

Feedback on the European Commission's proposal for a Green Claims Directive

Bioenergia ry – the Bioenergy Association of Finland supports the objectives of the Directive on substantiation and communication of explicit environmental claims. It is important to clarify the rules for environmental claims in the EU and to prevent greenwashing of products and services.

We would like to highlight a few issues regarding the proposal:

- First of all, it is essential that the Directive provides sufficiently clear guidance for companies and fully takes into account the administrative burden caused by this Directive and the impacts of the Directive on competitiveness of European companies vs. their international competition. The bureaucracy related to the new reporting requirements should be minimised.
- We believe the scope of the Directive and more specifically, the list of environmental regulations in Article 1.2. for which the Directive does not apply is problematic, as it does not include some important new legislations, such as the RED3 Directive recently agreed in the trilogues. It is also questionable that the ISO14024-based national and regional labels are included in the scope, but the EU environmental labelling is not.
- We support the exclusion of the smallest companies (“micro companies”) from the proposal to avoid disproportionate impacts on the smallest actors.
- The use of delegated acts should be limited to technical details only.
- Consumers need a very simple, “traffic-light”-type labelling in products. Requirements for substantiating environmental claims, transparency and the related reporting should not make labels or other accompanying environmental information much more complex for consumers. Otherwise, we run the risk of consumers ignoring the “excessive” information produced with high administrative costs for companies.