



THE GREEN CLAIMS GUIDANCE

# Green Claims Directive and how to use C2C Certified®

What is the Green Claims Directive and how to use  
C2C Certified® to meet the proposal's requirements?

2025

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# Table of Contents

# The Green Claims Directive

## Why

The European Commission reported that in 2020, 53% of the examined environmental claims were misleading or unfounded and that 40% had no supporting evidence. **The proposal on Green Claims** aims to protect consumers and businesses from greenwashing, make green claims reliable, comparable and verifiable to enable consumers to make informed purchasing decisions.

## What

The Green Claims Directive introduces specific requirements to **voluntary environmental claims and labelling** relating to the environmental impact, performance or aspect of a product or company itself.

## Who

The proposed requirements will apply to all **companies operating in the European Union or companies selling products in the single market**. Microenterprises with turnover under €2 million and fewer than 10 employees are exempt from complying with the requirements.

## When

**The European Council has not adopted its position yet**, it is expected to be completed in 2025. All Member States will have to adopt the Directive and start applying it 24 months later.

# Further guidance depending on your geographic region

Some countries have published their own guidance to provide country-specific rules on green claims. Below you will find a non-exhaustive list of existing guides:

## Guidance Reference

### The Green Guides

### Guidelines regarding sustainability claims

### Advertising Guidance

Misleading environmental claims and social responsibility

### Le Guide Pratique des allégations environnementales

### The Quick Guide on environmental claims

### Virksomheders Miljømarkedsføring

### Guía de comunicación sostenible

Cómo incluir información medioambiental en tus estrategias y campañas

## Country Issued

*The United States*

*The Netherlands*

*The United Kingdom*

*France*

*Denmark - English*

*Denmark - Danish*

*Spain*

# C2C Certified® verifies your product achievements

To substantiate their environmental claims, companies in scope need to use robust, science-based and verifiable methods. Independent, third-party verifications are necessary to support voluntary claims about the environmental aspects or performance of a product or company.

## Why C2C Certified® can help substantiate your product-related claims?

- C2C Certified® provides **reliable, accurate and verifiable information** on your products to prove your environmental and social claims.
- C2C Certified® **holistic approach** enables you to make claims on a wide range of sustainability achievements (air, water, circularity, non-toxicity etc.).
- **The Communication Guide** enables you to select the appropriate claim according to the level of achievement of the certified product (product-related claims and process-related claims).



# 01. How to substantiate your green claims

Member States must ensure that companies conduct assessments to validate explicit environmental claims, adhering to several specified requirements, including:

1. Specification
2. Scientific evidence
3. Lifecycle perspective & significant environmental impact
4. No harmful impacts & trade-offs
5. Beyond the law
6. Report GHG emissions in a transparent way
7. Prioritize primary information

## Specification

Indicate clearly whether your claim concerns the whole product or some aspects of it.

### Correct Claims:

- ✓ This packaging is made of 75% recycled paper.
- ✓ This is a fully-electric truck.
- ✓ The cardboard box of the TV is fully recyclable.

### Incorrect Claims:

- ✗ Our product contains some recycled content.
- ✓ *Our product contains 75% of recycled polyester.*

- ✗ This T-Shirt is made of organic cotton.
- ✓ *This T-Shirt is made of 30% organic cotton.*

**These claims are too vague and not specific enough. Here, indicate the exact amount.**

- ✗ The packaging is recyclable.
- ✓ *The packaging is fully recyclable after removing the plastic handle.*

**Make clear what the sustainability benefit is and what part of the product or of the lifecycle the claims refer to (e.g. raw material extraction, transport, production, use, disposal).**

- ✗ We made a conscious choice to manufacture our product using fewer virgin materials.  
**This is too general and therefore not recommended.**
- ✗ Environmentally-friendly, eco, green, nature's friend, ecological, sustainable, more sustainable, good for the environment, climate-friendly or friendly to the environment, non-polluting, biodegradable, zero emissions, low on carbon, carbon-neutral, climate-neutral, slave-free, conscious, responsible.

**The use of general or absolute terms is often too vague and misleading. It needs to be nuanced or removed completely from the company's communications.**

# Scientific Evidence

Use accurate data and certifications based on widely recognized scientific evidence to demonstrate the accuracy of your claim.

## Correct Claims:

- ✓ The C2C Certified® Product Standard ensures that our environmental claims are backed by accurate data and certifications based on widely recognized scientific evidence. By adhering to this standard, we provide transparent and verifiable information about our products' sustainability, giving consumers confidence in the environmental benefits we promote.
- ✓ We have a list of restricted substances in place, following the requirements of the EU REACH Directive, and engage with our suppliers to ensure compliance.

## Incorrect Claims:

- ✗ We certify that our product contains some recycled content.
- ✓ *Our panels are made from 100% recycled materials tested for potential contaminants against the X analytical test.*

Here it adds value to include a description of the specific tests conducted and materials tested. The recycled content should be evaluated by a third-party to establish the amount and source. Analytical testing required under the C2C Certified® standard provides the scientific evidence to prove the accuracy of this claim.

- ✗ This product does not harm the environment.

Without concrete evidence or certification, such broad claims can be misleading and are often considered greenwashing.

**Good to note that:** C2C Certified® recognizes other programs and certifications that can also support your environmental claims. Please refer to [the C2CPII-Recognized Certification Programs and Standards](#) for the most recent list of recognized programs.

# Lifecycle perspective & significant environmental impact

From the extraction of raw materials to disposal, take into account the entire life cycle of a product to guarantee a global assessment and take all the relevant environmental aspects and impacts into account to assess the environmental performance.

## Correct Claims:

- ✓ Our company develops durable packaging solutions that withstand temperature fluctuations and harsh conditions during transportation, ensuring product freshness and extending shelf life.
- ✓ Our company has increased the proportion of recycled content in its new containers and ensures that our products are 100% recycled at the end of life.

These claim are based on a life cycle assessment (LCA) that evaluates the product's environmental performance from production to disposal, ensuring that it takes all relevant environmental aspects and impacts into account.

## Incorrect Claims:

- ✗ Our washing machines are sustainable because we use less water during the rinse cycle.

This claim is incorrect if it only considers the water usage during the rinse cycle and ignores other environmental impacts, aspects, or performance metrics such as energy consumption, material sourcing, and end-of-life disposal. For a valid comparison, the assessment must cover all relevant environmental impacts and performance metrics equivalently.

- ✗ Our product is environmentally friendly because it uses biodegradable packaging.

This claim is incorrect because it only considers one aspect (biodegradable packaging) and does not take into account the entire life cycle of the product, from raw material extraction to disposal. It fails to address all relevant environmental aspects and impacts, such as energy consumption during production, transportation emissions, and end-of-life disposal.

## No harmful impact & trade-offs

Take all environmental aspects into account to assess the environmental impact or performance of the product and indicate any environmental trade-offs. Make sure that a positive achievement has no harmful impact on climate change, resource consumption and circularity, sustainable use and protection of water and marine resources, pollution, biodiversity, animal welfare and ecosystems.

### Correct Claims:

- ✓ This product has achieved CO<sub>2</sub> and water consumption savings.

**This claim is correct but must be nuanced and indicate trade-offs if it leads to any increase in another environmental aspect. For instance, if you want to communicate on CO<sub>2</sub> emissions reduction while this reduction led to an increase in water use, then this claim is not complete. If no trade-offs were found, then this claim is accurate, but make sure to verify it before claiming it.**

- ✓ Our washing powder has a reduced environmental impact because it allows consumers to wash clothes at lower temperatures, saving energy during the washing cycle. Additionally, it uses 1/3 less packaging per wash compared to its previous version, and contains fewer hazardous ingredients.

**This claim is based on a life cycle assessment (LCA) that evaluates the product's environmental performance from production to disposal, ensuring that improvements in one area do not lead to greater negative impacts in another.**

**Good to note that:** C2C Certified® takes a holistic approach ensuring that all aspects are considered and that no significant harm is done. The C2C Certified® Products Program verifies across 5 sustainability performance categories: Material Health, Product Circularity, Clean Air & Climate Protection, Water & Soil Stewardship, and Social Fairness. Additional requirements on packaging, animal welfare and an environmental policy must be in place to make sure that the product has no harmful impact on people or planet.

## Beyond the law

Demonstrate that your claim is not equal to requirements imposed by law, and indicate whether your product subject to the claim performs significantly better than in common practice.

### Correct Claims:

- ✓ Our LED light bulbs use 50% less energy than the industry standard, significantly reducing electricity consumption and greenhouse gas emissions. Unlike traditional incandescent bulbs, which are required by law to meet a minimum energy efficiency standard, our LED bulbs exceed these requirements by offering twice the efficiency. This results in lower energy bills and a smaller carbon footprint for consumers.
- ✓ Our company sources materials from suppliers who not only comply with child labor laws but also provide educational opportunities and living wages to their workers, ensuring a positive social impact beyond legal compliance.
- ✓ Fair business practices are applied in our company's governance and management approach. This is reflected by a diverse, inclusive and engaged workforce and through training, remuneration, and payment of a living wage.

### Incorrect Claims:

- ✗ Our plastic bottles are environmentally friendly because they are recyclable, which is better than what is required by law.  
**This claim does not provide any comparison to common practice or indicate how the product performs significantly better.**
- ✗ My product is made with materials and components from countries where no child or forced labor is involved.
- ✗ My company strikes for the abolition of child labor.

**These claim are incorrect because it highlights compliance with legal requirements rather than demonstrating sustainability achievements beyond what is mandated by law. Child labor and forced labor are prohibited practices in the European Union. The EU has strict regulations to prevent these practices both within its borders and in the supply chains of products sold in the EU (find out more information on the [EU Forced Labour Regulation](#) here).**

# Report GHG emissions in a transparent way

Separate GHG offsets from GHG emissions, specify whether those offsets relate to emission reductions or removals and provide information on the quality of the offsets.

## Correct Claims:

- ✓ Between 2020 and 2023, we reduced our operational GHG emissions by 55% through electrification and the installation of solar panels on our facility's roof. To address the remaining emissions, we purchased carbon offsets from the Verified Carbon Standard (VCS) program. These offsets are specifically related to emission removals through reforestation projects, which are verified to ensure they provide real, measurable, and permanent carbon sequestration.

## Incorrect Claims:

- ✗ Carbon neutral, climate neutral, 100% CO<sub>2</sub> compensated.  
**Green claims based solely on carbon offsetting schemes are banned. Companies should prioritize reducing emissions within their own operations or value chain. When making climate-related claims, they must clearly distinguish between reductions achieved through their own efforts and those dependent on purchasing offsets.**
- ✗ Green electricity and natural gas.  
**This claim gives the impression that it supplies 100% green energy and natural gas, when this is not the case. It is misleading because it is not clear that the manufacturing process requires the use of fossil gas, but that it is offset by the purchase of carbon offset programs. Clearly state that emissions are reduced by a specific percentage and that the remaining percentage is offset by the purchase of carbon offset/credit programs.**

**Good to note that:** C2C Certified® carefully selects the quality of offset programs. Offsets must come from projects certified according to [C2CPII-Recognized Certification Programs and Standards](#).

# Prioritize primary information

Include primary information (directly measured or collected by the company) and when no primary information is available, then include secondary information (based on other sources than primary information, such as literature, engineering studies and patents).

## Correct Claims:

- ✓ Our bottle is made of 100% post-consumer recycled PET resin made out of bales of post-consumer PET bottles clear and clear blue. Our Circularity Data Report is available online with all third-party verified circularity achievements.

**Good to note that:** C2C Certified® carefully selects the quality of offset programs. Offsets must come from projects certified according to [C2CPII-Recognized Certification Programs and Standards](#).

- ✓ Our T-Shirt is 100% home compostable and tested against the following compostability test: TÜV AUSTRIA: OK Compost HOME.

**Good to note that:** The use of approved analytical test methods, C2CPII recognized standards and certifications based on third party audits and verification provides directly measured and assessed data that can be used to make accurate claims for the specific certified product. Some internal audits or the use of desk research may be acceptable, for example for the environmental risk assessment.

Please refer to the [C2CPII-Recognized Certification Programs and Standards](#) or the most recent list of recognized programs.

# 02.

## How to substantiate your comparative claims

Additional requirements have been introduced for comparative claims such as stating that a product/ company has a higher environmental impact or better performance than the other. These include:

1. Same information
2. Same source
3. Same stages along the value chain
4. Same environmental impacts
5. Same assumptions

## Same information

The information and data used for the comparison of the two products are equivalent.

### Correct Claims:

- ✓ This packaging contains 30% recycled plastic, while the other one contains 95%.
- ✓ Our newly launched product has a carbon footprint of 1.2 kg CO<sub>2</sub> per unit, while the previous version had a carbon footprint of 2.5 kg CO<sub>2</sub> per unit.

### Incorrect Claims:

- ✗ Our 50% cotton T-shirt is more eco-friendly than our 50% polyester T-shirt because cotton is a natural material.

The claim does not provide equivalent data or information for both products. It only mentions that cotton is a natural material without considering other environmental impacts.

Moreover, the claim ignores the fact that cotton production can involve significant water usage and pesticide application, which can be harmful to the environment. Polyester, while synthetic, can be made from recycled materials and may have a different environmental footprint. Lastly, there is no specific data or metrics provided to substantiate the claim, making it vague and potentially misleading.

## Same source

The data is generated or sourced in an equivalent manner to compare the 2.

### Correct Claims:

- ✓ Our new detergent reduces water pollution by 40% compared to our previous formula. Both products were tested under identical conditions, using the same water quality parameters and washing machine settings, ensuring a fair and accurate comparison.

This claim is correct because they use equivalent testing conditions.

- ✓ Our door frames have a lower environmental impact than our competitor's because they achieved C2C Certified® at the Gold level, while our competitor's frames only achieved the Bronze level.

It is possible to compare the sustainability achievements of two products if they are evaluated against the same standard. In this case, the comparison covers the full scope of the certification, but specific claims can also be made on individual sections such as Material Health or Product Circularity.

### Incorrect Claims:

- ✗ Our door frames are more sustainable than our competitor's because they are made from 100% recycled materials, while our competitor's frames are only 50% recycled.

This claim is incorrect if the data about the recycled content is not sourced or verified using the same standards or methodologies. It also does not specify the certification or standard being used for comparison, which can lead to misleading conclusions.

## Same stages along the value chain

The coverage of the value chain stages must be equivalent for the comparison.

### Correct Claims:

- ✓ Our organic cotton T-shirt reduces water usage by 50% compared to our conventional cotton T-shirt, considering the entire production process from farming to final product.

The claim is correct because the comparison covers all relevant stages of the value chain, ensuring that the environmental performance is assessed comprehensively and fairly for both products. Both T-shirts are evaluated from cotton farming, processing, manufacturing, transportation, and retail.

**Good to note that:** The scope of C2C Certified® covers the final manufacturing stage of the certified products - refer to [the final manufacturing stage process definition](#) for more information.

### Incorrect Claims:

- ✗ Our laptops are more environmentally friendly than our competitor's because we use renewable energy in our manufacturing process, while they do not.

This claim is incorrect if the coverage of the value chain stages is not equivalent. For example, if the competitor also uses renewable energy but in different stages of their value chain, the comparison would be misleading. It also lacks specific data or certification to support the claim, making it potentially misleading.

# Same environmental impacts, aspects or performances

The coverage of environmental impacts, aspects or performance must be equivalent to compare the 2.

## Correct Claims:

- ✓ Our biodegradable packaging reduces overall environmental impact by 40% compared to our traditional plastic packaging. This comparison includes equivalent assessments of raw material extraction, manufacturing processes, transportation emissions, usage, and end-of-life disposal.

**This comparative claim is accurate because all environmental impacts are covered: both packaging types are evaluated for their impacts on resource use, greenhouse gas emissions, pollution, and waste generation.**

**The comparison also includes all relevant environmental aspects such as energy consumption, water usage, and recyclability. The assessment ensures that all stages and impacts are considered equally for both types of packaging, providing a fair and comprehensive comparison.**

# Same assumptions

The conclusions drawn from the assessment must be done in a similar way.

## Correct Claims:

- ✓ Our electric vehicle emits 60% less CO<sub>2</sub> over its lifetime compared to our gasoline vehicle. This comparison is based on the same assumptions for both vehicles, including average driving distance, energy source for electricity, and vehicle lifespan.

**This claim is accurate because both vehicles are assessed using identical assumptions for average annual mileage, energy mix for electricity (e.g., percentage of renewable energy), and total lifespan of the vehicles. The comparison includes CO<sub>2</sub> emissions from production, usage, and end-of-life disposal.**

**Therefore, here the conclusions are drawn using the same methodology and assumptions, ensuring a fair and accurate comparison of the environmental performance of both vehicles.**

# 03. How to communicate about your claims

Furthermore, Member States would have to ensure that the communication of green claims complies with a number of requirements, including:

1. If claim is related to the use phase
2. If claim is related to future environmental performance
3. Information to disclose

## If claim is related to the use phase

The claim should include information on how the consumer should use the product to achieve the expected environmental performance.

### Correct Claims:

- ✓ Our energy-efficient washing machine reduces water and electricity usage by 30% compared to standard models. To achieve these savings, use the machine with full loads, select the eco-wash setting, and use cold water whenever possible.

**Good to note that:** The C2C Certified® Product Standard requires companies to complete their Circularity Data Report, which is publicly available on the Product Registry. This report must include clear instructions for the cleaning, maintenance, and repair of the product, or provide a link to where these instructions can be found.

It also requires companies to indicate the functional use period. As a result, consumers are provided with clear information on how to prolong the lifespan of the product and how to dispose of it at the end of its life.

# If claim is related to future environmental performance

The claim should include a time-bound commitment (for own operations and value chains).

## Correct Claims:

- ✓ To meet our 2030 Climate Challenge, we aim at reducing operational energy demand and carbon by at least 75%, before offsetting and reducing embodied carbon by 50-70% before offsite renewables offsetting.
- ✓ We follow the clear UK Net Zero Carbon Buildings Standard to drive carbon emission reductions and achieve Net Zero carbon by 2050.
- ✓ By 2025, we commit to reducing our water usage across all operations by 40%, and ensuring that 100% of our wastewater is treated and reused within our facilities.
- ✓ Our goal is to achieve zero waste to landfill by 2030. We will accomplish this by implementing comprehensive recycling programs and reducing our overall waste generation by 50% by 2025.
- ✓ To support our 2040 sustainability vision, we pledge to source 100% of our raw materials from certified sustainable sources by 2035, and reduce our greenhouse gas emissions by 80% by 2040.

These claims include specific, measurable targets and time frames, ensuring transparency and accountability in the company's future environmental performance.

# Information to disclose

In a physical form or in the form of a weblink, QR code

- Environmental aspects, impacts or performance covered by the claim
- Relevant eu or international standards
- Underlying studies or calculations used for the assessment with explanations of their scope, assumptions and limitations
- Brief explanation on how the improvements are achieved
- Certifications and contact of the verifier
- Information on % of offsets and if these relate to emission reductions or removals (for climate-related claims)
- A summary of the assessment that is clear and understandable to consumers (with all the above points)



\*This cotton is GOTS-Certified – find out more [here](#).

# Compliance and penalties

Each EU country must appoint at least one competent authority to enforce the rules of this Directive. Individuals or organizations can report traders suspected of violating environmental claim rules to this authority.

Additionally, each country must determine appropriate penalties for rule violations. These penalties should be substantial enough to encourage compliance.

## Penalties will include:

- **Fines:** Confiscating profits gained from the violation, with higher fines for repeat offenders. Fines will be proportional to the company's size and revenue, with a maximum fine of at least 4% of the trader's annual revenue in the affected country.
- **Confiscation of revenue:** Seizing revenue earned from the sale of the involved products.
- **Bans:** Temporarily prohibiting the company from engaging in government contracts for up to a year.



