

# H/ADVISORS

## 2025 Commission Work Programme

12 February 2025



*"Our era's greatest challenges – from security to climate change to competitiveness – can only be solved through joint action. Against this backdrop, I believe Europe must choose its best option: Union."*  
- President Ursula von der Leyen

## INTRODUCTION

The European Commission's [2025 Work Programme](#) introduces a comprehensive set of initiatives aimed at enhancing competitiveness, simplifying regulations, and supporting innovation across finance, sustainability, technology, and other key sectors. With a focus on fostering long-term growth and investment, the Commission will roll out reforms such as the Savings and Investments Union Strategy, the Omnibus packages, and the Clean Industrial Deal,

which are designed to streamline processes, reduce compliance burdens, and facilitate cross-border trade. These measures will impact a wide range of industries, from financial institutions and technology companies to manufacturers and agri-food businesses and require proactive engagement with policymakers to ensure that business needs are effectively addressed in the evolving regulatory landscape.

If you would like to discuss the impact of the 2025 Commission Work Programme, get in touch with members of our H/Advisors Brussels team:



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# TECHNOLOGY

The European Commission's 2025 tech agenda reflects its ambition for a "bolder, simpler, and faster Union," with a focus on cybersecurity, connectivity, emerging technologies, and Artificial Intelligence (AI).

AI remains a core priority, through the **AI Content Action Plan** planned to accelerate AI adoption and strengthen Europe's tech competitiveness. The "**Apply AI**" Strategy will encourage greater AI uptake, working alongside the already announced **AI Factories** initiative to build Europe's competitive AI ecosystems. The upcoming **Digital Package** will encompass initiatives like the **Cybersecurity Act Review**, which is set to streamline the EU's cybersecurity landscape by eliminating reporting redundancies and simplifying certification schemes, a move that will be welcomed by businesses facing overlapping obligations. Equally, the new **European Security Strategy** will outline a revised approach to the evolving threat landscape, including hybrid threats, disinformation and cyberwarfare. On connectivity, the **Digital Networks Act** will focus on modernising Europe's connectivity infrastructure.

Companies operating in highly regulated sectors—such as digital platforms, telecoms, and AI firms—will need to adapt to both new policies and the enforcement of existing rules (e.g. DSA, AI Act).

## Legislative:

- Digital Networks Act – **Q2 2025**
- Digital Package including the Cybersecurity Act Review and simplification of cybersecurity legislation – **Q4 2025**

## Non legislative:

- Action plan on the cybersecurity of hospitals and healthcare providers – **15 January 2025** (*already launched*)
- New European Internal Security Strategy – **26 March 2025**
- AI Continent Action Plan (as part of which the Commission will work on the Apply AI Strategy and the AI Factories initiative) – **Q1 2025**
- Quantum Strategy of EU – **Q2 2025**
- European Democracy Shield – **Q3 2025**

# FINANCIAL SERVICES

The European Commission's 2025 financial services agenda will lay the groundwork for deeper reforms in the 2024-2029 mandate, focusing on enhancing European competitiveness, simplifying regulations, and strengthening capital markets. 2025 will serve as a transition phase, setting the stage for more comprehensive reforms expected from 2026 onwards.

The **Savings and Investments Union Strategy** will outline a long-term vision for capital market development, with an initial focus on boosting retail investment and long-term financing. The **review of the Securitisation Regulation** sets out to stimulate private capital flows and enhance market competitiveness, while the **Sustainable Finance Disclosures Regulation (SFDR) review** will respond to industry concerns over reporting complexity. The **second Omnibus package** will streamline investment processes, reducing regulatory fragmentation and administrative hurdles for financial institutions.

These initiatives will have far-reaching effects: asset managers and banks will need to adapt to evolving disclosure and investment frameworks, while corporates seeking financing may benefit from more dynamic capital markets.

## Legislative Initiatives

- Second Omnibus package on investment simplification – **Q1 2025**
- Review of the Securitisation Framework – **Q2 2025**
- Revision of the Sustainable Finance Disclosure Regulation – **Q4 2025**
- Evaluation of State aid rules for banks in difficulties – **Q4 2025**

## Non-legislative Initiatives

- Communication on a Savings and Investments Union – **19 March 2025**

# SUSTAINABILITY & DECARBONISATION

The European Commission's 2025 sustainability agenda will maintain a strong commitment to decarbonisation while shifting towards regulatory simplification and easing compliance burdens for businesses.

The **first Omnibus package** will address regulatory overlaps across the **Corporate Sustainability Due Diligence Directive (CSDDD)**, the **Corporate Sustainability Reporting Directive (CSRD)**, and the **Taxonomy**. Meanwhile, the **Clean Industrial Deal** will outline measures to expand green technology manufacturing, including hydrogen, chemicals, biotech, and nanotech. The **European Climate Law amendment** will make the EU's 2040 emissions reduction target of 90% legally binding, and the **Industrial Decarbonisation Accelerator Act** will focus on boosting investment in clean technologies. The **revision of REACH** aims to simplify chemical regulations while maintaining high safety and environmental standards. In parallel, a **Sustainable Transport Investment Plan** will support the move to cleaner transport through infrastructure development and the promotion of sustainable fuels.

These initiatives will impact a wide range of industries, from manufacturers and energy-intensive sectors to financial institutions navigating evolving sustainability requirements..

## Legislative

- First Omnibus package on sustainability – **26 February 2025**
- Industrial Decarbonisation Accelerator Act – **Q4 2025**
- European Climate Law amendment – **Q1 2025**
- Targeted revision of the REACH Regulation – **Q4 2025**
- Industrial Decarbonisation Accelerator Act – **Q4 2025**

## Non-legislative

- Clean Industrial Deal – **26 February 2025**
- Action plan on affordable energy – **26 February 2025**
- Sustainable Transport Investment Plan – **Q2 2025**

## FAST-MOVING CONSUMER GOODS

The European Commission's 2025 agenda for food and agriculture will focus on enhancing competitiveness, ensuring sustainability, and simplifying regulatory burdens for businesses across the FMCG value chain.

Key initiatives will include the **Vision for Agriculture and Food**, which is set to outline long-term sectoral priorities, and the **Common Agricultural Policy (CAP) simplification package**, aimed at reducing administrative burdens for food producers. The enforcement framework for the **Unfair Trading Practices Directive** will strengthen protections for farmers and suppliers against dominant retailers, ensuring fairer competition within the supply chain. Meanwhile, the review of the **REACH** will introduce updates that could impact food packaging and processing industries, particularly in terms of chemical use compliance. On sustainability, the **Bioeconomy Strategy** will support innovation in biodegradable packaging and alternative proteins and may include a legislative proposal on Biotech.

These developments will have significant implications for businesses across the FMCG sector. Retailers and food producers will need to navigate evolving rules on trading practices, manufacturers may face updated compliance obligations related to packaging and sustainability, and companies across the supply chain must prepare for stricter environmental requirements.

### Legislative

- Common Agricultural Policy simplification package – **Q2 2025**
- Evaluation of the Unfair Trading Practices Directive in agri & food supply chains – **Q3 2025**
- Targeted revision of the REACH Regulation – **Q4 2025**

### Non-legislative

- Vision for Agriculture and Food – **19 February 2025**
- Oceans Pact – **Q2 2025**
- Bioeconomy Strategy (which may be accompanied by a European Biotech Act) – **Q4 2025**

# HORIZONTAL POLICIES

Recognizing the need to support companies of all sizes in an increasingly competitive and digitalized economy, the Commission will introduce cross-cutting measures aimed at cutting red tape, improving access to finance, and enhancing labour market adaptability.

The **second Omnibus package** will introduce targeted regulatory simplifications, particularly for small mid-caps, and phase out outdated paper-based requirements. The **European Business Wallet** will streamline digital transactions, making it easier for companies to securely exchange data across the EU and globally. Furthermore, the **Single Market Strategy** will outline measures to eliminate remaining obstacles to cross-border trade and investment, ensuring businesses can operate more seamlessly. In parallel, the **EU Start-Up and Scale-Up Strategy** will address structural challenges limiting business growth, focusing on financing, talent acquisition, and regulatory consistency. The **2030 Consumer Agenda** will outline a vision for EU consumer policy, whilst the **Union of Skills** will focus on future-proof skill creation and retention for workers.

These initiatives will have broad implications: high-growth firms will benefit from reduced administrative burdens, digital businesses will see improved access to seamless transactions, and industries facing labour shortages will gain from enhanced skills policies.

## Legislative Initiatives

- Second Omnibus package on mid caps – **Q1 2025**
- European Business Wallet – **Q4 2025**

## Non-legislative Initiatives

- Competitiveness Compass – **28 January 2025** (*already launched*)
- Union of Skills – **Q1 2025**
- Single Market Strategy – **Q2 2025**
- EU Start-up and Scale-up Strategy – **Q2 2025**
- Quality jobs roadmap – **Q4 2025**
- 2030 Consumer Agenda, incl. action plan for consumers in the Single Market – **Q4 2025**