

Evian Letter Briefing – Context, Meaning, Follow-up

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Background of the Franco-German Meeting in Evian

The Franco-German Meeting is a closed-door session which has convened annually since 1992 in Evian, France. Its purpose is for CEOs of major companies from Germany and France to discuss strategies, build networks and improve economic relations between the two countries.¹ While heads of state or ambassadors have occasionally participated in past meetings, the 2025 meeting was attended by President Emmanuel Macron and Chancellor Friedrich Merz. This edition was presented as a continuation of the Franco-German Council of Ministers that took place in late August 2025 and focused on European competitiveness as well as the simplification of European Union (EU) regulations and directives.²

Following this meeting, a ‘Franco-German Evian Call’ (Evian letter) was sent in early October 2025 to both heads of state by the CEOs of TotalEnergies SE and Siemens AG.³ Although post-meeting letters are not unprecedented,⁴ this letter was only brought to light through reporting by POLITICO.⁵ While signed by the two CEOs, the letter states it was written on behalf of all the CEOs in attendance⁶ and outlines the priorities that emerged throughout the discussions held, including the “full abolishment” of the **Corporate Sustainability Due Diligence Directive (CSDDD)**.⁷

Early reporting on the letter echoed this claim,⁸ however, by mid-October POLITICO published an article indicating that French companies were backtracking on the call for “abolishment”, which was followed by a Tagesspiegel article confirming continued support for the CSDDD.⁹ In response to the growing distancing, the Business and Human Rights Centre and Social LobbyMap contacted 10 companies (five French and five German) that had previous records of publicly supporting the CSDDD. Of the nine who provided a response, eight indicated at least a level of disagreement with the call to abolish the CSDDD, while one used the opportunity to reaffirm its commitment to climate and sustainability.¹⁰ As part of the process of compiling this briefing, the Social LobbyMap reached out to all 45 entities named in the letter. This was met with a high response rate of 41% of those that made public statements and an additional four entities expressing misalignment of the ask with their values. A number of them appreciated the opportunity to express their positions on the situation.

1 The 24th Evian Annual Meeting for French and German Companies, Berlin Global, October 2025, <https://www.berlinglobal.org/index.php?the-24th-evian-annual-meeting-for-french-and-german-companies>.
Rencontres Franco-Allemandes d'Evian, Élysée, September 2024, <https://www.elysee.fr/emmanuel-macron/2024/09/06/rencontres-franco-allemandes-devian>.

2 Macron et Merz à Évian pour porter la relance économique franco-allemande, Andolu Ajansi, September 2025, <https://www.aa.com.tr/fr/%C3%A9conomie/macron-et-merz-%C3%A0-%C3%A9vian-pour-porter-la-relance-%C3%A9conomique-franco-allemande/3678179>
Franco-German Evian Call, TotalEnergies SE and Siemens AG, October 2025, <https://www.politico.eu/wp-content/uploads/2025/10/15/e2c4c71c-bb72-4331-907d-7faf640f28ac-CLEANEvian-2025-Letter-to-President-Macron-and-Bundeskanzler-Merz.pdf>.

3 Franco-German Evian Call, TotalEnergies SE and Siemens AG, October 2025, <https://www.politico.eu/wp-content/uploads/2025/10/15/e2c4c71c-bb72-4331-907d-7faf640f28ac-CLEANEvian-2025-Letter-to-President-Macron-and-Bundeskanzler-Merz.pdf>.

4 Franco-German Evian Call, Siemens AG and TotalEnergies, September 2022, https://totalenergies.com/sites/g/files/nytnzq121/files/documents/202212/Call_for_action_post_Evian_English_Scholz_signed.pdf

5 French companies backtrack from joint deregulation call with Berlin POLITICO, October 2025, <https://www.politico.eu/article/french-companies-backtrack-from-joint-deregulation-call-with-berlin/>.

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- 6 Evian conference 2025 - List of participating CEOs, 33rd Evian Franco-German Meeting, POLITICO, <https://www.politico.eu/wp-content/uploads/2025/10/15/EVIANCEOLIST.pdf>.
- 7 Franco-German Evian Call, TotalEnergies SE and Siemens AG, October 2025, <https://www.politico.eu/wp-content/uploads/2025/10/15/e2c4c71c-bb72-4331-907d-7faf640f28ac-CLEANEvian-2025-Letter-to-President-Macron-and-Bundeskanzler-Merz.pdf>.
- 8 Why are Siemens & TotalEnergies CEOs Against EU's Omnibus?, Sustainability Magazine, October 2025, <https://sustainabilitymag.com/news/why-are-46-ceos-against-the-eus-sustainability-omnibus>; TotalEnergies, Siemens urge EU to abolish climate law, letter shows' Reuters, October 2025, <https://www.reuters.com/sustainability/boards-policy-regulation/totalenergies-siemens-urge-eu-abolish-climate-law-letter-shows-2025-10-09/>.
- 9 CEO-Brief an Merz und Macron: Finanzriesen widersprechen Siemens- und Total-Chefs', Tagesspiegel Background Finanzen & Sustainability, October 2025, <https://background.tagesspiegel.de/finance/briefing/finanzriesen-widersprechen-siemens-und-total-chefs>; French companies backtrack from joint deregulation call with Berlin POLITICO, October 2025, <https://www.politico.eu/article/french-companies-backtrack-from-joint-deregulation-call-with-berlin/>.
- 10 EU: Companies speak out after Evian letter attempt to undermine CSDDD, Business and Human Rights Centre, Business and Human Rights Centre, October 2025, <https://www.business-humanrights.org/en/latest-news/evian-letter-outreach/>.

Matters of transparency in lobbying

The legislative process around the CSDDD was accompanied by high intensity of corporate lobbying.¹¹ While lobbying is a valid method of participation in legislative processes, it is important that it is met with equal levels of transparency to ensure accountability and a balanced representation of all perspectives.

According to several reports by civil society organisations (CSOs) this transparency has not always been provided. Most notably, SOMO uncovered a group of eleven companies collaborating secretly on weakening the CSDDD. This strategy was only uncovered through leaked documents that were not otherwise publicly available.¹²

Similarly, the letter following the Franco-German meeting was not intended for public scrutiny; it was only published after it was leaked to journalists. As the meeting itself was not open to the public, the list of attendees was also confidential. It was only after it was made public by POLITICO that the positions held by the companies could be investigated.

This kind of ‘behind closed doors’ lobbying activity is made possible by both significant resources available to companies as well as unequal levels of access provided to high-ranking policy makers.

While companies can dedicate a lot more money and time to the task of advocating for their interests, other members of the public, CSOs, and affected stakeholders don’t have nearly the same levels of resources available. This can lead to corporate positions taking up more space in the perception of policymakers.

At the same time, research on the sustainability omnibus, demonstrates that policymakers in the EU and member states are showing an increased willingness to engage with corporate positions.¹³ The attendance of both heads of state at the Franco-German meeting indicates a growing interest in hearing corporate viewpoints and to do so in a non-public environment.

As such, the Franco-German meeting and the resulting letter to the French and German heads of state reflect broader dynamics observed around the legislative process of the CSDDD and other initiatives of the ‘simplification agenda’¹⁴: high intensity of corporate lobbying paired with a decline in transparency that is not always addressed by policymakers. These developments risk increasing the divide between civil society advocacy and corporate influence in an already uneven playing field of political participation.

11 Sustainable corporate governance consultation, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12548-Sustainable-corporate-governance_en

12 The secretive cabal of US polluters that is rewriting the EU’s human rights and climate law, 03 December 2025, <https://www.somo.nl/the-secretive-cabal-of-us-polluters-that-is-rewriting-the-eus-human-rights-and-climate-law/>; TotalEnergies informed Somo that its “views expressed in this [Roundtable] forum are fully aligned with those publicly stated”.

13 This is what corporate capture looks like! How corporations run the EU deregulation agenda, 01 April 2026, https://corporateeurope.org/sites/default/files/2026-03/REPORT_CORPORATE%20CAPTURE.pdf.

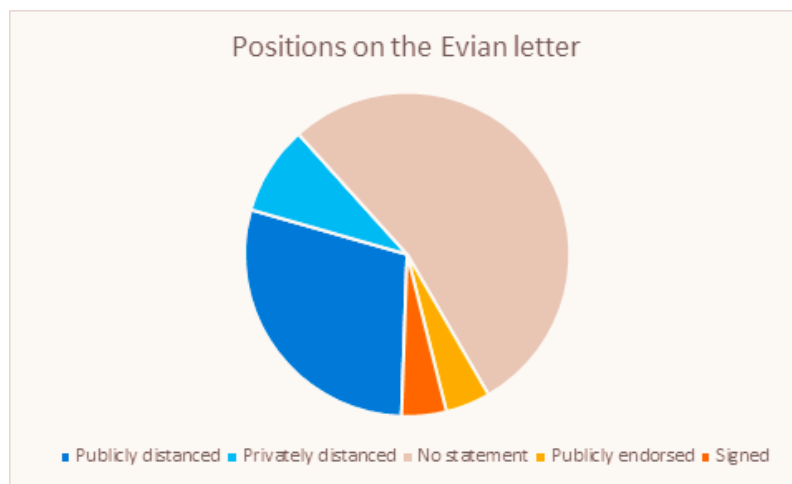
14 This is what corporate capture looks like! How corporations run the EU deregulation agenda, 01 April 2026, https://corporateeurope.org/sites/default/files/2026-03/REPORT_CORPORATE%20CAPTURE.pdf.

Contextualising the claims of the Evian letter

Reactions to the letter being leaked

The letter signed “on behalf” of the 45 participants of the 2025 Franco-German meeting called for the “full abolishment” of the CSDDD. In reality, only two companies (Siemens and TotalEnergies) signed the letter, and two companies (Deutsche Börse AG and Robert Bosch GmbH) subsequently endorsed it. Of the remaining 41 entities, 28 remained silent on the matter, and 13 publicly distanced themselves from the call, saying that they did not endorse the position that Siemens and TotalEnergies put forth on their behalf.¹⁵ In sum 17 participants have taken public positions in relation with the letter: the two signatories, two who subsequently endorsed it, and the 13 who publicly distanced themselves.

As part of the analysis, Social LobbyMap reached out to all 45 entities with its assessments of public positions on the letter and invited them to share any other public statements they had made. In the course of this engagement, four entities that had not publicly reacted volunteered that the call for “full abolishment” of the CSDDD did not align with their values and position. Social LobbyMap only assesses statements that are publicly available and therefore does not consider information provided only in the course of engagement with entities in the assessments. Nonetheless, this demonstrates an even wider gap between the conception of a joint position held by the participants of the Franco-German meeting and the full range of positions truly held by those entities.



[Figure 1: Company positions on the Evian letter]

Some of the entities that publicly distanced themselves did call for simplification or reduced standards to protect competitiveness while restating support for the introduction of the CSDDD in principle. Under Social LobbyMap methodology, support for legislation that is qualified, restrictive or suggests caveats are downgraded accordingly. While the methodology acknowledges the importance of public support for the CSDDD, this support needs to be clear and consistent with the original level of ambition of the CSDDD¹⁶ to receive a strongly supportive score.

¹⁵ Eight of those did so in response to outreach by the Business and Human Rights Centre and Social LobbyMap, five further responses were identified in news media reporting.

¹⁶ By original level of ambition here we mean before amendments made by the Omnibus I Simplification.

The Social LobbyMap methodology thus provides a framework for capturing a more nuanced assessment of lobbying positions. Therefore, the statements of the 13 companies include some that are being assessed as mixed or non-supportive positions. However, while our research identified weakening support across other topics that are aligned with international standards and would ensure effective enforcement and accountability, this is still a far reach from calling for the “full abolishment” of the CSDDD.

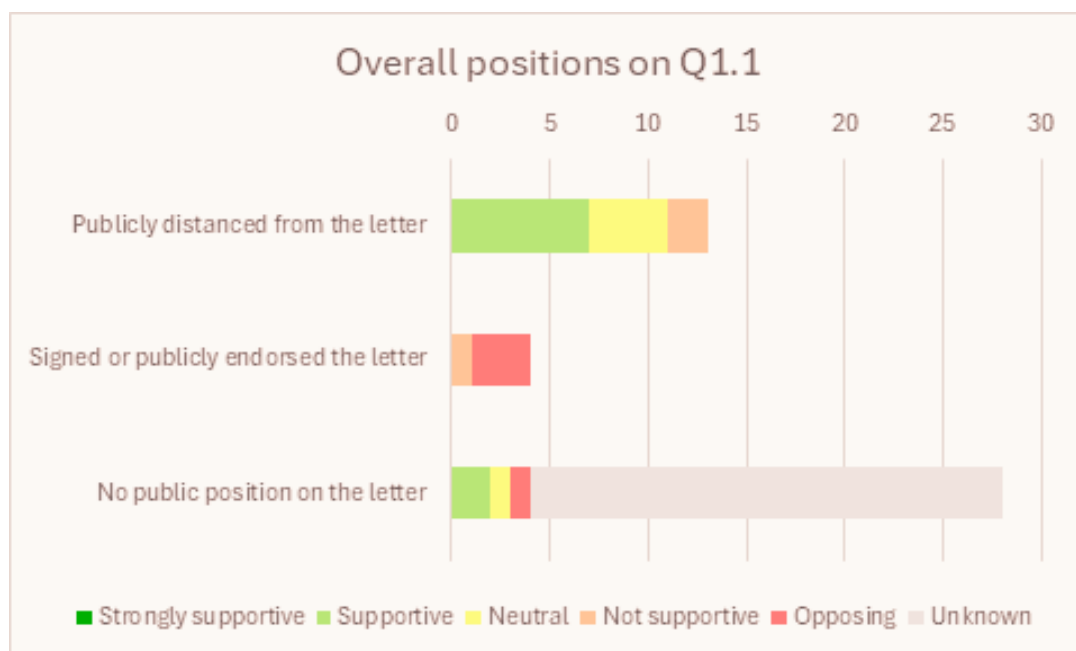
Public positions on the EU CSDDD held by the entities attending the conference

21 of the entities that attended the meeting were found to have public positions on the CSDDD or the Omnibus I Simplification. Those are:

- The 17 entities that engaged directly and publicly with the letter and
- A further four entities that were assessed solely on lobbying activity unrelated to the letter.

These 21 entities were assigned scores¹⁷ in the Social LobbyMap database based on other prior public lobbying activity.¹⁸ While the latter four did not respond publicly to their association with the Franco-German meeting and the Evian letter, their positions can still be determined from their responses to the EU Commission consultations or public position statements.

On the specific question of supporting mandatory due diligence (indicator Q1.1 of the Social LobbyMap methodology), across all 21 scored entities, more were supportive than non-supportive and oppositional. Thus, the majority of those who have spoken or lobbied publicly have shown their support for legislating the CSDDD. For the remaining 24 entities named in the attendance list of the meeting, no position on an EU-wide mandatory human rights due diligence legislation could be found.



[Figure 2: This chart shows the breakdown of positions scored under the first indicator of the SLM methodology. It includes both the statements made regarding the letter – where such statements were made – and any other lobbying activity on the CSDDD or Omnibus I made by the entities]

¹⁷ Please take note of this disclaimer when reviewing the scoring <https://sociallobbymap.org/disclaimer/>.

¹⁸ Please see the full Social LobbyMap Methodology here <https://sociallobbymap.org/methodology/>.

The data indicates that of the companies that publicly distanced themselves from the letter, more than half support the introduction of mandatory HRDD legislation (Q1.1). At the same time, those that signed the letter or later expressed endorsement generally held unsupportive positions. For two of the companies who signed or endorsed the letter, the letter represents their only known public position, while two others have additional evidence of public positions that were unsupportive of the CSDDD. Among companies with no known public position on the letter, only four were found to have publicly stated views on the CSDDD. These positions were mixed: two entities support the legislation, one is neutral, and one is opposed. This makes it difficult to assign a position to those that did not publicly react, as there is no clear evidence base for assumptions.

This analysis shows a pattern of broad support for the introduction of a mandatory due diligence directive at the EU level. While there is no suggestion that either of the signatories deliberately set out to misstate the positions of other entities the positions held by the entities can be seen to be much more nuanced than the blanket call presented in the letter. The letter, in making this claim, did not accurately reflect the positions of the entities it was signed “on behalf” of, creating an illusion of consensus.

At the time of writing, TotalEnergies SE and Siemens AG have not responded to a request for comment.

Corporate accountability for the Evian letter

Being associated with opaque lobbying activities, such as this letter, can create significant reputational risk. Unlike more coordinated lobbying efforts, such as that of the ‘Competitiveness Roundtable’ published by SOMO,¹⁹ some companies in this case stated that they had no opportunity to influence its content. As a result, they may be publicly linked to positions they do not support, simply through their attendance at the event.

The United Nations Guiding Principles on Business and Human Rights state that businesses have an obligation to assess the risk for adverse human rights impacts arising from their business activities. The UNGPs further require businesses to mitigate the risks they are causing or contributing to. As stated by Business and Human Rights experts such as Anita Ramasastry, political engagement is a business activity under the UNGPs. Given the letter’s call for the “full abolishment” of the CSDDD, a piece of legislation aimed at protecting human rights in business activities, this can be seen as creating a risk. Had the call been successful, it would have led to weaker protections for human rights, including access to remediation. The UNGPs distinguish between three forms of involvement in human rights risks: causing, contributing to, and being directly linked to them. Each form of involvement gives rise to different responsibilities for companies. Being named in the letter can be considered a contribution to the risk of potential human rights harm.

According to the UNGPs, contributing to harm creates an obligation to provide remedy. In this case, remediation could take the form of a public statement distancing the company from the letter’s call for the abolition of the CSDDD.

¹⁹ The secretive cabal of US polluters that is rewriting the EU’s human rights and climate law, 03 December 2025, <https://www.somo.nl/the-secretive-cabal-of-us-polluters-that-is-rewriting-the-eus-human-rights-and-climate-law/>.

Annex

List of companies attending the meeting

Name	Signed letter	Publicly endorsed	Publicly distanced	Entry on Social LobbyMap Database
AFEP	×	×	×	✓
Air Liquide SA	×	×	×	×
Airbus SE	×	×	×	×
Allianz SE	×	×	✓	✓
Amundi	×	×	✓	✓
AXA	×	×	×	×
BASF SE	×	×	✓	✓
BMW AG	×	×	✓	✓
BNP Paribas	×	×	✓	✓
Boehringer Ingelheim	×	×	×	×
BPI France	×	×	✓	✓
Capgemini	×	×	×	×
Celonis SE	×	×	×	✓

Annex

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Name	Signed letter	Publicly endorsed	Publicly distanced	Entry on Social LobbyMap Database
Danone	✗	✗	✓	✓
Deutsche Bank AG	✗	✗	✓	✓
Deutsche Börse AG	✗	✓	✗	✓
ENGIE	✗	✗	✓	✓
Eramet	✗	✗	✗	✓
Federation of German Industries (BDI)	✗	✗	✗	✓
FORVIA	✗	✗	✗	✗
Fresenius SE	✗	✗	✗	✗
Hamburger Hafen und Logistik AG	✗	✗	✗	✗
Heidelberg Materials AG	✗	✗	✗	✗
Infineon Technologies AG	✗	✗	✗	✗
KfW Bankengruppe	✗	✗	✓	✓

Annex

List of companies attending the meeting

Name	Signed letter	Publicly endorsed	Publicly distanced	Entry on Social LobbyMap Database
Korian	×	×	×	×
LANXESS AG	×	×	×	×
Michelin	×	×	✓	✓
Oddo BHF SCA	×	×	×	×
OPmobility	×	×	×	×
Orange SA	×	×	×	×
Peugeot Invest	×	×	×	×
Robert Bosch GmbH	×	✓	×	✓
RWE AG	×	×	✓	✓
Saint-Gobain	×	×	×	×
Sanofi	×	×	×	×
SAP SE	×	×	✓	✓
Schaeffler AG	×	×	×	×

Annex

List of companies attending the meeting

Name	Signed letter	Publicly endorsed	Publicly distanced	Entry on Social LobbyMap Database
Siemens AG	✓	✗	✗	✓
Sonepar	✗	✗	✗	✗
SPIE SA	✗	✗	✗	✗
STMicroelectronics	✗	✗	✗	✗
Thales	✗	✗	✗	✗
TotalEnergies SE	✓	✗	✗	✓
Vonovia SE	✗	✗	✗	✗

Disclaimer

This publication is intended to be for information purposes only and it is not intended as promotional material in any respect. The material is not to be used as investment advice or legal advice, nor is it intended as a solicitation for the purchase or sale of any financial instrument. It should not be taken as an endorsement or recommendation of any particular company or trade association. Whilst based on information believed to be reliable, no guarantee can be given that it is accurate or complete. Companies and trade associations whose lobbying activity is being assessed in this report were selected based on the list of attendees of the 2025 German-Franco meeting at Evian as published by POLITICO.

All information used for the assessment of entities' positions in this report, are publicly available information and/or consultation responses to the CSDDD. The findings on this report should not be considered representative of the current position of the entities represented on this report.

The assessment follows a set structure which is based on the SLM methodology. The awarding follows a five-point scale of +2, +1, 0, -1, -2 with the higher score being 'strongly supportive' and a lower score 'opposing'. We have informed all entities identified about their inclusion on this analysis. We also shared the assessment results and gave them an opportunity to comment prior to publication. Not all companies responded within the allotted timeframe. Where responses were received, they were reviewed and, where appropriate, considered in the final analysis. The absence of a response should not be interpreted as agreement or disagreement with the findings. If any entity considers that the information about their organisation is inaccurate or misrepresented, we are willing to revise and update such information after the matter is brought to our attention. Any communication should be sent to us via email to social.lobbymap@eirisfoundation.org.

Company policies, practices, and positions may have evolved since the research was conducted. This assessment does not claim to reflect subsequent developments, changes in strategy, or newly disclosed information beyond the stated research timeframe.

While we strive for accuracy and objectivity while analysing the information, we also acknowledge that the information and materials on this report may contain typos and/or inaccuracies. We reserve the right to correct, change or improve the information and materials without any obligation to notify the entities.

This paper was produced by [Dakota Anton](#), [Kiara Brodie](#), and [Jana Hoess](#) at the [EIRIS Foundation](#). Thanks also to the wider team at the EIRIS Foundation for their input and contributions.

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