



Industry calls for the implementation of a simple verification process for the reporting of unsold goods

At a time when the competitiveness of EU industry is increasingly at stake, we, industry associations representing sectors ranging from detergents to branded goods, recommend the EU implements a reporting obligation on the format and verification of the disclosure of information on unsold consumer products in a way that minimises unnecessary regulatory burden.¹ Simplifying reporting obligations is consistent with European Commission President von der Leyen's call to reduce 'administrative burdens and simplifying implementation: less red tape and reporting, more trust, better enforcement (...).'²

Against this background, the Commission should **put in place a cost-effective system to verify the information provided by economic operators. The verification process should occur under the processes already foreseen by the ESRP:**

- **Risk-based verification by national competent authorities based on Article 24 (2) of the ESRP.** The ESRP already enables Member States to provide the Commission with all the information and documentation necessary to demonstrate the delivery of unsold consumer products to a waste management option. As a result, this provision would allow Member States to check the accuracy of companies' online reports.
- **Market surveillance provisions pursuant to Chapter XI of the ESRP.** As for product legislation, the ESRP foresees that national competent authorities have a strategy to check economic operators' compliance.

The above mechanisms foreseen by the ESRP provide an effective way for competent authorities to verify the accuracy of online reports, which are publicly available online, making it easy for all stakeholders to scrutinise these data. Companies should be allowed to develop their own internal verification systems, which can be auditable ex- post (after the information is disclosed) by national competent authorities.

¹ Art. 24 (3) of the ESRP.

² Ursula von der Leyen, 'Europe's Choice, Political Guidelines for the next European Commission 2024-2029', p. 7 ([link](#)).

Any additional verification mechanism – eg through third-party verification – would:

- Add **unnecessary costs** associated with third-party fees and company resources needed to go through a third-party verification, diverting financial and human resources away from much-needed investments. These costs would add to the significant reporting costs that companies are already incurring.³ Given the public nature of the reports and the existing possibilities for national competent authorities to verify companies' reports, these costs are unnecessary.
- **Potentially delay reporting** due to the time needed for companies to go through all the audits.
- **Lead to static reporting**, since the need for pre-approval would make it more difficult for companies to update or correct information in real-time based on new data or insights.
- **Run against** both the conclusions of the **Draghi report** on the imperative to reduce reporting costs, the **Commission's own commitment to reduce reporting burden by 25%**⁴ and the **European Council's** call to '**drastically [reduce] administrative, regulatory and reporting burdens.**'⁵

For the reasons above, the Commission must **leverage the existing mechanisms under the ESPR** (Art. 24 (2) and market surveillance tools) **to verify** economic operators' reports on discarded unsold consumer products **and avoid additional mechanisms such as third-party verification**. This is the best way for the Commission to translate its simplification goals into concrete actions.

List of signatories:



AIM, The European Branded Goods Association



AmCham EU, The American Chamber of Commerce to the European Union



Applia, Home Appliance Europe



AISE, International Association for Soaps, Detergents and Maintenance Products



CEPE, The European Council of the Paint, Printing Ink and Artist's Colours Industry

³ Eg through the Corporate Sustainability Reporting Directive, the Taxonomy Regulation, the Corporate Sustainability Due Diligence Directive and the Digital Product Passport.

⁴ Communication on the long-term competitiveness of the EU: looking beyond 2030, 16 March 2023, p. 18, ([link](#)).

⁵ European Council, Budapest Declaration on the new European Competitiveness Deal, 8 November 2024.



Cosmetics Europe, The Personal Care Association



DigitalEurope, The Association for Digitally Transforming Industries in Europe



EDANA, The Global Association and Voice of Nonwovens and Related Industries



Federation of the European
Sporting Goods Industry

FESI, Federation of the European Sporting Goods Industry



TIE, Toy Industries of Europe