

Dear Commissioner Roswall,

As the undersigned EPP shadow rapporteurs, on behalf of the EPP Group, we are writing to formally request that the Commission reconsiders and ultimately withdraws the Green Claims Directive (GCD) proposal. With the concluding trilogue approaching and the final agreement taking clearer shape, it is the carefully considered position of the EPP Group that we will not support any trilogue outcome.

The EPP is supportive of rules on the internal market that address greenwashing and strengthen consumer confidence in environmental claims. This, after all, was the rationale behind our support on the Directive on Empowering Consumers for the Green Transition (ECGT), which we endorsed in the plenary vote of January 2024. We are convinced that the upcoming implementation of this Directive, and in particular its effective enforcement by member states, will play a crucial role in addressing greenwashing and empowering consumers to make informed, sustainable choices.

Nevertheless, we hold the considered view that the GCD risks unduly hindering sustainability communication through procedures that are overly complex, administratively burdensome, and costly. The Commission and Co-Legislators have made clear commitments under the Better Regulation Agenda, the Draghi Report, and the Competitiveness Compass to reduce administrative burdens and uphold the principles of evidence-based policymaking through comprehensive impact assessments. In our view, the GCD undermines these commitments.

We, the EPP shadow rapporteurs, have made every effort to improve this proposal through constructive engagement and negotiation. Part of these efforts have included calling for a comprehensive, dedicated impact assessment, which the proposal lacks. We regret having not received any satisfactory responses that address our core concerns. These concerns relate not only to regulatory complexity and to legal coherence, but also to the burdens the GCD will place on European businesses without sufficient evidence of proportionality or necessity. There is, quite simply, no dedicated cost-benefit analysis or supporting data underpinning the ambitious system proposed by the GCD. Nor does the proposal convincingly demonstrate that the expected benefits of the regime would outweigh the significant costs and regulatory uncertainty it entails.

While certain elements of the GCD may warrant further reflection, the introduction of a pre-approval requirement for environmental claims is a fundamentally flawed idea. Pre-approval of claims is not a standard mechanism in the internal market and is not applied across sectors. This approach deviates from established internal market practices and may set a precedent that is difficult to reconcile with our broader objectives of regulatory coherence, competitiveness and administrative simplification.

While we remain fully committed to the objective of protecting consumers from greenwashing, we firmly believe that such efforts must be grounded in a sound regulatory framework and supported by a comprehensive impact assessment.

Yours sincerely,

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