

JBCE'S POSITION ON THE EUROPEAN COMMISSION'S LEGISLATIVE PROPOSAL ON SUBSTANTIATING GREEN CLAIMS

INTRODUCTION

Being a cross-sector association with member companies operating in different industries and stages in the supply chain, Japan Business Council in Europe (JBCE) welcomes the opportunity to provide its feedback on the European Commission's proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive)¹.

We are dedicated to promoting truthfulness and transparency in environmental information, ensuring consumer protection. To align with the proposed Directive on Empowering Consumers for the Green Transition, we believe that the scope of the proposed Green Claims Directive should be limited to B2C commercial practices. In addition, it is crucial for the legislation to consider the practical implications for companies, especially considering the operational complexities of global businesses.

Our main points of concern are listed below.

KEY MESSAGES

- ❖ We support the **prohibition of false or misleading information** regarding the environmental properties of products and services. **Transparency of information** provided to consumers is also essential to ensure the legitimacy of environmental product laws.
- ❖ The scope should be clearly limited to **B2C** commercial practices to maintain coherence with the proposed Empowering Consumers Directive (the proposal for the Empowering Consumers Directive amends the Unfair Commercial Practices Directive and the Consumer Rights Directive). Commercial communications on a website related to B2B products and services should be explicitly excluded from the scope.
- ❖ The requirements of the legislation must be **workable and realistic for companies** to implement and should take into account the operational complexity of **global companies**. For example, the potential inclusion into the scope of environmental claims on a website, which is run by a data centre server physically located outside the EU and is managed by a non-EU parent company, and which can be visited around the world including in the EU, would raise operational issues as to how the structure of the website should be organized.

¹ [COM\(2023\)166](#)

- ❖ We believe that **efficient and functional market surveillance** promotes a level playing field and consumer protection.

ABOUT JBCE

Founded in 1999, Japan Business Council in Europe (JBCE) is a leading European organization representing the interests of about 100 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles, and glass products.

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EU Transparency Register: [68368571120-55](https://ec.europa.eu/transparency/regexp1/index.html)