Dazzle

2026 EDITION

The Green Claims Checklist

What to fix now the rules apply

BEFORE YOU START

Where these rules apply

Directive (EU) 2024/825, the Empowering Consumers Directive, applies from 27 September 2026. It is consumer protection law, so it governs packaging, your website, your ads and your social posts. The Commission's Q&A puts mandatory CSRD reporting outside its scope, because that reporting is addressed to investors. Lift a claim out of that report into a consumer campaign and it is in scope again.

There is no transition period and no sell-through window for old stock. There is no size exemption either, the under 10 employees threshold belonged to a separate proposal that was never adopted.

PART 1 OF 5

Inventory every claim you make

- Sweep packaging, product pages, ads, social, influencer content, catalogues, point of sale and sales decks
- Include about and contact pages, where company-level claims usually sit
- Include claims hiding in product names and sub-brand names
- Include green visuals, because a leaf, a water drop or an earth-tone palette can carry a claim without words
- Include brand manuals and guidelines, because that is what the next campaign gets built on
- Give every entry an owner, a risk level and a verdict: keep, specify or remove

Done looks like: one list, with a named owner against every claim, before anyone starts rewriting.

PART 2 OF 5

Test the wording, and where it sits

- Generic claims are banned unless you hold a recognised ecolabel: eco-friendly, green, climate friendly, biodegradable, biobased
- The bar is the EU Ecolabel or an official Type I label such as Milieukeur or Nordic Swan, relevant to the claim. That list of words is not exhaustive
- A specific claim survives only if the specification sits on the same medium, in clear and prominent terms
- The ACM allows one click away, Germany does not. Design for the strictest market you sell in

Done looks like: every surviving claim says what the benefit is, right where the claim appears.

PART 3 OF 5

Check your labels and own logos

- A label must be established by a public authority or based on a certification scheme. The self-made green seal is the clearest casualty of this directive
- A compliant scheme means independent verification, published requirements, objective monitoring, and openness to other traders on fair terms
- The scheme owner and the label owner may be the same entity. What you cannot do is verify yourself and call it certification
- Internal tiers and scorecard badges such as EcoVadis count as labels once a consumer sees them. Memberships are not certifications: Fair Wear says so itself

Done looks like: every seal on your packaging traces to a scheme whose terms you have read.

PART 4 OF 5

Screen your carbon and future claims

- Offset-based claims are banned in all circumstances: climate neutral, CO2 neutral, carbon positive, climate compensated
- Reductions inside your own operations and value chain are still claimable, with the baseline, the period and the scope on the same medium
- You can still describe the projects you fund, as investments, with no implied neutrality
- A future claim such as net zero by 2030 needs 6 things: a public verifiable commitment, a written plan, dated targets, allocated resources, recurring independent verification, and findings a consumer can reach

Done looks like: no neutrality claim on any product, and every forward claim backed by a plan someone outside the company has checked.

PART 5 OF 5

Make it stick

Parts 1 to 4 clean up what exists. This is what stops you doing the whole exercise again in 2 years.

- Build an evidence dossier per claim: the wording, the proof, the method, the dates, and who approved it
- Keep one master document of pre-approved claims, split into company-level and product-level, and check product eligibility with supplier proof before any claim goes live
- Put one gate in the content process, with a named owner for the register and the review dates, and brief agencies to the same standard

What you can and cannot say

Banned: generic terms such as eco-friendly, green, ecological and climate friendly, unless the specification appears on the same medium or the term is backed by a recognised ecolabel. Also banned: sustainable, conscious and responsible in any form, unless specified on the same medium; an ecolabel alone does not justify these, because they also imply social performance. Also banned: climate neutral, CO2 neutral or climate positive claims based on offsetting, and any self-made seal. High risk without proof: recyclable, and social claims such as ethically made, fair or no child labour. Defensible when specified: 80% recycled polyester, verified by a named certification scheme.

Who wrote this

Nynke E. co-wrote this checklist. She is an independent sustainability consultant and a GRI Certified Professional, with 10+ years in sustainability and ESG. She specialises in green claims and EmpCo compliance.

Need someone alongside you

Dazzle connects companies to vetted sustainability freelancers and interim experts, usually within 48 hours. A claims audit, a second pair of eyes on your packaging copy, or a workflow that stops the problem coming back. This checklist is a working document, not legal advice.

Book a free 20 minute session: meetings-eu1.hubspot.com/robert13

Next steps

You've downloaded this checklist. Now let's put it to work.

In 20 minutes, one of our experts can walk through your claims, flag the ones that will not survive the new rules, and tell you what to fix first.

Scan the QR code to book your free discovery call.
www.dazzle-platform.com