

EU sustainable products Call for feedback

CRNI response

As a member of ECOS, CRNI welcomes the European Commission's draft implementation of Regulation (EU) 2024/1781 regarding disclosure of information on unsold consumer products. However, we share our colleagues' concerns regarding factors that could undermine its intended impact.

Firstly, we support ECOS's recommendation to broaden the list of products for which use of 4-digit CN codes is required when disclosing unsold goods, rather than 2-digit codes. The resulting higher level of detail and accuracy will benefit consumers, companies and the planet. We agree with ECOS that incorporating 4-digit CN codes within disclosure requirements aligns with general obligations of Article 23 of the ESPR mandating economic operators to take necessary measures to prevent the destruction of unsold consumer products.

Secondly, we agree with the need for verification of figures reported by companies (set out in the Commission's draft as being "based on a limited assurance engagement from a person or firm authorised to give an opinion on the assurance of sustainability reporting").