managing €4.5 trillion in assets in France, subsequently sent its clear position to Stéphane Séjourné's office. Regarding the CSDDD, the AFG requested two things: the temporary suspension of the directive and the definitive removal of Article 36(1), which sought to regulate financial activities.

The following email is among the documents obtained by Reclaim Finance following an official request for documents from the European Commission⁸.

⁷ European Parliament, [Results of the votes on the proposal for a directive on the duty of care of companies](#), 1 June 2023. The votes concern the version adopted by the JURI committee, which provided for the establishment of rules for the financial sector.

⁸ Link to the Freedom of information request: [Commissioners' meeting with industry regarding "Omnibus" - Notes and documents - a Freedom of Information request to Secretariat General of the European Commission - AsktheEU.org](#)

Link to the email obtained: [Email AFG - Suite à notre rencontre - Projet de directive omnibus CSRD, CS3D, Taxonomie - Simplification](#)

Some passages of the email have been cut in order to keep only the part relating to the CSDDD.

From: [REDACTED]
Sent: Friday, January 31, 2025 4:52 PM
To: CAB SEJOURNE ARCHIVES
Subject: FW: AFG - Suite à notre rencontre - Projet de directive omnibus CSRD, CS3D, Taxonomie - Simplification
Attachments: OECD RBC-for-Institutional-Investors.pdf; 2025 01 10 - AFG - CS3D - Key messages ENG.pdf; Etude financement global economie-fev 2025-Web.pdf

From: [REDACTED]
Sent: Friday, January 31, 2025 4:36 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: AFG - Suite à notre rencontre - Projet de directive omnibus CSRD, CS3D, Taxonomie - Simplification

Dear [REDACTED]

On behalf of AFG and our members, I would like to express our gratitude for the engaging and constructive discussion we had on the Omnibus Directive project.

c. **CSDDD**

On the CSDDD, we would like to highlight two key concerns. A more detailed position, including other proposals to reduce regulatory burdens, is attached to this email:

1. **Global Postponement of the CS3D Directive:**

AFG believes that a global postponement of the CS3D Directive's implementation would be beneficial. **The implementation should be preceded by a thorough impact assessment, with a focus on competitiveness, as this remains a core objective of the new Commission.**

2. Support for the Deletion of the Review Clause (Article 36(1)):

AFG advocates for the removal of this review clause, which could introduce additional requirements, such as extending the scope to the downstream activities of financial services providers. **This could lead to financial services firms facing more stringent reporting requirements than other industries, creating an uneven playing field.** Notably, Recital 26 of the Directive specifies that “regarding regulated financial undertakings, only the upstream activities, not the downstream activities, should be covered by this Directive”.

It is also important to highlight that **regulated financial entities already comply with a comprehensive set of regulations dedicated to sustainable finance, including due diligence on portfolio investments.** Implementing the CS3D Directive could result in regulatory overlaps (e.g., SRD II, SFDR, AIFMD/UCITS), undermining the objectives of the Omnibus Directive. Therefore, concerns regarding the financial services sector should remain within the already well-established regulatory framework (and its periodic reviews).

As agreed during our meeting, please find attached:

- OECD Responsible Business Conducts for Institutional Investors
- Our position on CS3D
- Our study on the financing of the Economy that will be released next week

We stay at your disposal should you want to pursue our exchanges.

Kind regards,

[Redacted signature]

[Redacted contact information]

In the email, the AFG thanks the European Commission for the productive discussions on simplification. The AFG calls for deregulation in the truest sense of the term: removing regulations. The email concludes with the transmission of PDF documents arguing in favor of removing the rules surrounding asset management, "as agreed during [the] meeting."

These attached documents are now also available⁹.

⁹ Link to the attachment obtained after the document request: [OMNIBUS SIMPLIFICATION PACKAGE – CORPORATE SUSTAINABILITY DUE DILIGENCE DIRECTIVE \(CS3D\) – Key messages](#)

The following letters have also been cropped to highlight the requests regarding the exclusion of financial services from the CSDDD.



OMNIBUS SIMPLIFICATION PACKAGE – CORPORATE
SUSTAINABILITY DUE DILIGENCE DIRECTIVE (CS3D) –
Key messages

Key messages from AFG

In the context of the draft omnibus simplification package on simplification and reduction of the administrative and reporting burdens, and more specifically concerning Directive 2024/1760/EU on corporate sustainability due diligence directive (CS3D), AFG's key messages are as follows:

- **Global postponement of the CS3D Directive**

AFG is in favor of a global postponement of the implementation of the CS3D Directive, which should be subject to the completion of an in-depth impact assessment, focusing in particular on impacts on the competitiveness of European companies.

- **Deletion of the review clause (Article 36 (1))**

AFG considers that this review clause is inappropriate, as it deals with the possibility of introducing additional requirements (extension to the downstream chain of activities) targeting only the provision of financial services and the investment activities of regulated financial undertakings.

The European Commission's notes are also available. The conclusions are brief: "The Commission takes note." They nevertheless show that the Commission is listening to the concerns of private stakeholders.

Conclusions:

The Commission took note.

The French Asset Management Association is not the only one to have expressly requested the removal of the rules that were supposed to lead to a study on the responsibility of financial services in human rights violations and damage to the climate and the environment. Many stakeholders met by Stéphane Séjourné or his office have indeed requested the removal of the rules that concern them, both by email and during meetings.

The following excerpts are from the same request for documents and show the requests to pause the CSDDD and to remove Article 36(1).



Ref. Ares(2025)4774237 - 16/06/2025



JOINT STATEMENT ON THE OMNIBUS INITIATIVE

Reducing Burdens and Enhancing Competitiveness Under EU Sustainable Finance Framework

Brussels, 31 January 2025

CSDDD-related recommendations

IMPLEMENTATION: Ensure that all relevant implementation guidance is in place at least **two years before the application and if necessary, defer the application date**. Many concepts require clarification and guidance before companies can start their implementation, and in many instances, this may include extensive operational and technology transformation which need long-term planning for effective execution. Currently, the deadline for the Commission to adopt guidelines under the CSDDD coincides with, or falls very close to, the first application of the Directive.

SCOPE: Remove the review clause for the potential extension of the scope of CSDDD to the downstream part of financial undertakings' chains of activities.

SIMPLIFICATION – CUTTING THE RED TAPE FBF's views and proposals

Core demands

- The implementation of the directive, as it stands, puts European companies at a disadvantage relative to international competition. In this new context, the main request is to **suspend the implementation of the directive until the following adjustments have been made**.
- **Request for removal of the review clause in a broad manner Article 36(1)**. It is not justified or appropriate to impose additional obligations on financial companies compared to other businesses. Financial companies must be treated like other sectors. Furthermore, any new obligations imposed regarding due diligences would necessarily be passed on to the users of financial services, particularly businesses, which would be contradictory to the goal of reducing due diligence and reporting requirements for companies.



- **Exempt financial institutions' clients from mandatory due diligence on their clients**, as this creates impractical requirements, hinders competitiveness by leading to higher costs for clients and reducing investment in critical sectors.



Key messages

CSDDD related recommendations

- **SCOPE:** Remove the review clause for the inclusion of financial institutions' downstream value chain, given the complexity and the consequences on corporate sectors and SMEs.

Conclusion

Our analysis shows the disproportionate influence of economic and financial interests in the development of European policies. By adopting the demands of lobbyists and almost systematically excluding civil society, Stéphane Séjourné and his office are going against the democratic and good governance principles that are supposed to guide European action. The initial findings of the ongoing investigation by the European Ombudsman emphasize this point¹⁰.

While highlighting the efforts of private groups to exempt the financial sector from any due diligence obligation is a telling example, it is not anecdotal. Many other similarities can be identified between the positions of the various economic and financial lobbies. A previous study by Reclaim Finance showed that the demands of the main voices in favor of the Omnibus law largely converged with the contents of the Omnibus proposal. The Omnibus I proposal also satisfied 70% of the MEDEF's demands¹¹.

While the European Union had equipped itself with ambitious tools to hold businesses accountable and direct capital towards a just and sustainable transition, it has now chosen to backtrack and follow the Trump administration in its desire to destroy social and environmental standards. Such an approach not only runs counter to its commitments, but also jeopardizes the credibility of its political project. It satisfies the demands of a few very large companies while ignoring those of the overwhelming majority of businesses¹² and European citizens¹³.

¹⁰ EU Ombudsman, [The European Commission's failure to comply with its 'Better regulation guidelines' in preparing a legislative proposal on corporate sustainability reporting and due diligence](#), May 2025.

¹¹ [EU Omnibus : nouveau terrain de jeu pour les lobbies - Reclaim Finance](#), March 2025

¹² E3G, [What European business leaders think about the EU's corporate sustainability and due diligence rules](#), September 2025.

¹³ Reclaim Finance, [8/10 French want multinational corporations accountable for social and environmental impacts](#), June 2025 and a poll from Amnesty International and Global Witness [EU: New research suggests majority of Europeans favour human rights and environmental protection in face of EU rollback](#), October 2025.

Appendix 1 - Methodology

The data presented in the first part of this note come from an analysis of freely accessible sources on the European Commission's website as of October 1, 2025. Indeed, for the College of Commissioners and their cabinets, it is mandatory to publish information on organised meetings.

Between December 1, 2024, and October 1, 2025, Executive Vice-President Stéphane Séjourné met with 105 stakeholders, [as indicated on the European Commission's website](#). Over the same period, his cabinet met with 625 interest representatives, as indicated in this other part of the [European Commission's website](#).

The meetings were then classified by Reclaim Finance into the following categories:

- "Businesses," for private actors with for-profit objectives and their representatives;
- "NGOs," for organisations and associations with non-profit objectives (defending human rights, biodiversity, climate, etc.);
- "Trade Unions," for worker unions and their representatives. Employer associations and business forums were classified under "Businesses";
- "International Organisations," for the IFRS or the World Economic Forum, the European Union Chamber of Commerce in China, and the EU-ASEAN Business Council;
- "Think Tanks and Universities," for research institutes that do not represent businesses or business groups, such as the Cambridge Institute for Sustainability Leadership.
- "Others" for organisations that do not fall into the above categories, for example, organisations representing public and parapublic institutions or organisations relating to corporate social responsibility involving these same companies

Meetings with different categories of stakeholders, such as strategic dialogues, were classified as "others," with the exception of meetings where more than 85% of the stakeholders around the table represented the same interests. For example, a meeting with 43 business representatives and two NGO representatives (i.e. 95.56% of businesses representatives) was classified as "business."

Some meetings provide access to brief minutes of the discussions. These "minutes" are not sufficient to assess the quality of an exchange; they only mention the main themes discussed and do not provide details on the content of the discussions.

To delve deeper, requests for access to administrative documents are required, as provided for in Regulation (EC) No. 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council, and Commission documents.

Thanks to several requests¹⁴, Reclaim Finance obtained numerous documents, including emails sent by interest representatives, position papers, and letters. These documents and the position papers voluntarily published by the stakeholders who met with Executive Vice-President Séjourné provide the basis for the second part of this note.

Other documents, notably those sent by the banks Goldman Sachs and Citi, could not be obtained due to the "protection of commercial interests" as indicated in the extract from the Commission's response below.

The following document falls also within the scope of your application:

- Goldman Sachs International – Simplification of the EU Sustainable Finance Framework, 6 March 2025, Ares(2025)5807668.

Since the document originates from a third party, the author (Goldman Sachs International) has been consulted in accordance with Article 4(4) of Regulation (EC) No 1049/2001¹ regarding public access to documents ('the Regulation').

The third party has objected to disclosure of the document that it sent to the Commission based on Article 4(2), first indent of the Regulation. According to Goldman Sachs International, the document discusses commercial positions, implementation strategies, and certain key challenges the company may face, and disclosure of the document would therefore undermine the company's commercial interests.

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- Letter from Citi to Commissioner McGrath, 13 December 2024, reference: Ares(2024)8957649.

Since the document originates from a third party (Citi), we have consulted the originator. The third party has objected to the disclosure of the document providing the following justification:

Protection of commercial interests (Article 4(2), first indent): According to Citi, disclosure of the document would compromise Citi's commercial interests as it reveals Citi's compliance strategies and compliance challenges, as well as specific areas of concern, regarding two important pieces of EU legislation (CSRD, CSDDD).

Protection of international relations (Article 4(1)(a), first indent): According to Citi, disclosing the content of the confidential submission by a foreign company could attract undue international attention in relation to the (proposal for a) Sustainability Omnibus, potentially disrupting the ongoing regulatory revision of the directives.

¹⁴ See in particular:

- The main freedom of information request, February 17, 2025: [Commissioners' meeting with industry regarding "Omnibus" - Notes and documents - a Freedom of Information request to Secretariat General of the European Commission - AsktheEU.org](#)
- For non-European banks and their involvement in the CSDDD https://www.asktheeu.org/request/non_eu_banks_and_the_exclusion_o/response/60276/attach/2/EASE%202025%201668%20final.pdf?cookie_passthrough=1
- For European banks and their involvement in the CSDDD https://www.asktheeu.org/request/eu_banks_and_the_exclusion_of_fi/response/60275/attach/2/reply%20EASE%202025%201667%20final.pdf?cookie_passthrough=1