

**JOINT RECOMMENDATION:
KEY PRINCIPLES FOR A UNIFORM, PREDICTABLE, AND PROPORTIONATE FRAMEWORK FOR
EXISTING STOCKS OF PRODUCTS**

April 2026

This document summarises feedback from the members of a [coalition of 18 European business associations](#). It reflects what they believe should be included in the upcoming CPC common understanding on enforcing the Empowering Consumers for the Green Transition Directive, to ensure transparency and legal certainty for businesses across all Member States.

1. Legal Certainty and Predictability

- The common understanding should be **in writing** and **adopted sufficiently in advance** of the Directive's application date to allow companies to prepare.
- Authorities should provide **clear, forward-looking timelines** for enforcement and compliance expectations.
- Future guidance must be timely, **uniform, practical, and jointly agreed** within the CPC network to ensure consistent interpretation across all Member States. FAQ documents should also be promptly updated accordingly.

2. Transparency

- The European Commission should make the common understanding **publicly and easily accessible, preferably online (e.g., on each respective authority's website and on the European Commission's website)**.
- The Commission should publicly welcome and acknowledge the adopted common understanding and reflect its content in other relevant materials, such as FAQ documents.

3. Consistent Enforcement Procedures

- The Commission should ensure all competent authorities across Member States apply the agreed common approach consistently.
- Testing, supervision, and enforcement methods should be **standardised** within the CPC network to minimise divergent national approaches.
- Any transition timelines coordinated in the CPC network should be:
 - Realistic
 - Harmonised across Member States
 - Allowing for orderly stock reduction
 - Adjusted where needed due to late national implementation

4. Continuous Dialogue and Monitoring

- CPC authorities and the European Commission should **maintain ongoing dialogue** with stakeholders to identify issues, ensure consistent application, and raise concerns regarding practical challenges, or unintended impacts.
- This dialogue should also continue after the adoption of the CPC common understanding to facilitate exchange on the ongoing implementation of the Directive and application of the CPC common understanding, for example to address:
 - Divergent national interpretations,
 - Novel enforcement approaches,
 - Member State-specific guidances that would deviate from the common understanding; where divergence is identified, the European Commission should issue rapid corrective clarifications.

5. Proportionate and Pragmatic Enforcement

- Initial enforcement should be proportionate, focused on supporting compliance, especially during the transition.
- Authorities should apply a lenient approach to products placed on the market before 27 September 2026, allowing:
 - Exhaustion of stocks;
 - No requirements for product withdrawal, relabelling, or stickering.
- Enforcement should consider:
 - **Date of placement on the market.** Such information can be retrieved through sales and supply documents, product batch numbers, or “best before” dates (for food products).
 - **Good-faith efforts by companies,** i.e. whether the company has been working towards compliance, including credible and reasonable implementation plans and timelines for updating packaging and marketing materials. Recognition of such plans as part of supervisory practice would enable orderly adaptation while maintaining the Directive’s objectives.

6. Avoidance of unnecessary bureaucratic and logistical burdens

- **No** retroactive labelling or additional stickers on already packaged products should be required. Solutions should be ecologically sound and operationally realistic, avoiding unnecessary waste and logistical complexity.
- A sell-off period for existing stocks should be the primary mechanism to support transition.

7. Protection Against Abusive Litigation

- Clear criteria and safeguards should prevent **disproportionate warnings or lawsuits**, especially in Member States with extensive private enforcement.
- Proportionality should guide all enforcement actions.

8. Clear Allocation of Responsibilities under the Directive to avoid unnecessary disruption

- Responsibilities should be aligned with and proportionate to each actor’s role in the supply chain, avoiding undue liability transfer.
- Manufacturers are responsible for the accuracy and compliance of their own environmental claims.
- Implementation should also support smooth value chain functioning, avoiding unnecessary disruptions.