

New environmental communication rules: welcome Empowering Consumers directive

Mandatory regulatory requirements on environmental communication are enriched thanks to the Empowering Consumers Directive 2024/825/EU, that introduces new definitions, provisions, and prohibitions on green claims.

Basic principles and updates of the EmpCo Directive

The creation of sustainability claims must follow the European directives UCPD [2005/29/EC](#) (Unfair Commercial Practices Directive) on unfair commercial practices and [2011/83/EU](#) on consumers' rights. The [EmpCo directive 2024/825/EU](#) (Empowering Consumers), in force from 27th September 2026, amends and enriches the previous directives, introducing new rules.

The new European rules introduce stricter limits to environmental communications, with the objective of fighting greenwashing and ensuring consumers clear, more transparent, and verifiable information. These rules are implemented in Italy with the decree [d.lgs. 30/2026](#), which amended the "Codice del Consumo". In the creation of environmental claims, the principles of form and substance remain valid.

Fundamental principles (directive UCPD 2005/29/EC)

Form

Environmental statements must be presented in a clear, specific, accurate, and unambiguous manner.

Substance

Evidence supporting the statements must be available and be readily provided to inquiring competent supervising authorities.



Green claim

as defined by directive 2024/825/EU

"In the context of commercial communication, a green claim is **any message or representation** which is not mandatory under Union or national law, in any form, including text, pictorial, graphic or symbolic representation, such as labels, brand names, company names or product names, and which **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.**"

New prohibitions (directive EmpCo 2024/825/EU)

Self-declared labels

Prohibition of displaying sustainability labels not based on certification schemes or not established by public authorities.

Amplification of claims

Prohibition of creating claims referring to the entire product when, in reality, they only apply to a specific aspect of it.

Generic claims

Prohibition of using generic terms that recall a general environmental superiority (green, ecologic...), unless the excellence of environmental performance can be demonstrated (through Ecolabel regulation, through quality labels according to EN ISO 14024, or through other applicable regulations).

Legal requirements

It is prohibited to highlight as unique features of the firm's offering those requirements that are imposed by law on all products in a given category in the EU market.

Carbon claims

It is forbidden, based on greenhouse gas offsetting, to state that a product has a neutral, reduced, or positive impact on the environment in terms of greenhouse gas emissions.

Relevant omissions

It is forbidden to omit relevant information on product functionality regarding software updates, durability, repairability, and the use of non-original consumables or accessories.

Key dates

- **27th March 2024**
The Empowering Consumers directive enters into force
- **24th March 2026**
The directive is implemented in Italy with legislative decree 30/2026
- **27th September 2026**
The directive enters into force in member States

What it means for companies

- **Inventory** of ESG claims and review of wording used in all touchpoints (packaging, websites, ads, social media...)
- **Evidence-based approach:** documental evidence always available
- **Avoid absolute and generic claims** and create specific, clear, and verifiable claims
- Coordination between marketing, legal, and sustainability functions for an effective **governance**
- **Regulatory monitoring** and continuous review of communication materials



Examples: allowed claims with available evidence

- The packaging of this product is made with 70% recycled material
- The transport optimization of the raw materials used in this product has allowed a reduction of CO2 emission of 30% with respect to 2020, in this lifecycle stage
- The packaging of this product can be recycled in the paper bin



Examples: claims at risk

- "Green", "eco", "sustainable", "Planet-friendly", in the absence of recognized proof of environmental excellence (e.g., Ecolabel)
- "Carbon neutral product" if neutrality is only based on carbon offsetting
- Uncertified green badges or environmental labels

In short, the European Union promotes a strategy to curb greenwashing, through the creation of clear and substantiated claims.

It is not only about "how to prove it", but also "what can be said and how".

Today, communicating well is more important than ever. Discover GS1 Italy's tools for a correct product environmental communication.

GS1 Italy tools for product environmental communication

With the new European rules against greenwashing introduced by the EmpCo directive 2024/825/EU, communicating sustainability requires greater accuracy and concrete evidence. Environmental information must be clearer and more reliable, to contrast generic or misleading claims and increasing transparency towards consumers. GS1 Italy offers standards, guidelines, and digital tools that help companies communicate environmental information in a clearer and more transparent manner, coherently with the EmpCo directive principles.

LCA analysis: the first ally for product environmental communication

Calculating products' environmental footprint ensures transparency and accuracy and helps mitigate the risks associated to greenwashing. Using the LCA methodology (Life Cycle Assessment) ensures green claims are based on credible, verifiable, and comparable environmental data, building trust with consumers.

Therefore, it is essential for firms to base their claims on LCA studies of their own products. If such studies are not available, the [LCA studies for 29 product categories developed by GS1 Italy](#) represent a reference and a solid analytical base to assess which are the most critical hotspots and environmental impacts, to consequently identify priority areas to improve the product's environmental performance and determine the information is truly relevant to communicate.

[Watch the video tutorial and discover how to read the sheets with LCA results.](#)

A matrix for actions and green claims coherent with LCA analyses

To ensure coherency in the actions aimed at reducing environmental impacts and in the related environmental communication, these must refer to LCA studies, considering hotspots (most relevant lifecycle phases by considering their contribution to the overall environmental impact) and most relevant environmental impact categories. The matrix below indicates how to check whether a green claim is relevant, depending on hotspots and most relevant impact categories for a given product.

Ameliorating actions about:	Entire life cycle	Claim only allowed with proof of excellence	Fairly coherent claim	Coherent claim
	Main hotspot	Claim only allowed with proof of excellence	Fairly coherent claim	Coherent claim
	Other hotspots	Claim only allowed with proof of excellence	Not very coherent claim	Fairly coherent claim
	Non-hotspot phases/aspects	Incoherent/irrelevant claim	Incoherent/irrelevant claim	Not very coherent claim
		Generic terms (ecologic/green...)	Benefits in less relevant impact categories	Benefits in highly relevant impact categories
Claim leveraging:				

Coherent claim: communication concerning a very significant impact category, within the whole life cycle or for the hotspot phase.

Fairly coherent claim: communication not focusing on the main hotspot but stating a positive effect on a highly relevant impact category, or vice versa.

Not very coherent claim: communication focusing on less relevant impact categories or on actions in lifecycle phases that are not primary hotspots.

Incoherent and irrelevant claim: communication on lifecycle stages that are marginal in the LCA analysis. When the communication is irrelevant, the environmental claim loses its primary function of directing consumers towards informed and conscious choices.

Claim only allowed with proof of excellence: communication to be used only in presence of recognized proof of environmental excellence, in accordance with the provisions of directive 2024/825/EU.

Five steps to create environmental claims for LCA analyses

To structure a green claim based on a LCA study of its product, potentially comparing the results to a previous version or to a benchmark, the firm must follow a systematic approach. Below are the logical steps to structure the claim, together with an example.



Did you know that the packaging of our hand cream is made from 100% recycled plastic?

Considering the entire product lifecycle, this allows for a 6% reduction in climate-changing CO₂ eq emissions with respect to the previous version made with virgin plastic.

Considering our product's annual production, thanks to the new recycled plastic packaging, in 2023 we avoided the emission of 600 tonnes of CO₂ eq...
...which is equivalent to the emissions absorbed by around 800 trees in a year!**

*The data is derived from a product life cycle assessment study conducted following the PEF (Product Environmental Footprint) methodology. View the study on our website > ...
**Estimation based on the Effige Project Life Cycle Communication tool. Data source: AzzeroCO₂ dossier, according to which an equivalent tree absorbs 7.5 kg of CO₂ eq per year. The term "equivalent tree" is used since it represents an average absorption value obtained from various forestry projects involving different species, both trees and shrubs.

- 1** Declare the object of the claim (e.g., product, component, pack, process) and the concrete characteristic that distinguishes it.
- 2** State the environmental advantages (in specific impact categories e.g., CO₂ eq, m³ H₂O...) that derive from that characteristic with respect to the standard option, expressed as a percentage reduction.
- 3** Quantify the environmental benefits (in specific impact indicators) of the whole annual production.
- 4** Use an intuitive equivalence to make the data on impact reduction clearer to the consumer.
- 5** Cite the source of data, providing access to it. Both the LCA data sources and any other document use to create the claim and necessary for a correct comprehension must be cited. The source of the equivalence used to convert the results into metrics accessible to the consumer must therefore be cited.

Digital tools to support green claims

Barcode 4 Environment is the web app developed by GS1 Italy that allows communicating to the consumer the environmental impact of products in a simple, accurate, and reliable manner by scanning products' barcode or QR code containing a GS1 Digital Link. [Watch the video on Barcode 4 Environment on Youtube](#)



QR codes powered by GS1 can provide consumers instructions about recycling based on their location, trace the product lifecycle and communicate products' environmental impact. [Go the web page dedicated to QR code powered by GS1 on GS1 Italy website](#)

Green claims about products: what to do and what to avoid

Scope of application



Entire
lifecycle



Raw materials
production



Product
manufacturing



Transportation



Use



End of life

What to do

- 1 Provide specific information and claims**
Give clear and precise messages, such as:
 - Contains 95% ingredients of organic origin.
 - Palm oil from an RSPO Segregated supply chain.
 - 90% of electrical energy during manufacturing from renewable sources.
- 2 Clearly define the object and perimeter of the claim**
Always specify the considered scope (lifecycle stage, ingredient), for example:
 - 4% reduction of emissions in transportation with respect to 2025.
 - Rainforest Alliance certified cocoa.
- 3 Define quantification and explicit comparisons**
Always provide measurable data and propose clear comparisons, for instance:
 - 15% reduction in water consumption in the manufacturing process with respect to 2023.
 - -20% CO₂ eq emission with respect to 2024 in the transport phase thanks to trip optimization.
- 4 Support the claims with verifiable data**
Use verifiable evidence and documentation proving what is being communicated, for example through:
 - LCA studies, EPD...
 - Recognized certifications.
 - Technical documentation based on scientific and recognized methodologies.
- 5 Use clear and understandable terms**
Ensure the communication is clear, simple, and straightforward for everyone:
 - Avoid technical terms without explanations.
 - Use clear and simple terms.
 - Explain symbols and certifications.
- 6 Use recognized certifications and standards**
Rely on standards and certifications with certification schemes, such as:
 - Organic formula COSMOS ORGANIC certified.
 - Tomatoes from organic agriculture, according to the EU Organic certification.
- 7 Give the opportunity to learn more**
Give access to detailed and up-to-date information (methodology, sources, certifications), for instance with digital tools:
 - QR codes, web pages.
 - Apps, such as Barcode 4 Environment.

What to avoid

- 1 No generic, absolute, or non-verifiable claims**
Absolute claims or claims not supported by concrete evidence pose the greatest risks, such as:
 - No impact.
 - Sustainable product.
 - Carbon neutral (if based on offsetting).
- 2 No vague, unquantified, or ambiguous claims**
Vague or unclearly defined terms can be misleading, for example:
 - Green product.
 - Ecologic formula.
 - Totally natural.
- 3 Do not omit relevant information**
An incomplete and selective communication can be deceptive, for example:
 - Highlight natural ingredients while ignoring relevant product impacts.
 - Communicate reduced emissions without specifying the scope of the analysis.
- 4 Do not use misleading or self-declared symbols**
Symbols without explanation or with unverified certifications reduce transparency, for instance:
 - Improper environmental labels.
 - "Green" badges without explanation.
 - Certifications that cannot be verified by the consumer.
- 5 Do not emphasise mandatory features**
It is not correct to present as environmental benefits what is imposed by the law, such as:
 - Does not contain chlorofluorocarbons (CFC).
 - Present as distinctive advantage the conformity to current environmental regulations.
- 6 Do not extend environmental benefits**
A specific improvement to a part of the product or in a lifecycle stage cannot be extended to the whole product, for example:
 - Defining a detergent fully organic when it only contains one organic raw material.
- 7 Do not overload communication**
Providing too much environmental information can be confusing, it is best to use clear and relevant claims and give access to further insights, for example using QR codes.

Green claims about packaging: what to do and what to avoid

Scope of application



Entire
lifecycle



Raw materials
production



Product
manufacturing



Transportation



Use



End of life

What to do

1

Provide specific information and claims

Give clear and precise messages, such as:

- Bottle with 70% recycled plastic.
- FSC certified paperboard.
- Recyclable packaging where local collection allows.

2

Clearly define the object and perimeter of the claim

Always specify the considered scope (lifecycle stage, component, ingredient), for example:

- Bottle cap made of recycled plastic.
- 20% reduction in greenhouse gas emissions with respect to the 2024 bottle version, along the entire lifecycle.

3

Define quantification and explicit comparisons

Always provide measurable data and propose clear comparisons, for instance:

- 15% reduction in energy consumption in the bottle production with respect to 2022.
- -80% virgin plastic compared to the previous packaging.

4

Support the claims with verifiable data

Use verifiable evidence and documentation proving what is being communicated, for example through:

- LCA studies, EPD...
- Recognized certifications.
- Technical documentation based on scientific and recognized methodologies.

5

Use clear and understandable terms

Ensure the communication is clear, simple, and straightforward for everyone:

- Avoid technical terms without explanations.
- Use clear and simple terms.
- Explain symbols and certifications.

6

Use recognized certifications and standards

Rely on standards and certifications with certification schemes, such as:

- Compostable bag according to TÜV Austria's "OK Compost Industrial".
- Cardboard from PEFC certified forests.

7

Give the opportunity to learn more

Give access to detailed and up-to-date information (methodology, sources, certifications), for instance with digital tools:

- QR codes, web pages.
- Apps, such as Barcode 4 Environment.

What to avoid

1

No generic, absolute, or non-verifiable claims

Absolute claims or claims not supported by concrete evidence pose the greatest risks, such as:

- No impact.
- Sustainable packaging.
- Carbon neutral (if based on offsetting).

2

No vague, unquantified, or ambiguous claims

Vague or unclearly defined terms can be misleading, for example:

- Green packaging.
- Responsible choice.
- Environmentally-friendly packaging.

3

Do not omit relevant information

An incomplete and selective communication can be deceptive, for example:

- Only communicate benefits if a packaging has other criticalities.
- Declare recyclability without specifying the limits of collection.

4

Do not use misleading or self-declared symbols

Symbols without explanation or with unverified certifications reduce transparency, for instance:

- Improper environmental labels.
- "Green" badges without explanation.
- Certifications that cannot be verified by the consumer.

5

Do not emphasise mandatory features

It is not correct to present as environmental benefits what is imposed by the law, such as:

- Does not contain chlorofluorocarbons (CFC).
- Present as distinctive advantage the conformity to current environmental regulations.

6

Do not extend environmental benefits

A specific improvement to a part of the product or in a lifecycle stage cannot be extended to the whole product, for example:

- Defining a pack as fully compostable when it only contains one compostable component.

7

Do not overload communication

Providing too much environmental information can be confusing, it is best to use clear and relevant claims and give access to further insights, for example using QR codes.

Green claims in stores: what to do and what to avoid

Scope of application



Signage and signposting



Thematic shelves and corners



Monitors and digital signage



Flyers and promotional materials



Online communication



Labels

What to do

- 1 Provide specific information and claims**
Give clear and precise messages, such as:
 - Shelf only for EU Organic products.
 - Area devoted to products with recyclable packaging.
- 2 Make the communication criteria explicit**
Always specify the criteria considered for “green” corners, for example:
 - Explain how products are selected (environmental requirements, criteria, certifications).
 - Make the selection policy publicly accessible.
- 3 Provide information, quantifications, and explicit comparisons**
For in-store initiatives, provide punctual information and clear comparisons:
 - 30% reduction in energy consumption in this point of sale with respect to 2024.
 - In this store we donate surplus food to the local parish.
- 4 Support the claims with verifiable data**
Use verifiable evidence and documentation proving what is being communicated, for example through:
 - LCA studies.
 - Recognized certifications.
 - Technical documentation based on scientific and recognized methodologies.
- 5 Use clear and understandable terms**
Ensure the communication is clear, simple, and straightforward for everyone:
 - Avoid technical terms without explanations.
 - Use clear and simple terms.
 - Explain symbols and certifications.
- 6 Use recognized certifications and standards**
Rely on standards and certifications with certification schemes, such as:
 - The building of this store has obtained the LEED Gold environmental certification.
- 7 Give the opportunity to learn more**
Give access to detailed and up-to-date information (methodology, sources, certifications), for instance with digital tools:
 - QR codes, web pages.
 - Apps, such as Barcode 4 Environment

What to avoid

- 1 No generic, absolute, or non-verifiable claims**
Absolute claims or claims not supported by concrete evidence pose the greatest risks, such as:
 - No impact products.
 - Sustainable store.
 - Carbon neutral (if based on offsetting).
- 2 No vague, unquantified, or ambiguous claims**
Vague or unclearly defined terms can be misleading, for example:
 - Responsible choice.
 - Environmentally-friendly store.
- 3 Do not omit relevant information**
An incomplete and selective communication can be deceptive, for example:
 - Only communicate benefits if the point of sale has other criticalities.
 - Declare the environmental benefits of an in-store action without specifying the scope of the analysis.
- 4 Do not use misleading or self-declared symbols**
Symbols without explanation or with unverified certifications reduce transparency, for instance:
 - Improper environmental labels.
 - “Green” badges without explanation.
 - Certifications that cannot be verified by the consumer.
- 5 Do not emphasise mandatory features**
It is not correct to present as environmental benefits what is imposed by the law, such as:
 - Refrigeration compliant with European regulations.
 - Present as distinctive advantage the conformity to current environmental regulations.
- 6 Do not extend environmental benefits**
A specific improvement to a part of the point of sale cannot be extended to the whole store, for example:
 - Defining a store circular if only waste recycling and unsold items recovery activities are in place.
- 7 Do not overload communication**
Providing too much environmental information can be confusing, it is best to use clear and relevant claims and give access to further insights, for example using QR codes.

Seven good questions to ask yourself when creating a green claim

- 1** Is the claim clear and specific?
Have I provided all the elements for proper understanding?
- 2** Are the subject and scope of the claim clear?
Have I clearly specified the message subject and the boundaries within which the claim is valid?
- 3** Is the considered environmental impact clearly stated and quantified?
Have I provided clear indication of what the environmental impact the claim refers to, and to what extent?
- 4** Can the claim be demonstrated with verifiable data?
Do I have valid data and evidence supporting the claim I created?
- 5** Can the claim be clearly understood by consumers?
Have I written the claim in a way so that it is easily comprehensible in all its parts?
- 6** Can the message be perceived as misleading?
Have I omitted information that would make the claim ambiguous?
- 7** Are supporting data easily accessible?
Have I ensured that data and evidence supporting the claim are easily retrievable?