JOINT STATEMENT 29 September 2026

Beyond repair: time for clarity on the Green Claims directive in the upcoming 2027 Commission Work Programme

The undersigned European business associations, representing a broad range of businesses and sectors across Europe, fully support the European Union's ambition to advance the green transition, combat greenwashing and ensure that consumers have access to reliable and meaningful environmental information.

European businesses are investing significantly in sustainability and are committed to contributing to the EU's environmental objectives. We therefore share the objective of ensuring that environmental claims are credible, transparent and substantiated. At the same time, the regulatory framework must remain proportionate, coherent and workable, particularly for Europe's millions of SMEs.

Against this background, and in line with the EU burden reduction agenda, we respectfully call on the European Commission to **withdraw the proposed Green Claims Directive and remove it from the Commission's 2027 Work Programme.**

1. The Empowering Consumers for the Green Transition Directive already provides a robust framework against greenwashing

The **Empowering Consumers for the Green Transition Directive (EU) 2024/825** provides a substantial framework to address misleading environmental claims and sustainability labels. The Directive applies from **27 September 2026**, following its transposition into national legislation by the Member States.

The new rules already address several of the practices at the heart of the Green Claims initiative. In particular:

- **generic environmental claims are prohibited** where the trader cannot demonstrate recognised excellent environmental performance relevant to the claim;
- environmental claims must be **specific, substantiated and not misleading**;
- **unreliable voluntary sustainability labels are prohibited**;
- environmental labels must be based on a **certification scheme or established by public authorities**, and
- businesses must ensure that environmental information communicated to consumers is **accurate and supported by evidence**.

This represents a significant strengthening of the EU framework against greenwashing and provides consumers with stronger safeguards when making purchasing decisions.

Crucially, the new rules are only now beginning to apply at national level. Businesses across Europe are adapting their practices, communication and compliance processes to the new requirements. The practical reality of this transition is already an unprecedented challenge for European companies, as the rules also apply to products that were legally placed on the market before the entry into force of the Directive, leading to costly retroactive compliance checks on millions of products already in circulation, despite the good collaboration between business organisations, DG JUST and national authorities towards a common understanding.

Furthermore, European businesses are currently navigating a state of regulatory saturation. It would be strategically inconsistent to subject economic operators to a new redundant and overlapping framework that mandates a second, even more complex cycle of compliance for the same environmental claims already governed by the Empowering Consumers for the Green Transition Directive. **The priority should therefore be to ensure effective and consistent implementation of the existing framework and to allow sufficient time to assess its effectiveness.**

2. The Green Claims Directive would add complexity and disproportionate burdens

Against this background, we are concerned that the proposed Green Claims Directive would introduce an additional layer of requirements without sufficient evidence that the existing framework is inadequate. The proposal would establish detailed requirements for the **substantiation, communication and verification of environmental claims**, including ex-ante verification procedures. This risks creating significant additional administrative and financial burdens for businesses.

These concerns apply to all sizes of businesses, and are even more relevant for Small Mid-Caps, and **SMEs**, which often lack the dedicated sustainability, legal and compliance resources available to larger companies. Compliance with complex substantiation and verification requirements would likely become disproportionate to the nature and scale of the environmental claim concerned.

Moreover, the interaction between the Green Claims Directive and the Empowering Consumers for the Green Transition Directive risks creating **duplication, overlapping requirements and uncertainty**. Businesses would have to navigate two horizontal frameworks addressing closely related aspects of environmental communication, potentially subject to different requirements and enforcement approaches.

There is also a major risk that the Green Claims Directive's excessive complexity could have an unintended negative effect on the green transition itself. Companies' willingness to invest in sustainability is intrinsically linked to their capacity to market their investments to their customers. If legitimate environmental communication becomes too costly, complex or legally uncertain, many businesses may choose not to invest in sustainability at all, as the costs and complexity of making environmental claims would outweigh the benefits of investing in sustainability. The objective should therefore be to **prevent greenwashing without discouraging legitimate sustainability efforts or creating unnecessary barriers to sustainability investments.**

3. Delivering on the EU burden reduction and simplification agenda

Businesses welcomed the burden reduction and simplification agenda, which has now reached its midterm phase, but still need to see its practical effects on the ground. We believe this is an area where decisive action should be taken to provide businesses with much-needed regulatory clarity which would be fully consistent with the Commission's objectives, including **strengthening European competitiveness**. In addition, a clear majority in the **European Parliament** has called on the Commission to withdraw the proposal, whereas discussions within the Council are stalled.

Against this background, carrying the proposal forward into the Commission's **2027 Work Programme** would prolong regulatory uncertainty for businesses without a clear indication that the proposal has the political support necessary to progress.

In conclusion, the undersigned European business associations respectfully urge the European Commission to **withdraw the proposal for a Green Claims Directive and remove it from the Commission's 2027 Work Programme.**

Such a decision would not represent a retreat from the EU's sustainability ambitions nor from the fight against greenwashing. On the contrary, it would allow the Union to focus on **implementing, enforcing and evaluating the strong framework that has already been adopted**, while giving businesses and Member States the necessary time to adapt.

The signatories remain fully committed to working constructively with the European Commission, the Member States and the European Parliament to support the green transition, strengthen consumer trust and ensure that Europe's sustainability objectives are achieved in a way that supports investment, innovation and the competitiveness of European businesses.

Co-signing associations:

APPLiA – Home Appliance Europe

BusinessEurope

Ecommerce Europe

ECTAA – European Travel Agents' and Tour Operators' Associations

EDANA – International Association for Nonwovens and Related Industries

EURATEX – European Apparel and Textile Confederation

Euro Coop – European Community of Consumer Co-operatives

HOTREC – European Association of Hotels, Restaurants, Bars and Cafés

Independent Retail Europe

RURALTOUR – European Federation of Rural Tourism

SMEunited