

October 1, 2026

Guidance on EmpCo and the Use of ECO EPD Information

Guidance for manufacturers and other traders communicating environmental information to consumers

Applicable framework: Directive (EU) 2024/825 and the amended Unfair Commercial Practices Directive

Purpose of this guidance

This paper explains how the new EU rules on environmental claims and sustainability labels affect the use of the ECO EPD mark and information contained in ECO EPDs in business-to-consumer communications. It provides practical guidance but does not replace a case-specific legal assessment.

Key messages

- The new rules apply from 27 September 2026 to business-to-consumer commercial practices, including communications relating to existing products and old stock.
 - The ECO EPD mark and the quantitative information contained in an ECO EPD must be considered separately.
 - If the ECO EPD mark is used as a sustainability label in consumer-facing communications, the certification-scheme requirements introduced by EmpCo are relevant.
 - Specific, quantitative information from an ECO EPD may be used as evidence for a specific environmental claim, but the EPD does not make the claim lawful automatically.
 - The manufacturer or trader making the claim remains responsible for its wording, evidence, context and overall impression.
 - An ECO EPD does not justify vague claims such as 'green', 'eco-friendly' or 'climate-friendly' on its own.
-

1. Purpose and scope

Directive (EU) 2024/825 on empowering consumers for the green transition, commonly referred to as EmpCo or the ECGT Directive, amends the Unfair Commercial Practices Directive and the Consumer Rights Directive. Its provisions apply from 27 September 2026.

The rules addressed in this guidance concern commercial practices directed at consumers. They do not generally govern purely business-to-business communications. However, national law and other EU rules may impose additional requirements, and the same information may enter the B2C sphere when reused in packaging, advertising, product pages or other consumer-facing materials.

EmpCo regulates how products and businesses are presented to consumers. It does not change how an EPD is calculated or how a product is manufactured. Its purpose is to prevent vague, unsupported or misleading environmental messages and to establish minimum requirements for sustainability labels.

2. Two different uses of an ECO EPD

For EmpCo purposes, it is essential to distinguish between displaying the ECO EPD mark and using information from the EPD as evidence for a specific environmental claim.

Use	Main EmpCo question	Practical consequence
Displaying the ECO EPD mark	Is the mark being used as a sustainability label that sets apart or promotes the product by reference to environmental characteristics?	If so, the mark must be established by a public authority or based on a certification scheme meeting the EmpCo requirements.
Using quantitative ECO EPD data	Does the data adequately substantiate the exact claim made, in its full wording and context?	The claim must be specific, truthful, verifiable, adequately substantiated and non-misleading. The trader remains responsible.
Providing the EPD as neutral information	Is the EPD presented as a factual declaration without promotional environmental messaging?	A neutral quantitative declaration is less likely to constitute a sustainability label, but its presentation and the overall consumer impression still matter.

3. The ECO EPD mark as a sustainability label



EmpCo prohibits, in all circumstances, the display of a sustainability label that is neither established by a public authority nor based on a certification scheme. A sustainability label is broadly defined as a voluntary public or private trust mark, quality mark or equivalent that sets apart and promotes a product, process or business by reference to environmental or social characteristics.

Whether a particular use of the ECO EPD mark qualifies as a sustainability label depends on the context, presentation and likely perception of the average consumer. A consumer-facing logo or trust mark used to promote a product's environmental qualities is likely to fall within the definition.

Certification scheme requirements

Where a mark is used as a sustainability label, the underlying certification scheme must meet cumulative requirements. In practical terms, the scheme must:

- be based on independent third-party verification rather than self-declaration;
- make its requirements and terms publicly available;
- provide for compliance monitoring by a competent and independent third party in line with international, Union or national standards and procedures;
- be transparent, credible and open on fair and non-discriminatory terms;
- be open to all traders willing and able to comply with its requirements;
- set its requirements in consultation with relevant experts and stakeholders; and
- allow the use of the corresponding sustainability label and provide effective consequences for non-compliance, including suspension or withdrawal where appropriate.

The European Commission's September 2026 Questions and Answers state that the scheme owner and the independent third party responsible for monitoring compliance should be legally separate entities. The Commission document is expressly preliminary and non-binding; authoritative interpretation rests with the Court of Justice of the European Union, while enforcement lies with national authorities and courts.

4. Using ECO EPD information for specific environmental claims

The requirements applicable to certification schemes primarily determine whether the ECO EPD mark may be displayed as a sustainability label in B2C communications. They do not necessarily prevent manufacturers from using specific, quantitative information contained in an ECO EPD as evidence for a specific environmental claim. Any such claim must nevertheless be assessed on its own merits and must be truthful, specific, verifiable, adequately substantiated and non-misleading. Responsibility for that assessment remains with the manufacturer or trader making the claim.

A specific claim should identify what is being claimed, the part of the product or lifecycle concerned, the relevant indicator, the basis of comparison where applicable, and any conditions or limitations necessary to understand the result. The specification should appear clearly and prominently on the same medium as the claim.

Examples

Communication	Assessment
"This product is eco-friendly."	Generic claim. An ECO EPD alone does not demonstrate recognised excellent environmental performance and does not justify this wording.
"The declared GWP-total for modules A1-A3 is X kg CO ₂ e per declared unit, according to ECO EPD [reference]."	Specific quantitative information. Potentially supportable if the declared unit, modules, EPD validity and relevant limitations are clear and the presentation is not misleading.
"30% lower GWP than Product Y."	Comparative claim. Requires genuinely comparable products, declared or functional units, lifecycle stages, methods, datasets and valid evidence. The comparison method and update measures must be explained.
"Climate neutral product" based on purchased offsets.	Prohibited product claim where neutrality is based on greenhouse-gas offsetting outside the product's value chain.
"We will reduce this product's lifecycle GWP by 40% by 2030."	Future-performance claim. Requires clear, objective and verifiable targets, a detailed and resourced implementation plan, regular independent verification and accessible findings.

5. Guidance for manufacturers and traders

Before using the ECO EPD mark or information from an ECO EPD in consumer-facing communication, the manufacturer or trader should complete the following review.

1. Identify the audience and medium. Determine whether the communication is B2C and review packaging, websites, brochures, product names, campaigns and point-of-sale materials.
2. Classify the communication. Decide whether it displays a sustainability label, makes a specific environmental claim, makes a generic claim, presents a comparison or refers to future environmental performance.
3. Define the exact scope. State precisely which product, indicator, lifecycle stage, declared or functional unit and time period the message covers.
4. Check the evidence. Confirm that the EPD is valid, applicable to the marketed product and capable of substantiating the exact wording used.
5. Check comparability. For comparisons, confirm methodological equivalence and explain the comparison method and how the information is kept up to date.
6. Review the overall impression. Consider words, images, colours, icons, logos and placement together. Factually correct information may still mislead if the overall impression overstates the benefit.
7. Place essential qualifications with the claim. Do not hide decisive information behind a remote link or in general terms and conditions.
8. Retain records. Keep the EPD, calculations, comparison files, approvals and dated copies of the communication used.
9. Obtain legal review. Review higher-risk packaging, brand names, comparative claims, broad climate claims and campaign concepts before publication.

6. Simple dos and don'ts

Do	Do not
Use precise, measurable wording and identify the part of the product or lifecycle concerned.	Use vague wording such as “eco”, “green”, “environmentally friendly” or “climate-friendly” without meeting the requirements for generic claims.
Provide the explanation clearly and prominently on the same medium as the claim.	Assume that a QR code or a link can cure a vague claim when the essential specification is absent from the claim itself.
Keep reliable and current evidence for every factual statement.	Extend evidence relating to one indicator, component or lifecycle stage to the whole product or company.
Check images, colours, product names and logos as part of the overall message.	Present a legal requirement applying to all comparable products as a distinctive environmental advantage.
Use a detailed, resourced and independently reviewed plan for future-performance claims.	Use product carbon-neutrality or reduced-impact claims based on greenhouse-gas offsets outside the product's value chain.
Assess every claim independently, even where a valid label or EPD is available.	Treat the ECO EPD mark or the existence of an ECO EPD as automatic approval of a marketing claim.

7. Existing packaging and old stock

The new rules apply from 27 September 2026, including to B2C communications on products or packaging already manufactured, ordered, distributed or placed on shelves before that date. The Commission's September 2026 Questions and Answers indicate that practical corrective measures may include stickers, covering a non-compliant claim or providing supplementary information at the point of sale in close proximity to the affected products.

Manufacturers and traders should therefore review existing stock and distribution channels, document proportionate compliance measures and take account of national enforcement guidance. The assessment of individual cases remains with the competent national authorities and courts.

8. Responsibilities

Manufacturer or trader. The business that makes or uses a consumer-facing claim is responsible for ensuring that the communication complies with applicable consumer law. This includes the exact wording, evidence, context, presentation and overall impression.

ECO EPD Programme Operator. The Programme Operator administers the EPD programme and issues or publishes the declaration in accordance with the applicable programme rules. Unless separately agreed, it does not approve the manufacturer's packaging, advertising, website or campaign and cannot assess every subsequent use of EPD information.

ECO Platform. ECO Platform establishes common requirements for ECO EPDs and the ECO EPD mark and works with its recognised Programme Operators on harmonisation, quality and compliance. ECO Platform does not approve individual manufacturers' consumer claims and cannot guarantee that a particular claim is lawful in every Member State or factual context.

Manufacturer-provided content within an EPD. Free-text statements, images, slogans and other communication elements provided by the EPD Owner remain the responsibility of the EPD Owner. Their inclusion in a verified or published ECO EPD does not constitute approval, validation or certification by ECO Platform or the ECO EPD Programme Operator of any environmental or other marketing claim contained in such elements. Where such content constitutes or is used as a commercial claim, the trader making or using the claim remains responsible for compliance with applicable consumer and advertising law.

9. Status and limitation of this guidance

This paper provides general guidance on Directive (EU) 2024/825 and its application to the use of ECO EPD information. It does not constitute legal advice, certification, prior validation of a claim or authorisation to use a particular environmental statement or sustainability label.

Holding a valid ECO EPD does not mean that a particular environmental claim is lawful. ECO Platform and the ECO EPD Programme Operators do not accept responsibility for the wording, context or use of claims made independently by manufacturers or other traders. Each user must assess the applicable national implementing rules and the circumstances of the communication concerned.

The interpretation of EmpCo will continue to develop through national enforcement, guidance and case law. ECO Platform may update this paper accordingly.

About ECO Platform

ECO Platform AISBL is an international non-profit association that supports the harmonisation, quality and digital availability of verified environmental product information. Through cooperation with recognised EPD Programme Operators, ECO Platform enables consistent access to ECO EPDs based on common rules and third-party verification.

Further information and future updates to this guidance are available at www.eco-platform.org.

Disclaimer

ECO Platform assumes no liability for any improper, partial, out-of-context, or outdated use of these guidelines, nor for any commercial decisions, market communications, environmental or social claims, labels, trademarks, or sustainability statements adopted by third parties based - even indirectly - on this document.

For the avoidance of doubt, verification or publication of an ECO EPD does not constitute approval by ECO Platform of manufacturer-provided free text, images, slogans or other communication elements, nor does it constitute validation of any claims contained therein for compliance with applicable consumer or advertising law.

Any measures, formal objections, sanctions, claims for damages, or actions initiated by competent authorities, consumers, competitors, or other parties in relation to claims, trademarks, labels, or communications prepared and used by third parties may not be attributed to ECO Platform solely on the grounds that such parties consulted, referenced, or applied these guidelines.

This document may not be used, cited, or presented as an attestation, approval, validation, certification, or guarantee of conformity issued by ECO Platform regarding specific claims, trademarks, labels, certification systems, or commercial communications. Any reference to this document must be complete, accurate, and non-misleading, avoiding partial, selective, or decontextualized excerpts that could alter its overall meaning or imply ECO Platform's endorsement of specific statements or conduct by third parties.