POLICY HUB circularity for apparel and footwear

Policy Hub's Q&A Meeting with the European Commission

Empowering Consumers for the Green Transition Directive Implementation

12 February 2026

Questions and Answers related to ECGT implementation

Sustainability labels

Unclear interpretation of sustainability labels as "environmental claims"

The FAQ (pp. 8) states that sustainability labels can still be considerd as constituting an environmental claim, in the sense of Article 2(o) of the UCPD, as amended by Article 1(1)(b) of the ECGT Directive, if used in a way that suggests or creates the impression that a product has a positive or zero impact on the environment, or is less damaging to the environment than competing products.

The FAQ does not explain in which situations a sustainability label compliant with the Directive's requirements could still be considered an "environmental claim" under Article 2(o) UCPD, which creates uncertainty about when legitimate labels might nevertheless be treated as misleading. Clearer guidance and examples would be welcome to distinguish between compliant use of certified labels and practices that would fall under misleading environmental claims beyond the scope of the certification.

Commission's explanation:

The Commission emphasised the following points:

- The objective of the ECGT Directive is to address misleading practices and greenwashing, while ensuring a level playing field.
- Many sustainability labels are, in practice, eco-labels, and as such de facto environmental claims.
- Even if the sustainbaility label complies with the requirements under ECGT (e.g., is based on a certification scheme or established by a public authority), this does not automatically shield a trader from assessment under other UCPD provisions.

Example when sustainability labels can be considered environmental claims

For example, this would be the case if a 'carbon neutral' claim was put next to the sustainability label. While such a label would fall within the concept of a sustainability label and therefore need to comply with the requirements regarding certification or being established by public authority, an Annex I prohibition may also be triggered. Specifically, the prohibition relating to claims that a product has a neutral, reduced, or positive impact on greenhouse gas emissions based on offsetting would apply. In such a case, even if the label itself is compliant, the substantive claim embedded within it could be prohibited or otherwise subject to UCPD restrictions.

Therefore, sustainability labels are not immune from scrutiny under other UCPD provisions. Where the wording or overall presentation of a label creates a misleading impression, it may still be subject to assessment.

Use of broader terms with sustainability labels

Would words such as "green," "friendly," or "socially responsible," when not explicitly included in a certification logo but used in communication, be considered sufficiently substantiated by the fact that the product is certified under a recognised standard. In other words, does certification automatically justify the use of broader sustainability wording, or is additional substantiation required?

Commission's explanation:

The Commission clarified the distinction between specifying a claim and possessing evidence to substantiate it. While sustainability labels themselves do not require additional specification when they qualify as trust marks or certification-based labels, this does not provide a "carte blanche" to use broader or more ambitious wording in marketing communications.

The Commission referred to the example of terms such as "sustainable" or "responsible," noting that these expressions are broad in meaning and may go beyond purely environmental aspects. Even if such wording appears as part of a logo or certification-based label, this does not automatically shield the trader from scrutiny under the UCPD. Authorities may examine whether the claim corresponds to the actual scope of the certification scheme.

For example, if a label uses the term "responsible," and that term could imply both environmental and social attributes, enforcement authorities may expect clarity as to what dimensions are actually covered by the certification. The mere presence of a certification scheme does not automatically justify the use of broader sustainability language if that language extends beyond what is actually verified.

Clarification on the required "specification" when a label is considered an environmental claim

It is unclear how to interpret the requirements related to environmental claims in situations, as explained in the question above, when a sustainability label is considered an environmental claim - specifically, the requirement that the specification of the claim must be provided 'in clear and prominent terms and on the same medium'. As sustainability labels typically consist of a statement that the product is certified under a recognised scheme, displayed alongside the scheme's logo, what additional specification would be required beyond this?

Commission's explanation:

The Commission clarified that it is important to distinguish clearly between generic environmental claims and sustainability labels. A generic environmental claim should not be treated as a sustainability label, and a sustainability label should not be considered a generic claim. The two concepts serve different functions under the Directive.

No specification needed for sustainability labels

The requirement to provide specification in clear and prominent terms on the same medium is intended to address generic environmental claims. For example, if a trader uses terms such as "green" or "nature" in a random manner, and these are not part of a recognised trust mark, quality mark, or certification scheme, they may qualify as generic environmental claims. In such cases, providing clear and prominent specification on the same medium can transform a generic claim into a specific claim.

Crucially, the Commission explicitly confirmed that there is no requirement in the ECGT for sustainability labels to be accompanied by specification in clear and prominent terms on the same medium. Traders may choose to provide additional explanatory information regarding what a label means, and such clarification may be welcomed, but it is not mandated under the Directive.

In summary, the “specification on the same medium” requirement applies to generic environmental claims and does not automatically extend to sustainability labels. The Commission did not further elaborate on how this distinction would operate in situations where a sustainability label contains wording that itself conveys a claim, beyond the earlier carbon neutrality example.

‘Vegan’ labels

The FAQ explains that “vegan” and “vegetarian” labels may qualify as sustainability labels where they refer to environmental or social characteristics, but the explanation remains broad and leaves room for interpretation. How should the term “vegan” be assessed in practice under the ECGT Directive, given that it is commonly understood by consumers as relating primarily to animal welfare? For example, how would a garment labelled “PETA-Approved Vegan,” without any additional environmental or social claims or explanations, be assessed?

Commission’s explanation:

The Commission indicated that the assessment is case-specific and depends primarily on context and consumer perception. In particular, the decisive factor is how the average consumer understands the label in its specific presentation.

The Commission recalled that Recital 3 of the Directive explicitly refers to social characteristics and provides animal welfare as an example. Therefore, where a trader implies environmental or social benefits when using a term such as “vegan,” the label may fall within scope of the Directive’s definitions. In such cases, it may qualify either as an environmental claim or, depending on its structure, as a sustainability label under the amended UCPD framework.

PETA-Approved Vegan – sustainability label

With regard to the specific example of “PETA-Approved Vegan,” the Commission noted that this appears to be a certification programme managed by People for the Ethical Treatment of Animals (PETA). On that basis, the Commission indicated that such a logo would qualify as a sustainability label falling within the scope of the Directive. The reasoning is that it represents a certification scheme relating to a social characteristic (animal welfare), which is explicitly referenced in the Directive.

Recyclability icons and symbols

Do recyclability icons or symbols (e.g. universal symbols such as the Mobius loop or similar) qualify as sustainability labels, in particular where the trader’s intention is to simply rely on such symbols to give consumers an instruction that the packaging material or product material composition can be recycled. Whilst Q&A #5 covers the use of icons such as green leaves or water drops, it does not address common recyclability icons and symbols widely used by traders.

Commission’s explanation:

The Commission emphasised that the answer here depends on the specific context and on whether other, more specific legislation applies. They noted that there are existing “lex specialis” frameworks, for example in the area of waste and packaging legislation, that regulate certain recyclability symbols and instructions. In such cases, those specific legislative frameworks take precedence, and the UCPD serves only as a safety net.

***Lex specialis* assessment**

Where recyclability symbols are used in accordance with specific waste or packaging legislation (for example, as mandatory instructions on how to dispose of or recycle packaging), they would fall under those sectoral rules rather than being treated as sustainability labels under the UCPD framework.

However, if a symbol is used outside the scope of such lex specialis legislation – and if it qualifies as a sustainability label – then the rules introduced by the ECGT Directive would apply. In such cases:

- If the symbol is not established by a public authority, it would need to be based on a certification scheme.
- Other conditions applicable to sustainability labels (e.g. third-party verification requirements) would also need to be satisfied.

The Commission therefore indicated that much depends on the purpose and regulatory context of the symbol's use. If the symbol merely provides mandatory consumer instructions under another legislative framework, it would not be treated as a sustainability label under the ECGT Directive. If, however, it is used independently and conveys sustainability-related messaging outside such a framework, it may fall within scope.

Specification requirements

Lack of clarity on what is considered generic

There remain a number of grey areas that create practical challenges for brands when applying the ECGT Directive to product descriptions and marketing communications. While it is understood that an exhaustive list cannot be provided, additional clarification would be helpful.

- Could the Commission provide further examples of terms, words, or phrases that would automatically be considered generic environmental claims in practice? In particular, would the use of words such as "nature" or "natural" in relation to products made from natural fibres be likely to be treated by Member State enforcement authorities as generic environmental claims?
- In addition, could the Commission provide examples of what would be considered insufficient specificity, as well as further guidance or concrete examples of how a generic environmental claim can be successfully transformed into a sufficiently specific claim in line with the Directive?

Commission's explanation:

The Commission acknowledged that no exhaustive list has been provided and reiterated that only illustrative examples are included in the recitals and the Q&A document. For example, "Nature friends" is explicitly mentioned in the recitals as an example of a generic environmental claim.

On the risk of divergent interpretation across Member States, the Commission emphasised its commitment to supporting coherent application of the Directive throughout the EU. Although enforcement lies with Member States and the Directive is not yet applicable, the Commission indicated that it may address interpretative divergences if they arise. Discussions are taking place within the Consumer Protection Cooperation network, where misleading environmental claims are already a recurring topic.

Natural fibres example

With regard to specific terminology such as "natural fibres," the Commission suggested that the first step in any assessment would be to determine whether the term is regulated or protected under other sectoral legislation. For example, "organic" is a protected term under EU organic legislation and may continue to be used in accordance with that framework, even though it could otherwise be considered a generic environmental claim. The Commission noted that the Textile Labelling Regulation might contain relevant provisions in this area, which may be pertinent for assessing the use of "natural" in textile contexts.

Where no specific sectoral legislation applies, the Commission indicated that it may be advisable to further specify what is meant by "natural fibre," particularly given that fibres may have different origins and characteristics. The overarching objective of the Directive is to ensure that consumers are protected from misleading claims while enabling them to make informed purchasing decisions. The assessment therefore centres on whether the claim allows the average consumer to understand the environmental attribute in a clear and meaningful way.

Transforming generic claims to specific claims

The Commission referred to the example provided in the recitals and Q&A to illustrate how a generic claim may be transformed into a specific one. The example concerns "climate-friendly packaging." On its own, this would constitute a generic environmental claim. However, if the claim is specified – for example by stating that "100% of the energy used to produce this packaging comes from renewable sources" – it becomes a specific and verifiable environmental claim. The key element is that the additional specification provides concrete, measurable information enabling the consumer to understand the basis of the claim.

The Commission stressed that the central test under the Directive remains whether the commercial practice is misleading from the perspective of the average consumer. This principle is embedded in the broader UCPD framework and associated guidance documents. The purpose of specifying claims is to ensure that consumers can make informed choices based on clear information.

6. Lack of clarity on detail of evidence needed

The ECGT Directive prohibits making of generic environmental claims unless they are based on excellent environmental performance, and specific environmental claims are permitted. However, the FAQ (pp. 8-9) states that whether a specific environmental claim is permitted depends on "the specific circumstances of the case, including how the claim is presented and what ***evidence*** is provided to support it".

The Directive and FAQ do not sufficiently clarify what type or level of evidence is required to support specific environmental claims and where this information should be located, i.e.:

- What type of evidece is considered sufficient to support specific environmental claims?
- What level of detail is needed to demonstrate compliance?
- What information must appear directly on packaging (or other 'same medium'), and what can be proved digitally (e.g;, via QR codes)?
- If an environmental claim is used on a company's social media channels, would it be compliant to include a direct link to the Company's website which contains the further specification of the claim?

- With regads to comparison claims, where is the trader required to provide the required information on the basis for the comparison? Is it sufficient to include a web link/QR code directing consumers to where they can locate this information?

Commission's explanation

The Commission emphasised that the UCPD is a principle-based legislative framework. As such, there is no fixed or quantitative threshold defining exactly how much evidence is required, nor a precise rule determining how much information must appear on packaging versus other media. This assessment should be contextual.

The Commission recalled that Article 12 UCPD empowers national authorities and courts to require traders' evidence as to the accuracy of claims. Traders must be in a position to demonstrate the accuracy of what is being communicated to consumers. This obligation must be understood broadly, covering not only the literal wording of the claim but also what the presentation of the claim implies to the average consumer. In other words, substantiation must support both the explicit content of the claim and any implicit environmental benefit conveyed through its overall presentation.

The Commission indicated that the existing case law of the Court of Justice suggests that traders are not necessarily required to conduct complex behavioural studies or extensive consumer research to substantiate claims. However, they must be in a position to demonstrate the accuracy of what is being communicated to consumers.

Providing information on packaging vs digital media

On the question of where supporting information must appear, the Commission provided important clarification:

- Information displayed directly on packaging (or the "same medium") should primarily serve to specify the claim.
- Digital tools such as QR codes or web links may be used to provide further explanatory information.

There is no general requirement under the Directive to provide evidence via QR codes. The use of digital media is optional and increasingly common in market practice, but not mandated. What matters is that the information is well-structured, accessible, and understandable to the average consumer, in line with the Directive's objective of enabling informed decision-making.

Providing information on social media

With regard to environmental claims made on social media, the Commission reiterated the same principle. Despite space limitations, the specification of the claim must be provided in clear terms on the same medium – meaning within the social media communication itself. A trader cannot rely solely on an external website link to provide the essential specification of the claim.

In practice, this means that the core explanation necessary to avoid the claim being generic or misleading must appear within the social media post. Additional supporting details may be provided via links, but the essential specification must be visible on the same medium.

9. Type of 'supplementary information to be provided at the point of sale for existing products

Q&A #18 refers to the option available to traders to add *"supplementary information"* at the point of sale to ensure that existing goods comply with the requirements.

- Could the Commission give examples of what kind of *"supplementary information"* would need to be given at the point of sale to address the risk of potentially non-compliant sustainability labels on existing products.
- Could the Commission clarify what qualifies as "*existing products*". For example, does this include products that have already been lawfully placed on / made available in the EU market pre-27 September 2026 and are sold onwards (e.g. on a shop floor) from 27 September 2026 (so that traders would be expected to take corrective action to ensure compliance in respect of these products) or will these products be subject to any grace period/sell-through period?
- More generally, it would be helpful for there to be more clarity and guidance around the applicability of the requirements of the GTD to products already lawfully placed on the EU market pre-27 September 2026 and sold onwards in the EU market post-27 September 2026.

Commission's explanation

The Commission clarified that from the application date in September 2026, all commercial communications, including environmental claims and sustainability labels, are expected to comply with the new provisions. The obligation applies to communications made from that date onwards.

With regard to "existing products," the Commission indicated that these are products already produced and already in the distribution chain prior to the application date. In other words, products that were produced or placed in circulation before the Directive becomes applicable fall within this concept.

The Commission referred to Q&A #18, which outlines that traders who identify environmental claims or sustainability labels that may not comply with the new provisions have several options at the point of sale to ensure compliance. These options may include:

- Covering or removing certain claims or sustainability labels; or
- Adding supplementary information to clarify the situation.

Example of how supplementary information can be used to ensure compliance of existing products

As an illustrative example, the Commission suggested that if a sustainability label is not yet third-party certified but the trader is in the process of obtaining certification, the trader could explain this transparently at the point of sale. This was presented as an example of how supplementary information might be used to address potential non-compliance.

The Commission emphasised that enforcement will ultimately lie with national authorities. In assessing compliance, these authorities are expected to examine whether traders have made reasonable and proportionate efforts to comply with the new requirements and whether they have acted in good faith.

The Commission further indicated that concerns raised by business associations regarding transitional challenges are well known and are being discussed with enforcement authorities.

A workshop involving consumer protection authorities, business associations, and consumer organisations recently took place to address these issues. According to the Commission, enforcement authorities signalled that they intend to take a pragmatic approach, particularly where traders are engaging constructively and acting in good faith.

It was indicated that national authorities already tend to follow a dialogue-based approach in enforcement matters. Where modifications are required, authorities may allow traders a certain amount of time to implement necessary changes.

Requirements for certification schemes

Disclosure of certification schemes

Is it always necessary to explicitly mention the relevant certification scheme when making an environmental claim, or is it sufficient for companies to rely on a certification scheme internally and provide supporting evidence only upon request by public authorities?

Certification schemes may have licensing agreement requirements that companies choose not to adopt for business reasons (for example, where a scheme name or logo may only be used if the full garment and the company are certified). In such cases, where companies are nevertheless able to substantiate their claims with valid supporting documentation upon request, would this approach be considered acceptable under the ECGT Directive?

Commission's explanation

The Commission distinguished between sustainability labels and environmental claims backed by certification.

Where a sustainability label is used, the certification scheme on which it is based must be publicly available, and authorities may request additional information or evidence. However, where a specific environmental claim is made and that claim is substantiated by a certification scheme, the Directive does not automatically require that the certification scheme itself be publicly disclosed in every instance.

That said, Article 7 UCPD (misleading omissions) may be relevant. If the credibility of the claim depends on the consumer understanding that it is certified, verified, or approved, then that information may constitute "material information" and may need to be disclosed, taking into account the limitations of the medium used.

The Commission referred to existing Court of Justice case law on the concept of "material information," suggesting that this jurisprudence may provide further guidance in assessing when disclosure becomes necessary.

Future environmental performance

Scope of future environmental performance claims

Section 12 of the FAQ refers to claims relating to "future environmental performance," but it remains unclear which types of claims are covered by this requirement. Could the Commission please clarify the scope of such claims, for example;

- whether this covers claims such as Science Based Targets or similar target-setting initiatives;
- whether it applies to all future sustainability goals included in a company's sustainability strategy;
- whether broader company visions or ambitions fall within scope; and
- whether the provision applies to product-level claims, company-level claims, or both?

- whether it applies to claims relating to future targets for sustainable material sourcing (such as a target to reach 100% regenerative materials in a product line by 2050), when published on a company's sustainability website and accessible to consumers?

In addition, some of the examples mentioned above do not appear to be suitable for third-party verification. Could the Commission clarify which types of future claims are expected to be subject to third-party verification, and which are outside the scope of this requirement?

Commission's explanation

The Commission clarified that not all forward-looking statements automatically fall within scope of the Directive. The determining factor is whether the claim is used in product-facing marketing in a business-to-consumer context to communicate a future outcome.

In particular, the Commission referred to Recital 4 of the Directive, which highlights that traders may create the impression that consumers contribute to a low-carbon economy by purchasing certain products. Where such claims are used in B2C commercial communications, for example, linking a product purchase to a company's net-zero transition, they fall within the scope of the Directive.

The Commission provided examples such as:

- "By purchasing this product, you contribute to our climate neutrality by 2030/2050."
- "This product supports our net-zero transition."

In such cases, the claim is product-facing and intended to influence consumer purchasing decisions, and therefore falls under the UCPD framework. The Commission's explanation suggests that purely internal strategic objectives or non-product-facing corporate ambitions may not automatically fall within scope. However, once such future targets are communicated in a B2C marketing context in a way that influences purchasing decisions, they are likely to be captured.

The Commission did not specify categories of claims that would fall outside the verification requirement.

Are companies' sustainability strategies in scope?

The Commission clarified that this depends on the purpose and audience of the communication. The decisive factor is whether the sustainability strategy is used in a B2C context to influence purchasing decisions.

If a sustainability strategy is primarily intended for shareholders or financial stakeholders, it may fall under other regulatory frameworks, such as sustainability reporting or financial disclosure legislation (e.g. CSRD/SFDR). In such cases, the UCPD would not automatically apply.

However, if the sustainability strategy is used as part of consumer-facing marketing communications – meaning it is relevant to and capable of influencing consumer purchasing decisions – then the UCPD framework and its requirements, including those related to future environmental performance claims, would apply.

Acceptable means of verification

- Is assurance/attestation by an accounting firm providing limited assurance over an implementation plan acceptable as verification by an independent third-party expert under Article 6(2)(d), given it is not a financial audit?

Commission's explanation

On acceptable forms of verification, the Commission indicated that the Directive requires that verification ensure that the expert is capable of monitoring the trader's progress toward environmental commitments and targets. While it was acknowledged that questions had been raised about whether assurance by an accounting firm would suffice, the Commission did not provide a definitive answer on specific types of verifiers.

However, it was clarified that the expert responsible for verification must be capable of monitoring progress toward the commitments set out in the implementation plan, including reviewing resource allocation and measurable targets. The focus is therefore on the competence and capacity of the verifier to assess progress meaningfully.

Cadence of verification

- How should traders interpret 'regularly verified' cadence in practice - is annual or biennial verification expected, or should intervals be risk-based and aligned to the claim horizon (i.e., 2030 target)?

Commission's explanation

The Commission confirmed that the Directive does not define a specific time interval for what constitutes "regular" verification. This is intentionally left open, given that the Directive is horizontal and applies across sectors.

According to the FAQ (Question 12), verification frequency should take into account:

- The nature of the commitments; and
- The specific circumstances of the case.

The Commission noted that, based on identified best practices, annual or biennial (every two years) reviews may be appropriate. However, additional verification may be required if significant changes occur that affect the commitments or their implementation.

Timing of verification

- For claims referring to future environmental performance based on a transition plan, should the plan and the third-party verification of that plan be completed before the claim is communicated to consumers, or can such claims be made while verification is still pending?

Commission's explanation

The Commission explained that future environmental performance claims must be supported by a detailed and realistic implementation plan.

Crucially, the Commission stated that traders must have this implementation plan available before making the claim. The general principle under the UCPD – that traders must possess evidence at the time a claim is made – applies equally to future environmental performance claims.

In other words, a trader cannot communicate a future environmental commitment in B2C marketing without having a concrete and documented implementation plan already in place.

A third party expert should already be reviewing the implementation plan by the time the claim is made, in order for progress against the targets to be monitored.

Scope of verification

- What is the expected scope of verification: (i) design and governance of the implementation plan, (ii) progress against interim KPIs/commitments, (iii) forward-looking feasibility of targets and resource allocation or a combination?
- In situations where there are multiple claims based on the same implementation plan, does the ECGT Directive require a separate third-party assessment for each individual claim, or can one overarching verification be used to support several related claims?

Commission's explanation

While the Commission did not address these elements individually, its response indicates that verification is expected to be comprehensive and aligned with the content of the implementation plan. The Commission emphasised that the expert responsible for verification must be capable of monitoring the trader's progress towards the environmental commitments and targets set out in that plan. Commission's explanation suggests that the scope of verification should cover a combination of the above elements. Verification is not limited to confirming the existence of a plan. Rather, it is expected to assess whether the plan is sufficiently detailed and realistic, whether appropriate targets and resources are defined, and whether progress towards those commitments can be effectively monitored.

With regard to situations where several related future environmental performance claims are based on the same transition or implementation plan, the Commission clarified that the decisive element is the scope and level of detail of the plan and its verification.

Several claims can be derived from a signle implementation plan

Where multiple claims derive from the same implementation plan, it could be possible for an overarching verification to suport several claims, provided that:

- The implementation plan clearly details all relevant commitments and targets on which the claims are based; and
- The verification process explicitly covers the scope of those commitments.

In other words, if the implementation plan comprehensively sets out the relevant measurable and time-bound targets, and the expert verification is designed to monitor progress against that full scope, then one overarching verification may support several related claims.

Repairability and guarantee information

Official vector files for Guarantee of Conformity and Guarantee of Durability label

In the context of the EMPCO and the design and content of the harmonised notice on the legal guarantee of conformity and the harmonised label for the commercial guarantee of durability, could you please confirm whether the Commission has published official vector files (e.g. .ai or similar, rather than PDF) for the Legal Guarantee of Conformity notice and the Commercial Guarantee of Durability label set out in Annexes I and II of Commission Implementing Regulation (EU) 2025/1960? If so, could you indicate where these files can be accessed?

Commission's explanation

The Commission confirmed that an implementing regulation has been adopted establishing both the harmonised notice and the harmonised label. While the graphic design requirements are already set out in the implementing act (and published in the Official Journal), the

Commission is currently preparing a dedicated website to provide traders and producers with accessible files and practical guidance. The Commission indicated that the website is expected to go live in the coming months.