

BY INVITATION ONLY: POLICY CAPTURE AND THE EU OMNIBUS I

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TI EU's mission is to prevent and address corruption and promote integrity, transparency and accountability
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ARE MADE."**

European Commission
October 2025

**"THE BASIC RULE IS TO CONSULT
BROADLY AND TRANSPARENTLY AMONG
STAKEHOLDERS, WHO MIGHT BE
CONCERNED BY THE INITIATIVE,
SEEKING A WHOLE SPECTRUM OF VIEWS
IN ORDER TO AVOID BIAS OR SKEWED
CONCLUSIONS PROMOTED BY SPECIFIC
CONSTITUENCIES ('REGULATORY
CAPTURE')."**

European Commission
2021 Better Regulation Guidelines



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EXECUTIVE SUMMARY

*MEP Jörgen Warborn and Commissioner Dombrovskis shaking hands at a European Parliament plenary session on the state of play Commission's pledge to reduce the reporting burden, in particular for SMEs
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- This report brings together data on the meeting records of key European legislators as well as corporate lobbying positions to highlight policy capture risks within the European Union's (EU) so-called Omnibus I, whereby large-scale policy change was ostensibly secured by a narrow selection of interests.
- The deregulation achieved by Omnibus I, which amended the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD), was made possible through a combination of limited closed-door consultations and featured the over-representation of certain types of companies: large corporates and those linked to United States (US) interests.
- The Commission's ongoing revision of its Better Regulation framework, prompted by the European Ombudsman's finding of maladministration, leaves exemptions from consultation to the discretion of a single Commissioner and sets no transparency, balance or registration requirements for targeted consultations such as reality checks, risking turning the Omnibus I approach into standard practice.
- Our findings highlight the severe risks of policy capture should the Commission formally adopt a decision-making process that does not meet minimum requirements of transparency and accountability for evidence-based decision-making.

KEY FINDINGS

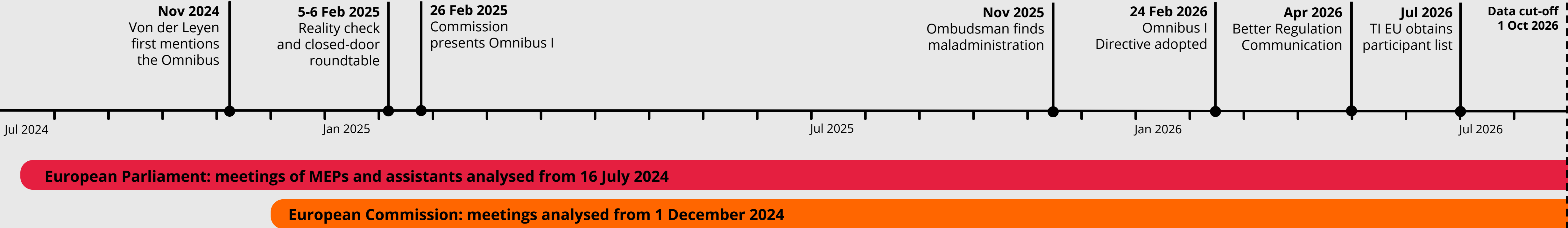
- At a 6 February 2025 roundtable, which took the place of a public consultation on Omnibus I and which the Commission cites as part of its “intense outreach to stakeholders”:
- Business interests represented at least two-thirds of the 110 organisations on the Commission’s list of participants. Only 13 were self-declared non-governmental organisations (NGOs).
- Participating organisations represented only 12 of the 27 Member States. Not counting EU-level associations, organisations linked to the US outnumbered those from more than 22 EU Member States, equal with the Netherlands and Spain.
- 12 participating organisations were not on the EU Transparency Register, meaning they did not disclose key information about their identity, resources and interests represented.
- One participating organisation was officially logged as a “grocery retail company”.
- Far from widening the circle, the roundtable favoured already well-connected organisations. Its participants make up just 0.5% of the over 17,000 registered organisations, yet accounted for more than one in ten of all Commission lobby meetings published since the start of the second von der Leyen mandate in December 2024.

- The Commission did not proactively publish the roundtable’s agenda, participants or minutes, using a loophole in the transparency rules on disclosing meetings with lobbyists. TI EU obtained the list of participants only through a confirmatory access-to-documents application, 17 months after the event took place.
- Between taking office on 1 December 2024 and presenting Omnibus I on 26 February 2025, Commissioner Dombrovskis, President von der Leyen’s lead on simplification, disclosed 12 meetings with interest representatives, eight of them on simplification. A third were with organisations based outside the EU or representing US business.
- Across the mandate, civil society and small businesses were barely heard. NGOs account for fewer than one in ten of the meetings held by Commissioner Dombrovskis and his cabinet and by Parliament rapporteur Member of the European Parliament (MEP) Jörgen Warborn. SMEs and their representatives account for less than 4% of the meetings held by Commissioner Dombrovskis, his cabinet and MEP Warborn combined over this mandate, despite SME relief being a main justification for the Omnibus I process.

- In 2025, the year he led Parliament’s work on Omnibus I, MEP Warborn met organisations linked to US interests more often than those from any other country, including his native Sweden.
- Fewer than 4% of the meetings published by Commissioner Dombrovskis and Warborn MEP since they took office were with organisations representing SMEs, despite SME relief being a justification for the expedition of the Omnibus I process
- The final Omnibus I Directive, adopted in February 2026, closely reflects the demands of a narrow set of industry voices, cutting the scope of both directives and deleting the obligation to adopt a climate transition plan.
- ExxonMobil, which met Commissioner Dombrovskis the day before the roundtable, later claimed the Corporate Sustainability Due Diligence Directive (CSDDD) had been “modified because of our advocacy”.

METHODOLOGY NOTE

- Transparency International EU maintains the Integrity Watch EU database, which collects all lobby meetings published by the European Commission and the European Parliament, cross-referenced with the EU Transparency Register. This Register contains all key information pertaining to entities seeking to influence EU decision-making. For this report, we analysed all meetings held between 1 December 2024 and 1 October 2026 for the European Commission. Meetings held with MEPs and their assistants are covered by the period of 16 July 2024 until 1 October 2026. Please note meetings can be published retroactively. Any meeting published after the retrieval date of 7 October 2026 and falling under the period covered was not included in this analysis.
- Transparency obligations for Commission Managers and top-ranking officials (Commissioners, Cabinet Members and Directors-General), including the obligation to meet only with registered organisations and to publish meetings as well corresponding minutes, do not apply where meetings are organised in response to direct and specific requests from the Commission, its representatives or staff, for factual information, data or expertise. Members of Parliament and their assistants, conversely, must publish their meetings with interest representatives, regardless of whether the organisation is registered or not.
- Roundtables and ‘reality checks’ are semi-formal, closed-door mechanisms the European Commission discretionarily introduced – and first used at the Omnibus I roundtable in February 2025 – as substitutes for public consultations and impact assessments. Criticised by the European Ombudsman as a procedural shortcoming due to opaque participant selection and heavy underrepresentation of NGOs relative to business interests, these processes grant the Commission unchecked discretion over who participates in the decision-making process and what information is released to the public. By claiming these are technical in nature, the Commission makes use of the loopholes embedded in current transparency obligations.
- InfluenceMap’s publicly available LobbyMap database was used for the case studies highlighted in this report. LobbyMap tracks the climate policy engagement activities of 1000 companies and over 300 industry groups globally, across sectors.
- SME figures count organisations whose mandate is specifically to represent SMEs or start-ups, identified by name, plus companies meeting the EU SME definition (fewer than 250 staff and turnover under €50 million). General business federations are excluded, though their membership does include SME members.



THE ORIGINS OF THE OMNIBUS PROCESS

The 2024 Antwerp Declaration, spearheaded by the petrochemical industry, signalled a more visible phase of deregulatory efforts in Brussels. The current Commission’s first year saw the fast-tracked implementation of legislation that scaled back flagship initiatives of the EU’s original Green Deal.

The EU’s current Omnibus process marks a continuation of such a deregulatory drive. The Omnibus is not a new legal tool, having been used for the consolidation of technical aspects of legislation in the past, such as consumer protection law and financial rules. But since its first mention by President von der Leyen, in November 2024, it has emerged as a novel and catch-all mechanism to deliver far-reaching policy change at pace. Its deployment to ‘simplify’ rules, by bundling multiple substantial amendments to legislation across domains, represents a fundamental departure from established EU lawmaking practice and procedural integrity. A central tension between the narrowly intended legal scope of the omnibus procedure and the far-reaching policy objectives in this case is visible from the outset. The declared goal of the European Council was a “simplification revolution”. The method, meanwhile, was a legal tool previously limited to administrative tidy-ups.

The first Omnibus (Omnibus I) brought together changes to the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD), part of the drive to reduce sustainability-related reporting requirements for EU companies by 25%. The Commission presented the legislative proposal without an impact assessment in February 2025. Impact assessments are a key tool outlined in the 2021 Commission’s own Better Regulation guidance, which until the start of the von der Leyen II Commission, governed how proposals were prepared.

Better Regulation Guidelines, considered by the Commission to be “one of the most advanced regulatory approaches in the world”, also provide stakeholder consultations, with the aim of giving “all interested parties” the opportunity to contribute to policy development. Within the Omnibus I, however, the Commission bypassed its own guidelines. It argued this was of “critical urgency” as the Omnibus directly influenced the European Union’s ability to achieve sustainable economic growth and maintain its position in the global market.

No formal public consultation took place for Omnibus I, with the Commission arguing that a series of events, including a ‘reality check’ workshop with selected stakeholders in February 2025, sufficed. The Commission has since moved to formalise this lighter-touch approach: its April 2026 Communication “A Simpler, Clearer and Better Enforced EU Rulebook” proposes institutionalising tiered impact assessments and more flexible consultation procedures, a reform critics argue retrospectively legitimises the procedural shortcuts first deployed in Omnibus I. Such stakeholder engagement will also entrench the practice of skirting transparency obligations. Claiming this engagement is only technical in nature allows the Commission to make use of existing transparency loopholes, resulting in minimal accountability on the objectives, participants and concrete legislative outcomes of this new form of engagement.

Throughout the Omnibus I process, an inquiry by the European Ombudsman found multiple procedural shortcomings: it provided insufficient justification for departing from impact assessment requirements; failed to conduct climate consistency assessments required by the European Climate Law; provided inadequate stakeholder consultations; and claims of ‘urgency’ were unjustified. This ultimately led the Ombudsman to assess in November 2025 that the Commission’s approach amounted to maladministration. The Ombudsman criticised the Commission’s justification, arguing that reduced regulatory burdens appear more “as a reflection of the Commission’s priorities than of an objective urgency.” The Commission accepted some responsibility in its response to the Ombudsman’s findings, namely that Better Regulation principles should be applied in a transparent and accountable manner “even in cases of urgency”.

Since February 2025, the Commission has presented twelve Omnibus packages. Ten were put forward without an impact assessment, and seven without any public consultation on the proposal itself. Where the public could contribute, it was mostly through short calls for evidence, while the Commission relied on invitation-only reality checks and targeted consultations. The Commission’s intention is now to codify the practice by modifying the Better Regulation Guidelines accordingly, thereby risking institutionalising these maladministration-prone practices, and increasing the likelihood of policy capture.

However, its commitments for future consultations are minimal, only that a call for evidence, reality check “or other targeted consultations” are conducted in such cases. As the evidence in this report shows, this approach does not deliver the transparency, integrity and accountability in policymaking that Better Regulation is supposed to secure.

BETTER REGULATION GUIDELINES

In 2021, the European Commission brought forward new guidelines intended to inform and improve its policymaking. Their objective is to promote evidence-based policies through broad-scope stakeholder consultations, which may be public, and impact assessments.

- They lay out specific provisions on how the Commission is to ensure open and transparent policymaking, including:
- Open documentation of the policymaking process, including the evidence used to make political decisions
 - Explaining the rationale behind political decisions
 - Warning, in the context of targeted consultations specifically, that “one should avoid granting privileged access to some stakeholders.”

- They are grounded in the Treaty on European Union (TEU) itself:
- Article 11 TEU: “The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society”; “The European Commission shall carry out broad consultations with parties concerned in order to ensure that the Union’s actions are coherent and transparent.”

NARROWNESS OF STAKEHOLDER ENGAGEMENT

The Treaty on European Union commits that “the European Commission shall carry out broad consultations with parties concerned in order to ensure that the Union’s actions are coherent and transparent” (Article 11). In the case of Omnibus I, the Commission claimed that a public consultation was substituted by two sets of events and other methods of collecting information from stakeholders. It alleged this was justified in the context of a deteriorating economic climate and, notably, a political environment with “a clear and urgent demand to the Commission to act swiftly to relieve companies overwhelmed by administrative burden and suffering from deteriorating competitiveness”.

- In the absence of a public consultation, the Commission argued that it conducted “intense outreach to stakeholders”, listing as evidence:
- A call for evidence from 2023, on reporting requirements generally
- Two hybrid meetings on 16 May and 15 November 2024
- A ‘reality check’ on 5 February 2025 and a roundtable on 6 February 2025

The two meetings in 2024 were advertised as “supporting companies in applying” the existing reporting standards, without reference to the prospect of policy change. The ‘reality check’ and roundtable event in February 2025 made use of an exemption to meeting transparency requirements which applies if the meeting is in response to “direct and specific requests from the Commission” for factual information or expertise. This limited definition of the event undermines the subsequent claims from the Commission that the meeting was part of its extensive stakeholder engagement offered in place of a formal consultation.

Policy capture, or the capture of the regulators by the regulated, occurs when a stakeholder gains disproportionate influence over policymakers during the policymaking process – securing privileged access and control relative to other stakeholders and thereby achieving most or all of its objectives for the policy in question. Equal interest representation and evidence-based policymaking are a cornerstone of European democracy. Structurally embedding privileged access for certain interest representations significantly increases the risk of the EU institutions being “captured” by them, undermining the EU’s fairness, institutional legitimacy and democratic credentials.



The Ombudsman concluded that the Commission was:

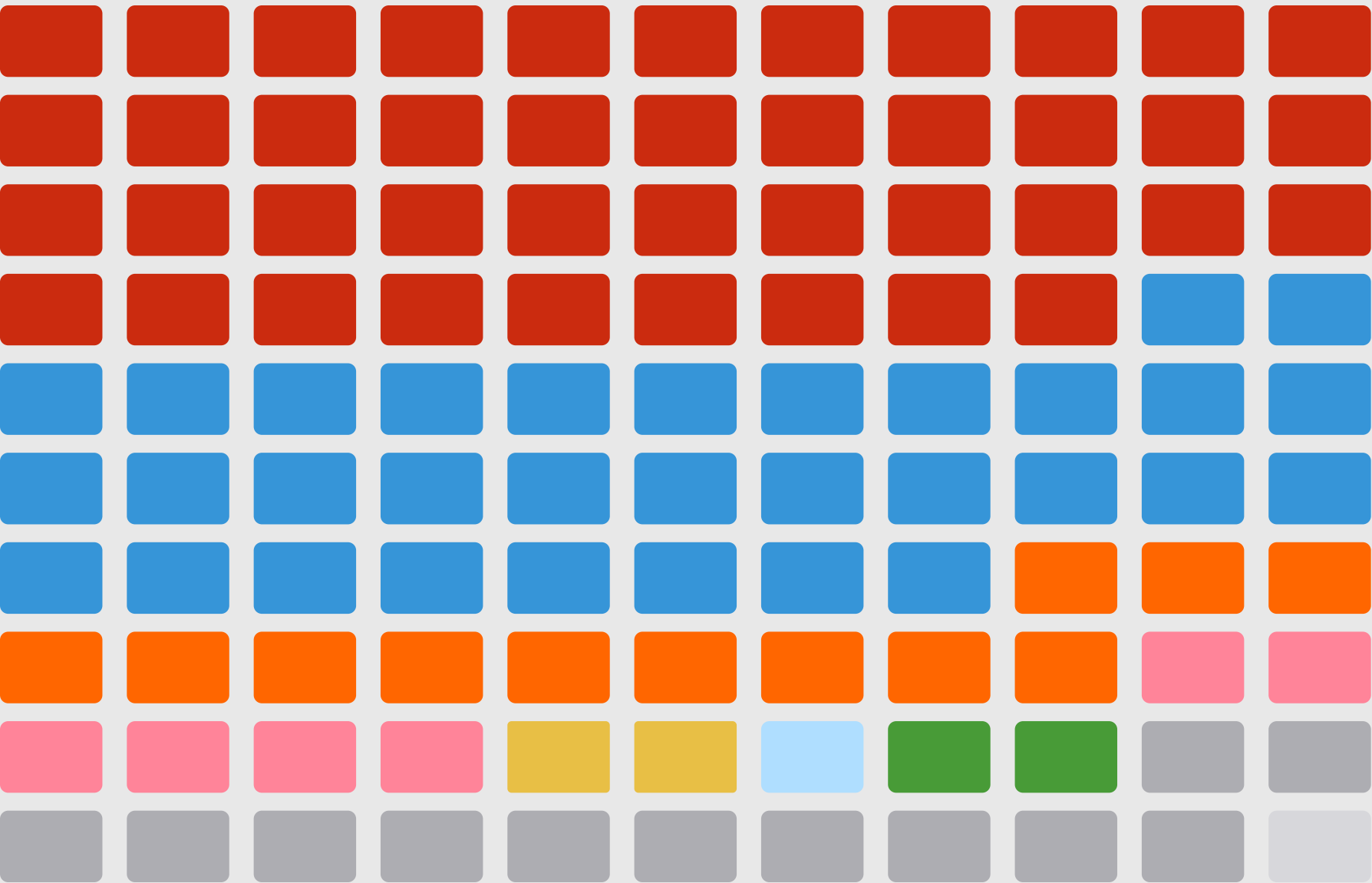
"Not able to explain how it selected stakeholders for the February 2025 events and ensured a balanced representation. In addition, by actively selecting stakeholders to participate in these meetings, the Commission might have excluded other potentially interested stakeholders from participating, especially considering that, according to the documents shared with the Ombudsman, most invited stakeholders were industry representatives."

ROUNDTABLE DEEP DIVE

Transparency obligations for both the Commission and interest representatives do not apply when meetings organised by the Commission are technical in nature. This leaves scope for both avoiding the proactive disclosure of the meetings in question as well as engaging with organisations that are not registered on the EU’s transparency register. A list obtained via an access-to-document request indicates that invitees to the roundtable included 32 companies and 41 industry associations, compared with 13 NGOs.

A breakdown by organisation type highlights a structural imbalance from the outset. Only **12% of the February roundtable seats were allocated to NGOs**. Additionally, 11% of seats were allocated to unregistered organisations, none of which disclose key transparency data such as the interests they represent, their sector or their resources, and none of which are bound by the Register’s Code of Conduct. While several of these are small and medium-sized enterprises (SMEs), the Commission should only invite registered organisations irrespective of the existing transparency loopholes. One organisation whose name reads as a “grocery retail company” could not be identified.

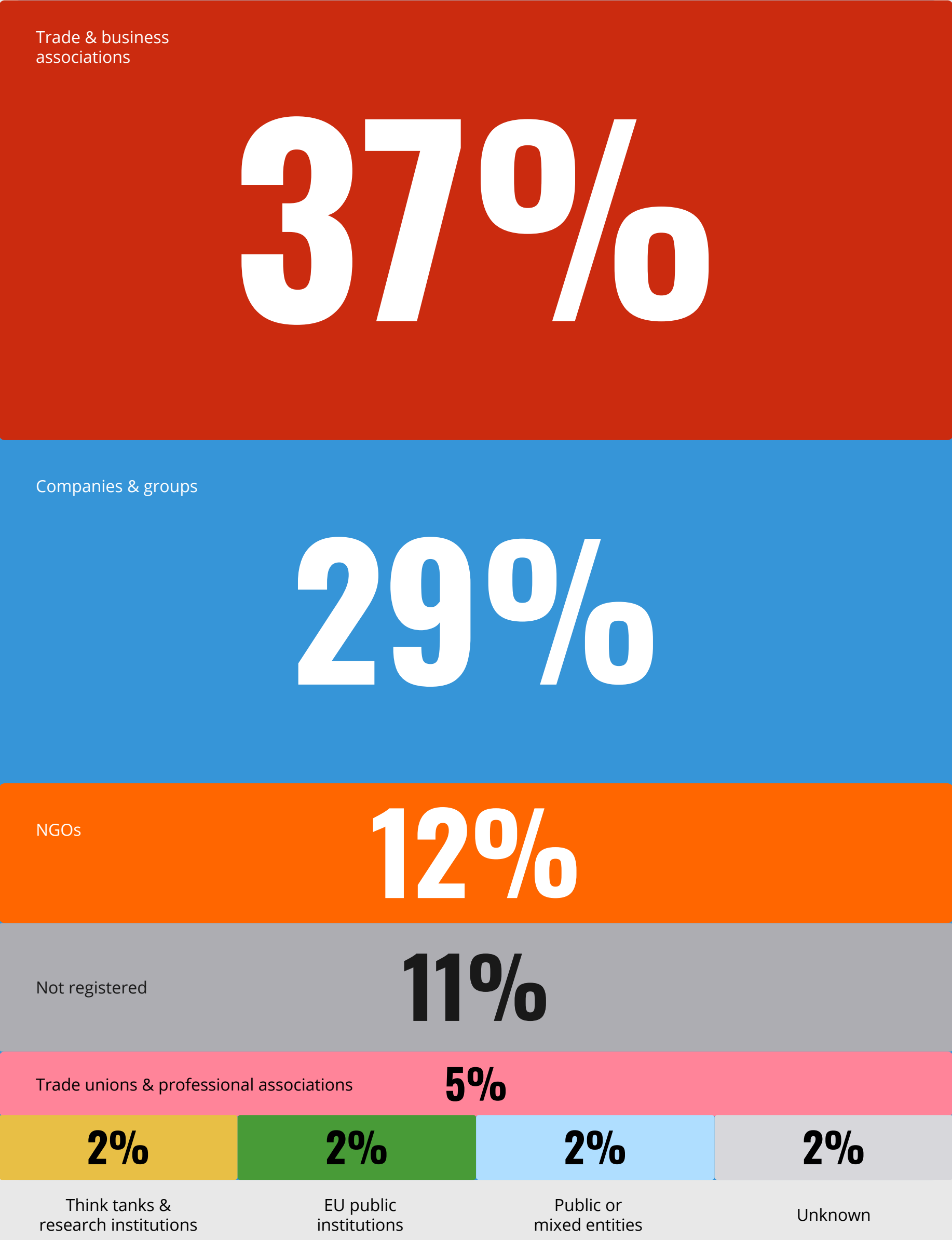
Categories follow Integrity Watch EU labels, which are based on the category each organisation declares in the EU Transparency Register. "Not registered" means not in the register on 6 February 2025, even where the participant is clearly a company; i.co.p. registered only in September 2026 and is counted here. The ECB representative office and the EIB are EU bodies. One participant is anonymised on the Commission list. Airbus and EAPB appear twice on the list and are counted once. Source: Commission Decision C(2026) 5585, annex (list of participants); EU Transparency Register.



110 organisations represented



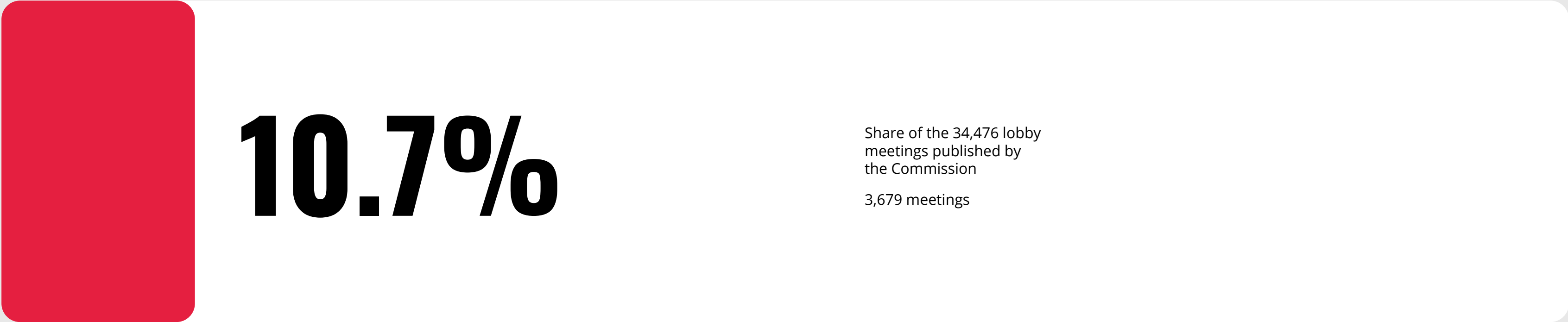
Fig: Who sat at the table. The 110 organisations on the Commission's list of participants, 6 February 2025, by category. Source: Commission Decision C(2026) 5585, annex; EU Transparency Register.



LEVEL OF COMMISSION ACCESS

The 95 registered organisations (out of 110 attendees) include some of the most actively engaged interest representatives in Brussels. Taken together, these organisations have held 3,679 meetings with the Commission between the beginning of the mandate and 1 October 2026. The EU transparency register comprises over 17,000 organisations. It is worth noting that within this timeframe, Commission officials published over 34,000 meetings: **this roundtable of 0.5% of all registered organisations therefore represents 10% of all official stakeholder engagement held so far in this mandate.** This aligns with TI EU’s wider findings, which indicate a structural imbalance across the Commission’s stakeholder engagement: **35 of the registered organisations present at the roundtable belong to the 100 organisations with the most lobby meetings with the Commission**, raising the question of the need for a roundtable with organisations enjoying significant engagement with the Commission in the first place.

Fig: A small circle, a large share of meetings. Source: Integrity Watch EU (Commission meetings, 1 December 2024 to 1 October 2026); EU Transparency Register; Commission Decision C(2026) 5585.

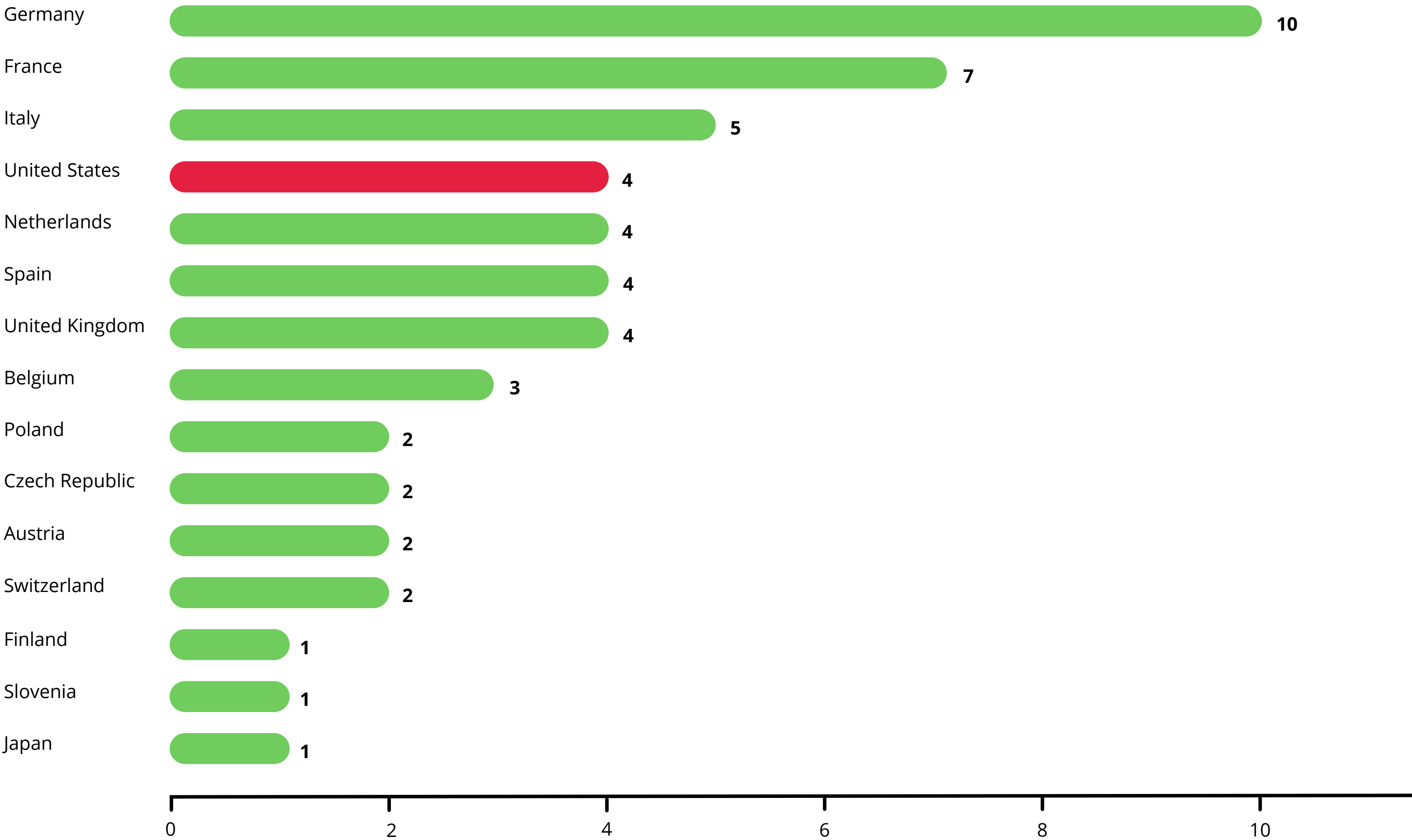


US-LINKED
INTERESTS
HAD GREATER
REPRESENTATION
THAN 22
EU MEMBER STATES

The roundtable wasn't just dominated by **commercial interests** but also displayed a significant **geographical imbalance**, despite such a process affecting all 27 Member States. US-linked interests had greater representation than 22 EU Member States, equal with the Netherlands and Spain.

Who was at the table: national organisations by country

Participants in the 6 February 2025 roundtable, excluding 57 EU-level or international associations and EU bodies



Only 11 of the 27 Member States had a national organisation present (12 counting the EIB, an EU body based in Luxembourg).
Source: Commission Decision C(2026) 5585, annex (list of participants); EU Transparency Register. US-linked = AmCham EU, ExxonMobil, PepsiCo, Mondelez.

DIRECT LOBBY MEETINGS WITH STAKEHOLDERS

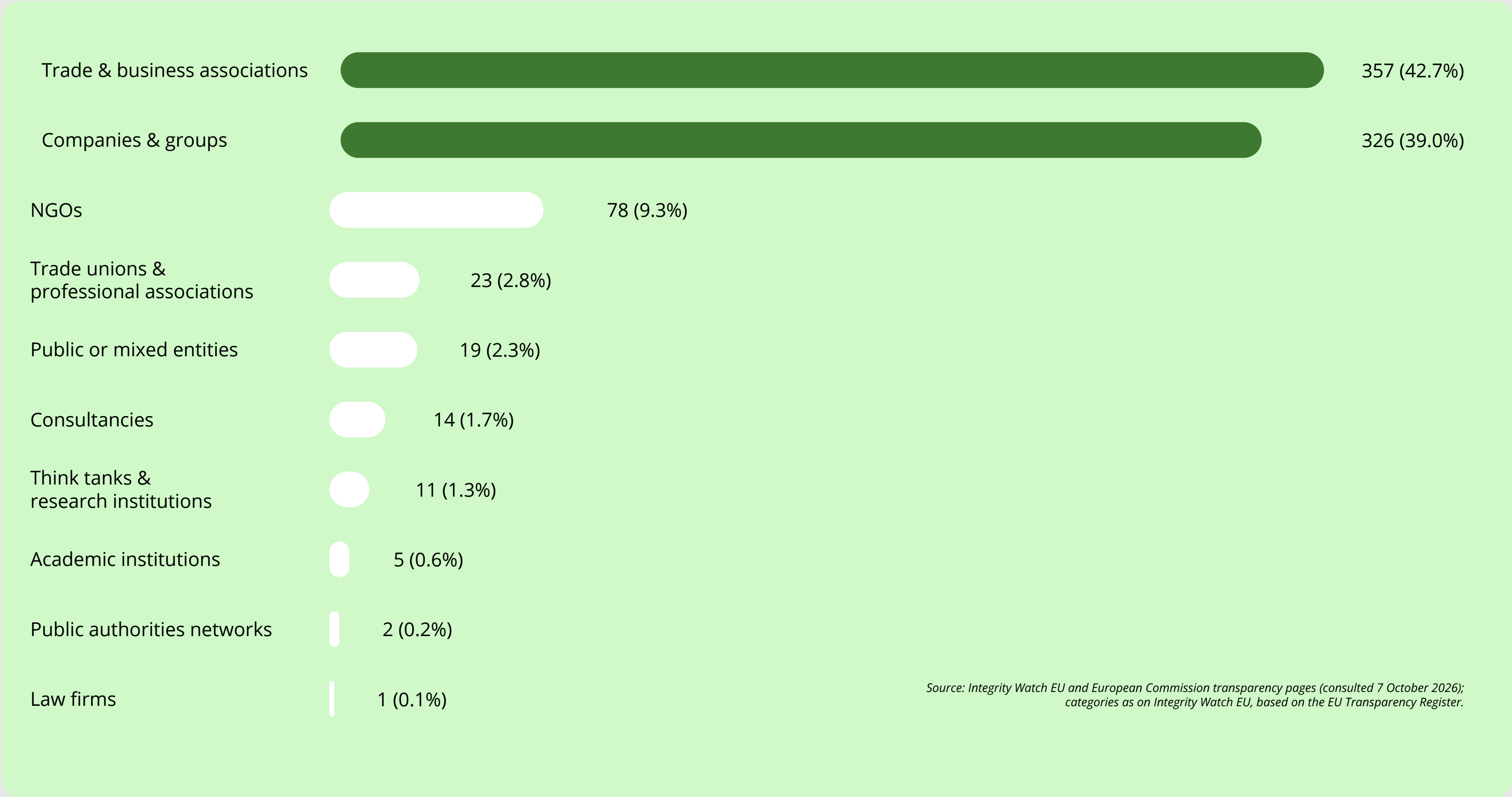
Public officials play a critical role in ensuring a level playing field where all voices are heard equally – private and public interests alike. This core aspect of the Better Regulation Principle should ensure that, at the very least, a diversity of voices is consulted for policy affecting all EU citizens. This means that top-level officials must set an example in practice, which has been the norm since the beginning of the Juncker Commission. Yet deeper analysis of the lobby meetings of **Commissioner Dombrovskis (the Commissioner in charge of simplification, including the CSRD and CSDDD) and his cabinet, as well as those of Swedish European People’s Party (EPP) MEP Jörgen Warborn (the Parliament’s Rapporteur for Omnibus I)**, reveals that this norm has not merely been broken, it has been actively reversed.



Commissioners Valdis Dombrovskis and Maria Luís Albuquerque at a press conference on the Omnibus:
© European Union 2025 - Source : EP

COMMISSIONER DOMBROVSKIS AND HIS CABINET

Since the beginning of the second von der Leyen Commission on 1 December until 1 October 2026, Commissioner Dombrovskis and his cabinet held a total of 836 meetings with individual lobby organisations. Of those meetings, simplification, competitiveness, and the Omnibus were the main topics of discussion over 70% of the time, highlighting a stark focus within Dombrovskis’s portfolio. Of all meetings published by Dombrovskis and his cabinet since the beginning of the mandate, only 9% were with NGOs. This is even lower than the Commission’s average of 15% across all meetings held with NGOs, suggesting that balanced stakeholder consultation is an afterthought when it comes to direct engagement with EU interest representatives by the leading policymakers on these Directives.



70%+

on simplification, Omnibus or competitiveness from meeting minutes

836

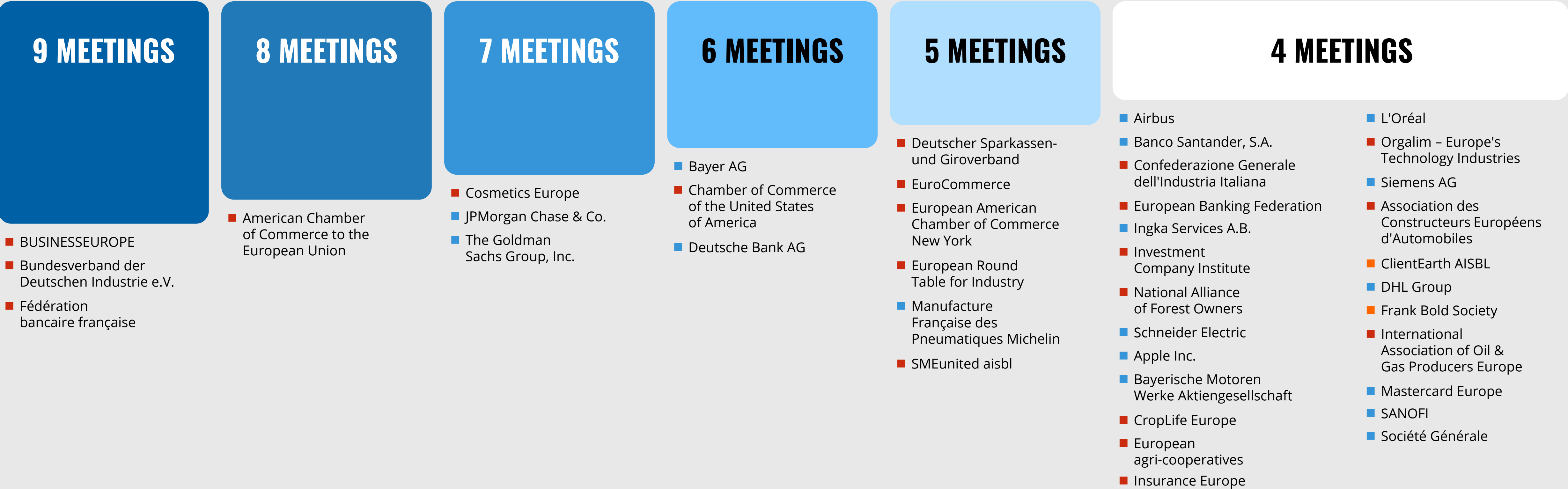
contacts with lobby organisations

9%

of contacts with NGOs

40 organisations met four times or more

When looking at the top organisations that held the most meetings with Dombrovskis and his cabinet, all but two entities represent commercial interests, the exceptions being the Czech NGO Frank Bold Society and the global environmental NGO ClientEarth.

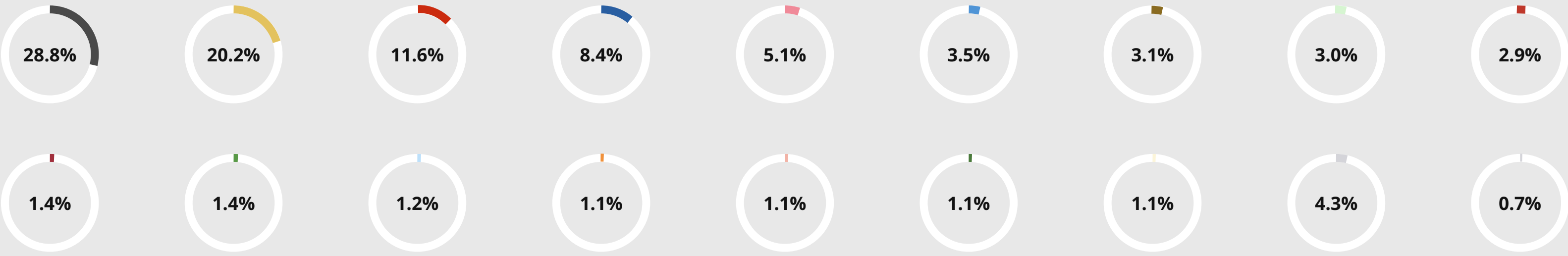


■ Companies & groups
■ Trade & business associations
■ NGOs

Source: Integrity Watch EU and European Commission transparency pages (consulted 7 October 2026); categories as on Integrity Watch EU, which are based on the EU Transparency Register.

Breaking this down by country, and factoring in that many international organisations declare their headquarters in Brussels, we still find that Dombrovskis and his cabinet met more often with **US-linked organisations** (97 meetings) than with entities from any individual EU Member State other than Germany (169). This means the United States outranks organisations in 25 Member States, five of which (Cyprus, Greece, Malta, Romania and Slovenia) had no representation at all. US interests are also prominent among his most frequent interlocutors: of the 16 organisations he and his cabinet met five times or more, five represent US interests, namely JPMorgan Chase, Goldman Sachs, the US Chamber of Commerce, the American Chamber of Commerce to the EU to the EU (AmCham EU) and the European American Chamber of Commerce to the EU New York. Only German organisations fare better, taking up 20% of lobby contacts. This matters because the stated rationale for the simplification agenda is reducing administrative burden on European SMEs, only a handful of which were actually part of the roundtable.

	Belgium	241		Czech Republic	12
	Germany	169		Sweden	12
	United States	97		Denmark	10
	France	70		Ireland	9
	United Kingdom	43		Austria	9
	Netherlands	29		Luxembourg	9
	Italy	26		Switzerland	9
	Spain	25		Other countries	36
	Finland	24		Not stated	6

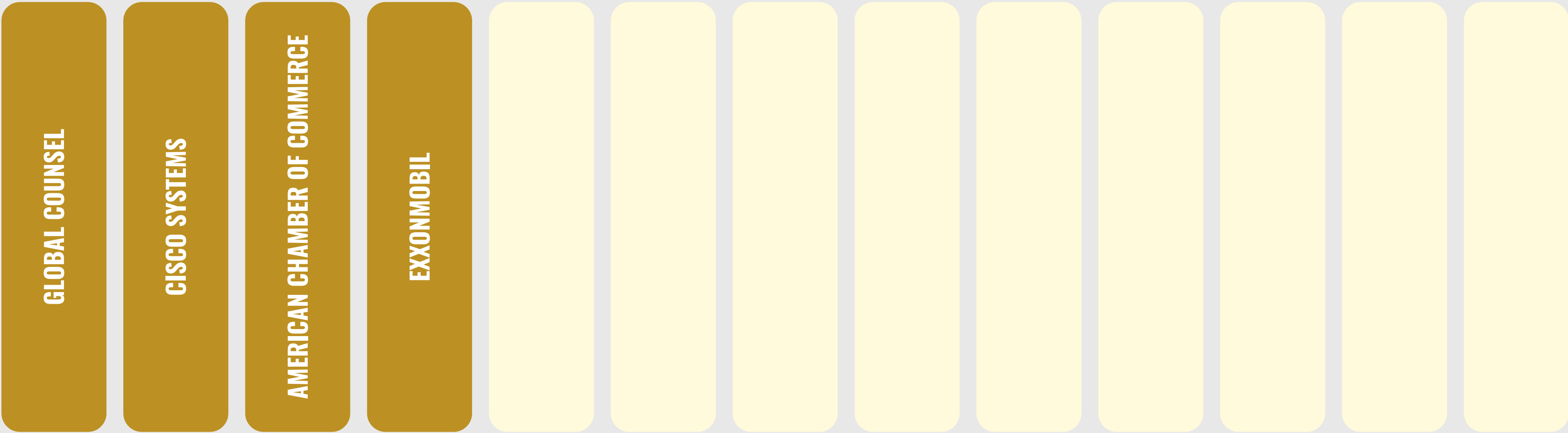


Source: Integrity Watch EU and European Commission transparency pages (consulted 7 October 2026); categories as on Integrity Watch EU, which are based on the EU Transparency Register.

It is particularly instructive to consider the meetings of Commissioner Dombrovskis in the three months between his appointment in November 2024 and the publication of the Omnibus I proposal in February 2025. Commissioner Dombrovskis took just twelve meetings in this crucial period. One third of these were with non-EU stakeholders on the topic of simplification, competitiveness and/or Omnibus, namely Global Counsel, Cisco Systems, the American Chamber of Commerce and ExxonMobil.



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12 meetings between 1 Dec 2024 and 26 Feb 2025



Overall, the picture that emerges from Dombrovskis’s interactions with EU-registered lobby organisations shows a severe imbalance, not only in the profile of organisations consulted, but also in their geographic spread.

JÖRGEN WARBORN MEETINGS

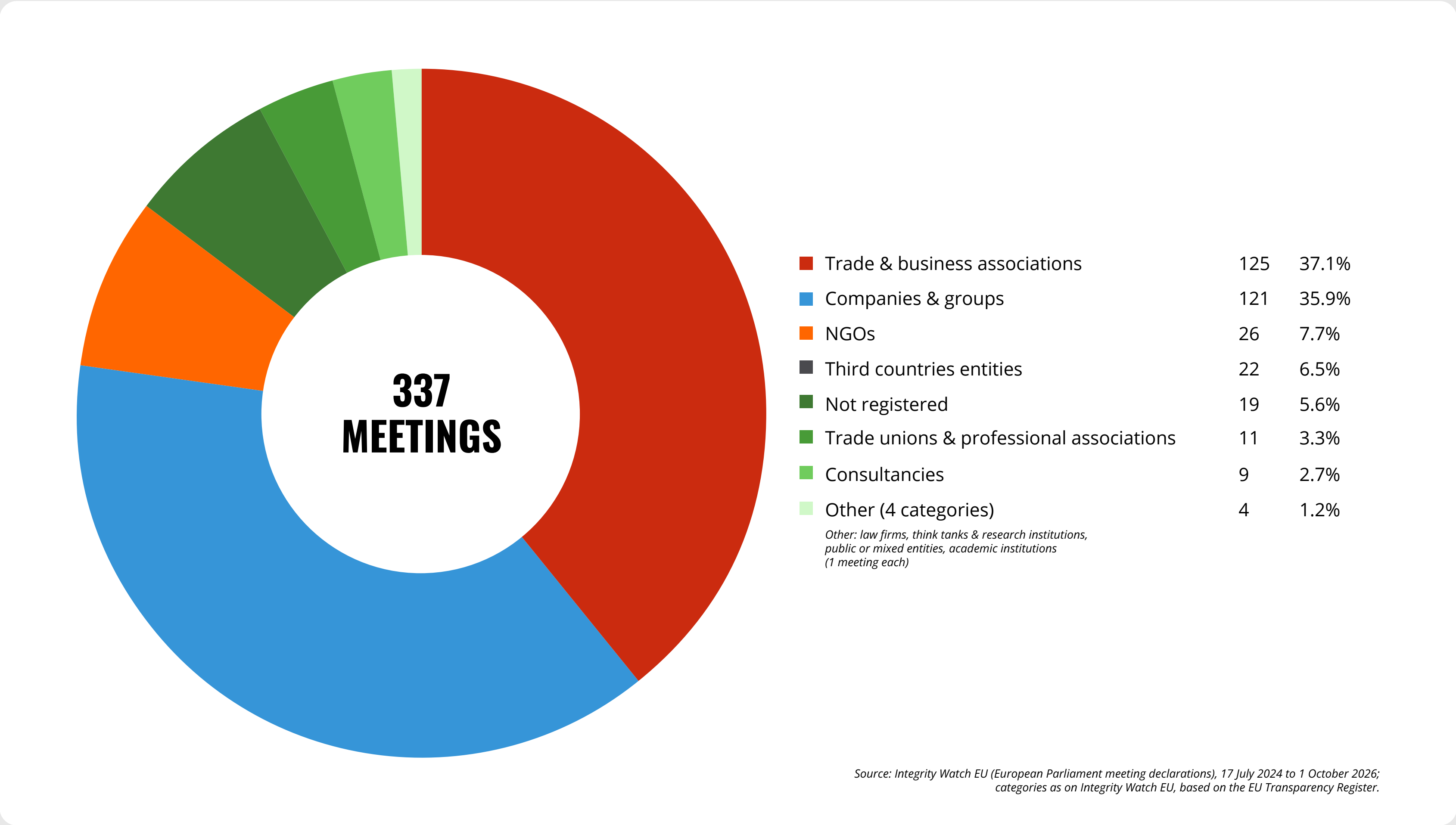
Jörgen Warborn is Dombrovskis’s counterpart in the European Parliament. As the Rapporteur in charge of steering the Omnibus I proposal through an accelerated legislative process, he oversaw the progress of the Parliament’s position on the legislation.



*Warborn at a European Parliament plenary session presenting the Better Regulation and Enforcement Communication:
© European Union 2026 - Source : EP*

JÜRGEN WARBORN MEETINGS

From the beginning of the current legislative mandate, Warborn had 337 contacts with individual lobby organisations.¹ 22% of his meetings were held on subjects related to simplification, Omnibus or competitiveness. Warborn fares even worse than his Commission counterpart in terms of stakeholder diversity, with only 8% of all contacts held with NGOs. While not subject to any specific balanced stakeholder consultation guidelines, such a lack of engagement with alternative voices gives rise to a call for Parliament to adopt balanced stakeholder consultation rules, particularly for MEPs in charge of drafting files.



Source: Integrity Watch EU (European Parliament meeting declarations), 17 July 2024 to 1 October 2026; categories as on Integrity Watch EU, based on the EU Transparency Register.

337

contacts with lobby organisations

22%

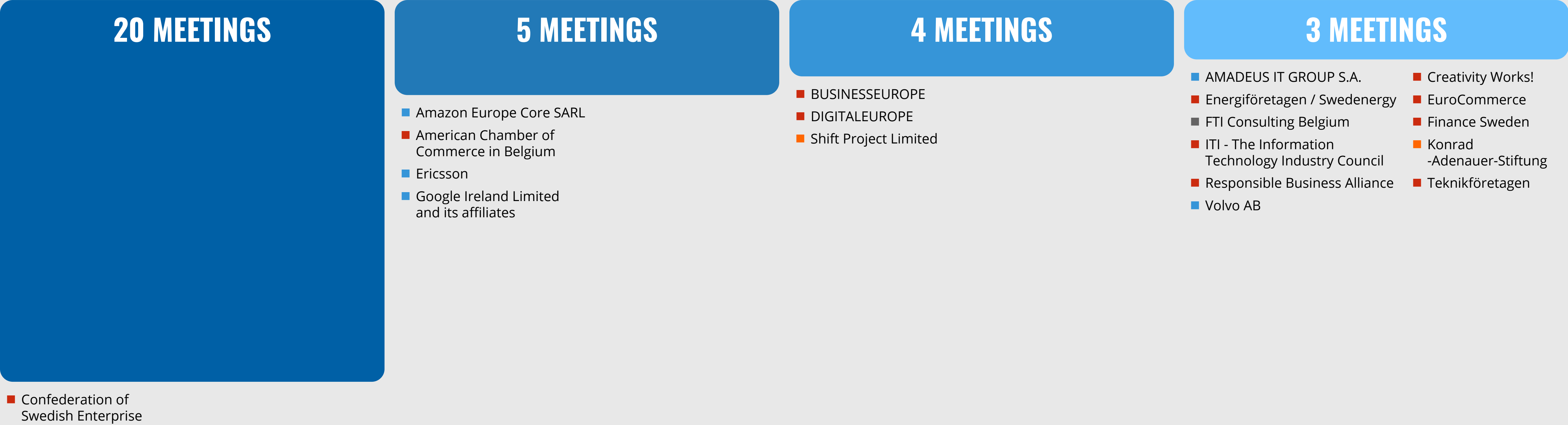
on simplification, Omnibus or competitiveness

7.7%

of contacts with NGOs

¹MEPs may log meeting subjects as they see fit, so this figure is based on MEP assessment.

In terms of top organisations consulted, the Confederation of Swedish Enterprise stands apart (Warborn is Swedish), with 20 contacts. Beyond this concentration, US corporate interests also feature prominently, with Google, Amazon and the American Chamber of Commerce in Belgium all appearing in the top five, with five contacts each. Shift Project Limited is the highest-ranked NGO, in joint sixth place with four contacts. The only other non-commercial entity in the top 20, the Konrad-Adenauer-Stiftung, is hardly a traditional NGO: it is the political foundation of the Christlich Demokratische Union Deutschland (CDU), a German member party of MEP Warborn's own political family, the EPP.



- Companies & groups
- Trade & business associations
- NGOs
- Consultancies

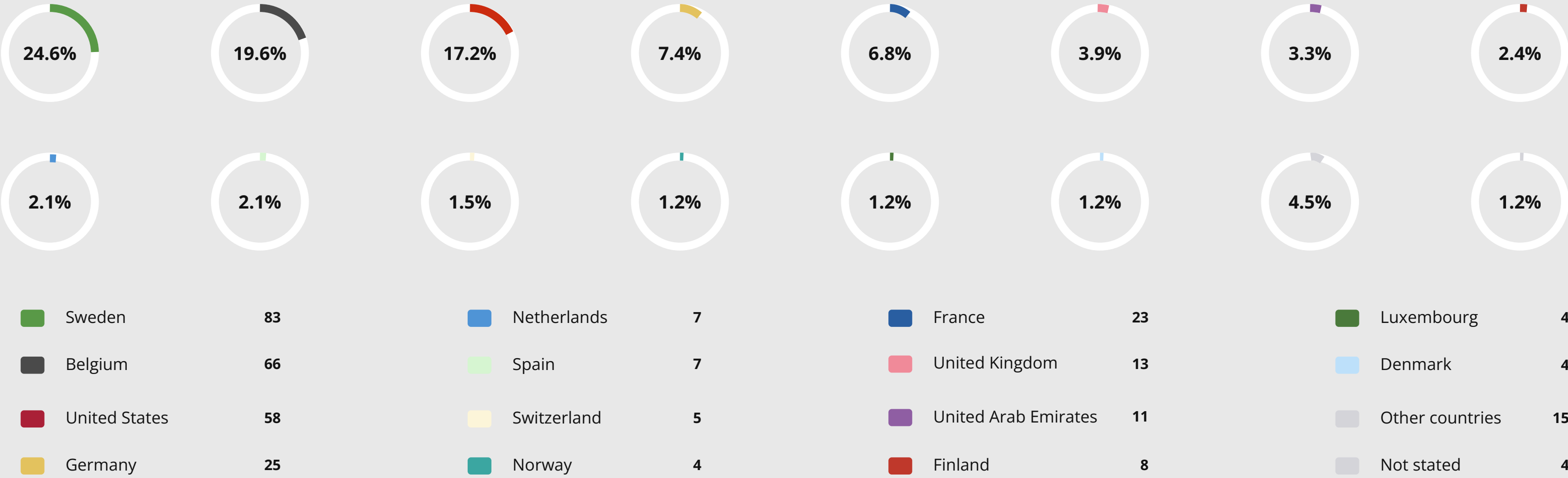
19 organisations had three meetings or more; the next level (two meetings) is a long tie, so the ranking stops at three. Period: 17 July 2024 to 1 October 2026. Source: Integrity Watch EU (European Parliament meeting declarations); categories as on Integrity Watch EU, which are based on the EU Transparency Register.

Setting aside Brussels-based EU-level organisations, which account for almost all of the 66 meetings with Belgian-registered entities, **US-linked organisations account for 58 of Mr Warborn's meetings (17.2%)**. That is second only to his native Sweden (83) and more than twice as many as Germany (25) or France (23). Four of the eight organisations he met four times or more are US-linked. Furthermore, in 2025 when he led Parliament's work on the Omnibus I file, US-linked organisations were Mr Warborn's most frequent interlocutors by country, with 51 meetings, ahead of organisations from his native Sweden (48). This appears to run against the grain of his central argument, which, like the Commission's, rested on the need to simplify due diligence rules for European SMEs. This framing is all the more notable given that, while leading Parliament's work on Omnibus I, Mr Warborn also served as president of SME Europe, an EPP-affiliated organisation registered on the EU Transparency Register. Ten civil society organisations, including TI EU, have filed an ethics complaint with the Advisory Committee on the Conduct of Members arguing that he failed to declare this as a potential conflict of interest.

It is worth mentioning here that unlike the Commission, where decisions follow a largely top-down process, the European Parliament's legislative work normally involves several political groups. Each group may appoint a shadow rapporteurs to follow the file and negotiate compromise amendments with the rapporteur, so a rapporteur's meetings do not on their own capture the full range of interests heard during the Parliament's deliberations. Many Shadow rapporteur appointed for Omnibus I did meet with a wider range of stakeholders, including NGOs, to help draft a collective compromise text. However, this process largely broke down in plenary where the most deregulatory version was adopted owing to a controversial alliance between Warborn's centre-right EPP group and far-right political groupings, with most members of the other political groups voting against.

Taken together, the meetings of Commissioner Dombrovskis and Warborn MEP paint a consistent picture. On the very files sold as relief for European SMEs, the officials in charge have overwhelmingly consulted **large corporations, US-linked interests and industry federations, with non-governmental organisations, trade unions, and actual small-business voices reduced to a thin margin of the conversation**. The result is a text widely characterised as the most deregulatory version on the table.

In the graph, countries with four meetings or more are shown individually (14 countries); the rest are grouped as "Other countries". Belgium is shown in grey for the same reason as in the Dombrovskis graph. Period: 17 July 2024 to 1 October 2026. Source: Integrity Watch EU (European Parliament meeting declarations); categories as on Integrity Watch EU, which are based on the EU Transparency Register.



OMNIBUS OUTCOMES OF AN ACCELERATED PROCEDURE

The European Union adopted the amended Omnibus I Directive on 24 February 2026, just under one year after the Commission published its proposal:

- The simplification package **narrowed the scope of entities required to report** under the CSRD to EU companies with more than 1,000 employees and net annual turnover exceeding €450 million (up from the original threshold which captured large undertakings that met two of the three criteria of 250 employees, €25 million balance sheet total, or €50 million net turnover).
- The **threshold for non-EU entities was also raised**, requiring reporting if they have both consolidated turnover exceeding €450 million in the EU and a subsidiary in the EU with turnover exceeding €200 million (up from consolidated turnover of €150 million and a large subsidiary in the EU or a branch in the EU with turnover exceeding €40 million).
- The **scope of the CSDDD was also rolled back**, raised to EU companies with over 5,000 employees (up from 1,000) and with over €1.5 billion turnover worldwide (up from €450 million) while non-EU companies need a €1.5 billion turnover in the EU.
- Crucially, **Article 22 of the CSDDD was removed**, which required entities to “adopt and put into effect a transition plan for climate change mitigation which aims to ensure, through best efforts, that the business model and strategy of the company are compatible with the transition to a sustainable economy and with the limiting of global warming to 1.5 °C in line with the Paris Agreement.” Companies in scope of the CSRD will still have to report on their climate transition plan where it exists, but the requirement to adopt and implement such a plan, a cornerstone of the overall framework, has been eliminated.

The original CSDDD itself, adopted in June 2024, barely had time to be implemented before it was revised by the new Commission, contradicting yet another core tenet of the **2021 Better Regulation Guidelines**. These explicitly outline an “evaluate first” principle, which requires timely analysis of real-world impact of legislation before it is revised. Notably, 6 weeks before the proposal was published, a group of major companies including Nestlé, Ingka Group (IKEA), Mars and Unilever had already urged the Commission not to reopen the CSDDD, arguing that the most practical way to support competitiveness was to provide clear guidance on implementing the law rather than revising it before it had even applied. In expediting the rolling back of the scope of companies required to report on climate risk and due diligence, weakening consequences for non-compliance, removing an obligation to develop a transition plan, and eliminating sector-specific climate disclosure standards, EU policymakers appear to have aligned, for the most part, with the most oppositional industry voices.

One such vocal oppositional voice, ExxonMobil, strongly engaged on the CSDDD, characterising the Directive as “bone crushing” and advocating for the Trump administration to use trade talks to fight the regulation. In September 2025, **Exxon’s** CEO Darren Woods said the EU should “repeal this legislation and do away with it” and in November 2025 Woods stated that the policy was “suffocating the economy” in Europe. In November 2025, the company along with QatarEnergy threatened to stop doing business with the EU if it did not roll back the CSDDD. Indeed, the **level of access on the Omnibus I by some US corporations** is further illustrated by the bilateral meeting Commissioner Dombrovskis had with ExxonMobil Petroleum & Chemical on 5 February, one day before the roundtable. Following the finalisation of the Omnibus package Exxon claimed that the CSDDD had been “modified because of our advocacy”.

Overall, some of the most negative positions came from **fossil fuel players and cross-sector groups**. In June 2025, FuelsEurope, Eurogas, and the International Association of Oil & Gas Producers Europe (IOGP Europe) called on policymakers to delete the transition plan requirement under CSDDD. In October 2025, IOGP Europe, along with Eurogas and FuelsEurope wrote to Parliament calling for removal of Article 22 which mandated companies to adopt climate transition plans in line with the Paris Agreement and asserting that the CSDDD constitutes “extra-territorial overreach.” In a November 2025 press release FuelsEurope supported the Parliament’s negotiating position on CSRD and CSDDD which raised the threshold for CSRD reporting further than initially proposed by the Commission. TotalEnergies, along with Siemens AG, a technology and engineering multinational, in an October 2025 letter to French President Macron and German Chancellor Merz, advocated for abolition of the CSDDD. These voices were not only well represented at the 6 February 2025 roundtable and bilateral meetings, but their push for deregulation also received a far more receptive audience than those cautioning against reopening a major pillar of the European Green Deal.



Ursula von der Leyen at the Antwerp Declaration:
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CONCLUSION

The Omnibus I process resulted in a playing field that was never level to begin with and is now even further skewed. But the Commission did not just tilt the table randomly. Instead, it tilted it towards a specific kind of business: large, representing highly polluting interests, headquartered in a few Member States or the US, and already deeply embedded in EU policymaking. Deregulation, as designed here, is not a neutral technical exercise. It is in essence a process engineered by and for the interests that already benefit from outsized access. What remains in its wake is the potential dismantling of the architecture of the EU’s accountability and transparency towards its citizens.

The European Commission's own 2021 Better Regulation Guidelines instruct officials to "consult broadly and transparently among stakeholders (...) seeking a whole spectrum of views in order to avoid bias or skewed conclusions promoted by specific constituencies ('regulatory capture')." As this report has shown, the Omnibus I process subverted both instructions. A **narrow set of interests was over-represented** in the closed-door consultation that took the place of a public one, and, running in parallel, a system of **privileged bilateral access** took the form of direct meetings between key policymakers and large multinational companies or their industry association representatives.

In light of the European Ombudsman's finding of maladministration, the European Commission has embarked on a review of its Better Regulation Guidelines and toolbox. Its Communication, however, falls short of the principles embedded in the original 2021 guidance. It commits, in principle, to publishing a call for evidence even under accelerated procedures, to documenting urgency assessments and derogations in explanatory memoranda, and to extending impact assessments to a wider range of initiatives. However, this is left to the appreciation of a single Commissioner, and justification of this may be up to three months ex post. Strikingly, the new Better Regulation Communication is silent on the specific failure that both the Ombudsman and this report have identified: that the Commission was ‘not able to explain how it selected stakeholders.' There is no commitment to proactive disclosure of participant lists, agendas or minutes for targeted consultations, no balance criteria for stakeholder selection, and no requirement that participants be on the Transparency Register. This means that targeted consultations, such as implementation dialogues and reality checks foreseen in the updated better regulation guidance, could well become the norm rather than the exception, eschewing the **transparency obligations**, evidence-based policymaking and balanced stakeholder engagement that serve as essential safeguards against policy capture.

The risk now is that the Better Regulation revision, rather than reasserting the 2021 guidance, retrofits the rulebook around the practice that breached it. Over 50 civil society organisations have written to the Commission to make the case for improved application of Better Regulation rules, especially in light of the Ombudsman’s findings, citing the risk to “democratic values, fundamental rights and evidence-based policymaking” in favour of expediency.

It is essential that EU legislation avoid a repeat of this pattern of policy-capture. Failure to do so risks further eroding the EU’s transparency and accountability architecture, institutionalising a practice that weakens the EU’s democratic legitimacy.

12%

of seats at the February 2025 roundtable went to NGOs

9%

of meetings held by Commissioner Dombrovskis and his cabinet were with NGOs

8%

of MEP Warborn’s meetings were with NGOs

US > 22

US-linked interests outnumbered organisations from 22 Member States at the roundtable

<4%

of their meetings were with SMEs, the very businesses Omnibus I was meant to relieve

RECOMMENDATIONS

PROCESS

- The Commission should end the use of “accelerated” processes to circumvent Better Regulation guidelines on formal consultation and impact assessments. In the rare case of accelerated procedures, these should be thoroughly justified prior to the start of the procedure.

INCLUSIVENESS

- The revision of the Better Regulation guidelines and corresponding toolbox must reinstate broad stakeholder engagement and evidence-based policymaking as core guiding principles to prevent policy capture. Any deviation must be conducted on an exceptional basis and not left to the sole discretion of Commissioners.
- The European Commission and the European Parliament should adopt balanced stakeholder engagement guidelines, that stipulate a fair balance between varied geographic, sectoral and non-commercial and commercial interests.

TRANSPARENCY

- Targeted stakeholder consultations, including roundtables, reality checks and implementation dialogues should be proactively disclosed and must include, at minimum, participant lists, agendas and minutes.
- Conversely, the Commission’s transparency obligations applicable to top Commission officials and managers must also apply to meetings organised at the specific request of the Commission, its representatives or staff, for factual information, data or expertise.
- Records of meeting minutes for all interest representative engagement should be published in open data formats on the EU open data portal.
- Where applicable, interest representative engagement should be connected to a legislative database including consultation responses.
- MEPs and their assistants must only meet with interest representatives properly registered on the Transparency Register.