



President of the European Commission, Ursula von der Leyen
Executive Vice-President of the European Commission, Teresa Ribera
Executive Vice-President of the European Commission, Stéphane Séjourné
Commissioner Valdis Dombrovskis

20 January 2025

Omnibus package proposal

Dear Ms von der Leyen, Ms Ribera, Mr Séjourné and Mr Dombrovskis,

We understand that the College of Commissioners plans to discuss the Omnibus package of a chapeau communication and omnibus proposal on 26 February 2025, which presumably might affect the adopted Corporate Sustainability Due Diligence Directive (CSDDD – Directive 2024/1760).

In our view, the current CSDDD represents an important step forward in driving the necessary transformation of the cocoa and chocolate sector and in making human rights and environmental due diligence the norm in global value chains. Through the Cocoa Coalition, we have called for EU-wide due diligence legislation since our [joint paper in 2019](#).

Member states are now starting to transpose the CSDDD into their national legislation to allow for companies to prepare for implementing their CSDDD obligations on time.

A failure to implement the CSDDD on time would undermine the position of those companies aiming to put in place systems that protect human and labour rights and the environment. It would risk the emergence of a patchwork of national legislation in EU member states, increasing compliance costs without any benefit to the sector or consumers. This would be a major setback to sustainability in global supply chains.

In order to prevent more uncertainty and delays, we urge the European Commission to focus on the preparations as required in the CSDDD. We call upon the European Commission not to undertake any modification of the adopted text of the CSDDD, nor to reopen it for renegotiation by the co-legislators.

Companies have over two years to prepare for implementation. We are confident that with clear guidance and timely support from the European Commission, implementation of the CSDDD provisions will be practical and workable for companies, sectors, and the European economy.

It is crucial that the Directive is supported by guidance, including on what companies are accountable for, and accompanying measures, especially to support upstream economic actors and vulnerable stakeholders in global value chains. We call on the European Commission to prevent further delays and engage with relevant stakeholders, including through the public consultation – originally planned for Q4 2024 – on the guidelines to support the implementation of the CSDDD.

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