

## **The Fair Trade Movement's contribution to the European Commission's call for evidence on the Consumer Agenda 2025-2030 and action plan on consumers in the Single Market (Ref. Ares(2025)3998664)**

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# **Embedding Fair Trade principles within the Consumer Agenda 2025-2030**

## **Background**

The European Commission is consulting in order to update the New Consumer Agenda (2020) via a new action plan on consumers in the Single Market. This planned initiative will ensure consumers do not face unfair discrimination, keep benefits when crossing borders and are protected when buying goods or services. Among the problems the initiative aims to tackle are consumers' choices that may not reflect their environmental concerns, the availability of sustainable products, and the ability of SMEs to operate efficiently and compete in the global market. The upcoming Consumer Agenda 2025-2030 will identify the main priorities and put forward a list of consumer-related initiatives and actions, with a specific timeline and making use of various EU policy tools.

## **The Fair Trade Movement's contribution**

The Fair Trade Advocacy Office (FTAO), on behalf of the Fair Trade movement, welcomes the opportunity to provide evidence that will guide the development of the Consumer Agenda 2025-2030. Enrico Letta's report "*Much more than a market*" stressed that consumers need to be empowered and protected to drive, among other factors, sustainability.<sup>1</sup>

The FTAO's feedback focuses on how to embed Fair Trade principles within this Consumer Agenda, which would empower consumers to do exactly this, and facilitate the uptake of sustainable choices within the EU Single Market. The FTAO focuses its recommendations on the following topics:

1. Defining sustainable choices and sustainable products
2. Empowering consumers to be drivers of sustainability

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<sup>1</sup> Letta, E. (2024). [\*Much more than a market. SPEED, SECURITY, SOLIDARITY. Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens.\*](#)

- a. Understanding and expanding access to circular and sustainable products and services
  - b. Addressing green- and fairwashing
  - c. Textile Labelling Revision
  - d. Ecodesign for Sustainable Products Regulation
- 3. Cooperation with international partners

## **Defining sustainable choices and sustainable products**

The Fair Trade movement recognises that environmental ambition cannot be separated from social justice. This is a premise firmly enshrined in the UN Sustainable Development Goals, which holds that three dimensions - social, environmental and economic - are inseparable. This is also recognised in the OECD Recommendation on Policy Coherence for Sustainable Development (2019), which recalls that the SDGs are “indivisible” and “balance the economic, social and environmental dimensions of sustainable development”. This Commission has also enshrined in the Political Guidelines of the 2024-2029 Commission that the EU shall pursue joint action to “protect our planet” and “ensure social fairness”. In the Mission Letter to Commissioner Michael McGrath, who oversees DG JUST, which leads on the Consumer Agenda, the Commission President stated that economic, social and climate files as “all connected and will all impact each other”.

The Horizon Europe project CUES (Consumers’ Understanding of Eating Sustainably) has developed research on the scientific methods and approaches to transmit and present sustainability-related information to guide consumer knowledge and behaviour, and to determine the persuasive cues to promote sustainable consumer behaviour most effectively. The researchers have found that while the concept of “sustainable food” is multidimensional, consumers often understand “sustainability” mainly through an environmental lens, disregarding social (fair labour, local economy) and economic (affordability, access) factors. The upcoming EU consumer agenda must recognise and address this challenge so that consumers can, through their choices, promote companies which are sustainable in all the dimensions of the term.

Each purchase can accelerate - or delay - the shift to an economy where decent livelihoods, a thriving environment and competitive markets reinforce one another, aligning the social and environmental pillars at the heart of the EU’s sustainability vision. Working from this understanding, the Fair Trade movement asserts that “consumers driving sustainability” means equipping citizens with trustworthy information and unfettered access to fair, accessible and sustainable products so that every Euro spent rewards business models delivering both climate stewardship and social equity.

Defining sustainable choices must also account for how consumers perceive, interpret, and respond to those choices. While social and environmental goals are often aligned at the macro-level, they can appear disconnected or even contradictory to individuals. For

instance, consumers might be aware of some of the benefits of consuming organic or fair trade products, but not of the full range of positive externalities that it entails. According to the systematic review by Glenisson et al. (2025), such cognitive barriers and conflicting mental models are key obstacles to uptake.<sup>2</sup> Therefore, definitions and criteria for “sustainable products” should be consumer-tested for clarity, resonance, and accuracy, especially across social groups and cultures.

Additionally, insights from EU-level policy mapping conducted under the CUES project reveal that key policy language is often absent or underdeveloped in areas that are crucial for consumer empowerment – particularly regarding food culture, food democracy, and plant-based diets.<sup>3</sup> For example, the term “food culture” did not appear in any of the EU policies reviewed. The CUES policy mapping shows that policy coherence is lacking when it comes to access: while “sustainability” was referenced over 1,000 times in reviewed policies, terms like “ethical consumption,” “economic inequality,” or “food democracy” were nearly absent. This reveals a semantic and ideological gap—where circular and sustainable consumption is discussed in market or efficiency terms but not in relation to fairness, justice, or inclusion. This lack of engagement with the cultural and social dimensions of food severely limits the effectiveness of sustainability policies in changing consumption patterns. Bridging this gap is essential if circular consumption models are to be scaled equitably.

Additionally, the mapping highlights how fragmented policy language and isolated policy efforts fail to support consumers as active agents of transformation. The CUES analysis strongly supports the need for systemic, emotionally resonant, and culturally tailored communication strategies.

### **Specific recommendations:**

- 1.** The EU Consumer Agenda 2025-2030 should explicitly recognise the inter-linkages and interactions between the environment, economic and social policies in order to avoid conflict between these policy objectives.
- 2.** When developing policy interventions to support consumers in making sustainable choices, the Commission should reflect that environmental and social sustainability cannot be separated.
- 3.** Definitions and criteria for “sustainable products” should be consumer-tested for clarity, resonance, and accuracy, especially across social groups and cultures.

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<sup>2</sup> Glenisson, L., Hallez, L., Smits, T. (2025). [“Thought for food”: A systematic review of how psychological state factors affect sustainable food outcomes](#). Sustainable Production and Consumption. Volume 57, July 2025, Pages 277-291.

<sup>3</sup> The policy mapping is a forthcoming document and can be made available to DG JUST on request.

## Empowering consumers to be drivers of sustainability

The European Commission's Call for Evidence rightly observes that consumers' purchasing decisions often fail to match their intentions and environmental concerns, partly because sustainable options are rarely straightforward, readily available, or affordable. Enrico Letta's review of the Single Market reinforces this point, stressing that the collective choices of the European Union's four hundred and fifty million consumers could accelerate the transition to a greener and more resilient economy. As introduced above, research on the obstacles to sustainable consumption shows that people tend to change what they buy when information, motivation, and opportunity are provided together through carefully designed cues; consumers can become genuine drivers of sustainability when clarity, credibility, and convenience converge.

However, it is important to note that clear communication on its own is not always enough to drive behavioural change. Research on blockers and enablers of fair, accessible, sustainable and short food chains provides extensive recommendations for concrete, feasible and multi-scalar policy options, and identifies the social solidarity economy as a key enabler.<sup>4</sup> Further, the Horizon Europe project Consumers Understanding of Eating Sustainably (CUES) has shown several additional persisting challenges regarding the uptake of sustainable food:

- **Psychological barriers**, such as low perceived behavioural control and negative social norms
- **Intention-behaviour gap**, showing that knowledge alone is insufficient: Positive attitudes towards sustainable food must be paired with motivation – especially to overcome emotional attachment to conventional food - and opportunity – especially price and availability.
- **Barriers for vulnerable groups**, in which older adults report low digital/media engagement and emotional attachment to traditional foods, and value affordability over sustainability. Low-income individuals show willingness but face price sensitivity, low trust, and information confusion.

Research by the Horizon Europe project has found that personal moral norms and visible packaging cues are strong predictors of both attitude and behaviour. For instance, resistance to plant-based diets is emotional and cultural: Anti-vegans oppose veganism due to perceived moral imposition and identity threats. On the other hand, moral disengagement allows consumers to justify unsustainable choices (e.g., “veganism is a corporate trend”).

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<sup>4</sup> Fair Trade Advocacy Office (FTAO), University of Antwerp & World Fair Trade Organization-Europe. (2022). [Smart mix of recommendations to consolidate and scale up FASS-FOOD supply chains in the EU](#).

This can have strong implications for sustainable consumer choices more broadly and thus for the goal to empower consumers to drive sustainability.

The work of the Horizon Europe project CUES reveals several aspects that support consumers in making sustainable choices:

- Community-led, culturally relevant and emotionally resonant messaging is most effective.
- Digital tools like gamification, social modelling, and virtual reality offer scalable pathways to build habits.
- Credible certification (e.g. Nutri-Score A) and transparent communication (e.g., QR codes, blockchain) boost trust in claims and producers.
- In-store prompts and environmental cues are more trusted and more effective than influencers and traditional ads.
- Consumers respond more to specific product attitudes (e.g., meat alternatives) than to general pro-environmental attitudes.
- Ensuring affordability and the same price between sustainable food products and conventional food products facilitates sustainable buying.

## CROSS-CUTTING RECOMMENDATIONS

Leverage robust behavioural science and psychology research to design consumer-facing interventions that align with how people actually make sustainable decisions. Insights from the CUES project demonstrate that knowledge alone is insufficient policies must also shift norms, identities, emotional responses, and perceived control. This includes:

<b>a.</b>	Integrating behavioural science into policy design;
<b>b.</b>	Supporting member states in deploying interventions tailored to specific barriers;
<b>c.</b>	Funding cross-cultural, community-based programs;
<b>d.</b>	Embedding sustainability literacy in education and media systems.

Building on these overarching insights, the following subsections will examine the different facets of empowering consumers and offer recommendations for embedding this empowerment in the Consumer Agenda 2025–2030.

## ***Understanding and expanding access to circular and sustainable products and services***

The European Commission emphasises the importance of evidence-based consumer policy, as understanding consumer markets and behaviour leads to better policy design.<sup>5</sup> Collecting robust data on the Fair Trade market is essential to ensuring that operators committed to fair practices receive appropriate support. The European Commission already uses the biennial *Consumer Conditions Scoreboard* to “monitor the consumer environment across the EU” and adjust legislation accordingly.<sup>6</sup> Comparable, up-to-date metrics on Fair Trade sales volumes, price premiums, and consumer access would inform further evidence-based policy making. Further, investors and public buyers would benefit from having catalogues with accurate data from Fair Trade enterprises, providers and products that are easy to use and interpret.

Further, sustainable and circular products and services should not be a luxury. Especially in light of the cost-of-living crisis, low income and consumers in a marginalised position should have access to circular products and in turn create scale. This concerns food affordability specifically, as well as access to sustainable and circular products and services more broadly, such as garments. In addition to identifying the specific needs of the Fair Trade market in scaling up, the Commission should ensure equal access to sustainable and circular products and services. Tangible actions to develop economic incentives and fiscal reform remain largely absent in circular economy policies.

The Horizon Europe CUES project introduced above underscores that accessibility includes more than physical or financial availability. Psychological barriers, such as lack of trust, misinformation, and entrenched habits, reduce uptake even when sustainable options are present. For example, findings reveal that emphasising health benefits resonates more in family-oriented cultures, while economic appeals are more effective in price-sensitive contexts.<sup>7</sup> Moreover, low-income consumers and those in a marginalised position may face cognitive overload and decision fatigue, making them less responsive to poorly designed eco-labels or generic sustainability messages. Research recommends simplified, credible communication formats and default options.<sup>8</sup>

### **Specific recommendations:**

- 1.** Conduct a detailed assessment and gather data on the Fair Trade market, which is essential to effectively promoting operators participating in the market.

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<sup>5</sup> European Commission. (n.d.) [Evidence-based consumer policy](#).

<sup>6</sup> European Commission. (2023). [Consumer conditions scoreboard. 2023 Edition](#).

<sup>7</sup> Polyportis, A., De Keyser, F., van Prooijen, AM. et al. (2025) [Addressing Grand Challenges in Sustainable Food Transitions: Opportunities Through the Triple Change Strategy](#).

<sup>8</sup> Glenisson, L., Hallez, L., Smits, T. (2025). “Thought for food”: A systematic review of how psychological state factors affect sustainable food outcomes. *Sustainable Production and Consumption*. Volume 57, July 2025, Pages 277-291.

2. Use economic incentives and environmental fiscal reform to ensure that circular products are competitive on the market. They should pursue a tax shift, away from taxing labour, towards taxing negative externalities on people and the environment. Examples include using VAT reductions for value retention or using EPR (extended producer responsibility) fee modulation to favour products designed for reuse or longevity.
3. Ensure that the further development and implementation of the Consumer Agenda 2025-2030 is conducted with close involvement of consumer voices, which is essential for maximising the effectiveness of future measures.
4. Ensure that interventions to promote circular and sustainable products:
  - a. Consider cultural relevance and social identity in campaign design.
  - b. Design tailored narratives that align with local values.
  - c. Address consumer scepticism via transparent cues (e.g., QR codes, blockchain traceability).

### ***Addressing green- and fairwashing***

Previous responses to consultations regarding the EU consumer protection agenda, including by the Fair Trade movement, have emphasised the importance of promoting ambitious production standards across the European Union while communicating clearly to consumers about their sustainability impact. Consumers have a right to know the environmental impacts associated with the lifecycle of the goods and services they intend to purchase, and must be helped to identify the truly sustainable option, while being protected from misleading or unfounded environmental and social claims.

The European Commission has recently proposed a set of amendments to the Common Market Organisation, which include defining the conditions for the use of the term “fair”, “equitable” or equivalent ones. With regard to this attempt, the FTAO emphasises that the use of the term “fair” (and its translations in the different European languages) is associated with a distinct set of practices and principles separate from those linked to other similar terms. These practices have been developed over years of experience by the economic actors within the Fair Trade Movement and are enshrined in the International Fair Trade Charter,<sup>9</sup> supported by over 250 organisations, including economic operators and civil society organisations. The FTAO recommends aligning with the vision outlined in this Charter and ensuring consistency with existing legislative developments at the EU level, such as the French legal framework. The FTAO considers that only an EU law that sets an ambitious standard for the use of the terms ‘fair’ and ‘equitable’ would both address misleading claims towards consumers. Action on this policy file would also align with other

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<sup>9</sup> Fair Trade Advocacy Office. (2018). [International Fair Trade Charter](#).



EU ambitions, such as the goal to improve farmers' livelihoods as set out in the Vision for Agriculture and Food.<sup>10</sup>

In addition, CUES policy-mapping show a significant disconnect between sustainability rhetoric and substantive, enforceable consumer protection. Keywords like “greenwashing” and “consumer trust” appeared far less frequently than “sustainability,” suggesting that EU policies continue to prioritise supply-side sustainability measures over consumer-facing accountability mechanisms. Tackling greenwashing must therefore go beyond claims verification, and must include supportive infrastructures that build consumer understanding, prevent confusion, and enable informed decisions. Beyond legal enforcement, combating greenwashing requires attention to how consumers interpret and react to claims. The CUES project identifies that greenwashing undermines trust and erodes the effectiveness of labelling, even when labels are accurate. To restore trust, it is not enough for claims to be true; they must also be credible, transparent, and contextually understandable. For instance, visual design, source credibility, and perceived company motives heavily affect consumer belief in environmental messaging.

### **Specific recommendations:**

1. Any definition of “fair trade” at the EU level, such as the one proposed in the targeted amendments to the CMO, must uphold the existing practices and principles within the International Fair Trade movement, as enshrined in the International Fair Trade Charter.<sup>11</sup>
2. When addressing green- and fairwashing, create supportive infrastructure for consumers that builds consumer understanding and enables informed decisions.

### ***Revision of the textile labelling regulation***

As per the EU Strategy for Sustainable and Circular Textiles adopted in 2022, by 2030, textile products placed on the EU market should be made with respect for social rights. As part of this, and in line with broader aims to ensure that consumers are empowered to make sustainable choices, the Commission has announced the revision of the Textile Labelling Regulation (Regulation (EU) No 1007/2011), with a legislative proposal planned for 2025.

There are ample studies which show that EU consumers find it problematic that textile labels currently do not provide social information, and that they want to know about social aspects linked to garments:

- In a 2020 survey of the German environmental agency, 91% of respondents considered compliance with social standards in the manufacture of products to be “very” or “rather” important.<sup>12</sup>

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<sup>10</sup> European Commission. (2025). [Vision for Agriculture and Food](#).

<sup>11</sup> Fair Trade Advocacy Office. (2018). [International Fair Trade Charter](#).

<sup>12</sup> Umweltbundesamt. (2020). [Erweiterte Integration sozialer Aspekte im Umweltzeichen Blauer Engel](#).



- In a Flash Eurobarometer (2019), more than 80% of the respondents agreed (totally or tended to) that ‘[t]here is not enough information available about [...] working conditions linked to clothing’.<sup>13</sup>
- The 2020 Fashion Revolution Consumer Survey shows that 70% of consumers want to have detailed information about wages and working conditions of the people in the supply chain.<sup>14</sup> Further, a Fashion Revolution survey from October 2024 found that 96% of respondents would like their clothing labels to provide information about the social conditions in which their clothes were made (such as fair wages, safe working conditions), 68% wanted to know if the people who made their clothes were paid at least a living wage and 62% of respondents wanted to see where their clothes were made all the way to raw material suppliers such as farmers.<sup>15</sup>
- A 2024 survey (full study) by Fairtrade Luxembourg and Caritas Luxembourg, as part of the campaign “Rethink your clothes”, showed that 55% want more transparency by companies on the working conditions in their supply chain, and 52% want companies to provide more such information about the production on the labels.<sup>16</sup> 49% disagreed that enough information to self-inform is easily available, and 57% disagreed that the current offer in the fashion industry is sufficiently ethical, fair and sustainable.
- A 2021 study done by OpinionWay for Max Havelaar France shows that for 58% of French consumers, the first criterion in deciding to buy an item concerns the conditions of garment workers.<sup>17</sup> 60% of French people are ready to boycott a brand that does not produce fair clothing.
- A 2019 Ipsos study for the Changing Markets Foundation and Clean Clothes Campaign showed that 79% of French consumers believe that clothing brands should specify whether employees in their supply chains receive adequate wages, and more than half (56%) said they are deterred from buying clothes from a brand that does not provide this information.<sup>18</sup>
- An OCU survey found that 60% consider the lack of product transparency and information as a barrier to sustainable consumption of clothing.<sup>19</sup> 42% consider information on the origin of clothes as important.

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<sup>13</sup> European Commission. (2019). [Preparatory study to gather evidence on ways to empower consumers to play an active role in the green transition](#).

<sup>14</sup> Fashion Revolution. (2020). [Consumer survey. Key Findings](#).

<sup>15</sup> Fashion Revolution. (2024). [Textile Labelling Regulation Survey - 1183 responses as of 30/10/2024](#).

<sup>16</sup> Fairtrade Luxembourg & Caritas Luxembourg. (2024). [Rethink your clothes](#).

<sup>17</sup> Max Havelaar France. (2021). [Les Français mûrs pour la mode durable: Sondage exclusif Max Havelaar, et appel à des solutions \(enfin\) concrètes pour faire évoluer le secteur textile](#).

<sup>18</sup> Changing Markets Foundation & Clean Clothes Campaign. (2019). [Une enquête majeure souligne leur manque de confiance dans les informations fournies par les grandes enseignes de l'habillement](#).

<sup>19</sup> OCU. (2017). [Otro consumo para un futuro mejor](#).

- In a Danish Consumer Council survey on clothing consumption, respondents flagged that the possibility of assessing social manufacturing conditions is difficult to assess when purchasing.<sup>20</sup>
- A March 2024 study regarding fast fashion shows that French consumers are in favour of better supervision of these retailers' practices, and most of them would be in favour of forcing them to be more transparent (via labels, 86%, or greater publicity of these aspects, 83%) about the production conditions and environmental impact of the clothes they put on sale.<sup>21</sup>
- A March 2022 study for Les Echos in France showed that 66% of French people say they are ready to turn away from clothing brands that do not respect people and the environment.<sup>22</sup> Similarly, a 2020 McKinsey study showed that 66% of consumers said they would stop or significantly reduce shopping at a brand if they found it was not treating its employees or suppliers' employees fairly.<sup>23</sup>

The Consumer Agenda 2025-2030 should set out that the Textile Labelling Regulation should be revised to ensure that it fulfils these consumer needs on social aspects. As part of this, the Textile Label should require a mandatory “made-in” label, which should be genuinely informative. Article 24 of the current Regulation calls for the revision to include an origin-labelling scheme that gives consumers “accurate information ... and full traceability.” Achieving that goal means going beyond a single country-of-origin code based on customs rules, which are ill-suited to the multi-tier structure of textile supply chains. The FTAO proposes a TLR-specific origin label that, in addition to the customs declaration, uses a digital component to provide information on the locations of every manufacturing stage—cut-make-trim, weaving, spinning, dyeing—and, where relevant, the farm(s) that supplied the cotton. Only this multi-tier disclosure can prevent misleading claims and deliver the traceability the regulation envisages.

### **Specific recommendations:**

1. When revising the Textile Labelling Regulation, integrate, in the digital component, key social indicators based on the clear evidence of consumers’ demands for social information.
2. In the digital component of the revised Textile Labelling Regulation, introduce a multi-tier “made-in” label that lists all production sites, giving consumers full traceability as foreseen in Article 24.

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<sup>20</sup> Taenk. (2023). [Sammen mod tøjspild](#).

<sup>21</sup> Harris Interactive. (2024). [Les Français et l'industrie textile. Enquête Toluna Harris Interactive pour le Ministère de la transition écologique et de la cohésion des Territoires](#).

<sup>22</sup> Les Echos. (2022). [Deux Français sur trois prêts à renoncer à une marque non responsable](#).

<sup>23</sup> McKinsey. (2020). [Survey: Consumer sentiment on sustainability in fashion](#).

## ***Ecodesign for Sustainable Products Regulation***

The FTAO, as a member of the Commission's Ecodesign Forum, considers the Ecodesign for Sustainable Products Regulation (ESPR) a groundbreaking legislation aimed at banning the least sustainable products by setting clear requirements on product design, production and performance. The FTAO is committed to strengthening this regulation, particularly in the design and implementation of the delegated act on textiles and the establishment of a truly transparent, accessible and unlimited digital product passport.

Beyond setting product content requirements, the ESPR also sets information requirements, which include the Digital Product Passport (DPP). The DPP is a welcome step towards greater transparency. Access to the data in the DPP should be accessible and unlimited for all actors in the supply chain, including smallholder farmers and garment workers. Digital labels should be mandatory for all the products in the scope of the Textile Labelling Revision (*see section above*), not only for those covered by the ESPR delegated acts. It is important to ensure that the digital aspect of the textile label, and the DPP are integrated and aligned, and that all information needed on the digital label (including social information) should be sure to be included in the delegated act for the DPP. Therefore, the DPP for textiles should also include production sites, date of production, and certification or other third-party verification.

### **Specific recommendations:**

- 1.** Align the forthcoming information requirements for textiles and the revised textile label so that social, environmental and circularity information appears in a single, user-friendly format. Embed the same social-and-origin information requirements in both instruments so that every textile product on the EU market, not just garments as covered by the ESPR, carries a complete digital label.
- 2.** Guarantee an open, cost-free access to DPP data for consumers, which does not require already having access to the physical product.

## **Cooperation with international partners**

The Call for Evidence notes that the Consumer Agenda 2025-2030 will ensure close dialogue and cooperation with the EU's international partners. The Fair Trade movement agrees that there is ample opportunity for the EU to work towards a global market for sustainable products. There is an urgent need to raise standards globally and in multilateral settings, and for the EU to cooperate with those countries that are at the beginning of the supply chains of said sustainable products. In the previous Consumer Agenda, the EU announced that it will use its influence at the WTO, UNCTAD and OECD levels. The upcoming roadmap should build on this and expand so that multilateral collaboration goes beyond just the promotion of consumer *protection*.

EU consumers benefit from a reliable and resilient supply of sustainable products. For example, in 2023, the EU imported 2.48 million metric tonnes of organic products and in 2024, 6.4 million metric tonnes.<sup>24</sup> However, the farmers who are at the origin of the supply chain often face important challenges to access the EU market; and might consider targeting other markets if these obstacles keep growing. For instance, following the implementation of the New EU Organic Regulation ((EU) 2018/848), many non-EU operators have reportedly considered dropping the EU organic regulation due to the increase in the costs of compliance.<sup>25</sup>

In parallel to this, the low prices of many commodities mean that farmers (within and out of the EU) often do not earn a living income or living wage. While seeking to increase accessibility and affordability of sustainable producers, including, for instance to organically produced food and textile products, the EU should ensure that it engages closely with its international partners to ensure that the affordability of sustainable products goes hand in hand with decent livelihoods for the people producing them. It is in the EU consumers' interest that the EU cooperates with partner countries so that producers have access to fair remuneration and can implement sustainable production and processing practices.

The Call for Evidence also notes concerns about the growing circulation of unsafe products coming from outside the EU, and difficulties in ensuring compliance with consumer protection rules and fair competition in the market, in particular as regards traders not established in the EU. At the same time, the FTAO uses this opportunity to emphasise that highly hazardous pesticides, unsafe toys, polluting single-use plastics, and other goods that cannot be put on the market in the EU are still being produced across the territory to be exported outside the EU borders, as documented by Greenpeace in 2024.<sup>26</sup> The EU therefore needs a horizontal legislation to prevent the export to non-EU countries of goods, such as unsafe toys or toxic chemicals and pesticides, whose sale and use is not allowed on the EU market.

### **Specific recommendations:**

- 1.** Leverage fora such as the WTO, UNCTAD and OECD to drive multilateral collaboration on sustainable production.
- 2.** The EU should close all existing loopholes through an EU horizontal legislation that prevents the export from the EU of goods (such as single-use plastic products or toxic chemicals and pesticides) whose sale, use or consumption in the EU is not allowed under EU law.

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<sup>24</sup> European Commission. (2025). [EU imports of organic agri-food products. Key developments in 2024.](#)

<sup>25</sup> FIBL. (2024). [Impacts of the new EU Organic Regulation 2018/848](#); Fair Trade Advocacy Office. (2025). [Simplification measures for the EU Organic Regulation.](#)

<sup>26</sup> Fair Trade Advocacy Office. (2024). [TOXIC DOUBLE STANDARDS: How Europe sells products deemed too dangerous for Europeans to the rest of the world.](#)

3. The EU must put in place policies that facilitate producers from partner countries to have access to fair remuneration. This can be enshrined in existing policies, such as the Corporate Sustainability Due Diligence Directive (CSDDD) or the Directive on Unfair Trading Practices in business-to-business relationships in the agri-food supply chain (UTP Directive); or take the shape of new initiatives such as a comprehensive living income/ living wage strategy.
4. The EU must support partner countries in their compliance with EU sustainability-related legislation, such as the EU Deforestation-free product Regulation or the EU Organic Regulation.

## About the Fair Trade Advocacy Office (FTAO):



The Fair Trade Advocacy Office (FTAO) leads political advocacy for the Fair Trade Movement at the EU level. It has the purpose of promoting justice, equity and sustainable development at the heart of trade structures and practices so that everyone, through their work, can maintain a decent and dignified livelihood and develop their full human potential.

The FTAO is a joint initiative of Fairtrade International, the World Fair Trade Organization, and the World Fair Trade Organization-Europe.

### Get in touch:

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