



Preparing for the Empowering Consumers for the Green Transition Directive

Why trusted certification data matters,
and how GS1 can help

Consumers want to make sustainable choices, but can they trust claims?

Consumers increasingly want to understand the environmental and sustainability characteristics of the products they buy. Yet sustainability information is often difficult to verify; while labels, logos and green claims can be confusing or inconsistent.

To address this challenge, the European Union introduced the **Empowering Consumers for the Green Transition Directive** (EmpCo, EU 2024/825) as part of the European Green Deal. The objective is to tackle misleading environmental and sustainability-related commercial practices, including greenwashing, and help consumers make informed purchasing decisions based on transparent, credible and verifiable information. The directive does not operate in isolation. Instead, it strengthens and expands existing consumer protection legislation by amending both the Unfair Commercial Practices Directive (UCPD) 2005/29/EC and the Consumer Rights Directive (CRD) 2011/83/EU.

Among these instruments, the UCPD provides the principal framework for assessing misleading business-to-consumer commercial practices and marketing communications¹. While environmental claims were already subject to the general rules against misleading commercial practices, EmpCo introduces specific rules and prohibitions relating to sustainability claims, environmental claims and sustainability labels, creating greater legal clarity and consistency across the EU. In addition, the Directive introduces measures relating to product durability, repairability and practices linked to premature obsolescence. Even before EmpCo was adopted, the European Commission had clarified through its guidance on the UCPD that environmental claims must be truthful, substantiated and understandable for consumers.

¹ European Parliament and Council. Directive 2005/29/EC on Unfair Commercial Practices (UCPD). EUR-Lex. Primary EU framework governing unfair business-to-consumer commercial practices and misleading claims. <https://eur-lex.europa.eu/eli/dir/2005/29/oj/eng>



GREEN?



ECO-FRIENDLY?



SUSTAINABLE?



NATURAL



PLANT BASED



LOW IMPACT



RECYCLABLE



ECO
FRIENDLY

A GREENER
TOMORROW

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Stricter requirements for environmental claims, labels and product information

From 27 September 2026 onwards, companies communicating sustainability benefits to consumers must meet stricter requirements for environmental claims, labels and product information. Companies should assess both explicit statements and implicit messages conveyed through visual elements such as colours, images, symbols and packaging artwork. More specifically, companies will no longer be able to:

- Make generic environmental claims such as “green”, “eco-friendly” or “climate friendly” unless they can demonstrate recognised excellent environmental performance, for example through the EU Ecolabel, an officially recognised ISO 14024 Type I ecolabel, or another recognised scheme demonstrating excellent environmental performance under applicable EU law².
- Make claims that suggest a neutral, reduced or positive climate impact based on greenhouse-gas offsetting. Any climate-related claim must be substantiated by relevant evidence and comply with the general rules on misleading commercial practices.
- Display sustainability labels that are not based on a qualifying certification scheme with independent third-party verification, publicly available requirements and transparent governance, or established by public authorities.
- Communicate future environmental improvement commitments (e.g. net-zero or carbon-neutral targets) without a clear, credible and verifiable implementation plan clear, measurable and publicly available commitments and targets, a detailed and realistic implementation plan, and regular verification by an independent third-party expert.
- Present a benefit relating to one aspect of a product as if the whole product were environmentally better.
- Mislead consumers regarding a product’s durability, reparability, software support or expected lifespan, or fail to provide information required under the Directive relating to those characteristics.

In practice, this lands differently across the value chain. For brands and manufacturers, the first exposure is marketing copy and packaging: vague claims and carbon offset-based neutrality claims disappear, every label must rest on a qualifying scheme, and the evidence supporting each claim must be available, verifiable and relevant to the product or business activity concerned. For retailers and marketplaces, who display those claims to consumers and make their own on private label, the task becomes verifying at scale that every claim and label is valid, current, and actually covers the specific product being sold.

Non-compliance can lead to enforcement actions and penalties, including maximum fines of at least 4% of a company’s annual turnover for certain widespread cross-border infringements, while some national laws may include even higher fines³.

² European Parliament and Council. Directive (EU) 2024/825 on empowering consumers for the green transition through better protection against unfair practices and better information (EmpCo Directive). EUR-Lex. <https://eur-lex.europa.eu/eli/dir/2024/825/oj/eng>

³ European Parliament and Council. Directive (EU) 2019/2161 as regards the better enforcement and modernization of Union consumer protection rules (Omnibus Directive). EUR-Lex. <https://eur-lex.europa.eu/eli/dir/2019/2161/oj/eng>

Proving sustainability as part of a bigger market shift

EmpCo is accelerating a broader shift already underway. Businesses increasingly need to prove sustainability, not just communicate it. That pressure is coming from four directions:

1. Regulators

EmpCo, Corporate Sustainability Reporting Directive (**CSRD**), Packaging and Packaging Waste Regulation (**PPWR**), Ecodesign for Sustainable Products Regulation (**ESPR**), EU Deforestation Regulation (**EUDR**) and other European legislation are raising the bar for sustainability communication. Companies increasingly need credible evidence behind the claims they make.

2. Consumers and public scrutiny

Consumers want trustworthy sustainability information, while public scrutiny of sustainability claims continues to grow. Independent certifications help distinguish verified claims from marketing claims.

3. Banks and investors

Sustainability performance is becoming an important factor in risk assessments, lending and investment decisions. Certifications provide scalable, third-party verified evidence of ESG performance.

4. AI and agentic commerce

AI systems do not just need information, they need information they can trust. Certifications provide independent, verifiable evidence that AI can use to validate claims and make decisions with confidence.

Although their motivations differ, all four market drivers rely on the same thing: trusted evidence. Increasingly, certifications are becoming that evidence layer.



The challenge: not all certification data is fit for digital ecosystems

Certification schemes issue certificates to brands and manufacturers. Retailers and marketplaces must collect the certificates and verify whether they are valid, apply to a specific product and was issued by an accredited organisation. Despite its growing importance, certification data is often shared through PDFs, spreadsheets and emails. So this work is still largely manual, leading to three major challenges:

Risk of false claims

Certification status, validity and scope can change over time. Manual processes make it difficult to ensure that communicated claims remain accurate, increasing compliance and reputational risk.

Missed sales opportunities

Marketplaces may see a sales uplift when a product's sustainability claim is communicated. Amazon reports that products joining its Climate Pledge Friendly programme see, on average, a 12% sales lift and a 10% increase in page views within their first year⁵.

Operational inefficiencies

Retailers spend significant effort collecting and validating certification data. Product certificate onboarding may take 1-30 days and verification can take c. 5-15 minutes per certificate⁴.

⁴ GS1 U.S. and GS1 Netherlands retailer and marketplace interviews (n=6). Findings referenced in: New Pilot Cuts Sustainability Certification Verification From Weeks to Seconds. <https://www.gs1us.org/industries-and-insights/media-center/press-releases/New-Pilot-Cuts-Sustainability-Certification-Verification-From-Weeks-to-Seconds>

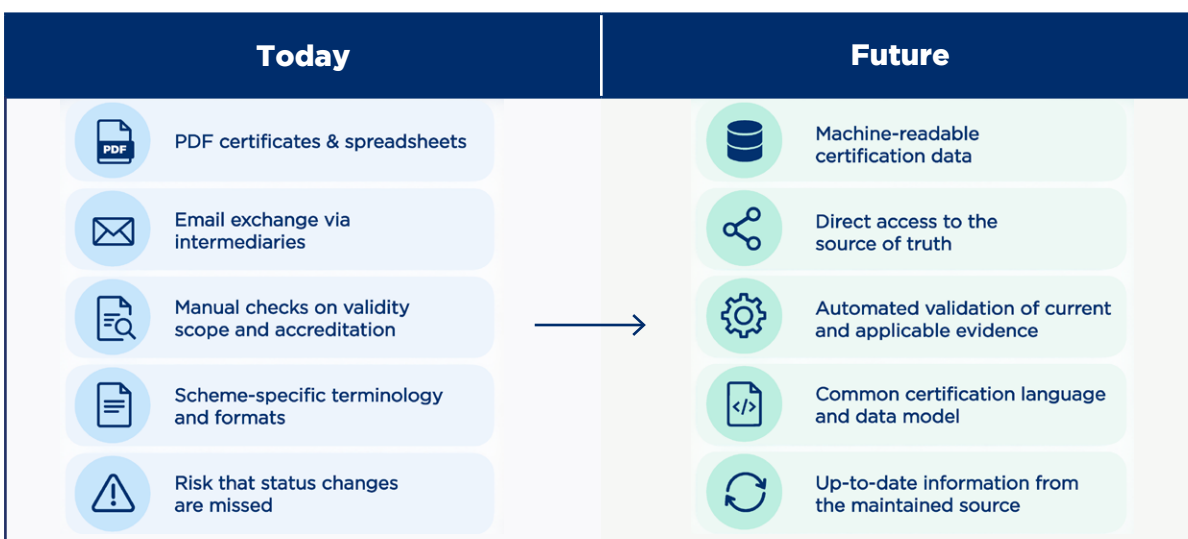
⁵ Amazon Sustainability Story: Sustainability Labels Are Shifting Shopping Decisions. Illustrates growing consumer interest in sustainability information and the role of trusted labels in purchasing decisions. <https://sustainability.aboutamazon.com/stories/sustainability-labels-are-shifting-shopping-decisions>

From documents to digital evidence from the trusted source

Today, sustainability evidence is often locked in PDF certificates, spreadsheets and emails. Certification schemes and bodies hold trusted data, but it remains difficult to discover, verify and reuse. Meanwhile, retailers and brands spend effort collecting and validating certification data from multiple sources.

The future is not about exchanging more certificates but about exchanging certification information digitally and directly from the organisations that issue and manage it.

This enables certification schemes and certification bodies to remain the trusted source of sustainability evidence while making that evidence easier to access, verify and reuse across the value chain.



This shift creates value for all stakeholders. Retailers and marketplaces gain access to trusted certification data, brands can support claims more easily, and certification schemes expand visibility, reach and impact of their certifications by becoming trusted providers of digital sustainability evidence.

Although this paper focuses on certification data, the same architecture can support product documentation, declarations, Digital Product Passports and regulatory information. The common challenge is enabling trusted information to be identified, structured and discovered across value chains.

How GS1 can help

GS1's role is not to certify products or own certification data. Its role is to provide the infrastructure that enables trusted certification data to be identified, structured, and shared consistently across systems. To make this possible, three building blocks are required:

1. Scope & identifiers

To exchange certification data digitally, it must be clear what is certified. GS1 global identifiers uniquely identify products, organisations and locations covered by a certification. Relevant GS1 standards:

- GTIN (Global Trade Item Number) for products
- GLN (Global Location Number) for organisations and locations

These identifiers ensure certifications can be linked unambiguously to the products, companies or locations they cover.

2. Data structure

Today, certification schemes often use different terminology, formats and data structures, making certification data difficult to compare, exchange and reuse across systems. Relevant GS1 standards:

- GS1 Certification Data Model in GS1 Web Vocabulary

A common data model enables certification information from different schemes to be represented in a consistent, machine-readable format.

3. Discovery & reuse

Organisations increasingly want direct access to this information from the source, rather than through multiple copies across the value chain. Certification schemes and bodies already hold trusted sustainability information and can make each certification available once, as a single structured record at a stable web address, kept current. Publish once, so many can find it.

Relevant GS1 standards and services:

- GS1 Registry Platforms
- GS1 Digital Link
- Next generation data carriers (including QR code powered by GS1 and GS1 DataMatrix)

Here, GS1 Registry Platform makes it easy to search, look up and verify information such as certifications about any barcode number, location or company. GS1 Digital Link – a standard URI structure – can be included in the registry as a gateway to the authoritative certification record. The GS1 Digital Link can also be included in the 2D barcodes to make the record accessible from the physical product.

All of the above building blocks follow GS1's Identify-Connect-Share-Use framework, set out in full in the guides linked at the end of this paper.

Building blocks for trusted certification data exchange

Identify what is certified. Structure it consistently. Discover it from the source.

1 IDENTIFY



What is certified?

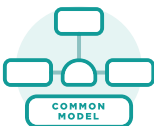
Link certificates to products, organizations and locations.

GTIN

GLN



2 STRUCTURE



One common language

Represent certification data in a consistent, machine-readable format.

GS1 Web Vocabulary



3 DISCOVER



What is certified?

Make trusted certification data findable without copying it everywhere.

GS1 Registry Platform

GS1 Digital Link

QR Code Powered by GS1

GS1 Data Matrix



The benefits

These standards enable certification schemes to make certification information shareable while remaining in control of their data and maintaining their role as the source of truth. On top, users can access the latest certification information directly from the source and verify whether a claim is valid, current and applicable to the product concerned.



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Get started today

The approach and path described in this guide does not require a whole change of how your organisation currently operates. Rather, it requires a small number of deliberate process changes, anchoring certification scope to identifiers, publishing one structured authoritative record, keeping status current – that together make certification data significantly more useful to the organisations that rely on it.

To help organisations prepare for EmpCo compliance GS1 provides several additional papers for support:



Achieving trusted certification data exchange with GS1 standards and services



Building a Sustainable Foundation that Link Products and Certifications



Empowering Consumer Directive (EmpCo) in Practice: Implementation Guideline for Transparent and Legally Compliant Product Communication



Quick Start Guide: Practical steps to make certification data easier to find, verify and reuse with GS1



Companion Guide: A practical playbook for implementing trusted certification data exchange with GS1



Do you need help?

GS1 in Europe Member Organisations can support you further in implementing GS1 standards.



Connect with your local GS1 Member Organisation through [GS1 member organisation](#)

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