



# SIR RemanPulse

*N°002*

*Italy Transposes the Anti-Greenwashing Directive — The Year That  
Rewrites the Rules of the Circular Product*

18 March 2026

SIR — Italian Remanufacturing Society

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*Weekly bulletin of the Italian Remanufacturing Society*

**THEME: RULES**

## 1 - Signal of the week

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On **9 March 2026**, the Italian Official Gazette published the legislative decree transposing **Directive (EU) 2024/825** — the so-called *Empowering Consumers for the Green Transition* Directive. Italy is among the first EU Member States to complete the transposition, with entry into force on **24 March 2026** and application from **27 September 2026**. The decree amends the Consumer Code by expanding the list of unfair commercial practices and introducing pre-contractual information obligations on durability, repairability and warranty. For remanufacturing, this is a turning point: environmental claims on remanufactured products will have to be independently verified by third parties, and uncertified sustainability labels will be prohibited. Those doing serious reman finally have a regulatory framework that penalises greenwashing and rewards transparency.

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## 2 - Beneath the surface

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### The 2026 regulatory map: five regulations, one horizon

2026 is the year when Europe's regulatory architecture for circularity becomes operational. At least **five legislative instruments** converge simultaneously: the ESPR with its first delegated acts, the anti-greenwashing Directive (2024/825), the Right to Repair (2024/1799), the future Circular Economy Act and the WEEE revision. For remanufacturing businesses, this means moving from voluntary compliance to concrete obligations — but also from regulatory marginality to explicit recognition. The ESPR lists the "possibility of remanufacturing" among its ecodesign requirements, and the CBAM indirectly incentivises circular strategies, including remanufacturing, to reduce compliance costs linked to embedded emissions.

### ESPR: the ban on destroying unsold goods becomes reality

On **9 February 2026**, the European Commission adopted the ESPR delegated and implementing acts on the destruction of unsold consumer products. From **19 July 2026**, large companies will no longer be able to destroy unsold clothing, accessories and footwear, except for derogations related to safety or product damage. SMEs will be included from 2030. In parallel, a disclosure obligation enters into force: companies must annually report the volumes of unsold goods discarded, the reasons for disposal and the measures adopted to prevent it. The Commission explicitly encourages alternatives such as resale, **remanufacturing**, donation and reuse.

### Digital Product Passport: 2026 as year zero

The DPP is preparing to become concrete. In January 2026, the Commission published the delegated act for DPPs in the textile sector, with entry into force expected in July 2027. By **19 July 2026**, the European digital registry for storing unique DPP identifiers will be operational. Batteries with capacity above 2 kWh will require a DPP from **18 February 2027**. For remanufacturing, the DPP is both a challenge and an opportunity: end-to-end lifecycle traceability — including remanufacturing phases — requires digital infrastructure that the sector must start building now. The rEUman project, coordinated by Politecnico di Milano, is already developing the first DPP specifically designed for remanufacturing.

### Right to Repair: Germany leads, Italy follows

Directive (EU) 2024/1799 must be transposed by **31 July 2026**. Germany published its draft implementing bill on **15 January 2026**, going beyond the Directive's minimum requirements: repairability becomes part of a product's "customary quality" under the BGB, with implications for B2B

contracts as well. Manufacturers of goods listed in Annex II (smartphones, washing machines, vacuum cleaners, refrigerators) will face a repair obligation lasting at least 7 years for smartphones and 10 for large household appliances. Contractual clauses or hardware/software techniques hindering repair will be prohibited. In Italy, transposition has been included in the European delegation bill approved by the Council of Ministers on 22 July 2025; the text is under parliamentary discussion. The target market for reman is expanding: every repairable product is a potentially remanufacturable product.

### **CEN/TC 473: the standardisation that enables the market**

The Technical Committee **CEN/TC 473 "Circular Economy"**, chaired by Raul Carlsson and hosted by the Swedish Institute for Standards, is developing the European standards that will translate policy objectives into operational criteria. WG 3 on Extended Producer Responsibility is defining common definitions, performance criteria and guidelines for EPR schemes. Zero Waste Europe, in its February 2026 policy brief, proposed reforming EPR to finance intermediate R-strategies (reuse, repair, **remanufacturing**) with a dedicated fund equal to 10 % of PRO budgets. The next TC 473 meeting is scheduled for May 2026. For SIR, active participation in European standardisation is a strategic priority.

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## **3 - From the network**

### **Linklaters — The Directive on Empowering Consumers for the Green Transition: Implementation Tracker**

[sustainablefutures.linklaters.com](https://sustainablefutures.linklaters.com)

An updated country-by-country tracker on the transposition status of the anti-greenwashing Directive. Italy published its decree in the Official Gazette on 9 March 2026 — among the first in Europe. Germany already in force since 19 February. France under discussion at the National Assembly. For reman companies, it is the operational map of national deadlines to monitor.

### **ESG Today — Digital Product Passports Are Coming, and 2026 Is When the Real Work Begins**

[esgtoday.com](https://esgtoday.com)

An analysis of how 2026 marks the shift from pilot projects to production systems for DPPs. The ESPR delegated acts will define how data must be structured, who is responsible for maintenance and how cross-border interoperability will be ensured. For remanufacturing, the message is clear: those who do not start building digital infrastructure now risk being shut out of the market.

### **Zero Waste Europe — EPR for waste reduction: policy brief**

[zerowasteurope.eu](https://zerowasteurope.eu)

The policy brief proposes a radical reform of EPR, allocating 10 % of PRO budgets to a "fund for transition to circularity" financing reuse, repair, remanufacturing and component reuse. Remanufacturing is explicitly cited as an intermediate R-strategy to be incentivised.

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## **4 - Our position**

*Note from the President of SIR*

2026 is the year when the rules change — for real. Italy's adoption of the anti-greenwashing Directive, the imminent ban on destroying unsold goods, the launch of DPPs and the countdown to the Right to Repair create a regulatory landscape that, for the first time, explicitly recognises the value of the remanufactured product. For those in remanufacturing, it is no longer about anticipating the regulator — it is about being ready when the regulator comes knocking.

SIR has always maintained that remanufacturing has an intrinsic competitive advantage: measurability, traceability, verifiability. The new rules reward exactly these qualities. The greenwashing ban demands verifiable claims — and reman can demonstrate energy savings of up to 85 %, raw material savings of up to 100 %, and CO<sub>2</sub> reductions of 70–90 %. The DPP demands lifecycle traceability — and the remanufacturing process is by nature documentable phase by phase.

As the Italian Remanufacturing Society, we are committed to supporting members in understanding and applying these new regulations, through our partnerships with affiliated universities and participation in European technical committees. The future of reman is shaped by rules — and we intend to be at the table where the rules are written.

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## 5 · Not to be missed

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- **24 March 2026** — Entry into force of Italy's legislative decree transposing Directive (EU) 2024/825 (Empowering Consumers for the Green Transition)
- **22–23 April 2026** — ECESP Annual Conference, Brussels: "A competitive and fair circular Europe" — sessions on the future Circular Economy Act
- **May 2026** — Next CEN/TC 473 "Circular Economy" meeting: progress on EPR standards and circularity framework
- **30 May 2026** — EuAReman 2026 (Palermo, CNR): abstract submission deadline for the 1st International Europe-Africa Workshop on Remanufacturing
- **19 July 2026** — European DPP digital registry becomes operational under the ESPR; ban on destruction of unsold textiles for large companies
- **31 July 2026** — Deadline for transposition of Directive (EU) 2024/1799 (Right to Repair): repair obligation for manufacturers, European platform, 12-month warranty extension
- **27 September 2026** — Application of the Green Transition Directive: harmonised EU label on warranty and durability; third-party verification mandatory for environmental claims

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