

ORGX INSIGHT INTO ACTION

**FROM SEPTEMBER 27th,
EVERY GREEN CLAIM
NEEDS PROOF**

What the EU's ECGT Directive means for your business:

- ✓ ***Understand the ECGT changes for green claims***
- ✓ ***Identify which existing claims are banned, risky, or need evidence***
- ✓ ***Act now to audit, substantiate, or remove non-compliant claims***

LET'S TAKE A LOOK

The EU is setting new rules on green claims

The Directive on Empowering Consumers for the Green Transition (ECGT) applies across the EU from **September 27, 2026**.

It sets binding rules on how companies can market their environmental credentials. Any business selling to EU consumers falls within scope, regardless of where they are headquartered.

The goal: ensure that every sustainability claim consumers see is specific, verifiable, and backed by evidence.

What's now banned

From September 27, the following practices are prohibited:

- ✓ **Generic green claims without certification:** Terms like “sustainable”, “eco-friendly”, “green”, or “climate friendly” must be supported by excellent environmental performance indicators, such as an EU Ecolabel, or backed up by your own ESG data.
- ✓ **“Carbon neutral” claims based on offsets:** Claiming a product has a neutral, reduced, or positive climate impact based on greenhouse gas offsetting is explicitly prohibited
- ✓ **Unsubstantiated future claims:** Statements about future environmental performance (e.g. “Net zero by 2040”) must be supported by a detailed implementation plan with measurable targets, verified by an independent third party

This goes beyond sustainability reporting

Unlike the CSRD, the ECGT does not regulate what you disclose to investors. It regulates what you say to consumers.

That means your **website, product labels, social media, and sales materials** all fall within scope.

If your company uses words like “sustainable”, “green”, or “eco” anywhere in consumer-facing communication, you now need verifiable evidence to support it.

The burden of proof has shifted to the company.



"We only sell B2B, so this doesn't affect us." Not quite.

The ECGT primarily targets consumer-facing claims. But the effects reach deep into B2B supply chains:

- ✓ **Your customers face fines for non-compliant products.** EU retailers and brands are liable if products on their shelves carry misleading green claims. That means they will increasingly require suppliers to provide substantiation for any environmental claims attached to their products.
 - ✓ **Member states may extend the rules to B2B.** The directive gives EU countries the option to apply these requirements to business-to-business communications during national transposition.
 - ✓ **Your corporate website may count as consumer-facing.** European Commission guidance states that claims published on company websites can be assessed under consumer protection rules if they are capable of reaching and influencing consumers, even when the intended audience is professional.
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What to check today

- ✓ **Audit your claims:** Scan your website, packaging, pitch decks, and social media for generic environmental terms
- ✓ **Substantiate or remove:** Every claim needs verifiable evidence. If you can't prove it, take it down
- ✓ **Document your evidence:** Build a clear trail linking each claim to its supporting data



The era of vague green claims is over.

The companies that get ahead of this won't just avoid penalties. They will stand out in a market where consumers and regulators are paying closer attention than ever.

Need help auditing your sustainability communications or building the data foundation to back them up?



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