

**Question for written answer E-004392/2025
to the Commission**
Rule 144
Arba Kokalari (PPE)

Subject: Application of the Empowering Consumers for the Green Transition Directive for products already placed on the market

There is concern about the upcoming application of the Empowering Consumers for the Green Transition Directive¹. According to the Directorate-General for Justice and Consumers' statement at the Internal Market and Consumer Protection committee meeting on 16 October 2025, the Directive will apply to products already on the market before its entry into force in September 2026.

Changing packaging and labels is a complex, costly and lengthy process. Many products may not meet the new requirements by 2026, forcing companies to withdraw, destroy, or relabel their goods. This would cause a negative environmental impact by creating unnecessary waste, high costs and supply chain disruption.

1. Does the Commission intend to allow this interpretation of the Directive to stand, considering the principles of proportionality, legal certainty and legitimate expectations, and noting that other relevant or related legislation includes clear transition periods and grandfathering clauses?
2. Will the Commission consider a grandfathering clause in a future omnibus, clear guidance, or managing of supervisory expectations to ensure the Directive is not applied retroactively?

Submitted: 6.11.2025

¹ Directive (EU) 2024/825 of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information (OJ L, 2024/825, 6.3.2024, ELI: <http://data.europa.eu/eli/dir/2024/825/oj>).