

EmpCo explained

The EU's rules on sustainability claims, in plain language.
What changed, what's banned, and what to do now.

27 Sept 2026

The rules apply from this date.
They are live now.

Applies to any company

Whatever its size or base, if EU
consumers can see the claim.

Fines of 4%+ of turnover

In coordinated EU-wide cases, the
maximum fine must be at least 4% of
turnover in the countries concerned.

What is EmpCo?

EmpCo is short for the Empowering Consumers for the Green Transition Directive, Directive (EU) 2024/825. It updates two existing EU laws: the rules against misleading marketing (Unfair Commercial Practices Directive) and the rules on what shoppers must be told before they buy (Consumer Rights Directive).

The idea is simple: every environmental or social claim must be specific, provable and backed by real action. Each EU country writes the rules into national law, so details can differ slightly, but the core is the same everywhere.

28 Feb 2024
Adopted by the EU

26 March 2024
Enters into force

27 Mar 2026
Deadline for national law
(20 countries missed it)

27 September 2026
Rules apply. No EU-wide
transition period.

Who does EmpCo apply to?

Any company making environmental or social claims to consumers in the EU. Your headquarters don't matter: if an EU shopper can see it, it counts. And a "claim" is broader than most teams expect:

Packaging & labels
(On-pack text, badges, seals)

Websites
(Product pages, about us, FAQs)

Ads & socials
(Campaigns, posts, audio, video)

B2C sales materials
(brochures, catalogues)

Reports

Visuals & names
(Colours, leaves, brand names)

What does EmpCo actually require?

Nine rules now shape every sustainability claim you make to consumers.

Each one comes with what to do instead.

1

VAGUE GREEN CLAIMS ARE OUT

"Eco-friendly", "green", "climate friendly": banned unless you explain what they mean on the same label, page or ad, or can prove recognised excellent performance (such as EU ecolabel)

Do instead: show the proof and say exactly what you mean.

2

SOCIAL CLAIMS COUNT TOO

Claims about fair wages, working conditions, human rights, diversity, community work and animal welfare fall under the label rules and the general ban on misleading claims.

Do instead: name the practice, the scope and the evidence.

3

DESIGN IS A CLAIM

Green colours, leaves, globes and nature imagery can count as an environmental claim on their own.

Do instead: review visuals and names, not just words.

4

DON'T CLAIM THE WHOLE FOR A PART

Recycled packaging isn't a recycled product. One site on renewables isn't a renewable company.

Do instead: scope every claim to what it covers.

5

DON'T SELL THE LEGAL MINIMUM

Free from "*a substance already banned in the EU*", or the legal guarantee every buyer already has, is not a selling point.

Do instead: highlight only what goes beyond the law.

6

NO IRRELEVANT BENEFITS

"Gluten-free" water implies a difference that isn't there.

Do instead: drop it!

7

NO OFFSET-BASED NEUTRALITY

Climate neutral", "CO₂ compensated" or "reduced climate impact" for a product can't rest on offsets.

Do instead: report real reductions; describe projects you fund separately.

8

FUTURE TARGETS NEED A PLAN

"Net zero by 2040" needs a public, detailed plan with measurable, time-bound targets and resources, checked regularly by an independent expert whose findings are made public.

Do instead: link every target to its plan.

9

ONLY CERTIFIED OR OFFICIAL LABELS

Sustainability labels must be set up by public authorities (such as the EU Ecolabel) or based on certification schemes that are open to all, built with experts, independently monitored and able to sanction breaches.

Do instead: retire self-made badges

**SAY WHAT YOU CAN PROVE.
PROVE WHAT YOU SAY.**



What is the impact on products?

COMPARISONS MUST SHOW THEIR METHOD

Say what you compare, how, which products and suppliers are included, and how the data stays current.

DURABILITY AND REPAIR CLAIMS MUST HOLD

Don't overstate how long a product lasts under normal use, or present it as repairable when it isn't.

NO BUILT-IN EXPIRY DATES METHOD

Don't promote products designed to fail early, or hide that updates or non-original parts limit use.

INFORM BEFORE PURCHASE

Legal guarantee notice, durability guarantees, software update periods and repair information.

What does that look like in practice?

The fix is usually simple: swap the sweeping statement for the specific fact behind it, or drop it. Figures in brackets are yours to fill in.

INSTEAD OF	TRY THIS
Eco-friendly packaging	Packaging made from 80% recycled cardboard
Made with recycled materials <i>(when only the packaging is)</i>	Packaging made from recycled material
Free from [substance banned in the EU]	Drop it: every product already meets that bar
We run on renewable energy <i>(when some sites don't)</i>	Fossil fuel use across our sites fell by [X]% last year
Nature positive brand	We restored [X] hectares of wetland in our sourcing region in [year]
Climate neutral product <i>(based on offsets)</i>	Emissions per [unit] cut by [X]% from [baseline year] to [year], covering [scope]. Separately: the climate projects we fund

What happens if you get it wrong?

Fines: in coordinated EU-wide cases, maximum fines must be at least 4% of turnover in the countries concerned, or at least €2 million where turnover data isn't available

Corrections: orders to withdraw or rewrite claims, labels and packaging

Public naming: regulators can publish their decisions and rulings

Legal claims: action from consumers, NGOs or competitors

Lost trust: the cost no regulator sets, and it takes far longer to win back than getting the claim right the first time

What should you do now?



1. Take inventory

List every claim, label, certificate and visual, wherever it appears.



4. Pressure-test targets

Back each future goal with milestones, a plan and independent checks.



2. Test the evidence

Sort each claim to keep, fix or drop



5. Learn from cases

Study rulings in your sector to spot your own blind spots.



3. Set up governance

One owner approves claims, with sustainability, marketing, legal and product at the table.



6. Train your people

Most slips start with one hasty social post. Share clear dos and don'ts.

Can Quest help?

At Quest, we help businesses turn trustworthy communication into a company asset. Whether you're starting from scratch or building on existing sustainability work, we help you say what you do, prove what you say, and earn trust that lasts.



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