

# *Empowering Consumers for the Green Transition (ECGT) Guidance*

*May 2026*

***Intended for UK-based organic businesses with products on the EU market Sept 27<sup>th</sup> 2026 and beyond***

The [Empowering Consumers for the Green Transition \(ECGT\)](#) directive is a new European Union law designed to fight greenwashing and improve product sustainability information. Approved in March 2024, it amends existing EU laws to restrict misleading environmental claims, requiring companies to provide verified, clear evidence for green claims. This guidance is intended to assist UK based organically certified businesses who anticipate their products being placed on the European market.

*Before reading please note: This document is based on [EC guidance](#) and doesn't constitute a formal Soil Association Certification position or legal interpretation of the ECGT Directive and is intended purely as guidance. The exclusive competence to provide authoritative interpretation lies with the Court of Justice of the European Union. It is the responsibility of the EU national competent authorities, including courts, to enforce the provisions of the Directive.*

## **1. Is this a totally new EU regulation?**

Not exactly. Limited to business to consumer practices in connection with the promotion, sales or supply of product, ECGT is an amendment to both the Unfair Commercial Practices Directive (UCPD) and the Consumer Rights Directive (CRD) to include specific prohibitions in relation to greenwashing and early obsolescence. ECGT does not change the scope and logic of intervention of these two existing Directives but introduces targeted changes, to:

- regulate vague and misleading environmental claims and sustainability labels under the UCPD and mandate better and more harmonised information at the point of sale on consumers' legal guarantee rights, and on the reparability and durability of goods under the CRD

## **2. Is this relevant for organic operators?**

Yes. This is potentially relevant to anyone who has organic products placed on the EU market on the 27<sup>th</sup> September 2026 and beyond. There are some specific concessions made where products are certified under EU organic regulation and/or voluntary organic schemes – for example GOTS or COSMOS.

### **3. What are ‘environmental claims’?**

ECGT regulates ‘environmental claims’. An ‘environmental claim’ is any message or representation (implicit or explicit) which is not mandatory under EU, or member state national law.

It can be in any form, including text, pictorial, graphic or symbolic representation, such as labels, brand names, company names or product names. Crucially it’s considered an environmental claim if it states or implies that a product, product category, brand or trader has a positive or zero impact on the environment or is less damaging to the environment than other products, product categories, brands or traders, or has improved its impact over time.

Even use of certain colours and graphic elements can suggest sustainability performance, so design choices should accurately reflect a benefit and not overstate it. Caution should be employed when using images such as leaves and the colour green in your advertising.

False or untruthful claims are not allowed and to determine if a claim is misleading, the regulation applies a ‘transactional decision test’ on a case-by-case basis. The test simply asks whether the practice would cause a consumer to make a decision they would not have ordinarily made.

### **4. What are “generic environmental claims” and are they allowed?**

Generally, no. Making a ‘generic environmental claim’ for which a trader is not able to demonstrate “recognised excellent environmental performance” (EEP) relevant to the claim is prohibited. Here are some examples of text based generic claims that are prohibited unless *part* of a recognised ‘sustainability label’ or you have been able to demonstrate EEP:

- environmentally friendly
- world-conserving
- green
- nature-friendly
- ecological
- environmentally just
- climate-friendly

- environmentally compatible
- CO2-friendly
- energy-efficient
- biodegradable
- bio-based

Making a generic claim is different from making a specific sustainability claim. Specific claims should indicate (in the same field, i.e. not elsewhere with a link to further information) which environmental aspect they refer to, and which stage of the product life cycle is affected. Furthermore, it should be clearly explained how the claimed effect is to be achieved, and ideally, it should also be quantified. An example of a specific claim might be: “The energy used to make this product is from 100% renewables” .

If the specification of the claim is not provided in clear and prominent terms on the same medium, unless it is part of an acceptable ‘sustainability label’, it is considered a ‘generic’ or ‘general’ sustainability claim. Generic claims are those made in a written or oral form and use of colours or images on their own is not considered a generic claim but can still be regarded as misleading.

Whilst claims made as part of a ‘sustainability label’ are not regarded as ‘generic’ claims, under existing UCPD regulation, claims made as part of a sustainability label should still not be misleading or irrelevant.

## 5. What is a ‘sustainability label’ ?

ECGT indicates that ‘Sustainability labels’ must be based on a ‘certification scheme’ (and meet the regulatory criteria -e.g. the scheme conforms to ISO17065/ or EC 765/2008) or established by public authorities. EU guidance indicates that certification must be based on independent third-party verification, and must fulfil these requirements:

- *The scheme’s requirements and terms must be publicly available.*
- *Compliance must be monitored by a competent, independent third party, in line with international, Union, or national standards (e.g. ISO 17065, or mechanisms provided for in Regulation (EC) No 765/2008 etc).*
- *The scheme must be transparent, credible, and open to all traders under fair and non-discriminatory terms.*
- *The scheme must be open to all traders willing and able to comply (non-exclusivity).*

- *The scheme owner sets the requirements in consultation with relevant experts and stakeholders.*
- *The scheme must allow for the use of a corresponding sustainability label*

Regards labels established by non-EU Public Authorities, EU guidance states that:

- *“The display of sustainability labels established by public authorities of non-EU Member States will be prohibited [...] unless these labels are based on a certification scheme.*

Whilst the regulation doesn't define 'Public Authority', the wider regulation does suggest a primary focus on EU Member States. Where the label is based on a 'Certification Scheme' (as defined above), this would appear not to be problematic.

## **6. How do you demonstrate excellent environmental performance (EEP)?**

There are three ways to ensure EEP is specified. EEP is recognised where a product complies with:

1. EU Ecolabel (EC 66/201),
2. National or regional ISO 14024 Type 1 Ecolabels,
3. Top environmental performance for a specific environmental characteristic in accordance with other applicable Union laws, such as for example recognised excellent environmental performance in accordance with the Energy Labelling Regulation.

The claim must be relevant to the standards being assured. In addition, there is allowance for statements made in line with other applicable EU law.

*Note that EU organic regulations are not included under these three scopes. At the time of publication German legislators have determined that – where claims relate to regulated aspects - organic would comply with point.3 above.*

## **7. So can I use the word organic where the product is certified to EU regulations?**

In accordance with Article 30 of Regulation 2018/848 the terms referring to organic food production such as 'bio' and 'eco', can be used throughout the European Union to demonstrate compliance with the EU organic farming rules, even though they could be considered as 'generic environmental claims' . So yes, if the product is organically certified under an organic 'certification scheme' (as defined above) then the word 'organic' can be used.

## **8. And other generic claims relating to the organic system where the product is certified to EU regulations? What about those?**

As complying with organic regulation EU 2018/848 (and potentially organic regulations in 3<sup>rd</sup> countries deemed by the EU as equivalent) would not be regarded as EEP as stated above, being certified organic in line with these regulations would not automatically mean you can make generic claims.

*The currently German regulator's interpretation of UCPD and ECGT indicates that it should be possible to make 'generic claims' relating to proven performance of the organic system (e.g. specific claims around the benefits for animal welfare, water quality or biodiversity) in this context. The term 'environmental claim' is seen to no longer apply when promoting products as "organic" where it is covered by regulation that mandates the use of the EU organic logo. This may not be the case for non-regulated products, such as non-foods.*

*Guidance published by AOL in Germany reminds businesses that:*

- *The product must actually exhibit the corresponding environmental performance in accordance with the Organic Regulation or the private standards based on it.*
- *Claims must be clear, explicit and relate explicitly to the organic certification and organic qualities of the products (e.g. say "does X because it's organic"). Claims can only be made in relation to food in the pack (not the packaging, as EU Organic regulations don't cover packaging).*

*Note: this is not yet a clear EU wide position and in any case claims must not be misleading.*

## **9. Are there claims I need to be careful with even where the product is certified organic?**

General claims that do not relate to the certified system would need further clarification and evidencing.

Be aware, 'sustainability conscious' and 'social' claims are not necessarily covered as organic regulations in the EU and UK have limited scope to address such issues. There are also additional specific rules on climate neutrality. These should be based on actual lifecycle impacts. *More detailed guidance can be found in Point. 10 of this [EU published FAQ](#)*

## **10. My products carry the 'Sustainability Label' associated with an organic 'Certification Scheme' that enforces additional requirement that go beyond**

**the EU regulation/my own Public Authorities regulation. Can I make generic claims relating to benefit associated with those additional requirements?**

ECGT does not provide any specific exemption for private standards that go beyond the substantive requirements of the organic regulation (such as Soil Association Certification or other EU Control Bodies who certify to standards that go beyond the EU organic regulatory requirements)

It's not clear at this time whether this will prove problematic for EU Members States to enforce but should the rest of the EU follow German legislators interpretation and it prove possible in future to make generic claims where product is certified to organic regulations, we would still recommend caution around claims specifically relating to performance achieved by meeting additional standards.

**11. What about non-regulated organic schemes such as GOTS or COSMOS?**

Both the regulated and non-regulated (e.g. COSMOS and GOTS) organic certification schemes SA Certification operates would be considered 'certification schemes' by this definition, and as such displaying such- "sustainability labels" would not be prohibited. It should also be possible to make generic claims as part of these sustainability labels (see Q.5 above). However, as organic regulation only covers food and farming, it is not clear whether other 'generic claims' can be made without meeting EEP (see Q.7).

**12. What are meaningless claims and can I claim future performance?**

Functionally meaningless claims (e.g. 'gluten-free water') and future performance also require third-party verification and an implementation plan with resource allocated.

Presenting requirements imposed by law (EU or Third Country) as a distinct feature is also seen as meaningless and as such is prohibited. This prohibition does not apply whenever the legal requirements only apply to some products but not to other competing products of the same category on the Union market, such as products of non-Union origin.

**13. What if my products are already on the EU market ?**

Where affected product is already on the market and remains on the market from 27<sup>th</sup> of September 2026, correction or over stickering is suggested.

ECGT will be enforced by national Competent Authorities. Where traders have made reasonable and proportionate efforts to comply, including for products already in the

distribution chain, authorities may include this in their assessment, taking due account of proportionality, legal certainty and legitimate expectations.

*Ends*