



To mitigate the challenges for all interested parties (from traders to national authorities and verifiers), **the framework established in the Directive should be simplified**. The Council's recent position marks progress in addressing identified flaws in the proposed ex-ante verification framework. Notably, **we support the intention behind the introduction of the simplified procedure to reduce the burden of the substantiation and ex-ante verification requirements for specific environmental claims**.

Nonetheless, we are concerned about the Council's proposed means to simplify the framework, as they may create **unintended additional burden**, duplicating in some cases the documentation to be provided, and further complicating the simplified procedure by mandating the adoption of detailed rules from the European Commission. Additionally, the discussions in the Council do not seem to properly address the challenges in the full ex-ante verification and certification process, due to the lack of deadlines for the completion of the process by verifiers.

**We therefore call for the immediate application of the simplified procedure (including simplified substantiation requirements) for those claims that do not require a full lifecycle assessment (LCA), as is the case of claims related to environmental aspects, and for those claims whose assessment is based on methodologies that are widely recognised at the EU and international level (e.g., ISO and OECD standards, PEF, EU Ecolabel).**

We need a well-designed and implementable green claims framework that will enable the achievement of EU climate and environment objectives and empower consumers to make more sustainable choices.

We would welcome the opportunity of an open and transparent dialogue to ensure a future-proof practical and workable framework, for both traders and verification authorities.

## List of signatories:



ACE, The Alliance for Beverage Cartons and the Environment



AIM, European Brands Association



A.I.S.E., International Association for Soaps, Detergents and Maintenance Products



AmCham EU, American Chamber of Commerce to the EU



APPLiA, Home Appliance Europe



BusinessEurope



CEPI, Confederation of European Paper Industries



Cosmetics Europe



EUROPEN, The European Organisation for Packaging and the Environment



Federation of the European Sporting Goods Industry

FESI, Federation of the European Sporting Goods Industry



FoodDrinkEurope



NATRUE, the International Natural and Organic Cosmetic Association



TIE, Toy Industries of Europe



WFA, World Federation of Advertisers