

Brussels, 25/06/2025

To: Ms Ursula von der Leyen, President of the European Commission

Cc: Ms Teresa Ribera, Executive Vice-President for a Clean, Just and Competitive Transition;

Mr Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy;

Mr Wopke Hoekstra, Commissioner for Climate, Net Zero and Clean Growth;

Mr Michael McGrath, Commissioner for Democracy, Justice, the Rule of Law and Consumer Protection;

Ms Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy;

Dear President von der Leyen,

I am writing to you on behalf of Directors of the five undersigned environmental civil society organisations to express our deep concern with the recent developments as regards the final negotiating stage of the Green Claims Directive.

According to the Commission's own data, half of all green labels offer weak or non-existent verification, and 40% of claims have no supporting evidence – leading to widespread consumer confusion and the lack of a level playing field for those companies who are serious about their investments in the green transition. There is therefore no doubt that the proposal tabled in March 2023 was a timely and needed step to protect citizens from greenwashing and provide businesses with guidance for their green marketing. As the Commission itself defines it, it is an important tool setting *"criteria to stop companies from making misleading claims about environmental merits of their products and services"*.

Withdrawing the Green Claims Directive would be directly counter to the European Commission's commitment to countering dis- and misinformation. Announcing an "intention of withdrawal" in response to an offhand question by a journalist in a Friday afternoon press briefing, the working day before what was to be the final trilogue, is nothing short of alarming – not to mention unprecedented. This surprise announcement came at a moment when both Council and Parliament were ready to negotiate the final details of the text, to come to an agreement that would reflect the will of the new legislature.

In a fragile geopolitical context, with democracy and our European values threatened both at home and around the world, our strong protections, our precautionary principle and our transparent and inclusive legislative process are a bulwark against the raging storm. Overruling the co-legislation process at this point in time, after more than two years of preparations and discussions, sets a

wrong and dangerous precedent. It would erode trust in the European system for citizens and companies, both here and abroad.

Such a withdrawal also raises procedural and legal concerns as indeed it does not seem to be in line with the Right of withdrawal as mentioned in the Framework Agreement on relations between the European Parliament and the European Commission (article 39) which states *"The Commission shall provide a detailed explanation in due time before withdrawing any proposals on which Parliament has already expressed a position at first reading. The Commission shall proceed with a review of all pending proposals at the beginning of the new Commission's term of office, in order to politically confirm or withdraw them, taking due account of the views expressed by Parliament."*

As the Green Claims Directive was expressly included in the 2025 [Work Programme](#) adopted on 11 February, and seeing that two trilogues on the matter had already been concluded with the active participation of the European Commission, it can hardly be considered to coincide with the beginning of the new Commission's term of office.

Furthermore, in [point II.9](#) of the 2016 Interinstitutional Agreement on Better Law-making and also in line with the Treaties, the Commission states that it will provide reasons for any proposed withdrawals, and an indicative timetable for what it intends to do next, with due interinstitutional consultation. No such reasons or timetables were offered at the time of the announcement. The reason given a few days later, the potential inclusion of microenterprises in the scope, is not convincing. Only the Council mandate included this point, and an agreement was likely to be found at the final trilogue.

Last but not least withdrawing the Green Claims Directive runs counter to the commitments made in the political guidelines on staying the course on the European Green Deal, the platform upon which the Commission president was elected. These expressly state: *"we must and will stay the course on all our goals, including those set out in the EU Green Deal."* Withdrawing the Green Claims Directive would constitute clear evidence of going directly against that promise.

We therefore call on the Commission not to withdraw the Directive and to support co-legislators in concluding the negotiations. If not, it will be seen to the outside world as the Commission giving in to short-term business pressures and anti-regulation ideology, while weakening the market for those companies wishing to be honest about their products and hence eroding the market for true front runners.

If we wish to have competitiveness building on sustainability, then we need this law.

Thank you for your attention to this important matter.

Sincerely,
Patrick ten Brink,
Secretary General of the **European Environmental Bureau**

On behalf of:
Ariel Brunner, Regional Director, **BirdLife Europe & Central Asia**
Chiara Martinelli, Director, **Climate Action Network Europe**
William Todts, Executive Director, **T&E**
Ester Asin, Director, **WWF European Policy Office**

