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**The EU's Directive on *Empowering Consumers for the Green Transition* raises the bar for consumer information**

*By Florette Peter, Stella Nalwoga, and Tobias Dolle*

On 27 September 2026, *Directive (EU) 2024/825 of the European Parliament and of the Council 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* (hereinafter, the Empowering Consumers for the Green Transition (ECGT) Directive) will enter into application. The ECGT Directive introduces new requirements on the information to be provided to consumers concerning, *inter alia*, environmental claims, sustainability labels, and product durability, thereby reshaping how businesses must communicate sustainability elements to EU consumers.

This article discusses the core requirements established by the ECGT Directive, particularly on environmental claims, and assesses the business implications.

***Regulatory gaps in the EU consumer protection framework***

The EU's consumer protection framework is underpinned by Articles 114 and 169 of the Treaty on the Functioning of the European Union (TFEU) and Article 38 of the Charter of Fundamental Rights of the European Union, which require a high level of consumer protection. Within this framework, *Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market* (hereinafter, the UCPD) establishes harmonised rules against unfair business-to-consumer commercial practices, including misleading environmental claims, and *Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights* (hereinafter, the CRD) establishes requirements on the information consumers need to be given before they purchase goods, services or digital content, such as the right to cancel online purchases. The UCPD does not regulate the intrinsic characteristics or composition of goods, services, or companies, but focuses exclusively on how these are presented to consumers, such as through marketing and commercial communications.

In its *Proposal* for the ECGT Directive, which was published in 2022, the European Commission had outlined several shortcomings in the existing EU consumer protection framework relating to commercial guarantees of durability, reparability information, 'greenwashing', and the premature obsolescence of goods. In particular, the CRD only

required producers to provide information on ‘after sale services’ on a ‘where applicable’ basis. Although the *UCPD*’s general rules on misleading practices could be applied to “greenwashing practices when they negatively affect consumers, using a case-by-case assessment”, it did not contain specific rules, including in its “Annex I”, which is known as the “blacklist”, defining practices that are unfair in all circumstances. The Commission considered that this limited the effectiveness of enforcement and noted evidence of widespread misleading environmental claims, with a study finding that 53.3% of assessed environmental claims contained vague, misleading, or unfounded information about products’ environmental characteristics.

### ***A strengthened EU consumer protection framework?***

Adopted on 28 February 2024, the *ECGT Directive* contains targeted amendments to the *UCPD* and *CRD*. It gave EU Member States until 27 March 2026 to transpose the new amendments into their regulatory frameworks. In line with the existing approach of the *UCPD* and *CRD*, the new rules apply across sectors, unless a matter is regulated by more specific legislation, and apply exclusively to business-to-consumer commercial practices, such as marketing, labelling, and point-of-sale information occurring before, during, and after the transaction.

As suggested by its title, the *ECGT Directive* introduces new measures aimed at empowering consumers for the green transition, including prohibitions on misleading sustainability and durability claims, unreliable sustainability logos, and practices linked to early obsolescence. It also introduces a host of new pre-contractual information requirements, including a mandatory harmonised notice on the legal guarantee of conformity, and a voluntary *GARAN* label for the producer’s commercial guarantee of durability, where applicable. On 30 June 2026, the Commission published a [Frequently Asked Questions document](#) (hereinafter, FAQ) clarifying some requirements introduced by the *ECGT Directive* in order to facilitate its coherent application.

### ***Newly banned practices – ‘greenwashing’***

According to Article 5 of the *UCPD*, misleading commercial practices are unfair and, therefore, prohibited, and *Annex I* lists practices considered as unfair in all circumstances. The *ECGT Directive* significantly strengthens this framework by adding, *inter alia*, “displaying a sustainability label that is not based on a certification scheme or not established by public authorities” and “inducing the consumer to replace or replenish the consumables of a good earlier than necessary for technical reasons” to Annex I to the *UCPD*.

Most notably, generic environmental claims, such as “green”, “eco-friendly”, “environmentally friendly” or similar statements suggesting excellent environmental performance are prohibited unless the trader can demonstrate “recognised excellent environmental performance relevant to the claim”. Recital 9 of the *ECGT Directive* explains that a claim that is clearly specified, such as “100% of energy used to produce this packaging comes from renewable sources”, is not considered a generic environmental claim. In this context, the Commission’s FAQ document notes that a claim would not be considered generic where its specification is provided “clearly and prominently on the same medium”.

The *ECGT Directive* also prohibits environmental claims about an entire product or business where the environmental benefit relates only to a specific aspect of the product or activity. As discussed in Recital 11 thereof, it would be misleading to market a product as “made with recycled material” where only its packaging contains recycled material. Businesses will, therefore, need to carefully consider both the wording and the level of specificity of the environmental claims made on product packaging, websites, and in related advertising.

Moving from a case-by-case assessment under Articles 6 and 7 of the *ECGT Directive* to an express prohibition under Article 5, means that, for the covered practices, it will no longer be necessary to establish that the communication caused, or was likely to cause, the average

consumer to take a different transactional decision. This will make it considerably easier for EU Member States' competent authorities to establish non-compliances.

### **Existing stock considerations**

The *ECGT Directive* does not provide for a general transitional exemption for products or packaging already on the market. Accordingly, from 27 September 2026, environmental claims and sustainability labels, as well as circularity information provided to consumers, must comply with the new requirements, including those appearing on existing stock. The Commission's *FAQ* document confirms that non-compliant stock will not necessarily have to be withdrawn or destroyed, but that corrective measures may need to be taken, such as covering or correcting claims with stickers or providing supplementary information at the point of sale.

In June 2026, the *Consumer Protection Cooperation Network*, a cooperation network between national authorities responsible for the enforcement of consumer protection laws, adopted a non-binding [Common Understanding on old stock situations](#). According to the Commission, “the document aims to support a coherent and proportionate enforcement approach across the European Union during the transition to the new rules, which will apply from 27 September 2026”. National authorities agreed to take a proportionate approach to situations that concern products or packaging displaying environmental claims or sustainability labels, which were manufactured, ordered, distributed, or placed on retailers' shelves before this date, notably where businesses face genuine transitional difficulties. On a case-by-case basis, authorities may favour a compliance-oriented approach based on businesses' packaging cycles, stock volumes, prior orders, supply-chain constraints, and the feasibility of corrective measures.

### **Way forward**

The *ECGT Directive* significantly raises the compliance standard for businesses targeting EU consumers, starting from 27 September 2026. The application of the new rules requires the prompt and careful assessment of the wording, substantiation, and overall presentation of environmental, durability, and circularity-related communications to consumers. Despite the proportionate approach initially to be pursued by EU Member States' competent authorities, businesses should ensure that their products are in line with the updated consumer law framework and seek expert advice to interpret and apply the new rules, as appropriate.

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## **New *Halal* rules in Indonesia for natural medicines, quasi-drugs, health supplements, and genetically modified products**

*By Imelda Jo Anastasya, Joanna Christy, and Paolo R. Vergano*

On 7 August 2026, Indonesia's *Halal Product Assurance Organising Agency* (i.e., *Badan Penyelenggara Jaminan Produk Halal*, hereinafter, BPJPH) notified the *World Trade Organization* (hereinafter, WTO) of a draft Decree on [Guidelines for the Implementation of the Halal Product Assurance System for Natural Medicines, Quasi Drugs, and Health Supplements](#), which sets out the measures and procedures that businesses dealing with natural medicines, quasi drugs, and health supplements must implement in order to comply with Indonesia's *Halal Product Assurance System*. Subsequently, on 28 August 2026, the BPJPH notified the WTO of a draft Decree on [Guidelines for the Implementation of the Halal Product Assurance System for Genetically Modified Products](#), which sets out corresponding requirements applicable to genetically modified products.

This article provides an overview of Indonesia's regulatory framework for *Halal* certification, discusses the two draft Decrees, assesses the compliance of Indonesia's *Halal* framework with WTO rules, and highlights the implications for businesses.

## ***Indonesia's Halal Product Assurance System***

Indonesia is gradually implementing mandatory *Halal* certification and labelling requirements for a wide range of products, over an eight-year period between 2026 and 2034 (see *Trade Perspectives*, Issue No. 16 of 9 September 2024). Under *Government Regulation No. 42 of 2024 on the Administration of the Halal Product Assurance Sector* (hereinafter, GR 42/2024), natural medicines, quasi-drugs, health supplements, and genetically modified products are among the product categories that must comply with the new rules as of 17 October 2026. Conventional pharmaceutical drugs, including over-the-counter and prescription medicines, are subject to later implementation dates, namely 17 October 2029 and 17 October 2034, respectively.

Under Article 74 of GR No. 42/2024, businesses must implement the *Halal Product Assurance System*, which requires domestic and imported products to comply with applicable *Halal* requirements. The draft Regulation on the *Assessment of Halal Product Assurance System Implementation*, notified to the WTO on 23 July 2026, sets out the general requirements for ensuring compliance with the system, including obtaining a *Statement Letter* from the BPJPH, confirming the business' continued compliance with *Halal* requirements following certification, and submitting, on an annual basis, the results of internal audits and documents relating to the product's composition and production process (see *Trade Perspectives*, Issue No. 16 of 7 September 2026).

The draft Decrees further provide sector-specific guidelines for natural medicines, quasi-drugs, health supplements, as well as genetically modified products. The guidelines are aimed at helping businesses comply with the *Halal Product Assurance System*. Separate guidelines are expected to be developed for other product groups that are also subject to *Halal* certification requirements. Despite being named "*Guidelines*", which suggests their non-binding nature, the draft Decrees contain provisions that impose binding requirements on businesses.

### ***The draft Decrees, unpacked***

Chapter II of both draft Decrees sets out the scope and definition of natural medicines, quasi-drugs, health supplements, as well as genetically modified products. For instance, natural medicines are defined as referring to drugs derived from natural resources, with standardised herbal medicines being examples of products falling within such category. These provisions provide greater clarity as to the products falling within each category, as the exact scope and relevant definitions were not previously provided for under GR No. 42/2024.

Chapter III of the draft Decrees sets out the same guidelines for implementing the *Halal Product Assurance System*, albeit for the specific product groups. In particular, businesses would be required to establish an internal *Halal* policy, consisting of a written statement setting out its commitment to ensuring that relevant *Halal* products obtain *Halal* certification and remain compliant with the applicable *Halal* requirements following certification. The *Halal* policy must be disseminated and communicated to all relevant parties, including personnel. For products subject to *Halal* certification, businesses must ensure that product materials are not derived from substances prohibited under Islamic law (e.g., alcohol and pork), and that equipment and production facilities used for the processing, storage, and packaging are separated from those used for non-*Halal* products.

Products seeking *Halal* certification may, however, be manufactured in the same production facility alongside products for which *Halal* certification is not required, provided that the latter are not derived from materials containing prohibited substances and that additional documents, such as cleaning procedures, are submitted to the BPJPH when applying for a *Halal* certificate. Following *Halal* certification, the product's packaging must bear Indonesia's official *Halal* label and must not be made from or contain non-*Halal* materials. Where non-compliance is identified, including where certified products are subsequently found to be non-compliant with *Halal* requirements, businesses must implement appropriate measures, such as recalling such products from the market and destroying such products.

## ***International standards: Compliance or divergence?***

The implementation of Indonesia's *Halal Product Assurance System* has raised significant concerns among Indonesia's trading partners, notably regarding its potential divergence from international standards, such as, for food products, the *Codex Alimentarius General Guidelines for Use of the Term "Halal"* (hereinafter, CAC/GL 24-1997). Under CAC/GL 24-1997, *Halal* and non-*Halal* products may, *inter alia*, be processed at the same facility, provided that measures are in place to prevent cross-contamination and that equipment is properly cleansed in accordance with Islamic law. By contrast, Indonesia's *Halal* legislation, including the draft Decrees, goes beyond such requirements by requiring businesses to ensure that *Halal* and non-*Halal* products are not processed at the same facility, even where measures to prevent cross-contamination and to ensure proper cleansing are in place.

Such divergences may raise concerns under Articles 5.1.2 and 5.4 of the *Agreement on Technical Barriers to Trade* (hereinafter, TBT Agreement). Article 5.1.2 requires WTO Members to ensure that conformity assessment procedures (hereinafter, CAPs) are not prepared, adopted or applied so as to create "*unnecessary obstacles to international trade*", including by being more strict than necessary to provide adequate confidence that products conform with the applicable requirements. Article 5.4 further requires Members to use relevant international guides or recommendations, or the relevant parts thereof, as a basis for their CAPs, unless such guides or recommendations are inappropriate for the Members concerned for specified reasons.

Permitting *Halal* and non-*Halal* products to be processed in the same facility, subject to measures to prevent cross-contamination and ensure that equipment is properly cleansed in accordance with Islamic law, as provided under CAC/GL 24-1997, may be considered to provide an adequate level of assurance as to the *Halal* status of the products. Singapore's *Halal* certification framework similarly *permits* shared premises in certain circumstances, subject to segregation and cross-contamination controls. Accordingly, Indonesia's requirement for separate equipment and production facilities for *Halal* and non-*Halal* products, even where measures to prevent cross-contamination and ensure proper cleansing are in place, could be considered more strict than necessary to provide adequate confidence that products conform with the applicable *Halal* requirements under Article 5.1.2 of the *TBT Agreement*. Although Indonesia's *Halal* legislation is *aligned* with most aspects of CAC/GL 24-1997, including requirements relating to *Halal* labelling, Indonesia would need to demonstrate why the relevant provisions of CAC/GL 24-1997 concerning shared production facilities are "*inappropriate*" for Indonesia within the meaning of Article 5.4 of the *TBT Agreement*.

## ***Next steps***

WTO Members have until 6 October 2026 to comment on the draft Decree on natural medicines, quasi-drugs, health supplements, and until 27 October 2026 to submit comments on the draft Decree on genetically modified products. WTO Members should consider submitting comments by the respective deadlines, including with respect to any potential implications for international trade. In parallel, businesses should monitor developments concerning the enactment and implementation of the draft Decrees. Once enacted, businesses must ensure compliance with the *Halal* requirements throughout the certification process and continue to comply with the *Halal* framework following certification.

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## **Pesticide residue limits and market access: The EU's evolving approach and harmonisation across ASEAN**

*By Alya Mahira, Pattranit Chantaplaboon, and Paolo R. Vergano*

Recent developments in the EU and within the *Association of Southeast Asian Nations* (hereinafter, ASEAN) highlight different approaches to regulating pesticide residues in food and their implications for market access. While ASEAN continues its efforts to harmonise maximum residue levels (hereinafter, MRLs), the EU appears to be moving towards “*stronger import rules for pesticide residues*”, as reflected in the European Commission’s *Proposal* to lower certain MRLs for hazardous pesticides in imported products, as part of its *Food and Feed Safety Simplification Package*.

This article examines the approaches to pesticide MRLs regulation in the EU and within ASEAN, discusses the consistency of the EU’s MRLs approach with the *World Trade Organization’s* (hereinafter, WTO) *Agreement on the Application of Sanitary and Phytosanitary Measures* (hereinafter, SPS Agreement), and highlights the implications for businesses.

### ***The EU’s proposed reform of pesticide residue limits for imported products***

An MRL is the highest level of a pesticide residue legally permitted in or on food or feed. In the EU, under *Regulation (EC) No 396/2005 of the European Parliament and of the Council of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin*, a general default MRL of 0.01 mg/kg applies, where no specific MRL has been established. This default corresponds to the limit of quantification (hereinafter, LoQ), which refers to the lowest residue level that can be reliably measured. Under Article 6 of *Regulation (EC) No 396/2005*, import tolerances may be established for pesticide residues resulting from uses authorised in third countries, even where those pesticides are not approved for use within the EU. Import tolerances are typically established based on third-country good agricultural practices (hereinafter, GAPs) or *Codex Alimentarius* MRLs, and are assessed primarily on the basis of consumer safety.

On 16 December 2025, the European Commission presented a Proposal under the *Food and Feed Safety Simplification Package*, aiming to “*pursue a stronger alignment of production standards applied to imported products, notably on pesticides*” and to “*establish a principle that the most hazardous pesticides banned in the EU for health and environmental reasons are not allowed back to the EU through imported products*”. The Proposal foresees to amend *Regulation (EC) No 396/2005* to allow existing MRLs, which vary depending on third-country GAPs or *Codex* MRLs, to be lowered to the LoQ (i.e., 0.01 mg/kg), or “*technical zero*”, for certain hazardous pesticides not approved for use in the EU, subject to an impact assessment.

### ***Trade implications of lower import MRLs: Findings of the JRC’s Technical Report***

On 11 August 2026, the European Commission’s *Joint Research Centre* (hereinafter, JRC) published a *Technical Report* assessing the economic impacts of the Proposal. The *Technical Report* finds that reducing existing MRLs to the LoQ would render imports containing detectable residues non-compliant with EU requirements. As a result, exporters in third countries that continue to use the affected pesticides could face increased compliance costs, might need to adapt their production practices, or might risk losing access to the EU market. The *Technical Report* estimates that EU agricultural imports could decline by up to 41%, while imports are only estimated to decline between 8% or 0.4% in case third country exporters were to be able to adapt their production practices at higher or lower adaptation costs, respectively.

The *Technical Report* further emphasises that impacts are likely to vary considerably across active substances, commodities, and exporting countries, notably due to differences in the availability of alternative pesticides and adaptation costs. Therefore, the *Technical Report* highlights the need for further substance-, commodity-, and country-specific assessments, as the effects of lowering MRLs to the general default depend heavily on adaptation costs and the availability of alternative pesticides.

### ***The EU’s approach to MRLs: Inconsistency with WTO rules?***

The EU's approach to MRLs has been repeatedly criticised by several WTO Members, which argue that lowering MRLs to the default level departs from the *Codex* standards and raises concerns under Articles 2.2, 3.1, 5.1, and 5.6 of the WTO's *SPS Agreement*, notably as regards the scientific justification and the consistency with international standards (see *Trade Perspectives*, [Issue No. 8 of 22 April 2024](#) and [Issue No. 6 of 23 March 2026](#)). The European Commission's new Proposal prompted similar concerns. WTO Members, such as the US, Indonesia, and Australia, [questioned](#) the Proposal, arguing that producers in third countries already comply with internationally recognised standards and that lowering MRLs for certain pesticides below those standards could undermine the EU's risk-based MRL framework and disrupt international trade.

The implications for EU market access could be significant. Products that comply with the EU's current import tolerances or *Codex* MRLs could become non-compliant, requiring exporters to adapt their production practices to EU requirements or potentially forgo the EU market. This raises the broader issue of whether, and to what extent, the EU may require imported products to comply with EU production standards. This is part of the broader debate over so-called 'mirror clauses', which aim at ensuring "*that imported products are subject to the manufacturing standards in force within the EU*" (see *Trade Perspectives*, [Issue No. 3 of 14 February 2022](#)).

With respect to MRLs, the recent Proposal reflects an intention to address perceived double standards, whereby food or feed containing residues of substances banned for use in the EU may nevertheless be placed on the EU market. While the EU presents the measure as necessary to "*ensure a level playing field*" for its farmers, in practice it imposes stricter default MRL requirements than international standards, burdening third-country exporters and creating trade barriers through a *de facto* ban on those substances and products treated therewith.

### ***ASEAN's approach to harmonising MRLs***

In ASEAN, pesticide MRLs are harmonised regionally under the [Principle for Harmonisation of ASEAN MRLs](#), which promotes the adoption of *Codex* MRLs, where available and applicable. Where no relevant *Codex* MRL exists, ASEAN Member States may propose new MRLs for consideration by the *ASEAN Expert Working Group on the Harmonisation of Maximum Residue Limits of Pesticides* (hereinafter, EWG-MRLs). Most recently, at the [30<sup>th</sup> meeting](#) of the EWG-MRLs, held from 11 to 13 May 2026 to "*strengthen MRLs harmonisation on agricultural commodities within the ASEAN region*", 13 new ASEAN-harmonised MRLs were approved, seven of which are based on existing *Codex* MRLs. These MRLs are expected to be endorsed at the 48<sup>th</sup> meeting of the *ASEAN Ministers on Agriculture and Forestry* (AMAF) in October 2026. Following endorsement, they will be formally adopted and implemented by ASEAN Member States through their respective national regulatory frameworks.

On 27 May 2026, Thailand's *Food and Drug Administration* (hereinafter, FDA) [advised](#) food business operators to prepare for the forthcoming implementation of the 13 approved ASEAN MRLs, which would be incorporated into the Thai legal framework through *Schedule 2* annexed to *Notification of the Ministry of Public Health (No. 460) B.E. 2568 Regarding Food Containing Pesticide Residues*. This development reflects ASEAN's broader effort to reduce regulatory divergence in residue standards, thereby facilitating market access and promoting regional trade.

### ***Implications for businesses operating across markets***

While ASEAN continues to promote the adoption of *Codex* MRLs, the EU appears to be increasingly moving towards MRLs that are stricter than international standards. For businesses operating across multiple markets, such divergence can increase regulatory complexity and compliance costs. It also highlights the importance of continued international cooperation on pesticide regulation, including through the *Codex Alimentarius*. Against this background, the proposal should be carefully assessed to ensure consistency with the EU's WTO commitments and to avoid creating unnecessary barriers to trade.

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## **Recently adopted EU legislation**

### **Trade Law**

- *Commission Implementing Regulation (EU) 2026/2047 of 14 September 2026 extending the retrospective Union surveillance of imports of renewable ethanol for fuel*
- *Council Decision (EU) 2026/2060 of 20 November 2025 on the position to be taken on behalf of the European Union within the EU-Armenia Partnership Council as regards the adoption of the Strategic Agenda for the EU-Armenia Partnership*
- *Commission Delegated Regulation (EU) 2026/2102 of 13 July 2026 amending Regulation (EU) 2023/1115 of the European Parliament and of the Council as regards the list of relevant commodities and relevant products*

### **Trade Remedies**

- *Commission Implementing Regulation (EU) 2026/2049 of 14 September 2026 making imports of primary cells and primary batteries of alkaline manganese dioxide originating in People's Republic of China subject to registration with a view to allowing the levy of anti-dumping duties on the imports subject to registration*
- *Commission Implementing Regulation (EU) 2026/2022 of 10 September 2026 making imports of welded steel mesh originating in the People's Republic of China and Türkiye subject to registration with a view to allowing the levy of anti-dumping duties on the imports subject to registration*
- *Commission Implementing Regulation (EU) 2026/2023 of 10 September 2026 making imports of bolted and boltless steel shelves originating in the People's Republic of China subject to registration with a view to allowing the levy of anti-dumping duties on the imports subject to registration*
- *Commission Implementing Regulation (EU) 2026/2088 of 18 September 2026 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of certain alkyl phosphonic acids and their sodium salts originating in the People's Republic of China*
- *Commission Implementing Regulation (EU) 2026/2089 of 18 September 2026 amending Implementing Regulation (EU) 2022/191 imposing a definitive anti-dumping duty on imports of certain iron or steel fasteners originating in the People's Republic of China following acceptance of a request for new exporting producer treatment*

### **Food Law**

- *Commission Implementing Regulation (EU) 2026/2020 of 4 September 2026 amending Annexes V and XIV to Implementing Regulation (EU) 2021/404 as regards the entries for the United States in the lists of third countries, territories,*

*or zones thereof authorised for the entry into the Union of consignments of poultry and germinal products of poultry, and of fresh meat of poultry and game birds*

## Other

- *Commission Implementing Decision (EU) 2026/2048 of 14 September 2026 on the harmonised standard for batteries drafted in support of Regulation (EU) 2023/1542*

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