DRAFT OPINION

of the Committee on the Environment, Public Health and Food Safety

for the Committee on the Internal Market and Consumer Protection


Rapporteur for opinion: Edina Tóth
SHORT JUSTIFICATION

Background of the Commission proposal

In 2019, the European Commission presented the European Green Deal, which sets out a comprehensive strategy to transform the EU into a fair and prosperous society, with a climate-neutral, resource-efficient, clean and circular economy. To properly deliver the Commission’s legislative package, a number of EU policies should be updated accordingly. To that end, there is a need to envisage changes both in consumers and business behavior by amending two directives: the Unfair Commercial Practices Directive 2005/29/EC (‘UCPD’) and the Consumer Rights Directive 2011/83/EU (‘CRD’).

According to a consumer survey carried out by the European Commission, the lack of reliable information about products’ environmental sustainability, reparability and lifespan features among the main obstacles preventing consumers from adopting more sustainable consumption behaviors. Therefore, empowering consumers and providing them with better information on the durability and reparability of certain products are key aspects of environmental sustainability.

For these reasons, the present proposal of the European Commission corresponds to a strong and longstanding demand in implementing the European Green Deal, and a firm belief that consumers should be better protected against unfair commercial practices.

The current proposal amending the UCPD aims at preventing certain unfair commercial practices, such as greenwashing, early obsolesce practices and the use of unreliable and non-transparent sustainability labels and information tools. At the same time, the updated CRD will ensure that consumers can contribute to the green transition by having better information on products’ environmental characteristics, the lifespan of goods and products’ reparability.

Rapporteur’s position and amendments proposed

The Rapporteur believes that the initiative on Empowering Consumers for the Green Transition is a first step to tackle vague, irrelevant, misleading or factually wrong claims. It clearly bans unsubstantiated generic claims, introduces new information requirements on product durability and reparability, and strengthens how environmental labels and information tools are regulated. However, in many instances, the proposed amendments fail to match the original ambition of the initiative.

The Rapporteur stresses that carbon neutral claims are highly misleading to consumers because they imply environmentally positive meaning, without any impact of products (or services) on the environment. These claims are often being justified by the company’s involvement in carbon offsetting or compensation projects, which are currently unregulated. At the same time, consumers are not sufficiently informed thereabout and have no means to verify whether these claims are indeed robust enough and reliable. The Rapporteur, therefore, suggests banning carbon neutral claims and labels.

The Rapporteur welcomes the Commission’s proposal on banning claims related to future environmental performances, however, she believes it is necessary to provide more clarity.
thereupon. For this reason, the requirements on claims related to future environmental performances should be further strengthened for the sake of effectively preventing that consumers are being misled.

The Rapporteur also points out that a large number of labels can be expected to flourish and their certification can be expected to be controlled. This will require the national legislator of each Member State to define the scope of the label in addition to updating the list of misleading commercial practices. After the legislative phase, there will be a certification phase for candidate labels. It is only after this certification phase that traders will be able to identify compliant labels and thus market the products. Hence, the Rapporteur believes that the transitional period of 24 months is rather short and should be prolonged to 36 months.

The Rapporteur highlights that the Commission’s proposal introduces the reparability score and refers to an unspecified EU law for the method establishing the scoring system. She considers that the creation of scoring systems is urgent and therefore proposes to include provisions to that end in this proposal.

Finally, the Rapporteur insists that the initiative will need to be strictly enforced to bring tangible results.

AMENDMENTS

The Committee on the Environment, Public Health and Food Safety calls on the Committee on the Internal Market and Consumer Protection, as the committee responsible, to take into account the following amendments:

Amendment 1

Proposal for a directive
Recital 1

Text proposed by the Commission

(1) In order to tackle unfair commercial practices which prevent consumers from making sustainable consumption choices, such as practices associated with the early obsolescence of goods, misleading environmental claims (“greenwashing”), non-transparent and non-credible sustainability labels or sustainability information tools, specific rules should be introduced in Union consumer law. This would enable national competent bodies to address those practices effectively. By ensuring that environmental claims are fair,

Amendment

(1) In order to tackle unfair commercial practices which prevent consumers from making sustainable consumption choices, such as practices associated with the early obsolescence of goods, misleading environmental claims (“greenwashing”), non-transparent and non-credible sustainability labels or sustainability information tools, specific rules should be introduced in Union consumer law. Introducing provisions in this regard in Union consumer law will enable national competent bodies to address those practices
consumers will be able to choose products that are genuinely better for the environment than competing products. This will encourage competition towards more environmentally sustainable products, thus reducing negative impact on the environment.

**Justification**

*This amendment only seeks to improve the drafting from a linguistic point.*

**Amendment 2**

**Proposal for a directive**

**Recital 4**

*Text proposed by the Commission*

(4) Environmental claims, in particular climate-related claims, increasingly relate to future performance in the form of a transition to carbon or climate neutrality, or a similar objective, by a certain date. Through such claims, traders create the impression that consumers contribute to a low-carbon economy by purchasing their products. To ensure the fairness and credibility of such claims, Article 6(2) of Directive 2005/29/EC should be amended to prohibit such claims, following a case-by-case assessment, when they are not supported by clear, objective and verifiable commitments and targets given by the trader. *Such claims should also be supported by an independent monitoring system to monitor the progress of the trader with regard to the commitments and targets.*

*Amendment*

(4) Environmental claims, in particular climate-related claims, increasingly relate to future performance in the form of a transition to carbon or climate neutrality, or a similar objective, by a certain date. Through such claims, traders create the impression that consumers contribute to a low-carbon economy by purchasing their products. To ensure the fairness and credibility of such claims, Article 6(2) of Directive 2005/29/EC should be amended to prohibit such claims, following a case-by-case assessment, when they are *solely based on carbon offsetting or* not supported by clear, objective and verifiable commitments and targets given by the trader followed by an implementation plan at the trader level. *To achieve this, future environmental performance should include concrete and verifiable interim targets consistent with achieving long-term commitment, sufficient budget allocated and be based only on existing technologies. The implementation plan as well as the progress achieved should be made publicly available and regularly*
Claims related to future environmental performance should also be supported by an independent monitoring system to monitor the progress of the implementation plan of the traders' commitments and targets. Claims related to the future environmental performance should only be used at the trader level and not on product level, otherwise the environmental claims can mislead consumers.

Justification

The requirements under which claims related to the future environmental performance are allowed should be further strengthened in order to really prevent that consumers continue being misled.

Amendment 3

Proposal for a directive
Recital 9

Text proposed by the Commission

(9) Annex I to Directive 2005/29/EC should also be amended to prohibit making generic environmental claims without recognised excellent environmental performance which is relevant to the claim. Examples of such generic environmental claims are ‘environmentally friendly’, ‘eco-friendly’, ‘eco’, ‘green’, ‘nature’s friend’, ‘ecological’, ‘environmentally correct’, ‘climate friendly’, ‘gentle on the environment’, ‘carbon friendly’, ‘carbon neutral’, ‘carbon positive’, ‘climate neutral’, ‘energy efficient’, ‘biodegradable’, ‘biobased’ or similar statements, as well as broader statements such as ‘conscious’ or ‘responsible’ that suggest or create the impression of excellent environmental performance. Such generic environmental claims should be prohibited whenever there is no excellent environmental performance demonstrated.

Amendment

or whenever the specification of the claim is not provided in clear and prominent terms on the same medium, such as the same advertising spot, product’s packaging or online selling interface. For example, the claim ‘biodegradable’, referring to a product, would be a generic claim, whilst claiming that ‘the packaging is biodegradable through home composting in one month’ would be a specific claim, which does not fall under this prohibition.

Amendment 4
Proposal for a directive
Recital 14

Text proposed by the Commission

(14) In order to improve the welfare of consumers, the amendments to Annex I to Directive 2005/29/EC should also address several practices associated with early obsolescence, including planned obsolescence practices, understood as a commercial policy involving deliberately planning or designing a product with a limited useful life so that it prematurely becomes obsolete or non-functional after a certain period of time. Purchasing products that are expected to last longer than they actually do causes consumer detriment. Furthermore, early obsolescence practices have an overall negative impact on the environment in the form of increased material waste. Therefore, addressing those practices are also likely to reduce the amount of waste, contributing to a more sustainable consumption.

Amendment

(14) Given that they are perceived as particularly unfair and affect the welfare of consumers, several practices associated with early obsolescence, including planned obsolescence practices, understood as a commercial policy involving deliberately planning or designing a product with a limited useful life so that it prematurely becomes obsolete or non-functional after a certain period of time, should also be addressed in amendments to Annex I to Directive 2005/29/EC. Purchasing products that are expected to last longer than they actually do causes consumer detriment. Furthermore, early obsolescence practices have an overall negative impact on the environment in the form of increased material waste. Therefore, addressing those practices is also likely to reduce the amount of waste and the unnecessary consumption of resources, contributing thereby to a more sustainable consumption.
Amendment 5
Proposal for a directive
Recital 31 a (new)

*Text proposed by the Commission*

(31a) In order to lay down harmonised provisions on reparability, the power to adopt acts in accordance with Article 290 of the Treaty on the Functioning of the European Union should be delegated to the Commission in respect of specifying a methodology for the reparability score, by providing the detailed definition of the classes, by defining product groups and by setting dates as of when reparability scores become applicable per product group. It is of particular importance that the Commission carries out appropriate consultations during its preparatory work, including at expert level, and that those consultations be conducted in accordance with the principles laid down in the Interinstitutional Agreement on Better Law-Making of 13 April 2016¹a. In particular, to ensure equal participation in the preparation of delegated acts, the European Parliament and the Council receive all documents at the same time as Member States’ experts, and their experts systematically have access to meetings of Commission expert groups dealing with the preparation of delegated acts.


Or. en

Amendment 6
Proposal for a directive
Article 1 – paragraph 1 – point 1
Directive 2005/29/EC
Article 2 – paragraph 1 – point o
Text proposed by the Commission

(o) ‘environmental claim’ means any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names, in the context of a commercial communication, which states or implies that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time;

Amendment

(o) ‘environmental claim’ means any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names, in the context of a commercial communication, which states or indicates that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time;

Justification

The original wording could lead to a vast scope of interpretations to be considered as environmental claims. It would lead to a high degree of uncertainty as to the applicable legal framework.

Amendment 7

Proposal for a directive
Article 1 – paragraph 1 – point 1
Directive 2005/29/EC
Article 2 – paragraph 1 – point r

Text proposed by the Commission

(r) ‘sustainability label’ means any voluntary trust mark, quality mark or equivalent, either public or private, that aims to set apart and promote a product, a process or a business with reference to its environmental or social aspects or both. This does not cover any mandatory label required in accordance with Union or national law;

Amendment

(r) ‘sustainability label’ means any voluntary trust mark, quality mark or equivalent, either public or private, that is predominantly implemented with the aim to set apart and promote a product, a process or a business with reference to its environmental or social aspects or both. This does not cover any mandatory label required in accordance with Union or national law;

Or. en
Amendment 8

Proposal for a directive
Article 1 – paragraph 1 – point 1
Directive 2005/29/EC
Article 2 – paragraph 1 – point s

Text proposed by the Commission

(s) ‘certification scheme’ means a third-party verification scheme that is open under transparent, fair and non-discriminatory terms to all traders willing and able to comply with the scheme’s requirements, which certifies that a product complies with certain requirements, and for which the monitoring of compliance is objective, based on international, Union or national standards and procedures and carried out by a party independent from both the scheme owner and the trader;

Amendment

(s) ‘certification scheme’ means a third-party verification scheme that is open under transparent, fair and non-discriminatory terms to the participating traders willing and able to comply with the scheme’s requirements, which certifies that a product complies with certain requirements, and for which the monitoring of compliance and awarding of the certificate are objective, based on transparent and non-discriminatory procedures, as well as international, Union or national standards and impartially carried out by a party independent from the trader;

Or. en

Justification

Additional details to the definition of ‘certification scheme’ are needed to support reliable and consistent interpretation and application. The reference to ‘participating traders’ is necessary because the condition to having a system which is open to all may slow down progress. Business operators may have less incentives to develop more sustainable products if the law foresees obligation to have schemes open to all not allowing for exploiting competitive advantages. Furthermore, not only the monitoring of compliance should be objective and carried out by an independent party but also the awarding of the certificate, which should be objective and carried out by an independent party.

Amendment 9

Proposal for a directive
Article 1 – paragraph 1 – point 1
Directive 2005/29/EC
Article 2 – paragraph 1 – point u

Text proposed by the Commission

(u) ‘recognised excellent

Amendment

(u) ‘recognised excellent

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Or. en

**Justification**

The requirements under which claims related to the future environmental performance are allowed are further strengthened in order to really prevent consumers from being misled.

**Amendment 10**

**Proposal for a directive**

**Article 1 – paragraph 1 – point 1**

Directive 2005/29/EC

Article 2 – paragraph 1 – point y a (new)

Text proposed by the Commission

**Amendment**

(ya) ‘carbon offsetting’ means the purchase of carbon offsets to compensate for the purchaser's own greenhouse gas
emissions. Offsets are typically achieved through financial support for projects, like reforestation, renewable energy, energy efficiency, etc;

Or. en

Justification

The requirements under which claims related to the future environmental performance are allowed should be further strengthened in order to really prevent that consumers from being misled.

Amendment 11

Proposal for a directive
Article 1 – paragraph 1 – point 1
Directive 2005/29/EC
Article 2 – paragraph 1 – point y b (new)

Text proposed by the Commission

(yb) “greenhouse gases” means greenhouse gases as defined in Article 3, point (c) of Directive 2003/87/EC of the European Parliament and of the Council


Or. en

Justification

Carbon neutral claims are highly misleading to consumers as they imply neutrality and no impact of products (or services) on the environment, which is impossible to achieve. They are often being justified by the company’s involvement in carbon offsetting/compensation projects, which are currently unregulated and about which consumers are not sufficiently informed and have no means to verify whether they are really robust and reliable. Therefore carbon neutral claims and labels should be explicitly banned.
Amendment 12

Proposal for a directive
Article 1 – paragraph 1 – point 2 – point a
Directive 2005/29/EC
Article 6 – paragraph 1 – point b

Text proposed by the Commission
(b) the main characteristics of the product, such as its availability, benefits, risks, execution, composition, environmental or social impact, accessories, durability, reusability, after-sale customer assistance and complaint handling, method and date of manufacture or provision, delivery, fitness for purpose, usage, quantity, specification, geographical or commercial origin or the results to be expected from its use, or the results and material features of tests or checks carried out on the product.;

Amendment
(b) the main characteristics of the product, such as its availability, benefits, risks, execution, composition, environmental or social impact, accessories, durability, reusability, recyclability, after-sale customer assistance and complaint handling, method and date of manufacture or provision, delivery, fitness for purpose, usage, quantity, specification, geographical or commercial origin or the results to be expected from its use, or the results and material features of tests or checks carried out on the product.;

Or. en

Amendment 13

Proposal for a directive
Article 1 – paragraph 1 – point 2 – point b
Directive 2005/29/EC
Article 6 – paragraph 2 – point d

Text proposed by the Commission
(d) making an environmental claim related to future environmental performance without clear, objective and verifiable commitments and targets and without an independent monitoring system;

Amendment
(d) making an environmental claim related to future environmental performance *solely based on carbon offsetting* or without clear, objective and verifiable reduction commitments and targets *complemented by a realistic implementation plan* and without an independent monitoring system;

Or. en

Justification

The requirements under which claims related to the future environmental performance are allowed are further strengthened in order to really prevent that consumers from being misled.
Amendment 14
Proposal for a directive
Article 2 – paragraph 1 – point 1 – point b
Directive 2011/83/EU
Article 2 – paragraph 1 – point 14d

Text proposed by the Commission
(14d) ‘reparability score’ means a score expressing the capacity of a good to be repaired, based on a method established in accordance with Union law;

Amendment
(14d) ‘reparability score’ means a score expressing the capacity of a good to be repaired;

Justification
A new article is added on the reparibility score

Amendment 15
Proposal for a directive
Article 2 – paragraph 1 – point 4 a (new)
Directive 2011/83/EU
Article 22 a (new)

Text proposed by the Commission
(4a) The following article is inserted:
‘Article 22a
Reparability score
1. In order to inform consumers about the reparability of goods, a reparability score shall be established thereby enabling customers to choose goods according to the capacity of a good to be repaired.
2. The reparability score consists of at least five classes ranging from ‘very easy to repair’ until ‘impossible to repair.’ The reparability score shall be easy to understand for consumers and be based on an objective methodology.'
3. By...[two years from the date of entry into force of this Directive] the Commission shall adopt a delegated act in accordance with Article 30a in order to supplement this Directive by specifying a methodology for the reparability score, by providing the detailed definition of the classes, by defining product groups and by setting dates as of when reparability scores become applicable per product group.

4. The Commission shall at regular intervals review and update the methodology, the classes, the scores and product groups referred to in paragraph 3.

Or. en

Amendment 16

Proposal for a directive
Article 2 – paragraph 1 – point 4 b (new)
Directive 2011/83/EU
Article 30 a (new)

Text proposed by the Commission

(4b) The following article is inserted:

‘Article 30a

Exercise of the delegation

1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.

2. The power to adopt delegated acts referred to in Article 22a shall be conferred on the Commission for a period of five years from... [OJ please insert the date of entry into force of this Directive]. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration unless the European Parliament or the Council
opposes such extension not later than three months before the end of each period.

3. The delegation of power referred to in Article 22a may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the delegation of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.

4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.

5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.

6. A delegated act adopted pursuant to Article 22a shall enter into force only if no objection has been expressed either by the European Parliament or by the Council within a period of two months of notification of that act to the European Parliament and to the Council or if, before the expiry of that period, the European Parliament and the Council have both informed the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or of the Council.’

Amendment 17
Proposal for a directive
Article 4 – paragraph 1 – subparagraph 2
They shall apply those provisions from [24 months from adoption].

They shall apply those provisions from [36 months from adoption].

Justification

A large number of labels can be expected to flourish and their certification can be expected to be controlled. This will require the national legislator of each Member State to define the scope of the label in addition to updating the list of misleading commercial practices. After the legislative phase, there will be a certification phase for candidate labels. It is only after this certification phase that traders will be able to identify compliant labels and thus market the products. The transitional period of 24 months therefore appears to be rather short.

Amendment 18

Proposal for a directive
Annex I – paragraph 1 – point 1
Directive 2005/29/EC
Annex I – point 2a

Text proposed by the Commission

2a. Displaying a sustainability label which is not based on a certification scheme or not established by public authorities.;

Amendment

2a. Displaying a sustainability label which is not based on a label in accordance with Article 43(1), points (b) to (e) of Directive 2014/24/EU, an EU certification mark in accordance with Article 84 of Regulation (EU) No 2017/1001 or some other certification scheme or not established by public authorities.;

Amendment 19

Proposal for a directive
Annex I – paragraph 1 – point 2
Directive 2005/29/EC
Annex I – point 4b

Text proposed by the Commission

4b. Making an environmental claim

Amendment

4b. Making an environmental claim
about the entire product when it actually concerns only a certain aspect of the product; about the entire product *that is not covered by a sustainability label* when it actually concerns only a certain aspect of the product;

**Amendment 20**

Proposal for a directive
Annex I – paragraph 1 – point 2
Directive 2005/29/EC
Annex I – point 4b a(new)

*Text proposed by the Commission*  

4ba. Claiming that a good or a service has a neutral or positive greenhouse gas emissions’ impact on the environment.

*Amendment*

4ba. Claiming that a good or a service has a neutral or positive greenhouse gas emissions’ impact on the environment.

*Justification*

Carbon neutral claims are highly misleading to consumers as they imply neutrality and no impact of products (or services) on the environment, which is impossible to achieve. They are often being justified by the company’s involvement in carbon offsetting/compensation projects, which are currently unregulated and about which consumers are not sufficiently informed about and have no means to verify whether they are really robust and reliable. Therefore carbon neutral claims and labels should be explicitly banned.

**Amendment 21**

Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23e

*Text proposed by the Commission*  

23e. Omitting to inform the consumer about the existence of a feature of a good introduced to limit its durability.

*Amendment*

23e. *Introducing* a feature to limit the durability of a good.

*Justification*

Omitting to inform the consumer about the existence of a feature of a good introduced to limit its durability.
Amendment 22
Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23g

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Text proposed by the Commission

23g. Presenting goods as allowing repair when they do not or omitting to inform the consumer that goods do not allow repair in accordance with legal requirements.

Amendment

23g. Marketing goods, which do not allow repair in accordance with legal requirements.

Or. en

Amendment 23
Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23g a (new)

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Text proposed by the Commission

23ga. Omitting to inform that the seller will refuse to perform a repair on a product that has previously been repaired in another professional network, beyond the legal guarantee.

Amendment

Or. en

Amendment 24
Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23i

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Text proposed by the Commission

23i. Omitting to inform that a good is designed to limit its functionality when using consumables, spare parts or accessories that are not provided by the original producer.

Amendment

23i. Marketing a good that is designed to limit its functionality when using consumables, spare parts or accessories that are not provided by the original producer.
Amendment 25

Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23i a (new)

Text proposed by the Commission

23ia. Engaging in practices that lead to shortening a product’s lifespan and stimulate the purchase of a new product.

Amendment

Amendment 26

Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23i b (new)

Text proposed by the Commission

23ib. Marketing a good, which is not compliant with the requirements under Directive 2009/125/EC of the European Parliament and of the Council1a.

Amendment


Amendment 27

Proposal for a directive
Annex I – paragraph 1 – point 4
Directive 2005/29/EC
Annex I – point 23i c (new)
23ic. Marketing a good without remedying a design issue that leads to an early failure of this good, within a reasonable time after it became known.
The following list is drawn up on a purely voluntary basis under the exclusive responsibility of the Rapporteur. The Rapporteur has received input from the following entities or persons in the preparation of the report, until the adoption thereof in committee:

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<th>Entity and/or person</th>
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<td>The European Consumer Organization - BEUC</td>
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<td>European Coalition for Standards - ECOS</td>
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<td>European Association for Communications Agencies - EACA</td>
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<td>German Retail Federation - Handelsverband Deutschland (HDE)</td>
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<td>German Food Retail Association - Bundesverband des Deutschen Lebensmittelhandels e.V. (BVLH)</td>
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<td>Booking.com</td>
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<td>Independent Retail Europe</td>
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<td>Malaysian Palm Oil Council (MPO)</td>
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<td>European Brands Association - AIM</td>
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