Global Witness

Mega-pollution of CSDDD firms

New data reveals mega-pollution of companies still In scope of EU's climate accountability law

OCTOBER 2025

New analysis by Global Witness reveals that even after intense lobbying by major polluters and a recent vote to water down new EU corporate accountability laws, the firms that remain affected by the legislation are responsible for huge amounts of greenhouse gas emissions.

Contents

Emissions data revealed

Global Witness' investigation reveals that combined operational emissions of companies covered by the EU's Corporate Sustainability Due Diligence Directive (CSDDD) exceed 2 billion tonnes of CO2 – equivalent to almost two-thirds of the EU's total annual emissions[1] or equivalent to the yearly emissions of around 450 million cars[2].

The investigation also showed that beyond their direct operations, the same companies' scope 3 emissions[3] – indirect emissions from suppliers, transport, investments and product use – amount to a total of 23 billion tonnes of CO2e.

Out of 1,341 companies and corporate groups identified by SOMO's CSDDD Datahub as meeting the raised criteria for inclusion in the CSDDD, Global Witness was able to locate emissions data for 770 companies (57%), so the total emissions of companies affected by the legislation are likely higher than what we identified.

Despite the ongoing dilution of the EU's new corporate accountability laws, the data reveals that companies still captured within their scope are among the world's largest emitters. This data highlights why strong, enforceable obligations to cut emissions must remain at the core of the directive.

> **"Despite the best efforts of big business and their friends in government, there is still an incredible amount at stake – more than 2 billion tonnes of carbon emissions to be exact,"**
>
> **GLOBAL WITNESS EU SENIOR CAMPAIGNER, BEATE BELLER.**

"The EU's new sustainability laws were designed to keep the world's biggest polluters in check and help victims of corporate abuse get justice," said Global Witness EU Senior Campaigner, Beate Beller.

"Worryingly, what we've seen in recent weeks is industry lobbying to influence negotiations and dramatically shrink the scope and mandatory nature of the laws."

"As well as the new company size threshold and ambiguity around implementation duty, the two year opt-out clause and wording on 'contribution' to climate targets rather than 'compatibility' represent a significant weakening of these laws."

"The massive firms who we've shown are causing devastating levels of pollution shouldn't be allowed to turn away from climate responsibility – people across the EU and around the world deserve better."

Climate transition plans under threat

A major component of the CSDDD is the Climate Transition Plan – a legal requirement for large companies to adopt and implement concrete actions to align their business models with the Paris Agreement and the EU's 2050 climate neutrality goal.

Even after attempts to water down the EU's CSDDD, operational emissions from companies covered by the directive exceed 2 billion tonnes of CO2. Global Witness

The companies in this analysis operate across every region of the world, and their emissions would be among those targeted by the CSDDD's climate transition plans –meaning that under a strong directive, the companies responsible for billions of tonnes of CO2 would be legally required to set out how they will cut these emissions.

Yet from the moment the CSDDD was set in stone in June last year, intense lobbying by major corporations, several EU member states and foreign governments – including the US as well as Qatar – has sought to strip these commitments of their force and weaken or delay key provisions of the law.

The US-EU trade agreement amplified focus on the CSDDD's climate provisions, which have now been formally integrated into the transatlantic deal. Adding to the geopolitical stakes, Qatar issued a warning in July 2025, threatening to suspend LNG exports to the EU unless the directive underwent significant revisions.

On 13 October 2025, Members of the European Parliament's Committee on Legal Affairs voted to endorse a severely weakened version of the CSDDD. Together with the earlier adopted negotiation position of the EU Council (Member States), several provisions risk substantially diluting the Climate Transition Plan.

The proposed changes include creating ambiguity about the required ambition of implementing the plans, reframing the goal from Paris Agreement compatibility and 2050 climate neutrality to a mere "contribution", and introducing a two-year optionality loophole, allowing these climate plans to be not mandatory for the first two years.

These proposals significantly undermine what was meant to be a binding tool for climate accountability.

Increased thresholds reduce companies affected by the CSDDD

The same lobbying push also led to the raising of thresholds that determine which companies fall under the directive.

The threshold for inclusion was raised from 1,000 employees and over €450 million in global turnover for EU companies and over €450 million turnover generated within the EU for non-EU companies, to 5,000 employees and €1.5 billion in turnover.

This dramatically reduced the number of companies covered by the legislation and the emissions linked to those excluded companies are substantial.

Under the increased thresholds, nearly **1 billion** tonnes of CO2e of scope 1 and 2 emissions, and **9.4 billion** tonnes of CO2e of scope 3 emissions, will no longer be subject to Climate Transition Plans.

Fossil fuels at the heart of CSDDD and lobbying efforts to weaken it

Unsurprisingly, fossil fuel companies feature prominently among the biggest corporate emitters, with their operations and products among the most carbon-intensive in the world. These same companies also have some of the strongest incentives to weaken the CSDDD.

A recent investigation by SOMO revealed the extent of ExxonMobil's lobbying against the directive. During an interview with CNBC, the CEO of ExxonMobil, Darren Woods, even went so far as to call the CSDDD "possibly the worst legislation ever passed anywhere in the world."

Earlier this month, a letter spearheaded by TotalEnergies and Siemens, and signed on behalf of a total of 46 CEOs of major French and Germany companies, was sent to French President Macron and German Chancellor Merz, calling for the CSDDD to be scrapped entirely.

German companies Heidelberg Materials AG (ranked fourth) and RWE AG (seventh), along with French company Air Liquide SA (13th), are also among the top 15 polluters subject to the CSDDD – based on their Scope 1 and 2 emissions – and were said by a Total spokesperson to be supportive of wording in the letter calling for the directive to be scrapped.

Most polluting companies subject to CSDDD - sorted by scope 1+2 emissions (tCO_2e)

Companies lobbying against CSDDD are among the highest emitters:
ExxonMobil and TotalEnergies have both publicly lobbied against the CSDDD, and Heidelberg Materials, RWE, and Air Liquide have been linked by a TotalEnergies spokesperson to a letter calling for the directive to be abolished.

Company	HQ Country	Scope 1 + 2 ▼	Scope 3
Arcelormittal SA	Luxembourg	103m	8.4m
Exxon Mobil Corp	**USA**	100m	730m
Tata Steel Limited	India	82m	17m
Heidelberg Materials AG	**Germany**	68m	16.2m
Sasol Limited	South Africa	61m	35.6m
Shell PLC	UK	58m	1.08bn
RWE AG	**Germany**	54m	21.77m
Totalenergies SE	**France**	45m	417m
Lukoil PJSC	Russia	41m	no public data
Phillips 66	USA	40m	365m
Lausitz Energie Verwaltungs GmbH	Germany	38m	no public data
Linde PLC	Ireland	37m	24.37m
Air Liquide SA	**France**	36m	23.24m
British Petroleum (BP) PLC	UK	35m	322m
AP Moller-Maersk A/S	Denmark	34m	49.23m

Source: LSEG Data Library and public company reporting, European Commission, Reuters

Global Witness

Europe's chance for real climate action

These findings underline the extraordinary opportunity the CSDDD presents for the EU to turn its climate commitments into meaningful global action.

The companies captured by the directive are responsible for billions of tonnes of CO_2 emissions each year. By requiring them to adopt and implement credible Climate Transition Plans, the EU can drive real reductions across global supply chains.

Because it would compel major emitters to take concrete action to cut their emissions, the CSDDD has faced a concerted pushback from corporate lobbies seeking to weaken its core provisions.

Yet the directive remains one of the most powerful tools available to align corporate behaviour with the Paris Agreement and the bloc's 2050 climate neutrality goal.

To realise this potential, EU policymakers must defend the directive against the efforts of big polluters and their allies to undermine it. Anything less risks turning a landmark piece of legislation into a stitch-up by the very industries it was designed to hold to account.

Methodology

We collected CO2-equivalent emissions data for corporate groups and companies listed in SOMO's CSDDD Datahub, which identifies firms that fall within the scope of the EU's Corporate Sustainability Due Diligence Directive (CSDDD) as adopted in June 2024.

Under the text adopted in June 2024, the directive applied to EU companies with more than 1,000 employees and over €450 million in global turnover, and non-EU companies with over €450 million turnover generated within the EU.

Using this initial list of 4,282 companies and corporate groups, we identified reported emissions data through the LSEG Data Library and publicly available company reports. Emissions data was found for 1,607 companies, including figures for scope 1 (direct), scope 2 (energy-related) and, where available, scope 3 (value chain) emissions.

Following the European Parliament's committee vote to increase the thresholds for inclusion to EU companies with more than 5,000 employees and over €1.5 billion in global turnover, and non-EU companies with over €1.5 billion turnover generated within the EU, we re-filtered the dataset to reflect the narrowed scope of the law.

This left 1,341 companies that would remain in scope under the revised thresholds, of which we were able to identify emissions data for 770 companies.

This dataset does not capture the full emissions of all companies within scope. Some companies report only partial data – for example, scope 1 and 2 emissions but not scope 3.

In addition, SOMO has noted that its Datahub may not include all non-EU companies that meet the CSDDD thresholds but do not publish figures on their EU-based turnover, meaning the true coverage of the directive may be broader than reflected in our dataset.

Notes

[1] Based on total EU emissions in 2024 of 3.16 billion tonnes CO_2e, as estimated by the European Commission, Joint Research Centre.

[2] Based on U.S. Environmental Protection Agency (EPA) estimate that a typical passenger vehicle emits 4.6 tonnes of CO_2 per year.

[3] Scope 3 emissions include all indirect greenhouse gas emissions that occur across a company's value chain, and often one company's upstream emissions appear as another's downstream emissions. As a result, when combined across many firms, scope 3 figures inevitably involve double counting. The total therefore reflects the sheer scale of climate impact linked to these companies, but it should not be interpreted as a single, additive measure of emissions.