

Updated
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DEADLINE MARCH 2026!

FOR ALL 27 EU MEMBER STATES

**AVOID PENALTIES OF UP TO 4% OF
ANNUAL TURNOVER**

The essentials of EmpCo Empowering Consumers for the Green Transition Directive

**Guidance on the implementation of Directive (EU) 2024/825 of
the European Parliament and of the Council**



Immediate action is required

Sustainability aspects are crucial to companies' consumer communication, as they directly influence purchasing decisions. The implementation of Directive (EU) 2024/825 aims to protect consumers from misleading practices through reliable and substantiated environmental and sustainability claims (consumer protection), while at the same time promoting sustainable consumption and supporting the green transition.

EU-wide implementation into national law: 27 March 2026

All environmental and sustainability claims for products placed on the market from 2026 onwards must be EmpCo-compliant as of September 2026.

WE HAVE SUMMARISED THE CORE

KEY POINTS FOR YOU!

The following claims are in focus:

In a **study conducted by the European Commission** on greenwashing 150 environmental claims relating to various products were assessed.¹

The result:

53.3% of the claims contained vague, misleading or unsubstantiated statements regarding the environmental characteristics of the products — both in advertising and on the products themselves.



¹ Environmental claims in the EU, Inventory and reliability assessment Final report, © European Union, 2020
<https://flustix.com/wp-content/uploads/2026/02/Report-Milieu-Consulting-and-Ipsos-Environmental-Claims-in-the-EU.pdf>

The crucial difference



GREEN CLAIMING

Environmental claims, also referred to as “green claims” or sustainability claims, are statements made by companies regarding environmental or environmentally beneficial characteristics or attributes of their goods and services. They may relate to how products are manufactured, packaged, distributed, used, consumed and disposed of.



GREENWASHING

Misleading or unsubstantiated communication of “green” corporate activities or alleged product characteristics intended to enhance the positive public image of a company and/or its products or services, despite the absence of concrete or measurable actions behind such claims. In such cases, substantiated evidence is lacking.

Applies across the EU from 2026

1.

Companies will only be permitted to make environmental claims if these include clear, objective and verifiable commitments and targets, and are substantiated through an independent certification system.

2.

Sustainability labels and/or self-created “logos” that are not based on a recognised certification scheme or established by public authorities are prohibited.

3.

Environmental claims are prohibited where the entity placing the product on the market cannot substantiate the environmental claim through independent evidence based on a recognised certification programme.

4.

Environmental claims relating to an entire product are unlawful where they in fact refer only to a specific aspect or component of that product

Company checklist: “What to do now”

- 1. Comprehensive claim review (online & offline):**
Systematic identification and assessment of all sustainability claims across advertising, social media, websites/online shops, packaging, point of sale (POS) materials and B2C communication.
- 2. Risk analysis & prioritisation:**
Evaluation of all claims in use (e.g. “environmentally friendly”, “microplastic-free”, “recycled content”) and/or proprietary labels.
- 3. Ensure verifiable evidence**
Obtain up-to-date, transparent and verifiable evidence (third-party certifications) for each environmental claim — either from suppliers where applicable or by applying for certification directly.
- 4. Establish claim and label governance:**
Implement clear internal approval processes, define minimum requirements for standards and labels, and integrate structured documentation procedures.
- 5. Strategically manage packaging and inventories:**
Initiate early layout adjustments (immediately), plan stock sell-through, and update digital product information accordingly (no later than early September 2026).
- 6. Train marketing, sales and procurement teams:**
Raise awareness of regulatory requirements and prevent the use of legally vulnerable or non-compliant wording.

[Request consultation here](#)

What is prohibited?

PRESENTING LEGAL REQUIREMENTS AND STANDARD PRACTICES AS ENVIRONMENTAL BENEFITS:

Example: Statutory requirements, such as minimum recycled content quotas, are marketed as outstanding environmental achievements, thereby creating a misleading impression of exceptional environmental performance.

Misleading self-declarations & fake labels:

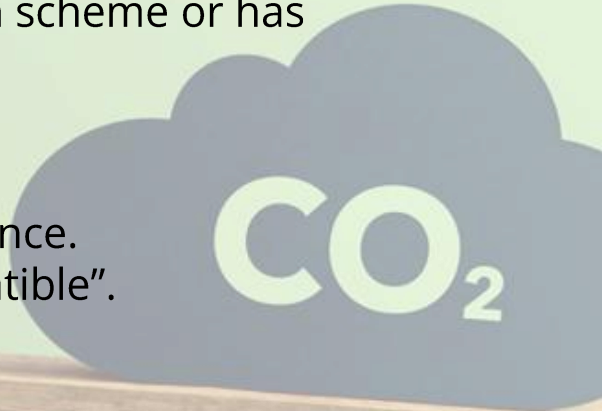
Affixing a sustainability label or logo that is not based on an independent certification scheme or has not been established by public authorities.

Unsubstantiated and vague claims:

Communicating a general, undefined environmental claim without measurable evidence.
Examples: “environmentally friendly”, “green”, “eco-friendly”, “environmentally compatible”.

Pars Pro Toto:

Making an environmental claim about the entire product even though it relates only to a specific aspect or component of the product: for example, a shampoo bottle is advertised as “made from recycled material” although only the cap contains recycled content.



CO₂

Where things stand – Next steps

The **Empowering Consumers for the Green Transition Directive (EU 2024/825, EmpCo)** supports consumers in making more sustainable purchasing decisions, thereby contributing significantly to sustainable consumption. To achieve this, companies will be required to provide clear and reliable information on the environmental and sustainability aspects of their products, maintain appropriate evidence, and remove any unsubstantiated environmental claims. Environmental claims relating to products must be substantiated either through recognised third-party certification or demonstrable compliance with applicable legal requirements.

Key deadline: EU Member States must transpose the Directive into national law by 27 March 2026, ensuring that the new rules are fully implemented across all platforms (both offline and digital) by 27 September 2026. Failure to comply may result in significant penalties.

Existing regulations, including national laws prohibiting unfair competition and misleading advertising, remain fully applicable. Manufacturers, distributors and brand owners should therefore adapt their environmental marketing practices without delay. Greenwashing is already subject to increasing scrutiny by watchdog organisations, NGOs and the media, with public exposure becoming more frequent.

From September 2026 onwards, companies may face substantial penalties of up to 4% of annual turnover.

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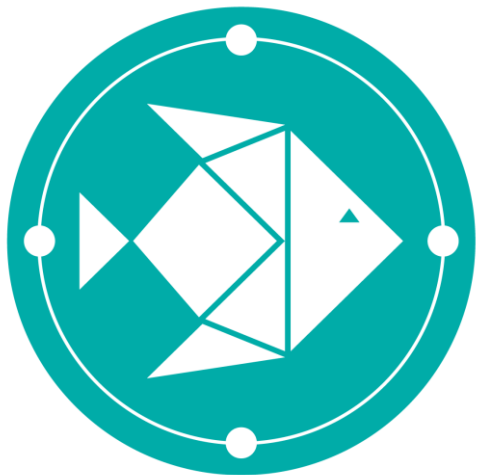
About flustix | Rethink plastics

Together with its accredited certification and analytical partners, the flustix initiative certifies plastic-sustainable and plastic-free products and packaging, microplastic-free product contents, the use of recycled materials, and the recyclability of packaging. The six distinctive and recognisable flustix product trustmarks are internationally valid and recognised.

[Click here to request a quote](#)

Our Partners





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Empowering Consumers for the Green Transition Directive

**WE ARE HERE TO SUPPORT YOU &
GUIDE YOU THROUGH THE PROCESS.**