



CLIENT ADVISORY

From: Quality Certification Services

Date: August 27, 2026

Subject: New EU rules on environmental claims take effect September 27, 2026 — what QCS clients should check now

The short version

A new European Union law changes what you are allowed to say about the environmental and sustainability qualities of your products in business-to-consumer (B2C) marketing. It applies to **any business, anywhere in the world, whose product reaches a consumer in the European Union**. It takes effect **September 27, 2026**, and it applies to products already sitting on shelves.

This advisory applies to your operation if any of your products reach EU consumers— directly, through a distributor, or through an e-commerce channel that ships to the EU.

What the law is

Directive (EU) 2024/825 *Empowering Consumers for the Green Transition Directive* (also known as EmpCo or ECGT) amends two existing EU consumer-protection laws (Directives 2005/29/EC and 2011/83/EU). The directive bans vague environmental marketing terms, requiring traders to provide clear, relevant and reliable information so that EU consumers can make informed purchasing decisions.

Enforcement runs through each member state's existing consumer protection authorities, with penalties set nationally.

What changes on September 27

1. Generic green claims are prohibited unless specified and substantiated.

Words like *eco-friendly*, *green*, *environmentally friendly*, *responsible*, and *sustainable*, used on their own, are no longer permitted. A claim must name the specific environmental aspect it refers to and be backed by evidence.

2. Sustainability labels must rest on a qualifying scheme.

A sustainability label may be used only if it was established by a public authority or is based on a certification scheme with criteria that are transparent, fair, and publicly accessible, and with verification by an independent third party. In-house seals and self-declared marks do not qualify.

3. Carbon-neutrality claims based on offsetting are banned outright.

Claiming a product is climate neutral, carbon neutral, or has reduced or positive environmental impact **on the basis of emissions offsetting** is prohibited at the product level. This is the single largest change for operations that have built a carbon program.

4. Forward-looking claims need a real plan.

Statements about future environmental performance must be supported by a clear, objective, publicly available implementation plan with measurable targets and independent verification.



5. Brand names are not exempt.

A registered trademark or product name containing "eco," "green," or similar is subject to the same rules. Being a trademark does not shelter the claim.

What this means for a certified organic operation

Organic labeling is protected because it is based on a qualifying certification scheme. The USDA National Organic Program and EU organic certification under Regulation (EU) 2018/848 are certification schemes with published criteria verified by third-party accredited certifiers. These are precisely the kind of sustainability labels Directive (EU) 2024/825 is designed to protect.

Three things to check anyway:

1 — Is your EU-facing claim covered by the right organic certificate?

Products sold as organic in the EU must be certified as organic to the appropriate scheme. USDA organic products can only be marketed as organic in the EU if they were produced or had their final processing occur within the United States and have been verified by QCS to be eligible for trade under the US-EU organic equivalence arrangement. Otherwise, products must be certified directly to the EU organic regulations. All organic products exported to the EU must be associated with an electronic Certificate of Inspection (COI) issued by the certifier prior to export.

2 — Are other sustainability claims on your product labels verifiable?

Review every environmental or social statement on your business-to-consumer labels, website and other marketing materials. Remove banned terms or replace with a specific attribute that is supported with certification or documented evidence. For example:

Likely a problem	Likely defensible
"Eco-friendly farming"	"Certified organic under Regulation (EU) 2018/848"
"Sustainably grown"	"Grown without synthetic pesticides, verified by annual inspection"
"Climate neutral" (via offsets)	"Emissions reduced 30% since 2022, verified by [body]"
"Good for the planet"	"Packaging contains 40% post-consumer recycled content"
"Green packaging"	"Recyclable where facilities exist"
Your own in-house sustainability seal	A seal from a scheme with public criteria and independent verification

3 — Can you produce substantiation within days, not weeks?

For every environmental claim you make, ensure you could provide the supporting documentation to a regulator quickly. If the paper trail does not exist, the claim is not defensible regardless of whether it is true.



What QCS can and cannot do for you

We can: certify and verify to support a claim. That includes EU Regulation 2018/848 certification, USDA organic certification, Regenerative Organic Certified® (ROC™), GLOBALG.A.P. and social fairness verification, and food safety certification. If your operation needs an accredited certificate to support a claim, that is our work.

We cannot: advise you on how to structure your claims or your compliance. We are prohibited from providing consulting services to the operations we certify. This is not a policy preference — it is the rule that makes our certification decisions worth something. We can tell you whether something meets a standard. We cannot tell you how to get there.

For general education, our parent organization Florida Organic Growers is developing free, publicly available resources on claim compliance — webinars, a claims reference guide, and a self-assessment tool. Watch for announcements.

For advice specific to your operation, engage qualified legal counsel or a consultant. We are happy to confirm what our certification does and does not cover so you can brief them accurately.

Next steps to consider

1. Determine whether any of your product reaches an EU consumer, including through distributors and e-commerce channels.
2. If yes, inventory every environmental and social claim across packaging, website, and marketing.
3. Flag anything generic, anything offset-based, and any self-declared seal.
4. Contact QCS about certification to the EU organic regulation or verification of US-EU equivalence if products exported to the EU are not already certified/verified. Lead times matter with a September 27 implementation.
5. Locate the substantiation for each remaining claim.

Further reading

- [Full text of Directive \(EU\) 2024/825 \(EUR-Lex\)](#)
- [European Commission FAQ](#) on the directive — non-binding but used by national authorities and courts in interpretation. First published November 2025, updated June 2026.

Questions about your certification scope: (352) 377-0133 or qcs@qcsinfo.org

This advisory is general information about a regulatory directive and is not legal advice. QCS does not provide consulting or compliance advice to certified operations. Consult qualified counsel regarding your specific circumstances.