bAwear SCORE

EMPCO GUIDE
OCTOBER 2026

NEW EU RULES ON GREEN CLAIMS

What you can say about your products. And what you can't.

A comprehensive guide for textile and apparel companies that sell to consumers in the EU.

27 Sep 2026 In force. No transition period.

Every company That sells to EU consumers.

BASED ON
Directive (EU) 2024/825, Empowering Consumers for the Green Transition ("EmpCo")

CLAIMS SEEN TODAY	WHY BANNED
~~Eco-friendly~~	Too vague
~~Sustainable jacket~~	One part only
~~Climate neutral~~	Offsetting
~~Conscious collection~~	Own label
~~REACH compliant~~	Legal minimum
~~Lasts 200 washes~~	Not tested

Since 27 Sep 2026

WHAT YOU CAN SAY	SPECIFIC AND PROVEN
22.23 kg CO_2 eq per kg product	Global warming potential, cradle to grave. ReCiPe 2016 Midpoint (Hierarchist), Sep 2026.
Outer shell: 100% recycled polyester	Lining and trims not included.
Tested to 50 industrial washes	At 75 °C, EN ISO 15797.

01 · WHO IT APPLIES TO

Does this apply to you? Almost certainly.

If a consumer in the EU can see your claim, the rules apply.
It does not matter where you are based or how big or small your company is.

Applies

Brands and labels

You sell clothing, footwear or home textiles to consumers, online or in stores.

Applies

Retailers, webshops and marketplaces

You are responsible for every claim on your pages, including claims copied from brands or suppliers.

Applies

Manufacturers outside the EU

When your products or claims reach consumers in the EU, for example through an EU webshop or retailer.

Treat as applies

B2B, workwear and private label

Not directly. But your claims reach consumers through your customers, and rules on misleading advertising still apply.

No exemption for small companies
A five-person label and a global brand follow exactly the same rules.

Where the rules apply

Anything that suggests you are good for the environment counts

- Hangtags and labels
- Packaging
- Website and webshop
- Ads and social media
- Newsletters
- Catalogues and lookbooks
- Brand and product names
- Icons, colours and imagery

02 · WHAT HAS CHANGED

Vague green claims are over. Transparency and data are in.

26 March 2024
EU law enters into force

June 2025
Separate Green Claims proposal put on hold

27 March 2026
Deadline for national laws

27 Sep 2026
Rules apply. Authorities may consider old-stock circumstances, but there is no general exemption.

No more vague words

Generic environmental claims such as ‘green’ or ‘environmentally friendly’ are prohibited unless the applicable legal conditions are met. Do not assume that a certification or label automatically makes a claim permissible.

Details on the spot

The facts must be on the same hangtag, page or ad as the claim. A link or QR code to another page is usually not enough.

You must prove it

Nobody approves your claim in advance. If the authority asks, you must show the evidence, quickly.

COMMON MISTAKE

"The Green Claims Directive was withdrawn, so we can wait."

Not true. Green Claims was a separate proposal. In June 2025 the Commission announced it would withdraw it, and it has been on hold since. EmpCo is already law and applies now.

THE LEGISLATION

Directive (EU) 2024/825

It updates two existing EU laws: the Unfair Commercial Practices Directive (2005/29/EC) and the Consumer Rights Directive (2011/83/EU). Each country turns it into national law. In the Netherlands, the new rules took effect on 27 September 2026 and the Authority for Consumers and Markets (ACM) enforces them.

03 · WHAT YOU CAN NO LONGER DO

Six practices are now banned.

These are always unfair. No exceptions, no defence. If you use one, remove it.

01

Vague green words

~~"Eco-friendly hoodie"~~

02

Whole-product claims based on one part

~~"Sustainable jacket" (lining only)~~

03

Neutral or positive claims through offsetting

~~"CO_2 neutral T-shirt"~~

04

Labels without independent certification

~~"Conscious collection" badge~~

05

Legal requirements as a selling point

~~"REACH compliant"~~

06

Durability claims that are not proven

~~"Lasts 200 washes"~~

Two more need full proof

Allowed with conditions

Comparisons

"50% less water than conventional cotton"

ONLY IF YOU PUBLISH

- ✓ How you compared
- ✓ Which products and suppliers
- ✓ How you keep it up to date

Future targets

"Net zero by 2030"

ONLY IF YOU PUBLISH

- ✓ A public plan with dated targets
- ✓ The resources behind it
- ✓ Regular checks by an independent expert

A good claim answers six questions.

You can still talk about environmental performance. Be specific, use a number, and put the details right next to the claim.



1	What impact?	Global warming potential
2	How much?	4.2 kg CO_2 eq
3	Of what?	Per T-shirt
4	Which stages?	Raw material to factory gate
5	Which method?	ReCiPe 2016 Midpoint (Hierarchist)
6	When?	June 2026

Sort every claim: remove, rewrite or keep

Remove

"Our sustainable T-shirt"

Vague. Banned.

Rewrite

"Lower-impact T-shirt"

Lower than what? Add facts.

Keep

"4.2 kg CO_2 eq per T-shirt, raw material to factory gate, June 2026"

Specific, measured, dated.

05 · SAY THIS, NOT THAT

Same message. Now with proof.

Typical textile claims, rewritten. Replace the numbers in brackets with your own measured data.

~~Sustainable jacket~~

"Outer shell made from 100% recycled polyester. Lining and trims not included."

Names the part and what is not covered.

~~Eco-friendly cotton~~

"Made with 100% organic cotton, certified to [scheme], licence no. [number]."

A fact, backed by a certification scheme with independent checks.

~~Climate neutral T-shirt~~

"Global warming potential: [4.2] kg CO_2 eq per T-shirt, raw material to factory gate."

The real impact. Offset projects may be mentioned separately, never as "neutral".

~~30% less water~~

"[30]% less water consumption per kg of fabric than our reference product [name]. Details on this page."

Says what is compared, and where to read how.

~~Durable workwear~~

"Tested to [50] industrial washes at [75] °C, EN ISO 15797."

Durability backed by a named test.

~~Conscious collection~~

"[24] styles, each with at least [50]% recycled fibre by weight."

Plain facts instead of a self-made label.

High-risk terms requiring careful review

~~Sustainable~~ ~~Eco~~ ~~Green~~ ~~Conscious~~ ~~Responsible~~ ~~Planet-friendly~~ ~~Climate-friendly~~ ~~Climate neutral~~ ~~CO_2 neutral~~ ~~Carbon positive~~ ~~Guilt-free~~ ~~Low impact~~

06 · CHECKLIST

Before any claim goes live

Print this page.
One sheet per claim.

THE CLAIM

- [ ] **It is specific**
  I can name the exact part, material or process it refers to.
- [ ] **The details are right next to it**
  Same hangtag, page or ad. Not behind a link or QR code.
- [ ] **It covers what it says**
  Whole-product wording only if the facts cover the whole product.
- [ ] **It has the numbers along with units**
  Value, unit, functional unit, impact indicator, per what, which stages, method and date.
- [ ] **The proof is filed**
  I can hand over the evidence today if asked.
- [ ] **No offsetting claims**
  Nothing "neutral" or "positive" based on buying credits.
- [ ] **Every label is certified**
  From a public authority, or a scheme with independent third-party checks. Valid for this product.
- [ ] **No legal minimums as features**
  Nothing that every product must meet anyway.
- [ ] **Comparisons and targets are backed**
  Method published, or a verified plan for targets.
- [ ] **Name and imagery checked**
  No leaves, globes or names that suggest more than the facts.

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For questions please contact

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