

Business organisations welcome pragmatic approach of CPC authorities on legacy (old) stocks to avoid unnecessary waste and disproportionate costs

Business organisations welcome the [common understanding](#) adopted by the Consumer Protection Cooperation (CPC) Network on legacy stocks under the Empowering Consumers for the Green Transition Directive (ECGT).

This common understanding provides much-needed guidance on how competent authorities will assess products or packaging already placed on the market before the application date of the new requirements on environmental claims and sustainability labels, while avoiding unnecessary waste, disproportionate costs, and disruptions to supply chains.

The CPC common understanding, developed in response to [industry concerns](#) calling for a swift and pragmatic EU-wide approach, acknowledges the practical challenges traders face with the implementation of the new rules, despite all their reasonable and proportionate efforts to be fully compliant on 27 September 2026 when the new rules become applicable. We appreciate that the common understanding specifically states that disproportionate and unreasonable measures by traders should be avoided, in particular if that measure would create disproportionate costs or unnecessary environmental harm e.g. the destruction or recall of products, hereby supporting the broader objectives of the circular economy.

We particularly welcome the constructive and pragmatic cooperation with the European Commission throughout this process. The close dialogue between business organisations, the Commission, enforcement authorities, and consumer associations has made it possible for the CPC network to formulate a suitable and timely approach to a challenge that would have created significant and disproportionate burdens for businesses across Europe.

However, we remain concerned about possible private enforcement actions that do not sufficiently take into account the practical challenges of achieving full compliance by 27 September 2026, as recognised by the CPC Network and the European Commission. We hope all stakeholders will respect the pragmatic approach reflected in the CPC common understanding to ensure consistent application across Member States, including where national enforcement frameworks differ.

As businesses continue preparing as fast as possible for the full application of the ECGT Directive's rules from 27 September 2026, we remain committed to working closely with the European Commission and national authorities to ensure a smooth and coherent implementation of the Directive across the Single Market.

List of signatories:

